

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

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

**RESPONSE OF THE SOLAR INTEVENORS TO DISCOVERY REQUESTS OF
KINGSPORT POWER COMPANY**

Attached are the responses of the Solar Intervenors to the discovery requests of Kingsport Power Company, issued July 8, 2016. Request No. 3 was answered by Steve Johnson of Lightwave Solar. The remaining requests were answered by Ms. Kimberly R. Sanders on behalf of The Alliance for Solar Choice.

REQUEST NO. 1:

Please provide Ms. Sanders' qualifications as an expert witness, including education and experience, particularly with respect to electric utility rate making.

RESPONSE NO. 1:

Please see attached resume of Kim Sanders.

KIM SANDERS

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(415) 580-6870 · ksanders@sunrun.com

WORK EXPERIENCE

SUNRUN, SAN FRANCISCO, CA

April 2013 – Present

Director, Public Policy

- Lead a team of Public Policy professionals that manage solar policy developments across 20 states.
- Directly managed over 15 regulatory proceedings and over 10 legislative campaigns spanning 8 states.
- Continuously monitor, discern business impact of, and develop advocacy strategy around regulatory, policy, and legislative developments affecting rooftop solar.
- Manage teams of attorneys, expert witnesses, and lobbyists to develop and pursue regulatory and legislative objectives.
- Collaborate with industry professionals on solar policy reforms nationwide.
- Promoted from Analyst to Director over a 3-year time period.

SUNRUN, SAN FRANCISCO, CA

January 2012 – April 2013

Inside Sales Associate

- Helped hundreds of homeowners save money on their electric bills by going solar.
- Served as a Sunrun ambassador to over a thousand potential solar customers.

UNITED STATES PEACE CORPS, ZÈ, BENIN

July 2009 – Sept. 2011

Natural Resource Advisor

- Facilitated construction of 25 latrines serving over 300 people.
- Installed hand-washing stations for use by 840 elementary school students and staff.
- Coordinated Take Our Daughters to Work Weekend, bringing 17 girls from rural villages in southern Benin to the capital to shadow professional female mentors at work.
- Facilitated 2 U.S. Senator visits to Zè that demonstrated Peace Corps' regional impact.
- Acted as a technical resource for environmental projects to new Peace Corps volunteers.

EDUCATION

UNIVERSITY of CALIFORNIA, LOS ANGELES

Sept. 2005 – June 2009

B.A. *cum laude*, in Global Studies and Environmental Systems and Society

Honors: Phi Beta Kappa, UCLA College Honors Program

Thesis on Human Vulnerability to Climate Change

REQUEST NO. 2:

Please provide a listing of all cases, including the docket number and state, where Ms. Sanders has testified. For any case in which the testimony is not readily available electronically on a website, please provide a copy.

RESPONSE NO. 2:

None.

REQUEST NO. 3:

Please identify the address of all customers of Lightwave in Tennessee, including any and all Lightwave customers in the Kingsport area.

RESPONSE NO. 3:

Lightwave is actively soliciting customers in the Kingsport service area and the number and addresses of the company's current customers is irrelevant to the issue of Kingsport's proposed changes to the net metering tariff. Nevertheless, without waiving this objection, Lightwave Solar currently serves four customers in the Kingsport service area; pursuant to Kingsport's net metering tariff. All four are residential customers.

Lightwave Solar declines to provide the addresses of those four customers and also declines to provide the addresses of the company's other customers in Tennessee. That information has no relevance to this case.

REQUEST NO. 4:

Refer to Ms. Sanders' testimony at page 4, lines 3-4, regarding demand rate options for residential customers. Please identify the 18 regulated utilities who offer a demand rate option for residential customers.

RESPONSE NO. 4:

The initial count of regulated utilities that offer demand charges mistakenly included a cooperative and political subdivisions that are not rate-regulated by a state regulatory authority. Ms. Sanders is aware of 11 rate-regulated utilities across 16 jurisdictions with optional residential demand charge tariffs:

Alabama Power
Alaska Electric Light and Power
Arizona Public Service
Black Hills Power (WY)
Black Hills Power (SD)
Dakota Electric Association
Dominion (NC)
Dominion (VA)
Duke Energy Carolinas (NC)
Duke Energy Carolinas (SC)
Georgia Power
Otter Tail Power Company (MN)
Otter Tail Power Company (ND)
Otter Tail Power Company (SD)
Westar Energy
Xcel Energy

REQUEST NO. 5:

Refer to Ms. Sanders' testimony at page 4, lines 11-13, regarding proposed mandatory demand rates for DG customers. Please provide all documents in Ms. Sanders' possession, custody or control regarding proposed mandatory demand rates for DG customers.

