

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

2016 FEB -5 PM 1:00

T.R.A. DOCKET ROOM

IN RE:

PETITION OF KINGSPORT POWER COMPANY
d/b/a AEP APPALACHIAN POWER
GENERAL RATE CASE AND MOTION FOR
PROTECTIVE ORDER

DOCKET NO. 16-00001

**RESPONSE OF KINGSPORT POWER COMPANY TO MOTION OF CAPD FOR
LEAVE TO FILE MORE THAN FORTY DISCOVERY REQUESTS**

Comes Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power ("KgPCo"), and responds to the Motion of the CAPD for leave to file more than forty (40) discovery requests:

KgPCo does not oppose the Motion, assuming it applies only to the First Discovery Requests already served. That is, the CAPD should be limited to the 207+ requests already served.

If the eventual procedural schedule permits a second round of discovery requests by the CAPD, KgPCo opposes the Motion as the current 207+ discovery requests are more than sufficient, and adopts, by reference, arguments made in KgPCo's Motion of Petitioner to Adopt Procedural Schedule, filed concurrently with this Response.

Respectfully submitted,

**KINGSPORT POWER COMPANY d/b/a AEP
APPALACHIAN POWER**

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CERTIFICATE OF SERVICE

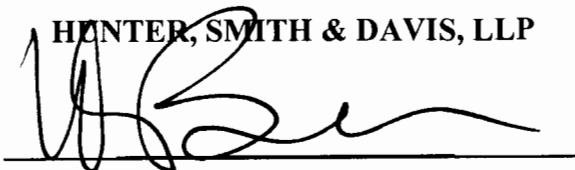
The undersigned hereby certifies that a true and exact copy of the foregoing **RESPONSE OF KINGSFORT POWER COMPANY TO MOTION OF CAPD FOR LEAVE TO FILE MORE THAN FORTY DISCOVERY REQUESTS** has been served upon the following by emailing a true and accurate copy on this the 4th day of February, 2016:

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