

# HUNTER·SMITH·DAVIS

SINCE 1916

LLP

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. Webb, Jr.  
James N. L. Humphreys  
Suzanne Sweet Cook  
Michael S. Lattier  
Scott T. Powers

**Kingsport Office**  
1212 North Eastman Road  
P.O. Box 3740  
Kingsport, TN 37664  
Phone (423) 378-8800  
Fax (423) 378-8801

**Johnson City Office**  
100 Med Tech Parkway  
Suite 110  
Johnson City, TN 37604  
Phone (423) 283-6300  
Fax (423) 283-6301

Leslie Tentler Ridings  
Christopher D. Owens  
Chad W. Whitfield  
Jason A. Creech  
Meredith Bates Humbert  
Joseph B. Harvey  
Rachel Ralston Mancl  
Caroline Ross Williams  
Marcy E. Walker  
Karen L. Kane  
Teresa Mahan Lesnak \*  
Michael A. Eastridge \*  
Jeannette Smith Tysinger\*

*\*Of Counsel*

[www.hsdllaw.com](http://www.hsdllaw.com)

**Respond to:**  
**Kingsport Office**  
William C. Bovender  
423-378-8858  
[bovender@hsdlaw.com](mailto:bovender@hsdlaw.com)

KPOW.92585

June 21, 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

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

Dear Chairman Hilliard:

We enclosed herewith a Motion for Admission Pro Hac Vice, submitted on behalf of Noelle J. Coates, for filing in the captioned docket. The originals and additional copies are being sent via FedEx for overnight delivery.

Should there be any questions, please contact the writer.

Very sincerely yours,

**HUNTER, SMITH & DAVIS, LLP**

  
William C. Bovender

Enclosure

Sharla Dillon, Docket Manager

Page 2

June 21, 2016

c: Monica L. Smith-Ashford, Esq. *(via email)*  
David Foster *(via email)*  
Charles Welch, Jr., Esq. *(via email)*  
Henry Walker, Esq. *(via email)*  
Thad B. Culley, Esq. *(via email)*  
Michael J. Quinan, Esq. *(via email)*  
Wayne Irvin, Esq. *(via email)*  
James R. Bacha, Esq. *(via email)*  
Hector Garcia, Esq. *(via email)*  
Noelle J. Coates, Esq. *(via email)*  
William Castle *(via email)*  
Larry Foust *(via email)*  
Joseph B. Harvey, Esq. *(via email)*  
Board of Professional Responsibility of the Supreme Court of TN *(via US Mail)*

**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**

**MOTION FOR ADMISSION PRO HAC VICE**

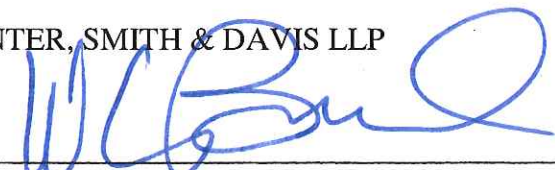
Noelle Jean Coates, an attorney licensed and in good standing in Virginia, moves for admission pro hac vice in order to represent Kingsport Power Company, a party in the above-captioned proceeding.

Pursuant to TRA Rule 1220-1-2-.04(7) and Tennessee Supreme Court Rule 19, movant has attached an affidavit containing the information required by Supreme Court Rule 19(d). Notice of this motion has been served on the parties to this proceeding as well as the Board of Professional Responsibility.

Based on the movant's compliance with the applicable rules for admission pro hac vice, the movant asks that this motion be granted.

  
\_\_\_\_\_  
Noelle J. Coates  
Attorney for Kingsport Power Company

HUNTER, SMITH & DAVIS LLP

By:   
\_\_\_\_\_  
William C. Bovender, Esq. (BPR #000751)  
Hunter, Smith & Davis, LLP  
1212 N. Eastman Road  
P. O. Box 3740  
Kingsport, TN 37664  
(423) 378-8858; Fax (423) 378-8801  
Email: [bovender@hsdlaw.com](mailto:bovender@hsdlaw.com)

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing **MOTION FOR ADMISSION PROF HAC VICE** has been served upon the following by emailing a true and accurate copy on this the 21 day of June, 2016:

