

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc. for Authority to Adjust PowerForward Rider.))	Case No. 19-1750-EL-UNC
))	
In the Matter of the Application of Duke Energy Ohio, Inc. for Approval of Certain Accounting Methods))	Case No. 19-1751-GE-AAM
))	

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

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

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MEMORANDUM IN SUPPORT

On September 24, 2019, Duke Energy Ohio, Inc. (“Duke” or “the Company”) filed an application for approval to recover four components of its Infrastructure Modernization Plan—a new customer information system, as well as three programs inspired by the PUCO PowerForward initiative—through Duke’s Rider Power Forward (“Rider PF”).

OHA is a private, nonprofit trade association with 220 hospitals, 20 of which are Duke’s customers. These OHA-member hospitals served by Duke consumed more than 400 GWh of electricity in 2015. Residents in the areas served by Duke rely on OHA-member hospitals over 3.2 million times per year for health care services on a combined in-patient and out-patient basis according to 2014 data. 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 Duke’s service area is a member of OHA, and all OHA member hospitals are posted at <http://www.ohanet.org/Members>.

The 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. The OHA is keenly interested in insuring that the ultimate resolution of the matters in these proceedings will not have a negative impact on the reliability of the electricity delivered to OHA-member hospitals. The OHA has a substantial interest in these proceedings 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 these proceedings and grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC 4901-1-11.

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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 30th day of January 2020 *via* electronic mail.



Devin D. Parram

elizabeth.watts@duke-energy.com
jeanne.Kingery@duke-energy.com
mkurtz@bkllawfirm.com
kboehm@bkllawfirm.com
jkylercohn@bkllawfirm.com
mleppla@theOEC.org
ctavenor@theoec.org
mpritchard@mcneeslaw.com
Whitt@Whitt-Sturtevant.com
Fykes@Whitt-Sturtevant.com
Bethany.Allen@igs.com
Joe.Oliker@igs.com
Michael.Nugent@igs.com
James@DunnLegal.com
dborchers@bricker.com
kherrnstein@bricker.com
jspottswood@bricker.com
Paul@CarpenterLipps.com
Bryce.McKenny@occ.ohio.gov
christopher.healey@occ.ohio.gov
bojko@carpenterlipps.com
nvijaykar@elpc.org

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Summary: Motion to Intervene of The Ohio Hospital Association and Memorandum in Support electronically filed by Teresa Orahood on behalf of Devin D. Parram