

**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. 16-00001**

**PETITION TO INTERVENE**

Pursuant to T.C.A. § 4-5-310(a), the Tennessee Solar Energy Industries Association (“TenneSEIA”) 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.”

TenneSEIA is the Tennessee state chapter for the national Solar Industries Association and represents the interests of the solar energy industry in Tennessee. The mission of TenneSEIA is to make solar energy a mainstream energy source and realize the full potential of the solar industry in Tennessee. TenneSEIA’s members include companies that design, install, monitor and maintain solar panels on a customer’s roof. These companies are located in Tennessee and are currently serving and seeking to serve customers located in the service area of Kingsport Power. TenneSEIA also has one or more individual members who are retail customers of Kingsport Power.<sup>1</sup>

In this rate case, Kingsport proposes not only to increase its retail rates but also to make substantial changes to its “Net Metering Service Rider” tariff, which governs the rates, terms, and conditions applicable to qualifying customers who generate solar energy which is intended primarily to offset all or part of the customer’s own electricity requirements. As described in the

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<sup>1</sup> TenneSEIA will supplement this filing with a list of TenneSEIA members who have elected to participate in this intervention. For example, the membership of TenneSEIA includes law firms, investment firms, accounting firms and other vendors who provide services to the solar industry. Those service firms are not participating in this intervention.

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, net metering service to customers beginning in 2017. The new tariff will require customers to begin paying a demand charge, which is not required by the existing tariff, and will also reduce the rate paid (credited) for customer-generated electricity. These changes will have a direct, financial impact both on the members of TenneSEIA who sell rooftop solar services in the Kingsport area and on the members of TenneSEIA who are retail customers of Kingsport Power and currently use or may wish to use rooftop solar panels. The members of TenneSEIA who are retail customers of Kingsport also have a direct financial interest in whether or not Kingsport is allowed to increase its retail rates.

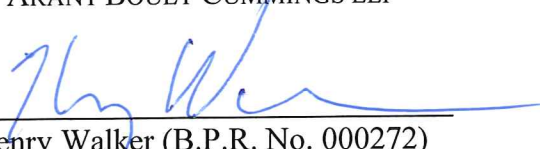
For these reasons, the “legal rights, duties, privileges, immunities or other legal interest” of TenneSEIA members may be determined in this proceeding. Furthermore, the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing this intervention.

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

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP

By: \_\_\_\_\_

  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 4<sup>th</sup> 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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