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October 30, 2015

***Via Electronic Mail and U.S. Mail:***

October 30, 2015

Chairman Herbert H. Hilliard  
Tennessee Regulatory Authority  
c/o Sharla Dillon, Dockets and Records Manager  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37243

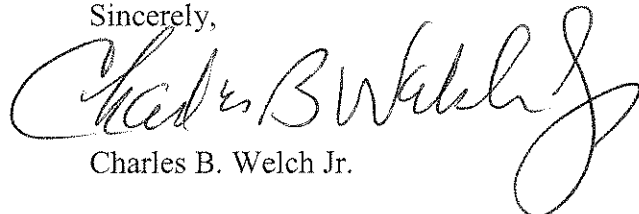
**RE: Amendment to EFCA Petition to Intervene, Docket No. 15-00093, Petition  
of Kingsport Power Company d/b/a AEP Appalachian Power General  
Rate Case**

Dear Ms. Dillon:

Please find enclosed for Docket Number 15-00093, an amendment to the *The Energy Freedom Coalition of America's* Petition to Intervene. This amendment addresses the request of the Hearing Officer at the October 28, 2015 Status Conference that EFCA provide a list of its members and requests clarification as to the scope of intervention granted to EFCA. This document was electronically filed on October 30, 2015 with the Tennessee Regulatory Authority.

Please contact me if you have any questions regarding this filing.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles B. Welch Jr.", with a large, stylized flourish at the end.

Charles B. Welch Jr.

Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

**IN RE:**

**PETITION OF KINGSPORT POWER  
COMPANY d/b/a AEP APPALACHIAN  
POWER GENERAL RATE CASE**

**DOCKET NO. 15-00093**

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**AMENDMENT TO  
THE ENERGY FREEDOM COALITION OF AMERICA  
PETITION TO INTERVENE**

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The Energy Freedom Coalition of America, LLC (EFCA) submits the following amendment and request for clarification following the October 28th Status Conference for the above referenced proceeding.

1. In response to the Hearing Officer's request for a list of EFCA members:

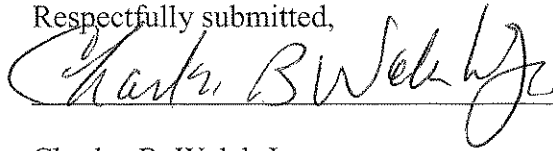
EFCA, a Delaware Limited Liability Company, is an organization that seeks to promote public awareness of the benefits of solar and alternative energy through public advocacy. EFCA membership includes SolarCity Corporation, Silevo Solar, and Zep Solar.

2. Clarification on the scope of intervention granted to EFCA:

At the Status Conference the Hearing Officer indicated that the scope of EFCA's intervention may be limited to net metering issues. EFCA would like to clarify what that scope entails. EFCA's interests are directly affected by any proposed changes to the net metering tariff, as well as by any cost of service or rate design proposals from Kingsport Power that seek to distinguish between customer generators (i.e., customers with

distributed energy resources) and non-generating customers. As stated in EFCA's Petition to Intervene, EFCA members have a material interest in expanding the rooftop solar industry and preserving their right to contract and do business with customers in the Kingsport Power service territory through non-discriminatory net metering service. Cost of service and rate design proposals from Kingsport Power could lead to additional fees and charges on utility customers installing customer-sited distributed energy resources. The Tennessee Regulatory Authority's disposition of these cost of service and rate design issues, in addition to the issue of the net metering tariffs, therefore directly affect the interest of EFCA members.

Respectfully submitted,



Charles B. Welch Jr.

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Attorney for the Energy Freedom Coalition  
of America

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served via electronic or first-class mail to all parties of record in this proceeding on October 30, 2015.