

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

IN RE:)	Filled Electronically TRA Docket
)	Office 11/17/15
PETITION OF KINGSPORT POWER)	
COMPANY d/b/a AEP APPALACHIAN)	
POWER GENERAL RATE CASE)	DOCKET NO. 15-00093

PETITION TO INTERVENE

Pursuant to T.C.A. § 4-5-310(a), the Tennessee Solar Energy Industries Association (“TenneSEIA”) moves to intervene as a matter of right in the above-captioned “Petition of Kingsport Power Company d/b/a AEP Appalachian Power General Rate Case.”

TenneSEIA is the Tennessee state chapter for the national Solar Industries Association and represents the interests of the solar energy industry in Tennessee. The mission of TenneSEIA is to make solar energy a mainstream energy source and realize the full potential of the solar industry in Tennessee. TenneSEIA’s members, all of whom are listed on the Association’s website (www.tenneseiasolar.com), includes companies that design, install, monitor and maintain solar panels on a customer’s roof. These companies are located in Tennessee and are currently serving and seeking to serve customers located in the service area of Kingsport Power. TenneSEIA files this intervention on behalf of these members.¹

In this rate case, Kingsport proposes substantial changes to its “Net Metering Service Rider” tariff, which governs the rates, terms, and conditions applicable to qualifying customers who generate solar energy which is intended primarily to offset all or part of the customer’s own electricity requirements. As described in the pre-filed testimony of Kingsport witness, William

¹ TenneSEIA will supplement this filing with a list of TenneSEIA members who have elected to participate in this intervention. For example, the membership of TenneSEIA includes law firms, investment firms, accounting firms and other vendors who provide services to the solar industry. Those service firms are not participating in this intervention.

Castle, Kingsport proposes to close its current net metering services to new customers at the end of 2016 and to offer a different, net metering service to customers beginning in 2017. The new tariff will require customers to begin paying a demand charge, which is not required by the existing tariff, and will also reduce the rate paid (credited) for customer-generated electricity. These changes will make customer-generated solar power a less attractive option and would therefore have a direct, financial impact on the ability of TenneSEIA members to offer service to customers in the Kingsport service area.

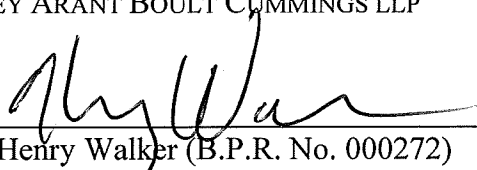
Because of these proposed changes in Kingsport's tariff, the participating members of TenneSEIA have a direct financial interest in the outcome of this proceeding. Therefore, the "legal rights, duties, privileges, immunities or other legal interest" of TenneSEIA may be determined in this proceeding. Since TenneSEIA agrees to the procedural schedule entered by the Hearing Officer on November 6, 2015, the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing this intervention.

For these reasons, TenneSEIA asks that this Petition to Intervene be granted and for such other relief as TenneSEIA may be entitled to receive.

Respectfully submitted,

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By: _____


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CERTIFICATE OF SERVICE

I hereby certify that on the 17th 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.

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