S. Morris Hadden William C. Bovender William C. Argabrite Jimmie Carpenter Miller Mark S. Dessauer Gregory K. Haden Michael L. Forrester Stephen M. Darden Edward J. Wehh. Jr. James N. L. Humphreys Suzanne Sweet Cook Michael S. Lattier Scott T. Powers

#### Respond to:

Kingsport Office Joseph B. Harvey 423-378-8854 jharvey@hsdlaw.com

KPOW.92585

# HUNTER SMITH DAVIS SINCE 1916 RECEIVED Leslie Ter Christoph

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2016 MAY -5 Ehad W. Whitfield

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Jeannette Smith Tysinger\*

\*Of Counsel

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May 4, 2016

### **VIA EMAIL & OVERNIGHT DELIVERY:**

Herbert Hilliard, Chairman c/o Sharla Dillon, Dockets & Records Manager Tennessee Regulatory Authority 502 Deaderick Street, 4th Floor Nashville, TN 37243

Petition of Kingsport Power Company d/b/a AEP Appalachian Power General Rate Case

TRA Docket No.: 16-00001

#### Dear Chairman Hilliard:

Re:

In accordance with discussions with the Consumer Advocate and the Company's letter to the TRA dated April 28, 2016, enclosed for filing in the above-referenced matter are the Company's supplemental responses to requests 2-021 through 2-038 of the CPAD's second round of discovery requests. The Company's additional responses may be in the form of a disk and/or paper documents.

As indicated in the Company's April 28, 2016 letter, these supplemental responses and the exhibits thereto were supplied to the CPAD via email today before the close of business. Having provided the enclosed supplemental responses, in addition to the additional information already provided, we are unaware of any disputes related to the Company's responses to the CPAD's second round of discovery requests.

Sharla Dillon, Docket Manager Page 2 March 23, 2016

Should there be any questions, please contact the writer.

Very sincerely yours,

HUNTER, SMITHE DAVIS,

oseph B. Harre

## Enclosures

c: Monica L. Smith-Ashford, Esq.
David Foster
Charles Welch, Jr., Esq.
Henry Walker, Esq.
Michael J. Quinan, Esq.
Wayne Irvin, Esq.
James R. Bacha, Esq.
William Castle
Larry Foust
William C. Bovender, Esq.

Data Requests and Requests for the Production of Documents by the Consumer Protection And Advocate Division (Second Set) To Kingsport Power Company

## **Data Request CPAD 2-021:**

Refer to the Attachment provided in response to CPADI-9 (Compelled). Specifically refer to the "RS-EMP" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-021:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## Supplemental Response:

As a result of discussions with the CPAD, the Company is providing CPAD 2-21 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "RS EMP", row 38, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

Please note that in that tab, the rows for Rate 18 and Rate 51 will need to be added together to tie to the totals reflected on row 38.

### For example for January 2014:

Rate 18	42,838
Rate 51	520
Total RS EMP 018 + 051	43,358

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "RS EMP", row 38, the amount is shown as a negative number.

Data Requests and Requests for the Production
of Documents by the
Consumer Protection And Advocate Division (Second Set)
To Kingsport Power Company

### Data Request CPAD 2-022:

Refer to the Attachment provided in response to CPAD 1-9 (Compelled). Specifically refer to the "RS-TOD" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-022:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## Supplemental Response:

As a result of discussions with the CPAD, the Company is providing CPAD 2-22 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "RS-TOD", row 38, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, the Rate 30 January weather adjustment of 1,205 kWh is reflected in the January column of row 38.

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "RS-TOD", row 38, the amount is shown as a negative number.

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Data Requests and Requests for the Production of Documents by the Consumer Protection And Advocate Division (Second Set) To Kingsport Power Company

### Data Request CPAD 2-023:

Refer to the Attachment provided in response to CPADI-9 (Compelled). Specifically refer to the "SGS-FIXED" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-023:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## Supplemental Response:

As a result of discussions with the CPAD, the Company is providing CPAD 2-23 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "SGS-FIXED", row 38, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, the Rate 231 January weather adjustment of 133,619 kWh is reflected in the January column of row 38.

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "SGS-FIXED", row 38, the amount is shown as a negative number.

Data Requests and Requests for the Production of Documents by the Consumer Protection And Advocate Division (Second Set) To Kingsport Power Company

## Data Request CPAD 2-024:

Refer to the Attachment provided in response to CPAD 1-9 (Compelled). Specifically refer to the "SGS-MEAS" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-024:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## **Supplemental Response:**

See the Company's response to CPAD 2-23. As a result of discussions with the CPAD, the Company is providing CPAD 2-23 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "SGS-MEAS", row 38, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, the Rate 232 January weather adjustment of 15,444 kWh is reflected in the January column of row 38.

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "SGS-MEAS", row 38, the amount is shown as a negative number.