Monica L. Smith-Ashford, Counsel  
Tennessee Regulatory Authority  
502 Deaderick Street, 4th Floor  
Nashville, TN 37243  
Email: [monica.smith-ashford@tn.gov](mailto:monica.smith-ashford@tn.gov)

David Foster, Chief - Utilities Division  
Tennessee Regulatory Authority  
502 Deaderick Street, 4th Floor  
Nashville, TN 37243  
Email: [David.Foster@tn.gov](mailto:David.Foster@tn.gov)

Wayne M. Irvin (BPR #30946)  
Assistant Attorney General  
Consumer Advocate and Protection Division  
Office of the Tennessee Attorney General  
P.O. Box 20207  
Nashville, TN 37202-0207  
E-mail: [wayne.irvin@ag.tn.gov](mailto:wayne.irvin@ag.tn.gov)

Henry Walker, Esq. (BPR #000272)  
Bradley Arant Boult Cummings, LLP  
1600 Division St., Ste 700  
Nashville, TN 37203  
Email: [hwalker@babco.com](mailto:hwalker@babco.com)  
Counsel for TenneSEIA and TASC

James R. Bacha, Esq.  
Hector Garcia, Esq.  
American Electric Power Service Corp.  
PO Box 16637  
Columbus, OH 43216  
Email: [jrbacha@aep.com](mailto:jrbacha@aep.com)  
Email: [hgarcia1@aep.com](mailto:hgarcia1@aep.com)

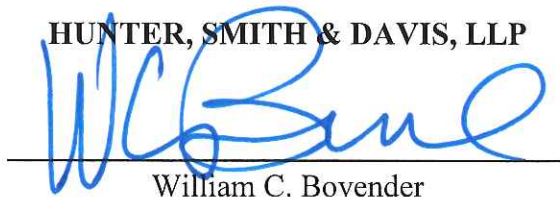
Michael J. Quinan, Esq. (BPR #11104)  
Christian & Barton, LLP  
909 East Main St., Ste 1200  
Richmond, VA 23219  
Email: [mquinan@cblaw.com](mailto:mquinan@cblaw.com)  
Counsel for East Tennessee Energy  
Consumers

Charles B. Welch, Jr., Esq. (BPR #5593)  
Farris Bobango, PLC  
Bank of America Plaza  
414 Union St., Ste 1105  
Nashville, TN 37219  
Email: [cwelch@farris-law.com](mailto:cwelch@farris-law.com)  
Counsel for Energy Freedom Coalition of  
America, LLC

Thadeus B. Culley, Esq.  
Keyes, Fox & Wiedman, LLP  
401 Harrison Oaks Blvd., Suite 100  
Cary, NC 27513  
Email: [tculley@kfwlaw.com](mailto:tculley@kfwlaw.com)  
Counsel for TASC

Board of Professional Responsibility of  
The Supreme Court of Tennessee  
10 Cadillac Drive, #220  
Brentwood, TN 37027

HUNTER, SMITH & DAVIS, LLP



William C. Bovender



**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:**

**PETITION OF KINGSFORT POWER )  
COMPANY d/b/a AEP APPALACHIAN )  
POWER, GENERAL RATE CASE )**

**DOCKET NO. 16-00001**

**AFFIDAVIT FOR ADMISSION *PRO HAC VICE***

The undersigned, after having been duly sworn, takes oath and states as follows:

1. My full name is Noelle Jean Coates. I reside at 2 South 25<sup>th</sup> Street, Richmond, VA 23223. I am employed by American Electric Power Service Corporation (AEPSC), 1051 East Cary Street, Suite 1100, Richmond, VA 23219, phone (804) 698-5541. AEPSC and Kingsport Power Company are both subsidiaries of American Electric Power, Inc. (AEP).

2. I seek to appear in the case styled *Petition of Kingsport Power Company d/b/a/ AEP Appalachian Power, General Rate Case* (Docket No. 16-00001), before the Tennessee Regulatory Authority in Nashville, Tennessee. I intend to represent Kingsport Power Company, an affiliate of both AEPSC and AEP.

