

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

**NASHVILLE, TENNESSEE**

IN RE: PETITION OF KINGSPORT POWER )  
COMPANY d/b/a AEP APPALACHIAN )  
POWER FOR APPROVAL OF )  
A STORM DAMAGE RIDER TARIFF )

DOCKET NO.: 15-00024

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**PETITION OF KINGSPORT POWER COMPANY FOR PERMISSION TO CONDUCT  
LIMITED DISCOVERY AND PROPOSED DISCOVERY SCHEDULE**

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Comes Petitioner, Kingsport Power Company, d/b/a AEP Appalachian Power ("Kingsport") and, pursuant to TRA Rules 1220-1-2-.11 and the Tennessee Rules of Civil Procedure, requests that the Hearing Officer permit it to engage in limited written discovery regarding prior case experience and testimony of Consumer Advocate Division Witness William H. Novak.

The purpose of the discovery would be to obtain prior public testimony and related reports/responses of Mr. Novak relative to the issue of allocation of costs to various classes of customers. Mr. Novak previously was employed by the Tennessee Regulatory Authority and its predecessor and was involved in cases where allocation of costs to classes of customers was an issue. He has also been involved as an expert witness in cases which involve allocation of costs since leaving the public sector.

Premises considered, Kingsport requests it be allowed to conduct this limited discovery.

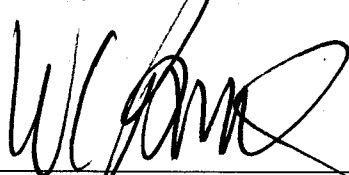
Kingsport proposes the following schedule to accommodate this proposed, limited discovery and hereby represents that it will be filing rebuttal testimony upon receipt and review of the responses to said discovery:

<b>DUE DATE</b>	<b>FILING/ACTION</b>
July 29, 2015	Kingsport serves written discovery.
August 28, 2015	Discovery responses due.
September 14, 2015	Rebuttal testimony on behalf of Kingsport to be filed.

Counsel for Kingsport, William C. Bovender, would respectfully show that the need to serve the discovery on July 29, 2015, arises from the fact he will be on vacation the week of July 19, 2015, and already has depositions scheduled out of the state on July 27, 2015, and July 28, 2015.

Premises considered, Kingsport respectfully submits the Hearing Officer should permit the discovery and adopt the proposed schedule set forth herein.

Respectfully submitted,

By: 

William C. Bovender, Esq.

**HUNTER, SMITH & DAVIS, LLP**

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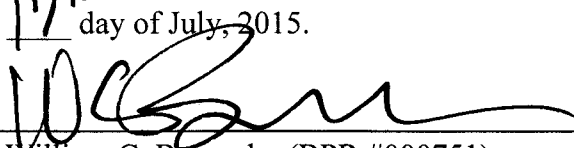
*Attorney for Petitioner, Kingsport Power  
Company d/b/a AEP Appalachian Power*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **PETITION OF KINGSFORT POWER COMPANY FOR PERMISSION TO CONDUCT LIMITED DISCOVERY AND PROPOSED DISCOVERY SCHEDULE** 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](mailto:erin.merrick@ag.tn.gov)

via email and US Mail on the 17<sup>th</sup> day of July, 2015.

  
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William C. Bovender (BPR #000751)

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