

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio )  
Power Company to Initiate its gridSMART® ) Case No. 19-1475-EL-RDR  
Phase 3 Project. )

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**MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION**

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Pursuant to Ohio Revised Code (“R.C.”) Section 4903.221 and Ohio Administrative Code Rule (“OAC”) Rule 4901-1-11, the Ohio Hospital Association (“OHA”) moves for leave to intervene in these proceedings. The Public Utilities Commission of Ohio (“Commission”) should grant OHA leave to intervene because OHA has a real and substantial interest in these proceedings, 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



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**MEMORANDUM IN SUPPORT**

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On July 26, 2019, Ohio Power Company (“AEP Ohio”) filed an application for approval to continue implementing gridSMART through a set of programs referred to as gridSMART Phase 3.

OHA is a nonprofit trade association with over 200 hospitals, 55 of which are AEP Ohio customers. These OHA-member hospitals served by AEP Ohio consume a significant amount of electricity. Residents in the area served by AEP Ohio rely on those 55 OHA-member hospitals over well over one million times per year for health care services on a combined in-patient and out-patient basis. OHA’s mission is to be a membership-driven organization that provides proactive leadership to create an environment in which Ohio hospitals are successful in serving their communities. Every hospital, or virtually every hospital, in AEP Ohio’s service area is a member of OHA, and all OHA member hospitals are posted at <http://www.ohanet.org/Members>.

OHA continues to be involved in efforts to enhance electric service reliability and contain costs for its members through both its advocacy before the Commission and through informal cooperative discussions with Ohio’s EDUs. OHA is keenly interested in insuring that the ultimate resolution of the matters in this proceeding will not have a significantly negative impact on the cost or reliability of the electricity delivered to OHA-member hospitals. 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 proceedings, 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 determine that OHA has a real and substantial interest in this proceeding and grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

Respectfully submitted on behalf of  
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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing *Motion to Intervene* was served upon the parties of record in this proceeding by electronic mail this 21<sup>st</sup> day of October 2019.



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Summary: Motion to Intervene of the Ohio Hospital Association electronically filed by Teresa Orahod on behalf of Devin D. Parram and Dylan F. Borchers