

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton)
Power and Light Company to Increase its) Case No. 20-1651-EL-AIR
Rates for Electric Distribution.)

In the Matter of the Application of The Dayton
Power and Light Company for Accounting Case No. 20-1652-EL-AAM
Authority.

In the Matter of the Application of The Dayton
Power and Light Company for Approval of Case No. 20-1653-EL-ATA
Revised Tariffs.

MOTION TO INTERVENE OF THE OHIO HOSPITAL ASSOCIATION

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221, Ohio Administrative Code (“O.A.C.”) 4901-1-11, the Ohio Hospital Association (“OHA”) moves for leave to intervene in the above-captioned proceedings. OHA requests that the Public Utilities Commission of Ohio (“Commission”) 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 its interest.

Respectfully submitted on behalf of
THE OHIO HOSPITAL ASSOCIATION



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MEMORANDUM IN SUPPORT

On November 30, 2020, the Dayton Power and Light Company (“DP&L”) filed an application to increase its electric distribution rates. OHA is a nonprofit trade association with over 200 hospitals, a number of which are DP&L customers. These OHA-member hospitals served by DP&L consume a significant amount of electricity. Residents in the area served by DP&L rely on those OHA-member hospitals 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 DP&L’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 these proceedings will not have a negative impact on the reliability of the electricity delivered to OHA-member hospitals. 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 grant its Motion to Intervene pursuant to R.C. 4903.221 and O.A.C. 4901-1-11.

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CERTIFICATE OF SERVICE

I certify that the foregoing was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 9th day of March 2020. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.



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3/9/2021 4:49:37 PM

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Case No(s). 20-1651-EL-AIR, 20-1652-EL-AAM, 20-1653-EL-ATA

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