Data Requests and Requests for the Production of Documents by the Consumer Protection And Advocate Division (Second Set) To Kingsport Power Company

### Data Request CPAD 2-025:

Refer to the Attachment provided in response to CPAD1-9 (Compelled). Specifically refer to the "SGS-NM" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

### Response CPAD 2-025:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## Supplemental Response:

See the Company's response to CPAD 2-23. As a result of discussions with the CPAD, the Company is providing CPAD 2-23 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "SGS-NM", row 38, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, the Rate 233 January weather adjustment of 890 kWh is reflected in the January column of row 38.

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "SGS-NM", row 38, the amount is shown as a negative number.

Data Requests and Requests for the Production of Documents by the Consumer Protection And Advocate Division (Second Set) To Kingsport Power Company

## Data Request CPAD 2-026:

Refer to the Attachment provided in response to CPADI-9 (Compelled). Specifically refer to the "MGS-SEC" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-026:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## **Supplemental Response:**

As a result of discussions with the CPAD, the Company is providing CPAD 2-26 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "MGS-SEC", row 45, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, the Rate 235 January weather adjustment of 647,513 kWh is reflected in the January column of row 45.

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "MGS-SEC", row 45, the amount is shown as a negative number.

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Data Requests and Requests for the Production of Documents by the **Consumer Protection And Advocate Division (Second Set)** To Kingsport Power Company

## Data Request CPAD 2-027:

Refer to the Attachment provided in response to CPADI-9 (Compelled). Specifically refer to the "MGS-TOD" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-027:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## Supplemental Response:

As a result of discussions with the CPAD, the Company is providing CPAD 2-27 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "MGS-TOD", row 38, is found in TRA Staff Informal 1-024 DRB & TAC - Workpaper 1 - KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, the Rate 229 January weather adjustment of 2,644 kWh is reflected in the January column of row 38.

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "MGS-TOD", row 38, the amount is shown as a negative number.

Data Requests and Requests for the Production of Documents by the Consumer Protection And Advocate Division (Second Set) To Kingsport Power Company

## Data Request CPAD 2-028:

Refer to the Attachment provided in response to CPADI-9 (Compelled). Specifically refer to the "MGS-PRI" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-028:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

### Supplemental Response:

See the Company's response to CPAD 2-26. As a result of discussions with the CPAD, the Company is providing CPAD 2-26 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "MGS-PRI", row 41, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, there is no weather adjustment kWh shown for Rate 237 for any month in the 2014 test year.

Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "MGS-PRI", row 41, weather adjustment kwh are shown as "-" or zero.

Data Requests and Requests for the Production of Documents by the Consumer Protection And Advocate Division (Second Set) To Kingsport Power Company

## Data Request CPAD 2-029:

Refer to the Attachment provided in response to CPADI-9 (Compelled). Specifically refer to the "LGS-SEC" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-029:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## **Supplemental Response:**

As a result of discussions with the CPAD, the Company is providing CPAD 2-29 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "LGS-SEC", row 46, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

Please note that in that tab, the rows for Rate 240 and Rate 242 will need to be added together to tie to the totals reflected on row 46.

For example for January 2014:

Rate 240 1,057,077 Rate 242 35,747 Total LGS SEC 240 + 242 1,092,823

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "LGS-SEC", row 46, the amount is shown as a negative number.

DOCKET NO. 16-00001

Data Requests and Requests for the Production of Documents by the Consumer Protection And Advocate Division (Second Set) To Kingsport Power Company

## Data Request CPAD 2-030:

Refer to the Attachment provided in response to CPADI-9 (Compelled). Specifically refer to the "LGS-PRI" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

### Response CPAD 2-030:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## **Supplemental Response:**

As a result of discussions with the CPAD, the Company is providing CPAD 2-30 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "LGS-PRI", row 46, is found in TRA Staff Informal 1-024 DRB & TAC - Workpaper 1 - KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, the Rate 244 January weather adjustment of 62,538 kWh is reflected in the January column of row 46.

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "LGS PRI", row 46, the amount is shown as a negative number.

**Data Requests and Requests for the Production** of Documents by the Consumer Protection And Advocate Division (Second Set) To Kingsport Power Company

## Data Request CPAD 2-031:

Refer to the Attachment provided in response to CPADI-9 (Compelled). Specifically refer to the "IP-PRI" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-031:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

### Supplemental Response:

As a result of discussions with the CPAD, the Company is providing CPAD 2-31 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC - Workpaper 1 -KgPCo Tariff Ratio File.xlsx, Tab "IP-PRI", row 46, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, the Rate 322 January weather adjustment of 165,053 kWh is reflected in the January column of row 46.

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "IP-PRI", row 46, the amount is shown as a negative number.

