



CHRISTIAN & BARTON, LLP  
ATTORNEYS AT LAW

MICHAEL J. QUINAN  
Direct Dial: 804.697.4149  
Direct Fax: 804.697.6149  
E-mail: mquinan@cblaw.com

March 11, 2016

**via E-MAIL and Overnight Courier**

Chairman, Tennessee Regulatory Authority  
c/o Sharla Dillon  
Dockets and Records Manager  
502 Deaderick St.  
Nashville, TN 37243

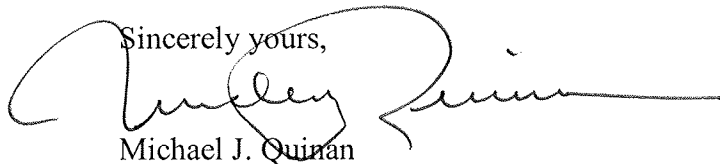
In Re: Petition of Kingsport Power Company  
d/b/a AEP Appalachian Power  
General Rate Case  
Docket No. 16-00001

Dear Ms. Dillon:

Enclosed please find an original and four copies of East Tennessee Energy Consumers Response to the Consumer Protection and Advocate Division's Motion to Compel in the above referenced docket.

Thank you for your kind attention to this request.

Sincerely yours,



Michael J. Quinan

MJQ  
Enclosure

cc: Ms. Monica Smith-Ashford, Hearing Officer  
Certificate of Service

**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**

**EAST TENNESSEE ENERGY CONSUMERS' RESPONSE TO  
THE CONSUMER PROTECTION AND ADVOCATE DIVISION'S  
MOTION TO COMPEL KINGSPORT POWER COMPANY  
TO ANSWER ITS FIRST ROUND DISCOVERY REQUESTS**

Comes East Tennessee Energy Consumers ("ETEC"), by counsel, pursuant to the Order Establishing Procedural Schedule of February 24, 2016 and the Notice of Status Conference of March 7, 2016 in this matter, and responds as follows to the Motion to Compel filed by the Consumer Protection and Advocate's Division ("CPAD"):

1. CPAD has filed its Motion to Compel in an effort to require Kingsport Power Company ("KgPCo" or "Company") to provide further response to CPAD's first round of discovery requests.

2. ETEC is a group of KgPCo's largest Industrial Power customers. ETEC's members include Air Products and Chemicals, Inc., Domtar Paper Company, Inc., Eastman Chemical Company and Wellmont Health System. ETEC is an intervenor in this matter.

3. One of the requests to which CPAD would like to compel a further response

is CPAD Discovery Request No. 25. By that request, CPAD seeks certain detailed information from KgPCo regarding the Company's 25 largest customers, including:

- a. The contact name and phone number of the individual at each company that is most familiar with their electric usage
- b. All correspondence with these customers from January 1, 2009 through December 2015 regarding historical, projected or anticipated changes to their electric usage.
- c. The monthly delivered kWh at each meter point for each customer from January 2009 through December 2015.
- d. A copy of each customer's monthly bill from January 2014 through December 2015.

4. ETEC's members will be among KgPCo's 25 largest customers subject to CPAD Request No. 25.

5. ETEC object's to CPAD Request No. 25, and requests that the Authority deny CPAD's Motion to Compel any further response by KgPCo to CPAD Request No. 25.

6. CPAD Request No 25 seeks information which is irrelevant to, and beyond the proper scope of discovery in, the Company's pending application for a rate increase. The information sought by the CPAD can be provided on a class-wide basis, or some basis other than a detailed customer-specific basis.

7. The correspondence, usage and billing details sought by CPAD relating to

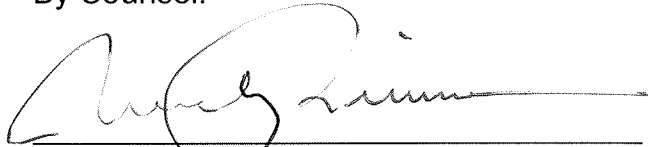
ETEC's members and other large customers of KgPCo constitute and include confidential, highly sensitive and proprietary business information, the disclosure of which could result in substantial damages and business losses. The Protective Order previously issued in this matter does not provide sufficient protection against such damages and losses.

8. ETEC hereby requests that any contact with its members by CPAD or other participants in this proceeding be initiated through ETEC's counsel, and objects to the names of, and contact information for, individuals employed by its members being obtained from KgPCo through discovery.

For the foregoing reasons, ETEC requests that the Hearing Officer deny CPAD's Motion to Compel Kingsport to provide any further response to CPAD Discovery Request No. 25.

Respectfully submitted this 11th day of March, 2016.

By Counsel:

A handwritten signature in black ink, appearing to read "Michael J. Quinan", is written over a horizontal line.

Michael J. Quinan, Esq.  
(Tenn. Sup. Ct. No. 11104)  
CHRISTIAN & BARTON, LLP  
909 East Main St., Suite 1200  
Richmond, VA 23219  
(804) 697-4149 (Telephone)  
(804) 697-6149 (Fax)

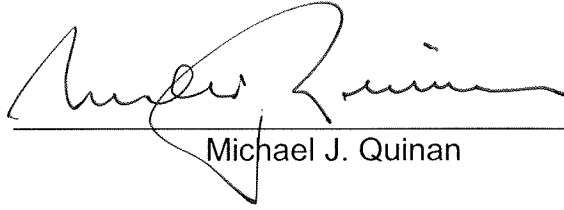
Counsel for East Tennessee Energy  
Consumers

## CERTIFICATE OF SERVICE

I hereby certify that, on March 11, 2016, the foregoing pleading was served by hand-delivery, facsimile, overnight delivery service, or first class mail, postage prepaid, to all parties of record at their addresses shown below

William C. Bovender Joseph B. Harvey HUNTER, SMITH & DAVIS, LLP P.O. Box 3704 Kingsport, TN 37664	William K. Castle Director, Regulatory Services VA/TN Appalachian Power Company Three James Center Suite 1100, 1051 E. Cary St. Richmond, VA 23219-4029
James R. Bacha Hector Garcia American Electric Power Service Corp. P.O. Box 16637 Columbus, OH 43216	David Foster Chief, Utilities Division Tennessee Regulatory Authority 502 Deaderick St. Nashville, TN 37243
Kelly Cashman-Grams General Counsel Tennessee Regulatory Authority 502 Deaderick St. Nashville, TN 37243	Monica Smith-Ashford Hearing Officer Tennessee Regulatory Authority 502 Deaderick St. Nashville, TN 37243
Herbert H. Slatery, III Attorney General and Reporter State Of Tennessee 425 Fifth Ave., North P.O. Box 20207 Nashville, TN 37202-0207	Wayne M. Irvin Assistant Attorneys General Consumer Advocate and Protection Div. 425 Fifth Ave., North P.O. Box 20207 Nashville, TN 37202-0207
Henry Walker Bradley Arant Boult Cummings LLP 1600 Division Street, Suite 700 Nashville, TN 37203	Charles B. Welch, Jr. Farris Bobango, PLC Bank of America Plaza 414 Union Street, Suite 1105 Nashville, TN 37219
James M. Van Nostrand 275 Orchard Dr. Pittsburgh, PA 15228	Beren Argetsinger 401 Harrison Oaks Blvd, Suite 100 Cary, NC 27513

This 11th day of March, 2016.



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Michael J. Quinan

#1912460