

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

IN RE:)
)
PETITION OF KINGSFORT POWER)
COMPANY d/b/a AEP APPALACHIAN)
POWER, GENERAL RATE CASE) **DOCKET NO. 16-00001**

PETITION TO INTERVENE

Pursuant to T.C.A. § 4-5-310(a), The Alliance for Solar Choice (“TASC”) 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.”

TASC leads advocacy across the country for the rooftop solar industry. TASC’s members include Demeter Power, Geostellar, Inc., LGCY Power, REPOWER by Solar Universe, Sunrun, SunTime Energy, and Lightwave Solar Electric, LLC. The members of TASC include some of the nation's largest providers of rooftop solar panels. One TASC member, Lightwave, is located in Tennessee and offers rooftop solar service to customers of the Petitioner, the Kingsport Power Company.

TASC was formed on the belief that consumers should have the option to switch to onsite solar power for at least a portion of their energy supply. TASC is committed to defending policies, such as net metering, that provide fair credit to residents, businesses, churches, schools, and public agencies when their rooftop solar systems export power to a utility’s grid. A lack of fair crediting policies and rate structures is a major barrier to entry for solar companies that wish to offer services to customers of any electric utility.

In this rate case, Kingsport Power Company (“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 primarily to offset all or part of the

customer's own electricity requirements. As described in the pre-filed testimony of Kingsport witness, William Castle, Kingsport proposes to close its current net metering services to new customers at the end of 2016 and to offer a different service to customers with onsite generation beginning in 2017. The new tariff will require customers to begin paying a demand charge—which is not required by the existing tariff for residential customer—and will reduce the rate credited to customers for the electricity they supply to the grid. These changes erode the cost savings that prospective solar customers realize by installing onsite solar and will be detrimental to TASC members' ability to offer service to customers in the Kingsport service area.

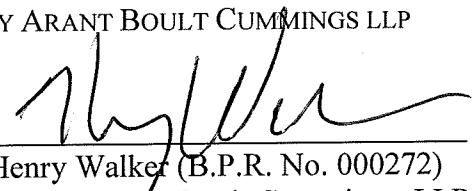
In light of the detrimental impact the proposed changes in Kingsport's net metering tariff would have on Kingsport's customers who wish to install and utilize onsite solar, TASC and its members have a direct financial interest in the outcome of this proceeding. Thus, the "legal rights, duties, privileges, immunities or other legal interest" of TASC and its members may be determined in this proceeding. Furthermore, the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing this intervention.

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

Respectfully submitted,

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By: _____


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CERTIFICATE OF SERVICE

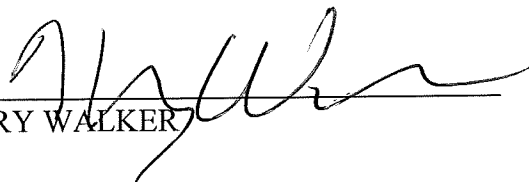
I hereby certify that on the 4th day of February, 2016, a copy of the foregoing document was served on the parties of record, via electronic email transmission and regular U.S. Mail, postage prepaid, addressed as follows:

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