Data Requests and Requests for the Production of Documents by the Consumer Protection And Advocate Division (Second Set) To Kingsport Power Company

### Data Request CPAD 2-032:

Refer to the Attachment provided in response to CPADI-9 (Compelled). Specifically refer to the "IP-TRAN" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-032:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## **Supplemental Response:**

Please see the Company's response to CPAD 2-31. As a result of discussions with the CPAD, the Company is providing CPAD 2-31 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "IP-TRAN", row 50, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, there is no weather adjustment kWh shown for Rate 324 for any month in the 2014 test year.

Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "IP-TRAN", row 50, weather adjustment kwh are shown as "blank" or zero.

Data Requests and Requests for the Production of Documents by the

Consumer Protection And Advocate Division (Second Set)
To Kingsport Power Company

## Data Request CPAD 2-033:

Refer to the Attachment provided in response to CPADI-9 (Compelled). Specifically refer to the "EHG" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-033:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

### **Supplemental Response:**

As a result of discussions with the CPAD, the Company is providing CPAD 2-33 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "EHG", row 37, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

Please note that in that tab, the rows for Rate 208 and Rate 209 will need to be added together to tie to the totals reflected on row 37.

## For example for January 2014:

Rate 208	163,931
Rate 209	48,906
Total FHG 208 + 209	212.837

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "EHG", row 37, the amount is shown as a negative number.

**DOCKET NO. 16-00001** 

Data Requests and Requests for the Production of Documents by the Consumer Protection And Advocate Division (Second Set) To Kingsport Power Company

## Data Request CPAD 2-034:

Refer to the Attachment provided in response to CPAD1 -9 (Compelled). Specifically refer to the "CS" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

### Response CPAD 2-034:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## Supplemental Response:

As a result of discussions with the CPAD, the Company is providing CPAD 2-34 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "CS", row 34, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, the Rate 221 January weather adjustment of 80,486 kWh is reflected in the January column of row 34.

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "CS", row 34, the amount is shown as a negative number.

Data Requests and Requests for the Production

of Documents by the

Consumer Protection And Advocate Division (Second Set)

To Kingsport Power Company

## Data Request CPAD 2-035:

Refer to the Attachment provided in response to CPADI-9 (Compelled). Specifically refer to the "PS 640" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-035:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## **Supplemental Response:**

As a result of discussions with the CPAD, the Company is providing CPAD 2-35 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "PS 640", row 43, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, the Rate 640 January weather adjustment of 91,100 kWh is reflected in the January column of row 43.

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "PS 640", row 43, the amount is shown as a negative number.

Data Requests and Requests for the Production of Documents by the

Consumer Protection And Advocate Division (Second Set)
To Kingsport Power Company

## Data Request CPAD 2-036:

Refer to the Attachment provided in response to CPAD I-9 (Compelled). Specifically refer to the "PS 641" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-036:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## Supplemental Response:

See the Company's response to CPAD 2-35. As a result of discussions with the CPAD, the Company is providing CPAD 2-35 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "PS 641", row 43, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, the Rate 641 January weather adjustment of 11,771 kWh is reflected in the January column of row 43.

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "PS 641", row 43, the amount is shown as a negative number.

DOCKET NO. 16-00001

Data Requests and Requests for the Production of Documents by the Consumer Protection And Advocate Division (Second Set) To Kingsport Power Company

## **Data Request CPAD 2-037:**

Refer to the Attachment provided in response to CPADI-9 (Compelled). Specifically refer to the "PS 642" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-037:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## Supplemental Response:

Please see the Company's response to CPAD 2-35. As a result of discussions with the CPAD, the Company is providing CPAD 2-35 Supplemental Attachment 1. The source of this data is the Utilities International ("UI") software, which is used to aggregate data from the Company's billing system.

In addition, weather adjustment kWh from TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "PS 642", row 43, is found in TRA Staff Informal 1-024 DRB & TAC – Workpaper 1 – KgPCo Weather Impacts & Billing Determinants.xls, Tab "Weather by Rate".

For example, in that tab, the Rate 642 January weather adjustment of 297,469 kWh is reflected in the January column of row 43.

In the above example, the impact of the January weather adjustment caused kWh to decrease. Therefore, in TRA Staff Informal 1-024 TAC – Workpaper 1 – KgPCo Tariff Ratio File.xlsx, Tab "PS 642", row 43, the amount is shown as a negative number.

Data Requests and Requests for the Production of Documents by the Consumer Protection And Advocate Division (Second Set) To Kingsport Power Company

## Data Request CPAD 2-038:

Refer to the Attachment provided in response to CPADI-9 (Compelled). Specifically refer to the "OL" tab of this spreadsheet. Please provide the source and support for the billing determinants included in Column 1 of this spreadsheet.

## Response CPAD 2-038:

See the Company's response to CPAD 2-020. Refer to the respective tab in the referenced attachment.

## **Supplemental Response:**

The source of the OL billing determinants is the monthly Billed and Accrued Tariff Summaries which have been provided as CPAD 1-020, Attachment 2.

Please note that there is no weather adjustment applicable to outdoor lights (OL).