

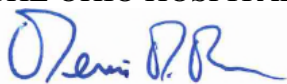
**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Filing by Ohio Edison)	
Company, The Cleveland Electric)	
Illuminating Company, and The Toledo)	Case No. 19-361-EL-RDR
Edison Company for an Extension of Their)	
Distribution Modernization Rider.)	

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221 and Ohio Administrative Code (“OAC”) Rule 4901-1-11, the Ohio Hospital Association (“OHA”) moves to intervene in the above-captioned proceeding. OHA requests that the Public Utilities Commission of Ohio (“Commission” or “PUCO”) grant OHA leave to intervene because OHA has a real and substantial interest in these proceedings, its participation will not cause undue delay, and the Commission’s disposition of these proceedings may impair or impede OHA’s ability to protect that interest.

Respectfully submitted on behalf of
THE OHIO HOSPITAL ASSOCIATION



Devin D. Parram
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227-8813
Facsimile: (614) 227-2390
E-mail: dparram@bricker.com

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Filing by Ohio Edison)	
Company, The Cleveland Electric)	
Illuminating Company, and The Toledo)	Case No. 19-361-EL-RDR
Edison Company for an Extension of Their)	
Distribution Modernization Rider.)	

MEMORANDUM IN SUPPORT

The Public Utilities Commission of Ohio (“Commission” or “PUCO”) approved the Distribution Modernization Rider (“Rider DMR”) in FirstEnergy’s¹ fourth electric security plan proceeding (“ESP IV”). *In Re Ohio Edison Company, et al.*, PUCO Case No. 14-1297-EL-ESP, Fifth Entry on Rehearing (October 12, 2016). The Commission’s ESP IV order approved Rider DMR for a period of three years, with an option for FirstEnergy to file an application to extend collection of Rider DMR revenues for a period of two additional years. On February 1, 2019, FirstEnergy filed its application in this proceeding to extend Rider DMR.

The members of OHA located within the FirstEnergy service territory will be affected by the determination of the Commission in this matter, and this Motion to Intervene should be granted because OHA has a real and substantial interest in this proceeding, and the PUCO’s disposition of this proceeding may impair or impede OHA’s ability to protect that interest.

OHA is a private, nonprofit trade association comprised of approximately 220 hospitals, many of which are served by the FirstEnergy companies. All OHA member hospitals are listed at <http://www.ohanet.org/Members>. OHA’s mission is to be a membership-driven organization that

¹ “FirstEnergy” refers to FirstEnergy Corp’s Ohio operating electric companies: Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company.

provides proactive leadership to create an environment in which Ohio hospitals are successful in serving their communities.

OHA continues to be involved in efforts to enhance electric service reliability and modernization of the electric grid to its members through both its advocacy before the PUCO and informal cooperative discussions with Ohio's electric distribution utilities, including First Energy. OHA is keenly interested in ensuring that the ultimate resolution of the matters in this proceeding have a positive impact on OHA members. OHA has a substantial interest in this proceeding that is not adequately addressed by any other party. OHA's participation will enhance the effectiveness of the above proceeding, will not unnecessarily cause delay, and will help ensure that the proceedings in this matter are fair to its membership.

Accordingly, OHA respectfully requests the Commission to grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

Respectfully submitted on behalf of
THE OHIO HOSPITAL ASSOCIATION



Devin D. Parram
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227-8813
Facsimile: (614) 227-2390
E-mail: dparram@bricker.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 18th day of June 2019 *via* electronic mail.



Devin D. Parram

jlang@calfee.com
mkeaney@calfee.com
bknipe@firstenergycorp.com
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com
bethany.allen@igs.com
joe.oliker@igs.com
michael.nugent@igs.com
trhayslaw@gmail.com
leslie.kovacik@toledo.oh.gov
fdarr@mwncmh.com
mpritchard@mwncmh.com
dstinson@bricker.com
gkrassen@bricker.com
william.michael@occ.ohio.gov
christopher.healey@occ.ohio.gov
angela.obrien@occ.ohio.gov
bojko@carpenterlipps.com
dressel@carpenterlipps.com
paul@carpenterlipps.com
dutton@carpenterlipps.com
mfleisher@elpc.org
mleppla@theOEC.org
tdougherty@theOEC.org
mkl@smxblaw.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/18/2019 11:35:12 AM

in

Case No(s). 19-0361-EL-RDR

Summary: Motion to Intervene of The Ohio Hospital Association electronically filed by Teresa Orahod on behalf of Devin D. Parram