

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)

**REQUESTS FOR PRODUCTION OF DOCUMENTS ON BEHALF OF KINGSPORT
POWER COMPANY D/B/A AEP APPALACHIAN POWER**

Comes Petitioner, Kingsport Power Company, d/b/a AEP Appalachian Power ("Kingsport") and submits the following Requests for Production of Documents to Intervenor, Office of the Tennessee Attorney General and Reporter, Consumer Advocate and Protection Division, and to its expert witness, William H. Novak, by service upon the Consumer Advocate's Office.

The responses are to be produced, pursuant to T.R.C.P. 34, at the office of the Kingsport's counsel, William C. Bovender, Hunter, Smith & Davis, LLP, 1212 North Eastman Road, Kingsport, TN 37664, on or before the 28th day of August, 2015, and may be produced electronically or by U.S. Mail or recognized national carrier:

1. Produce all class cost of service, cost allocation and rate design studies in all electric utility cases, prepared by or participated in by Mr. Novak, during his tenure with WHN Consulting (September, 2004 to present).
2. Produce all testimony (in any forum) of Mr. Novak related to any class cost of service, cost allocation, and rate design issues sponsored or offered in all electric utility cases, during his tenure with WHN Consulting (September, 2004 to present).

3. To the extent not provided in your responses to Request 1, produce all class cost of service, cost allocation, and rate design studies prepared by or participated in by Mr. Novak, as discussed in his curriculum vitae in Attachment 1, Page 1, during his tenure with WHN Consulting (September, 2004 to present). This request is specifically directed to gas and water proceedings.

4. To the extent not provided in your responses to Request 2, produce all testimony (in any forum) of Mr. Novak related to any class cost of service, cost allocation, and rate design issues sponsored or offered by Mr. Novak as discussed in his curriculum vitae, Attachment 1, Page 1, during his tenure with WHN Consulting (September, 2004 to present). This request is specifically directed to gas and water proceedings.

5. Produce all class cost of service, cost allocation, and rate design studies prepared by or participated in by Mr. Novak during his employment with the Tennessee Regulatory Authority.

6. Produce all testimony (in any forum) of Mr. Novak related to any class cost of service, cost allocation, and rate design issues sponsored or offered by Mr. Novak during his employment with the Tennessee Regulatory Authority.

7. Relative to documents produced in response to Requests 1-6, produce all work papers/calculations that support the ultimate numbers contained in said studies and testimony.

Respectfully submitted,

By: _____



William C. Bovender, Esq.

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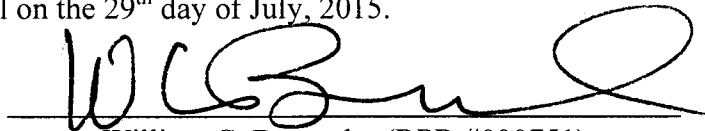
*Attorney for Petitioner, Kingsport Power
Company d/b/a AEP Appalachian Power*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **REQUESTS FOR PRODUCTION OF DOCUMENTS ON BEHALF OF KINGSFORT POWER COMPANY D/B/A AEP APPALACHIAN POWER** 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 and US Mail on the 29th day of July, 2015.



William C. Bovender (BPR #000751)

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