

**IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE**

IN RE:)	
)	
PETITION OF KINGSPORT POWER)	
COMPANY d/b/a AEP APPALACHIAN)	DOCKET NO. 16-00001
POWER GENERAL RATE CASE AND)	
MOTION FOR PROTECTIVE ORDER)	

**CONSUMER ADVOCATE'S RESPONSE
TO REQUEST OF PETITIONER REGARDING DATE FOR FILING
OF INTERVENOR'S TESTIMONY**

The Consumer Protection and Advocate Division of the Office of the Attorney General ("Consumer Advocate"), respectfully responds to the request of Kingsport Power Company d/b/a AEP Appalachian Power ("Kingsport Power" or "Petitioner") that the deadline for the filing of Intervenor's Pre-Filed Testimony be set for June 29, 2016, instead of the date set by the Hearing Officer at the Status Conference held on February 18, 2016.

Procedurally, the Hearing Officer set two dates at the Status Conference -- the date that Intervenor's Pre-Filed Testimony would be due (July 6, 2016) and the date that Kingsport Power's Rebuttal Testimony would be due (July 27, 2016) -- and requested that the Parties work on a proposed procedural schedule that takes into account those dates. Shortly after the Status Conference, Kingsport Power requested that the Parties agree to change one of the two dates that the Hearing Officer had set -- the date that Intervenor's Pre-Filed Testimony would be due -- to June 29, 2016. When the Consumer Advocate and another intervenor did not acquiesce, Kingsport filed its request asking to change a date set by the Hearing Officer and has essentially cut off the discussions among the Parties on a procedural schedule that the Hearing Officer had requested.

Kingsport Power's request comes against the backdrop of an already tight procedural schedule in this Docket – and fails to reflect the significant additional amount of time apparently given to Kingsport to respond to the Consumer Advocate's first round of discovery. Kingsport Power's request essentially seeks to build on its success in apparently getting more time to respond to the Consumer Advocate's discovery requests by shortening the already severely limited amount of time that the Consumer Advocate has for discovery, the analysis of that discovery, and the preparation of testimony by the Consumer Advocate's witnesses.

WHEREFORE, the Consumer Advocate respectfully asks that the Hearing Officer deny Kingsport Power's request to re-set the date on which Intervenor's Pre-Filed Testimony is due. Further, since Kingsport does not appear to be willing to discuss a proposed procedural schedule with the Parties, the Consumer Advocate respectfully requests that the Hearing Office set a procedural schedule as soon as practicable.

RESPECTFULLY SUBMITTED,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

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This the 22nd day of February, 2016.


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