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December 10, 2008

FILED ELECTRONICALLY

Tre Hargett, Chairman
Tennessee Regulatory Authority
ATTN: Sharla Dillon, Dockets & Records Manager
460 James Robertson Parkway
Nashville, TN 37243-0505

**Re: Notice of Kingsport Power Company, d/b/a AEP Appalachian
Power, Relative to Changes in its Purchased Power
Adjustment Rider**

TRA Docket No. 08-00213

Dear Chairman Hargett:

Enclosed for filing in the above matter are an original and five copies of the *Motion to Appear Pro Hac Vice* of Edward L. Petrini. Also enclosed is a stamped, self-addressed envelope. We would appreciate it if you would date-stamp a copy of the motion and return it to my attention.

Please contact me if you have any questions. Thank you for your assistance.

Sincerely,

Edward L. Petrini

Enclosure

#913608

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**NOTICE OF KINGSPORT POWER COMPANY,
D/B/A AEP APPALACHIAN POWER,
RELATIVE TO CHANGES IN ITS
PURCHASED POWER ADJUSTMENT RIDER**

**Docket No.
08-00213**

MOTION TO APPEAR PRO HAC VICE

Pursuant to Rule 1220-1-2-04 of the Rules of Practice and Procedure of the Tennessee Regulatory Authority and Rule 19 of the Rules of the Supreme Court of the State of Tennessee, Edward L. Petrini, an attorney for East Tennessee Energy Consumers ("ETEC"), hereby moves for permission to appear *pro hac vice* and to participate in the above-referenced docket on behalf of ETEC along with co-counsel R. Dale Grimes, Esq. and Michael J. Quinan, Esq.. In support of his motion, Edward L. Petrini states as follows:

1. Mr. Petrini is currently licensed to practice law and is in good standing in Virginia and Michigan. He was admitted to practice in 1974 in Michigan and in 1990 in Virginia.
2. Mr. Petrini has prepared and executed the Affidavit of Edward L. Petrini in compliance with Rule 19 of the Rules of the Supreme Court of the State of Tennessee. The Affidavit is attached as Exhibit 1.
3. Mr. Petrini principally practices in Virginia. A certificate of good standing with the Virginia State Bar is attached as Exhibit 2.
4. As stated in the Affidavit, no disciplinary action has been taken in any jurisdiction, nor is any investigation of his conduct pending, in Tennessee or in any jurisdiction in which Mr.

Petrini is admitted to practice law. He has not previously sought admission *pro hac vice* before the Tennessee Regulatory Authority or any court in Tennessee.

5. Mr. Petrini has never been denied admission *pro hac vice*, or had any such admission revoked, in any jurisdiction. He agrees to subject himself to the jurisdiction of the Authority in any manner arising out of his conduct in this proceeding and agrees to be bound by the rules governing the conduct of attorneys appearing before this Authority.

Wherefore, Edward L Petrini requests that he be admitted *pro hac vice* to appear and participate on behalf of ETEC in the above-referenced docket.

Respectfully submitted,

By: 

Edward L. Petrini, Esq.
Christian & Barton LLP
909 East Main Street, Suite 1200
Richmond, Virginia 23219-3095
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Fax: 804.697.6395
e-mail: epetrini@cblaw.com

By: 

R. Dale Grimes, Esq. (BPR # 6223)
Bass, Berry & Sims PLC
315 Deaderick Street, Suite 2700
Nashville, Tennessee 37238
Phone: 615.742.6244
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Fax: 804.697.6149
e-mail: mquinan@cblaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Motion for Admission Pro Hac Vice* was sent electronically or mailed, first-class postage prepaid, this 10th day of December, 2008, to each person listed below:



Counsel

William C. Bovender, Esq.
Hunter Smith & Davis LLP
12212 North Eastman Road
P.O. Box 3740
Kingsport, TN 37664-0740
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James R. Bacha, Esq.
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215-2373
jrbacha@aep.com

#913272

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**NOTICE OF KINGSPORT POWER COMPANY,
D/B/A AEP APPALACHIAN POWER,
RELATIVE TO CHANGES IN ITS
PURCHASED POWER ADJUSTMENT RIDER**

**Docket No.
08-00213**

**AFFIDAVIT OF EDWARD L. PETRINI
(*Pro Hac Vice Applicant*)**

STATE OF VIRGINIA

CITY OF RICHMOND

Before me, the undersigned, personally appeared Edward L. Petrini (*Pro Hac Vice Applicant*) who, after being duly sworn, makes oath and states as follows:

(1) My full name is: Edward L. Petrini

My residence address and phone are: 7017 West Franklin Street, Richmond, VA 23226

(Ph: 804.673.0397)

My firm name is: Christian & Barton LLP

My office address and phone are: 909 East Main Street, Richmond, VA 23219 (Ph:
804.697.4135)

Other jurisdictions licensed & registration/identifying numbers are:

Commonwealth of Virginia (Bar Number 30883)

State of Michigan (Bar Number P23829)

Full name or style of case in which I seek to appear:

**In re: Notice of Kingsport Power Company, d/b/a AEP Appalachian Power,
relative to changes in its Purchased Power Adjustment Rider**

Tennessee Regulatory Authority Docket No. 08-00213

Name of the client or clients I seek to represent:

East Tennessee Energy Consumers

- (2) The jurisdiction(s) in which licensed to practice law, with date(s) of admission:

Commonwealth of Virginia, Admitted 1990

State of Michigan, Admitted 1974

Any other courts in which admitted to practice, with date(s) of admission:

United States Court of Appeals for the District of Columbia Circuit (1980)

Statement of good standing in all other jurisdictions in which applicant is licensed to
practice law:

Applicant is in good standing in all jurisdictions in which he is licensed to practice law.

