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October 26, 2015

via E-MAIL and OVERNIGHT MAIL

Chairman, Tennessee Regulatory Authority
c/o Sharla Dillon
Dockets and Records Manager
460 James Robertson Parkway
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 four copies of a Petition to Intervene 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

**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

**PETITION TO INTERVENE OF
EAST TENNESSEE ENERGY CONSUMERS**

Comes East Tennessee Energy Consumers ("ETEC"), by counsel, pursuant to T.C.A. §§ 4-5-310 and 65-2-107 and the Rules and Regulations of the Tennessee Regulatory Authority ("TRA" or "Authority"), and petitions to intervene in this docket as a party of record. In support of its Petition to Intervene, ETEC states as follows:

1. This proceeding was initiated upon the petition ("Petition") of Kingsport Power Company d/b/a AEP Appalachian Power ("KgPCo") for a general rate case. In its Petition, KgPCo seeks a rate change that will increase its annual revenues in the amount of \$12,118,173, which would provide a projected rate of return of 6.69% on an adjusted total rate base of approximately \$71.5 million, and a 10.66% rate of return on common equity. KgPCo's Petition also describes a Variable Cost Rider, which it intends to apply for so that it may be implemented concurrently with the general rate increase it is requesting.

2. KgPCo is a subsidiary of American Electric Power Company, Inc. ("AEP"),

and is the electric distribution company (“EDC”) for approximately 47,000 customers in its service territory, which consists of portions of Sullivan and Hawkins Counties, including the City of Kingsport.

3. ETEC is a group of KgPCo’s largest Industrial Power customers. ETEC’s members include Air Products and Chemicals, Inc., Domtar Paper Company, Inc., Eastman Chemical Company and Wellmont Health Systems.

4. ETEC’s members would be directly and adversely affected by implementation of the general rate increase requested by KgPCo. Their interests are not represented by any other party in this proceeding.

5. Discovery will be needed to identify and address the extent to which the proposed general rate increase, the terms of its implementation, and the resulting changes to KgPCo’s tariff are or are not just and reasonable.

6. Accordingly, ETEC requests permission to intervene and participate in this contested case.

7. Granting ETEC’s Petition to Intervene will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

8. All notices, correspondence, pleadings, copies of orders, communications and other materials should be addressed to counsel for the Industrial Customers as follows:

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WHEREFORE, ETEC respectfully requests that the Authority grant this Petition to Intervene and enter an Order allowing ETEC to become an intervening party of record in this docket.

Respectfully submitted this 26th day of October, 2015

By Counsel:



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(Tenn. Sup. Ct. No. 11104)
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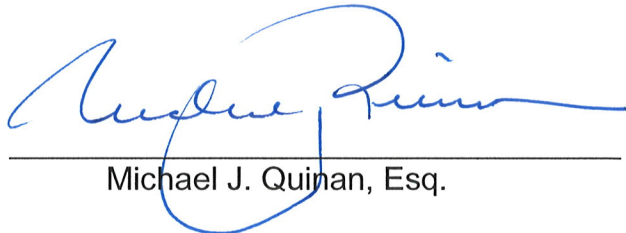
Counsel for East Tennessee Energy
Consumers

CERTIFICATE OF SERVICE

I hereby certify that, on October 26, 2015, the foregoing pleading was 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
James R. Bacha, Esq. Hector Garcia, Esq. American Electric Power Service Corp. P.O. Box 16637 Columbus, OH 43216	Mr. David Foster Chief, Utilities Division Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505
Jean A. Stone, Esq General Counsel Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505	Kelly Cashman-Grams Hearing Officer Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505
Herbert H. Slatery, III, Esq. Attorney General and Reporter State Of Tennessee 425 Fifth Ave., North P.O. Box 20207 Nashville, TN 37202-0207	Wayne M. Irvin, Esq. Assistant Attorneys General Consumer Advocate and Protection Div. 425 Fifth Ave., North P.O. Box 20207 Nashville, TN 37202-0207

This 26th day of October, 2015.



Michael J. Quinan, Esq.