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December 1, 2015

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Chairman Herbert H. Hillard  
Tennessee Regulatory Authority  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

Re: First Discovery Request  
Docket No. 15-00093

Dear Chairman Hillard:

Attached for filing are the "First Discovery Requests" of Sunrun and TenneSEIA to Kingsport Power Company.

As stated in the "Response of TenneSEIA to Kingsport Power Company's Objection" filed November 23, 2015, counsel for TenneSEIA and Sunrun has consulted with counsel for the Energy Freedom Coalition of America for the purpose of avoiding duplicative discovery requests. In light of the extensive discovery requests filed by Energy Freedom Coalition of America, the number of discovery requests submitted by Sunrun and TenneSEIA has been substantially reduced.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

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

Henry Walker

HW/dbi

cc: Kelly Cashman-Grams

211710-301001  
7/3756100.1

**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**

**FIRST DISCOVERY REQUESTS OF SUNRUN AND TENNESEIA**

Intervenors Sunrun and TenneSEIA hereby propound the following First Discovery Requests upon Kingsport Power Company.

**DEFINITIONS**

A. “The Company,” “Kingsport,” and “Kingsport Power Company” mean the Kingsport Power company d/b/a AEP Appalachian Power, as well as its agents, attorneys, representatives or any other person acting or purporting to act on its behalf.

B. “And” and “or” shall be construed conjunctively or disjunctively as necessary to make the interrogatory inclusive rather than exclusive. The singular shall include the plural, and vice-versa, where appropriate.

C. “Communication” means any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means including, but not limited to, telephone conversations, letters, memoranda, electronic correspondence, meetings and personal conversations.

D. “Document” means, in the broadest sense possible, any medium upon which information has been recorded or retrieved, whether in draft or final form, and includes the original and each copy thereof if the copy contains additional material or is not identical to the original, which is in your or your agent’s possession, custody or control or which was, but is no longer, in your or your agent’s possession, custody or control.

E. The word “identify” with respect to:

- (1) any natural person, means to state the full name; telephone number; and the last known residence and business addresses of the person and that person’s relationship, whether business, commercial, professional, or personal with you;
- (2) any legal person, business entity or association, means to state the full name; telephone number; and last known address of such person or entity;
- (3) any document, means to state the type of document (e.g., a letter); the title; the subject matter; the date the document bears and the date it was written; and
- (4) any oral communication, means to state the date when and the place where it was made; the identity of the person who made it; the identity of the person to whom it was made; the identity of any other person or persons who were present or who heard it; and the substance of it.

F. “Person” shall mean an individual, partnership, proprietorship, corporation, association, and any other kind of business or legal entity.

G. “Relates to” means constitutes, contains, records, discusses, summarizes, discloses, and/or refers to, in whole or in part.

H. “Petition,” “case,” “proceeding,” and “docket” refer to the above-captioned rate case.

## **INSTRUCTIONS**

1. To the extent that the information sought is incorporated or contained in a document, please identify the document.
2. If you object to a question on the basis of privilege, state in detail the facts on which you base your objection. If you claim a document is privileged, identify the document and state the basis for the privilege.
3. These interrogatories shall be deemed to be continuing and to require supplemental answers to the extent required by the Tennessee Rules of Civil Procedure and the rules of the Tennessee Regulatory Authority.

### **DISCOVERY REQUESTS**

1. State the name(s) and address(es) of all persons assisting in the answering of these questions.

**ANSWER:**

2. Please provide a graph showing the average load profile of a residential customer on Kingsport's peak summer day.

**ANSWER:**

3. Please provide a graph showing the average load profile of a residential net metering customer on Kingsport's peak summer day.

**ANSWER:**

4. From among the residential customers who are currently taking service under Kingsport's net metering tariff, select the six (6) who have been taking service for the longest period and provide a copy of each customer's bills (name and address omitted) for the most-recent twelve (12) months.

- (a) For those same six (6) customers, provide a revised bill for each month showing what the customer would have been billed under Kingsport's proposed changes to the net metering tariff.
- (b) Explain how the revised bills are calculated.

**ANSWER:**

5. How many commercial customers are currently taking service under Kingsport's net metering tariff?

- (a) Of those customers, select the six (6) who have been taking service for the longest period and provide a copy of each customer's bills (name and address omitted) for the most-recent twelve (12) months.
- (b) For those same six (6) customers, provide a revised bill for each month showing what the customer would have been billed under Kingsport's proposed changes to the net metering tariff.
- (c) Explain how the revised bills are calculated.

**ANSWER:**

6. Does Kingsport measure the gross output of generating facilities associated with net metered systems? If so, what are the total and average production outputs of all net metered systems?

**ANSWER:**

7. What are the total number of kilowatts that net metering customers exported to the grid in 2014?

**ANSWER:**

8. What is the aggregate capacity of the current net metering program (total installed capacity)?

**ANSWER:**

9. What is the average system size of a residential net metering customer?

**ANSWER:**

10. Please provide a list of distribution circuits in Kingsport's service territory.

**ANSWER:**

11. Please indicate which distribution circuits have a residential net metering customer?

**ANSWER:**

12. Please indicate the time and date of the maximum peak demand experienced on each distribution circuit.

**ANSWER:**

13. Please indicate the time and date of the maximum demand measured at each of Kingsport's substations.

**ANSWER:**

14. When a customer with distributed generation connects to the grid and requires an upgrade, who pays for the upgrade?

**ANSWER:**

15. Did anyone representing Kingsport participate in the recent value of solar stakeholder process held by TVA?

**ANSWER:**



16. Does a customer that reduces its load through energy efficient measures potentially shift costs to other customers?

**ANSWER:**

17. If the proposed changes to the net metering tariff became effective on the same date that the rate increases requested in this docket become effective, explain the impact of those changes on the Company's expenses, revenues, and rate of return during the attrition period.

**ANSWER:**

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP

By: 

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### CERTIFICATE OF SERVICE

I hereby certify that on the 1<sup>st</sup> day of December, 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:

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HENRY WALKER