

**IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE**

IN RE:

**PETITION OF KINGSFORT POWER
COMPANY D/B/A/ AEP APPALACHIAN
POWER FOR APPROVAL OF STROM
DAMAGE RIDER TARIFF**

DOCKET NO. 15-00024

**REQUEST OF THE CONSUMER ADVOCATE AND PROTECTION DIVISION
OF THE ATTORNEY GENERAL'S OFFICE
FOR INTERROGATORIES AND PRODUCTION OF DOCUMENTS**

To: Kingsport Power Company d/b/a AEP Appalachian Power
c/o William C. Bovender
Hunter, Smith & Davis, LLP
1212 North Eastman Road
P.O. Box 3740
Kingsport, TN 37664

This Discovery Request is hereby served upon Kingsport Power Company, d/b/a AEP Appalachian Power ("Kingsport Power" or "Company"), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. We request that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate and Protection Division, 425 Fifth Avenue North, Nashville, Tennessee 37243, c/o Erin Merrick, on or before 4:00 p.m. (CDT), June 5, 2015.

PRELIMINARY MATTERS AND DEFINITIONS

These discovery requests are to be considered continuing in nature, and are to be supplemented from time to time as information is received by Kingsport Power which would make a prior response inaccurate, incomplete, or incorrect.

The terms “you” and “your” as used herein mean Kingsport Power and all employees, agents, and representatives thereof.

The term “person” as used herein refers to any natural person, corporation, firm, company, sole proprietorship, partnership, business, unincorporated association, or other entity of any sort whatsoever.

The term “communication” means any transmission of information by oral, graphic, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, or otherwise.

The term “document” as used herein shall have the broadest possible meaning under applicable law. “Document” as used herein means any medium upon which intelligence or information can be recorded or retrieved, such as any written, printed, typed, drawn, filmed, taped, or recorded medium in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, letter, note, report, electronic mail, memorandum (including memoranda, electronic mail, report, or note of a meeting or communication), workpaper, spreadsheet, photograph, videotape, audio tape, computer disk or record, or any other data compilation in any form without limitation, which is in your possession, custody or control. If any such document was, but no longer is, in your possession, custody or control, please state what disposition was made of the document and when it was made. If you produce documents in

response to these discovery requests, produce the original of each document or, in the alternative, produce a copy of each document and identify the location of the original document. If the “original” document is itself a copy, that copy should be produced as the original.

If any objections to this discovery are raised on the basis of privilege or immunity, please include in your response a complete explanation concerning the privilege or immunity asserted. If you contend that you are entitled to refuse to fully answer any of this discovery, please state the exact legal basis for each such refusal.

If any of the interrogatories are not answered on the basis of privilege or immunity, include in your response to each such interrogatory a written statement evidencing:

- (a) the nature of the communication;
- (b) the date of the communication;
- (c) the identity of the persons present at such communication; and
- (d) a brief description of the communication sufficient to allow the Authority to rule on a motion to compel.

If, for any reason, you are unable to answer a discovery request fully, submit as much information as is available and explain why your answer is incomplete. If precise information cannot be supplied, submit (1) your best estimate, so identified, and your basis for the estimate, and (2) such information available to you as comes closest to providing the information requested. If you have reason to believe that other sources of more complete and accurate information exist, identify those sources.

If any information requested is not furnished as requested, state where and how the information may be obtained or extracted, the person or persons having knowledge of the procedure and the person or persons instructing that the information be excluded.

FIRST DISCOVERY REQUESTS

1. Provide a copy of each of the Company's monthly reports to the TRA beginning in 2005 and continuing to the present.

RESPONSE:

2. Provide a copy of the Company's ledger entries to record the 2013 storm damage costs. Specifically, how was the total \$1,949,062 from the 2013 storm damage costs recorded on the Company's books and to what accounts?

RESPONSE:

3. Provide a copy of the Company's ledger entries to record the 2009 storm damage costs. Specifically, how was the total \$1,629,352 from the 2009 storm damage costs recorded on the Company's books and to what accounts?

RESPONSE:

4. Provide a copy of the Company's ledger supporting the 2009 storm damage cost recovery contained on the Company's books.

RESPONSE:

5. Provide a pro forma calculation of the storm damage rider as shown in Exhibits 1, 2 and 3 applied to all customers (transmission and distribution).

RESPONSE:

6. Provide a pro forma calculation of the storm damage rider as shown in Exhibits 1, 2 and 3 applied to consumption instead of demand and to all customers (transmission and distribution).

RESPONSE:


7. Provide the source and support for Company witness Simmons' statement that "Traditional cost allocation rationale requires that the cost incurred to repair facilities such as distribution facilities should be allocated on a demand basis, as the distribution facilities are designed to meet peak demand rather than energy consumption."

RESPONSE:

8. Provide details of the Company's 2009 and 2013 storm damage costs by vendor.

RESPONSE:

RESPECTFULLY SUBMITTED,

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ERIN MERRICK (BPR# 033883)
Assistant Attorney General
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
(615) 741-8722

Dated: May 20, 2015.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

William K. Castle
Appalachian Power Company, Inc.
Three James Center, Suite 1100
1051 E. Cary Street
Richmond, VA 23219-4029

Hector Garcia, Esq.
Senior Counsel
American Electric Power Service Corp.
One Riverside Plaza, 29th Floor
Columbus, OH 43215

William C. Bovender, Esq.
Hunter, Smith & Davis, LLP
PO Box 3740
Kingsport, TN 37665

This the 20th day of May, 2015.



ERIN MERRICK