BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

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

RESPONSE OF TENNESEIA AND TASC TO FEBRUARY 19, 2016 MOTION OF KINGSPORT POWER

At the conclusion of the pre-hearing conference on February 18, 2016, the Hearing Officer stated she will shortly issue a procedural schedule but invited the parties to continue trying to reach agreement. Counsel for TenneSEIA and TASC did not understand the Hearing Officer's comments as inviting or allowing further argument about one party's preferences, at least not until after the Hearing Officer has decided upon a new schedule.

Counsel joins with the Consumer Advocate in urging the Hearing Officer to disregard the motion filed by Kingsport Power the day after the conference and issue a proposed schedule based on the filings and arguments previously made. Following that, the parties should have an opportunity to request or negotiate adjustments in the schedule.

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP

By:

Henry Walker (B.P.R. No. 000272) Bradley Arant Boult Cummings, LLP

1600 Division Street, Suite 700

Nashville, TN 37203 Phone: 615-252-2363

Email: hwalker@babc.com

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd 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:

William K. Castle
Director, Regulatory Services VA/TN
Three James Center
1051 E. Cary Street, Suite 1100
Richmond, VA 23219-4029
wkcastle@aep.com

James R. Bacha, Esq.
Hector Garcia, Esq.
American Electric Power Service Corporation
One Riverside Plaza
P.O. Box 16637
Columbus, OH 43216
jrbacha@aep.com
hgarcia1@aep.com

William C. Bovender, Esq. Hunter, Smith & Davis, LLP 1212 N. Eastman Road P.O. Box 3740 Kingsport, TN 37664 bovender@hsdlaw.com

Michael J. Quinan, Esq. Christian & Barton, LLP 909 East Main Street, Suite 1200 Richmond, VA 23219 mquinan@cblaw.com

Beren Argetsinger 401 Harrison Oaks Blvd., Suite 100 Cary, NC 27513 bargetsinger@kfwlaw.com Wayne Irwin
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202-0207
wayne.irwin@ag.tn.gov

Charles B. Welch, Jr.
Farris Bobango, PLC
Bank of America Plaza
414 Union Street, Suite 1105
Nashville, TN 37219
cwelch@farris-law.com

Joseph B. Harvey, Esq. Hunter, Smith & Davis, LLP 1212 N. Eastman Road P.O. Box 3740 Kingsport, TN 37664 jharvey@hsdlaw.com

James M. Van Nostrand 275 Orchard Drive Pittsburgh, PA 15228 jvannostrand@eq-research.com

HENRY WALKER