3. The jurisdictions in which I am licensed to practice law, with date(s) of admission, are as follows:

<u><b>Jurisdiction/Court</b></u>	<u><b>Date of Admission</b></u>	<u><b>Bar Number</b></u>
Commonwealth of Virginia	10/19/2006	73578
Florida (retirement requested earlier this year)	April 2011	90970

4. I am in good standing in all jurisdictions and Courts in which I am licensed to practice law.

5. I have never been admitted, nor have I sought to be admitted, *pro hac vice* in any trial or appellate court or administrative agency of Tennessee within the preceding three years.

6. I have never been denied admission *pro hac vice* nor had an admission *pro hac vice* revoked by any court in any jurisdiction.

7. I have never been disciplined nor sanctioned by the Board of Professional Responsibility of the Supreme Court of Tennessee, by any similar lawyer disciplinary agency in any jurisdiction, nor by any similar lawyer disciplinary authority.

8. No disciplinary action or investigation concerning my conduct is pending before the Board of Responsibility of the Supreme Court of Tennessee, before any similar lawyer disciplinary agency in any jurisdiction, or before any similar lawyer disciplinary authority.

9. I am familiar with the Tennessee Rules of Professional Conduct and the rules governing the proceedings of the court before which I seek to practice.

10. I consent to the disciplinary jurisdiction of the Board of Professional Responsibility of the Supreme Court of Tennessee and the Courts of Tennessee in any matter arising out of my conduct in this proceeding and I agree to be bound by the Tennessee Rules of Professional Conduct and any other rules of conduct applicable to lawyers generally admitted in Tennessee.

11. For the purpose of my participation in this case, I have associated with attorney William C. Bovender, Esq. (BPR #000751) who is licensed, in good standing, resides, and maintains a law office in the State of Tennessee. The business address for William C. Bovender is Hunter, Smith & Davis, LLP, 1212 N. Eastman Road, Kingsport, TN 37664

12. All fees required by Rule 19 of the Rules of the Supreme Court of the State of Tennessee in connection with the Motion for Admission will be paid.

13. I will cause to be served a Motion for Admission *pro hac vice* and all associated papers upon parties in the proceeding and upon the Board of Professional Responsibility of the Supreme Court of Tennessee.

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Noelle J. Coates

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24<sup>th</sup> day of May, 2016.

SWORN TO AND SUBSCRIBED before me this the 24<sup>th</sup> day of May, 2016.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: March 31, 2019



# Supreme Court of Virginia

AT RICHMOND

## Certificate

I, Patricia L. Harrington, Clerk of the Supreme Court of Virginia,  
do hereby certify that

NOELLE JEAN COATES

was admitted to practice as an attorney and counsellor at the bar of this Court on  
October 30, 2006.

I further certify that so far as the records of this office are  
concerned, NOELLE JEAN COATES is a member of the bar of this Court  
in good standing.

**Witness** my hand and seal of said Court

This 15th day of June

A.D. 2016

By: \_\_\_\_\_



*Deputy Clerk*



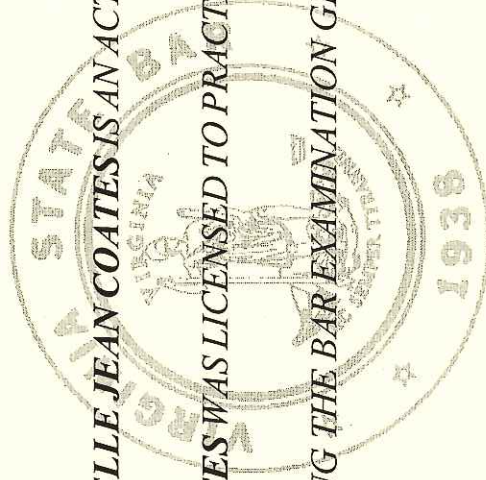
# VIRGINIA STATE BAR

## CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT NOELLE JEAN COATES IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING. MS. COATES WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON **OCTOBER 19, 2006**, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR

EXAMINERS.

Issued May 9, 2016



A handwritten signature in black ink, reading "Karen A. Gould".

KAREN A. GOULD  
EXECUTIVE DIRECTOR AND  
CHIEF OPERATING OFFICER

