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December 1, 2015

Via Email & U.S. Mail

Chairman, Tennessee Regulatory Authority
c/o Sharla Dillon
Dockets and Records Manager
502 Deaderick Street
Nashville, TN 37243

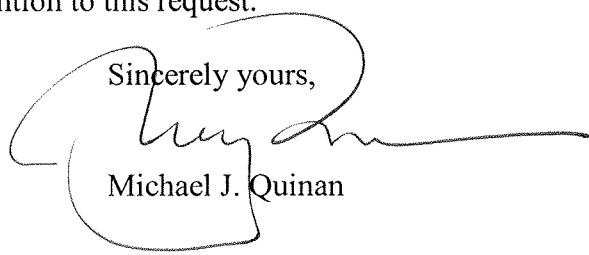
In Re: Petition of Kingsport Power Company
d/b/a AEP Appalachian Power
General Rate Case
Docket No. 15-00093

Dear Ms. Dillon:

Enclosed please find an original and 4 copies of East Tennessee Energy Consumers' Discovery Requests to Kingsport Power Company (First Set) to be filed on behalf of East Tennessee Energy Consumers in the above-referenced docket.

Thank you for your kind attention to this request.

Sincerely yours,


Michael J. Quinan

MJQ
Enclosures

cc: Ms. Kelly Cashman-Grams
Mr. James R. Bacha
Mr. Hector Garcia
Mr. William C. Bovender
Mr. William K. Castle
Ms. Jean A. Stone
Mr. David Foster
Hon. Herbert H. Slatery, III
Mr. Wayne M. Irvin
Mr. Henry Walker, Esq.
Mr. Charles B. Welch, Esq.

**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

**EAST TENNESSEE ENERGY CONSUMERS'
DISCOVERY REQUESTS TO KINGSPORT POWER COMPANY (First Set)**

Comes East Tennessee Energy Consumers ("ETEC"), by counsel, and propounds the following discovery requests to Kingsport Power Company d/b/a AEP Appalachian Power ("KgPCo") pursuant to Rule 1220-1-2-.11 of the Rules of Practice and Procedure of the Tennessee Regulatory Authority ("T.R.A.") and Rules 26, 33 and 34 of the Tennessee Rules of Civil Procedure. Responses are requested no later than Friday, December 18, 2015.

Discovery Requests

ETEC-1. Please provide a working copy of the Company's Class Cost of Service model, in electronic format with all formulas and data intact.

ETEC-2. Please provide a working copy of any spreadsheets that are linked to or otherwise used as sources in the Class Cost of Service model, in electronic format with all formulas and data intact.

ETEC-3. Please provide a working copy of each model used to develop KgPCo Exhibit Nos. 4a (DRB), 4b (DRB), and 4c (DRB) in electronic format with all formulas and data intact.

ETEC-4. Please provide a working copy of each model used to develop KgPCo Exhibit No. 5 (DRB), in electronic format with all formulas and data intact.

ETEC-5. Please reconcile the rate increases for MGS Secondary, MGS TOD, and MGS Primary; LGS Secondary and LGS Primary, and IP Primary and IP Transmission shown on KgPCo Exhibit No. 1 (TAC) with those shown for the MGS, LGS, and IP voltage levels on the bottom of KgPCo Exhibit No. 4-b (DRB) (all shown at 4.14%). Include a narrative explanation for each difference.

ETEC-6. Please provide a narrative explanation and all workpapers showing how the varying increases for the voltage levels of MGS, LGS, and IP were developed.

ETEC-7. According to KgPCo Exhibit No. 4-b (DRB), IP Primary is below cost of service under present rates and would require a 5.21% increase to reach full cost of service at the Company's requested rate of return. Please explain why the Company is proposing an increase of 9.19%, with subsequent rate decreases under the Rate Realignment Rider, instead of simply a one-time increase.

ETEC-8. Please provide the Company's proposed tariff language for the Rate Realignment Rider.

Respectfully submitted this 1st day of December, 2015,

By Counsel:

A handwritten signature in black ink, appearing to read "Michael J. Quinan", written over a horizontal line.

Michael J. Quinan, Esq.
(Tenn. Sup. Ct. No. 11104)
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Counsel for East Tennessee Energy
Consumers

CERTIFICATE OF SERVICE

I hereby certify that, on December 1, 2015, the foregoing discovery requests were served by hand-delivery, facsimile, overnight delivery service, or first class mail, postage prepaid, to all parties of record at their addresses shown below

William C. Bovender, Esq. HUNTER, SMITH & DAVIS, LLP P.O. Box 3704 Kingsport, TN 37664	Mr. William K. Castle Director, Regulatory Services VA/TN Appalachian Power Company Three James Center Suite 1100, 1051 E. Cary St. Richmond, VA 23219-4029
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Henry Walker, Esq. Bradley Arant Boult Cummings, LLP 1600 Division St., Ste 700 Nashville, TN 37203	Charles B. Welch, Jr., Esq. (BPR #5593) Farris Bobango, PLC Bank of America Plaza 414 Union St., Ste 1105 Nashville, TN 37219

This 1st day of December, 2015.



Michael J. Quinan, Esq.