

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

IN RE:)
)
PETITION OF KINGSPORT POWER)
COMPANY d/b/a AEP APPALACHIAN)
POWER GENERAL RATE CASE) **DOCKET NO. 15-00093**

**RESPONSE OF SUNRUN TO KINGSPORT'S
"OBJECTION TO PETITION TO INTERVENE"**

Sunrun Inc. ("Sunrun") submits the following response to the "Objection to Petition to Intervene" filed by Kingsport Power Company ("Kingsport") November 3, 2015.

At the pre-hearing conference on October 28, 2015, the Hearing Officer issued an oral ruling allowing Sunrun to intervene in this docket but limiting the Company's intervention to issues related to Kingsport's "Net Metering Service Rider" tariff. As counsel for Sunrun stated, Sunrun's interest in the case concerns any tariff changes affecting customer-generated solar power and, at this time, the only such issue in the case is Kingsport's proposal for various changes to its net metering tariff. Counsel also noted that it is not possible to predict or identify other issues which may arise in the course of this proceeding and which might impact Sunrun. In response, the Hearing Officer stated that if other issues arise which affect Sunrun, she would be willing to revisit the limitations on Sunrun's intervention. With that understanding, Sunrun appreciates and accepts the Hearing Officer's decision.

Kingsport's "Objection" asks, among other things, that if Sunrun is permitted to participate in the hearing regarding issues related to the net metering tariff, Sunrun "should not be permitted to receive confidential discovery responses or confidential responses to staff data requests from Kingsport which do not relate to the net metering tariff."

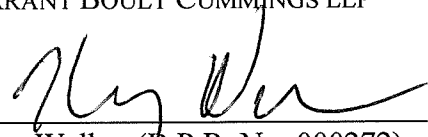
Recognizing the limits established by the Hearing Officer's decision, Sunrun does not intend to submit discovery questions on issues unrelated to the net metering tariff. Sunrun, however, is entitled to receive copies of all discovery and staff data responses, both confidential and non-confidential, submitted by any party. Only by reviewing this information can Sunrun effectively monitor developments in this docket and determine what, if any, other issues may impact Sunrun or warrant filing a request asking the Hearing Officer to reconsider her decision. Furthermore, Kingsport should not be allowed to make a unilateral decision as to which responses "relate to the net metering tariff" and which do not. That determination can only be made by agreement of the parties or, if the parties disagree, by a ruling from the Hearing Officer. Either way, Sunrun would need to see the responses in order to determine their relevance. Finally, providing Sunrun with a copy of responses to discovery and staff data requests – the same information being provided to the Staff and the Consumer Advocate – does not impose a material, additional burden on Kingsport.

For these reasons, Sunrun accepts the Hearing Officer's decision limiting Sunrun's intervention at this time to the net metering tariff with the understanding that Sunrun may ask for expanded participation should circumstances warrant. Sunrun, however, may never become aware of those "circumstances" without access to all discovery and staff data responses, both confidential and non-confidential. Sunrun therefore asks that Kingsport's request to limit Sunrun's ability to monitor the case be denied.

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP

By: _____

A handwritten signature in black ink, appearing to read "Henry Walker", is written over a horizontal line.

Henry Walker (B.P.R. No. 000272)
Bradley Arant Boult Cummings, LLP
1600 Division Street, Suite 700
Nashville, TN 37203
Phone: 615-252-2363
Email: hwalker@babbc.com

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of November, 2015, a copy of the foregoing document was served on the parties of record, via electronic email transmission and regular U.S.

Mail, postage prepaid, addressed as follows:

William K. Castle
Director, Regulatory Services VA/TN
Three James Center
1051 E. Cary Street, Suite 1100
Richmond, VA 23219-4029
wkcastle@aep.com

James R. Bacha, Esq.
Hector Garcia, Esq.
American Electric Power Service Corporation
One Riverside Plaza
P.O. Box 16637
Columbus, OH 43216
jrbacha@aep.com
hgarcia1@aep.com

William C. Bovender, Esq.
Hunter, Smith & Davis, LLP
1212 N. Eastman Road
P.O. Box 3740
Kingsport, TN 37664
bovender@hstdlaw.com

Wayne Irwin
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202-0207
wayne.irwin@ag.tn.gov

Charles B. Welch, Jr.
Farris Bobango, PLC
Bank of America Plaza
414 Union Street, Suite 1105
Nashville, TN 37219
cwelch@farris-law.com


HENRY WALKER