- (3) Full name or style of each case in which applicant was previously admitted or sought to be admitted *pro hac vice* in any trial or appellate court of Tennessee within the preceding three years, date of any such admission or the date of any such motion that was filed but not granted, and the status of any such case in which not admitted:

Applicant has not been previously admitted, or sought admission, *pro hac vice* in any trial
or appellate court of Tennessee.

- (4) Statement concerning whether the applicant lawyer has previously been denied admission *pro hac vice* or has had an admission *pro hac vice* revoked by any court in any jurisdiction and, if so, a full description of the circumstances, including the full name or style of the case:

Applicant has not previously been denied admission *pro hac vice*, nor has applicant's
admission *pro hac vice* been revoked by any court in any jurisdiction.

- (5) Statement concerning whether the applicant lawyer has ever been disciplined or sanctioned by the Board of Professional Responsibility of the Supreme Court of Tennessee, by any similar lawyer disciplinary agency in any jurisdiction, or by any similar lawyer disciplinary authority and, if so, a full description of the circumstances, including the full name or style of the matter:

Applicant has not previously been disciplined or sanctioned by the Board of Professional Responsibility of the Supreme Court of Tennessee or by any similar lawyer disciplinary agency in any jurisdiction or by any similar lawyer disciplinary authority.

- (6) Statement concerning whether any disciplinary action or investigation concerning the applicant lawyer's conduct is pending before the Board of Professional Responsibility of the Supreme Court of Tennessee, before any similar lawyer disciplinary agency in any jurisdiction, or before any similar lawyer disciplinary authority and, if so, a full description of the circumstances, including the full name or style of the matter:

No disciplinary action or investigation concerning the applicant's conduct is pending before the Board of Professional Responsibility of the Supreme Court of Tennessee, before any similar lawyer disciplinary agency in any jurisdiction, or before any similar lawyer disciplinary authority.

- (7) Statement that the applicant lawyer is familiar with the Tennessee Rules of Professional Conduct and the rules governing the proceedings of the court before which the lawyer seeks to practice:

The applicant is familiar with the Tennessee Rules of Professional Conduct and the rules governing the proceedings of the Tennessee Regulatory Authority.

- (8) Statement that the applicant lawyer consents to the disciplinary jurisdiction of the Board of Professional Responsibility of the Supreme Court of Tennessee and the courts of Tennessee in any matter arising out of the lawyer's conduct in the proceeding and that the lawyer agrees to be bound by the Tennessee Rules of Professional Conduct and any other rules of conduct applicable to lawyers generally admitted in Tennessee:

Applicant consents to the disciplinary jurisdiction of the Board of Professional Responsibility of the Supreme Court of Tennessee and the courts of Tennessee in any matter arising out of his conduct in the proceeding and agrees to be bound by the Tennessee Rules of

Professional Conduct and any other rules of conduct applicable to lawyers generally admitted in Tennessee.

- (9) Tennessee lawyer with whom the applicant lawyer is associated:

Name: R. Dale Grimes

Address: Bass, Berry & Sims PLC, 315 Deaderick Street, Suite 2700, Nashville,

Tennessee 37238

Telephone No.: (615) 742-6244

TN BPR No.: 006223

- (10) Statement that the applicant lawyer has paid all fees required by this Rule in connection with the motion for admission:

No fees are required for filing this affidavit with the Tennessee Regulatory Authority.

- (11) At the option of the applicant lawyer, any other information supporting the lawyer's admission:

No additional information appears to be needed.

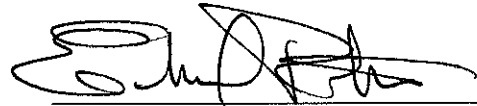
- (12) Statement indicating service of the *pro hac vice* motion and all associated papers upon all counsel of record in the proceeding:

The *pro hac vice* motion and associated papers are being served simultaneously herewith on all counsel of record in the proceeding.

- (13) A certificate of good standing from the court of last resort of the licensing jurisdiction in which the applicant principally practices, or resides, is attached as an Exhibit to this affidavit and incorporated herein.

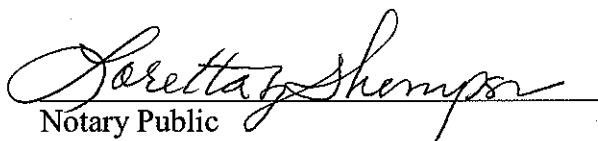
A certificate of good standing from the Virginia State Bar, the licensing jurisdiction in which applicant principally practices and resides, is attached.

I declare under penalty of perjury that the foregoing is true and correct.

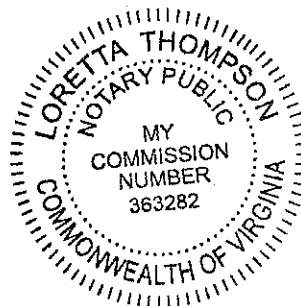


Pro Hac Vice Applicant

Sworn to and subscribed before me this 9th day of December, 2008.


Notary Public

My commission expires: 06/30/2009



#913604



VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT **EDWARD LEWIS PETRINI** IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN
GOOD STANDING. **MR. PETRINI** WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON **JANUARY 11, 1990**, AFTER
ADMISSION ON MOTION THROUGH THE SUPREME COURT OF VIRGINIA.

Issued December 5, 2008

KAREN A. GOULD
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER

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EXHIBIT

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