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KPOW.89998

November 9, 2015

VIA EMAIL & FEDEX

ATTN: Sharla Dillon, Dockets & Records Manager
Herbert Hilliard, Chairman
Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Re: Petition of Kingsport Power Company d/b/a
AEP Appalachian Power; **Docket No. 15-00024**

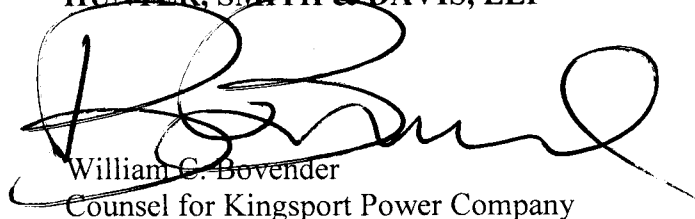
Dear Chairman Hilliard:

Enclosed with this letter is Kingsport Power Company's Motion to Withdraw Petition for Approval of Storm Damage Tariff Rider Without Prejudice for Later Refiling to be filed in the captioned docket. We are shipping the original and four copies via FedEx for overnight delivery.

If you have any questions, please do not hesitate to contact the writer.

Very sincerely yours,

HUNTER, SMITH & DAVIS, LLP



William C. Bovender
Counsel for Kingsport Power Company

Enclosures

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

IN RE: PETITION OF KINGSPORT POWER)	
COMPANY d/b/a AEP APPALACHIAN)	
POWER FOR APPROVAL OF)	DOCKET NO.: 15-00024
A STORM DAMAGE RIDER TARIFF)	

**MOTION TO WITHDRAW PETITION FOR APPROVAL OF A STORM DAMAGE
TARIFF RIDER WITHOUT PREJUDICE FOR LATER REILING**

Comes Petitioner, Kingsport Power Company, d/b/a AEP Appalachian Power ("Kingsport"), and respectfully moves to be allowed to withdraw its Petition for Approval of a Storm Damage Tariff Rider, without prejudice, to permit it to refile at a later date. As grounds for this Motion, Kingsport submits the following:

1. On February 19, 2015, Kingsport filed its Petition for Approval of a Storm Damage Tariff Rider. The proposed tariff would allow Kingsport to recover costs incurred as a result of a severe winter storm in January, 2013 (the "2013 Storm"), along with the remaining unrecovered balance related to winter storms in December, 2009. Those costs are currently deferred on Kingsport's books per orders of the Tennessee Regulatory Authority ("Authority" or "TRA").

2. The Consumer Advocate and Protection Division of the Office of the Attorney General filed a Petition to Intervene on March 4, 2015. Same was not opposed by Kingsport.

3. At the Authority Conference on April 29, 2015, the Directors unanimously voted to convene a contested case proceeding, granted the Petition to Intervene, and appointed the General Counsel or her designee to act as Hearing Officer.

4. The case has proceeded and pre-filed direct and rebuttal testimony have been filed by Kingsport, and pre-filed direct testimony has been filed by the Consumer Advocate. At this point in time, the pre-filed testimony of Kingsport and the Consumer Advocate disagree on how the increase in rates, which would result from an approval of the 2013 Storm recovery amount, would be allocated across the various classifications of Kingsport's customers. To date, the Consumer Advocate has not contested the amount of the recovery sought.

5. In the course of developing responses to Staff Data Request No. 3 (September 9, 2015), Kingsport uncovered information which placed in question a portion of the total amount of the recovery being sought by Kingsport related to the 2013 Storm. Since that time, Kingsport has been re-reviewing the invoices and other supporting documentation related to its 2013 Storm costs, but said review has not been completed and will take additional time to complete. Upon the completion of that review, it is possible that the amount of recovery being sought for the 2013 Storm could be less than the amount sought in this proceeding.


6. As the TRA is also aware, Kingsport is in the early stages of its first base rate case since 1992, and, has been required to devote much time and many resources to that proceeding, Docket No. 15-00093.

7. Kingsport owes a duty to its customers to be accurate in the amount it seeks to recover in this proceeding, Docket No. 15-00024.

8. As it will take additional time to complete its review of the 2013 Storm costs, and any necessary recalculations of the amount of recovery sought as a result of that review, Kingsport submits it should be permitted to withdraw this Storm Damage Recovery Petition, without prejudice, to permit it to refile at a later date.

PREMISES CONSIDERED Petitioner Kingsport Power Company d/b/a AEP
Appalachian Power request permission of the Tennessee Regulatory Authority to withdraw its
Petition and accompanying filings in this Docket No. 15-00024, without prejudice.

Respectfully submitted,

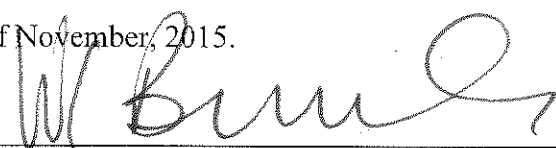
By: 
William C. Bovender, Esq.
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Ph: (423) 378-8858
*Attorney for Petitioner, Kingsport Power
Company d/b/a AEP Appalachian Power*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **MOTION TO WITHDRAW PETITION
FOR APPROVAL OF A STORM DAMAGE TARIFF RIDER WITHOUT PREJUDICE
FOR LATER REFILING** been served upon the attorney for the CAPD:

Erin Merrick, Esq.
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202
Email: erin.merrick@ag.tn.gov

via email on the 9th day of November, 2015.


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ATTN: Sharla Dillon, Dockets & Records Manager

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c: Monica Smith-Ashford, Esq. *(via email)*
Erin Merrick, Esq. *(via email)*
David Foster *(via email)*
William Castle *(via email)*
James R. Bacha, Esq. *(via email)*
Hector Garcia, Esq. *(via email)*
Larry Foust *(via email)*
Garry Simmons *(via email)*
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