

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

**IN RE: PETITION OF KINGSPORT POWER )**  
**COMPANY d/b/a AEP APPALACHIAN )**      **Docket No. 15-00064**  
**POWER FOR APPROVAL OF )**  
**HOME WARRANTY PROGRAMS )**

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**PETITION TO INTERVENE**

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Herbert H. Slatery III, Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate and Protection Division of the Office of the Attorney General (“Consumer Advocate”), pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Regulatory Authority (“TRA” or “Authority”) to grant the Consumer Advocate’s intervention into this proceeding because consumers’ interests, rights, duties or privileges may be determined or affected by the proceeding. For cause, Petitioner would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utilities services by initiating and intervening as a party in proceedings before the Authority in accordance with the Uniform Administrative Procedures Act (“UAPA”), Tenn. Code Ann. § 4-5-101 *et seq.*, and Authority rules.

2. Kingsport Power Company, d/b/a AEP Appalachian Power (“Kingsport Power”), is a public utility regulated by the Authority. It provides electric utility services to some 47,000 retail customers located in the state of Tennessee.

3. In its *Petition for Approval of Home Warranty Programs* (“*Petition*”), filed on June 1, 2015, in TRA Docket 15-00064, Kingsport Power has requested permission to allow an unaffiliated, unregulated third-party known as HomeServe USA Corp. (“HomeServe”) to offer

home warranty services to Kingsport Power customers using Kingsport Power's customer data and billing platforms. Consumers have an interest in the protection of personal information such as their names and addresses and determining whether the proposal is consistent with Kingsport Power's privacy policy and/or representations made to consumers in the past regarding whether their information was private. Consumers also have an interest in having the opportunity to decide if they want to opt in to marketing when contracting for essential services like electricity before they are marketed at all by third parties.

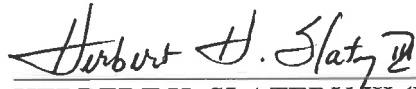
4. The *Petition* requests that the services offered by HomeServe appear as a line item on a consumer's monthly bill if they enroll. The *Petition* does not state whether nonpayment of HomeServe services would result in termination of a consumer's electric service. Consumers who may purchase services from HomeServe through Kingsport Power deserve to know the impact these services can have on their own electric service.

5. The *Petition* states that revenue flowing to Kingsport Power through this relationship with HomeServe will be dedicated to reducing the cost of residential electric service and will reduce the amount of revenues that Kingsport Power will collect from residential customers. Consumers clearly have an interest in the generation of these revenues as a means to reduce residential costs, as well as the application of these revenues to offset residential customers' rates.

6. Only by participating as a party to this proceeding can the Consumer Advocate adequately carry out its statutory duty to represent the interests of Tennessee consumers.

WHEREFORE, the Consumer Advocate requests the Authority to grant this Petition to Intervene.

RESPECTFULLY SUBMITTED,



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HERBERT H. SLATTERY/III (BPR #09077)  
Attorney General and Reporter  
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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:

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This the 25<sup>th</sup> day of June, 2015.

  
Erin Merrick