

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the matter of the Application of Ohio) Power Company For an increase in Electric) Distribution Rates)	Case No. 20-585-EL-AIR
In the Matter of the Application of Ohio) Power Company For Tariff Approval)	Case No. 20-586-EL-ATA
In the Matter of the Application of Ohio) Power Company For Approval to Change) Accounting)	Case No. 20.587-EL-AAM

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221, Ohio Administrative Code (“O.A.C.”) Rule 4901-1-11, the Ohio Hospital Association (“OHA”) moves for leave to intervene in the above-captioned proceeding. 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 its interest.

Respectfully submitted on behalf of
THE OHIO HOSPITAL ASSOCIATION



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MEMORANDUM IN SUPPORT

On June 1, 2020, Ohio Power Company (“AEP Ohio”) filed an application for approval to increase its electric distribution rates. OHA is a private, nonprofit trade association with approximately 246 hospitals, a number of which are AEP Ohio customers. 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.

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 negative impact OHA-member hospitals. OHA has a substantial interest in this proceeding that is not adequately addressed by any other party. As the statewide association for essentially all hospitals within Ohio, OHA is uniquely situated to address the reliability and cost concerns of hospitals served by AEP Ohio. For many

years, the Commission has permitted intervention by OHA to advocate on hospitals behalf regarding hospital-specific concerns. 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 grant its Motion to Intervene pursuant to R.C. 4903.221 and O.A.C. Rule 4901-1-11.

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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 listed below this 26th day of June 2020 *via* electronic mail.



Devin D. Parram

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