RESPONSE NO. 5:

TASC objects to this request for "all documents" in the "possession, custody or control" of the witness regarding "proposed mandatory demand rates" on the basis that this questions lacks specificity, is overbroad, vague and unduly burdensome. The request, if taken literally, seeks every textbook, article or even information available to Ms. Sanders from the Internet concerning this topic. However, without waiving these objections, TASC provides the following documents related to proposed mandatory demand rates for DG customers. Since Ms. Sanders' testimony at page 4, lines 11-13, refers to other regulatory proceedings in which a mandatory demand charge was proposed, Ms. Sanders has provided documents from each of those cases in which TASC participated. These documents explain the positions TASC has taken in these jurisdictions concerning proposed mandatory demand rates.

- Post-Hearing Brief of TASC in Arizona Corporation Commission Docket No. E-04204A-15-0142, available at:
 - <http://images.edocket.azcc.gov/docketpdf/0000169942.pdf>
- Post-Hearing Reply Brief of TASC in Arizona Corporation Commission Docket No. E-04204A-15-0142, available at
 - <http://images.edocket.azcc.gov/docketpdf/0000170274.pdf>
- Direct Testimony of Mark Fulmer in Arizona Corporation Commission Docket No. E-04204A-15-0142: <http://images.edocket.azcc.gov/docketpdf/0000167237.pdf>
- Attachment titled "Garrett Responsive Testimony TASC 2015-00273 2016.3.31.pdf"
- Attachment titled "Comments of TASC, SEIA, CALSEIA and Vote Solar on Party Proposals.pdf"
- Attachment titled "Opening Brief of TASC, SEIA, CALSEIA, and Vote Solar.pdf"
- Attachment titled "2015-10-27 TASC Beach Prefiled Direct Testimony"

REQUEST NO. 6:

Refer to Ms. Sanders' testimony at page 4, lines 11-13, regarding proposed mandatory demand rates for DG customers. Please provide a listing, including the date, docket number and state, in which these proposals have been made.

RESPONSE NO. 6:

- Arizona: Docket Nos. E-04204A-15-0142 (May 2015), E-10933A-15-0322 (Sept. 2015), Docket No. E-01345A-16-0036 (Jan. 2016)
- Arkansas: Docket No. 15-075-TF (July 2015)
- California: Docket No. R.14-07-002 (July 2014)
- Georgia: Docket No. 36989 (May 2013)
- Idaho: Case No. IPC-E-12-27 (Nov. 2012)
- Kansas: Docket No. 15-WSEE-115-RTS (Sept. 2014)
- Montana: Docket No. D2015.6.51 (June 2015)
- Nevada: Docket No. 15-07041 (July 2015)
- Oklahoma: Cause No. PUD 201500274 (July 2015), Cause No. PUD 201500273 (Dec. 2015)
- Oklahoma: Cause No. PUD No. 20160478 (Dec. 2015): Note: Ms. Sanders' testimony mistakenly omitted a pending docket in Oklahoma in which Public Service Company (PSO) proposed mandatory demand charges on solar customers. On July 15, 2016, PSO withdrew that proposal.
- South Dakota: Docket No. EL14-026 (April 2014)
- Texas: Case No. 44941 (July 2015)
- Wyoming: Case No. 13788 (Jan. 2014)

REQUEST NO. 7:

Refer to Ms. Sanders' testimony at page 8, lines 1-13, and Figure 2. (a) Is the sole source of the data presented on the website www.arizonagoessolar.com? (b) If not, please identify and provide any additional sources.

RESPONSE NO. 7:

(a) Yes. However, note that the source of the data is arizonagoessolar.org, not www.arizonagoessolar.com. The address was misstated in Ms. Sanders' prefiled testimony.

REQUEST NO. 8:

Please provide the data underlying Figure 2 in Ms. Sanders' testimony. Identify the specific page on the website where the data was obtained.

RESPONSE NO. 8:

The data underlying Ms. Sanders' testimony is attached as "SRPinstallations.csv." This data is obtainable from the home page of www.Arizonagoessolar.org by following the tabs for **Utility Programs → Salt River Project → Installations → Export as CSV.**

Note: This website is updated regularly by SRP. Current numbers show slightly lower applications (a handful each month) than reported in Ms. Sanders' testimony, likely systems that ended up getting cancelled.

REQUEST NO. 9:

Please confirm that the website referenced in footnote 18 at page 8 of Ms. Sanders' testimony should be www.arizonagoessolar.org.

RESPONSE NO. 9:

Yes, that is the correct web address.

REQUEST NO. 10:

Please identify the location within the website referenced in footnotes 18-21 at pages 8 and 9 of Ms. Sanders' testimony from which the data was obtained.

RESPONSE NO. 10:

The referenced data may be obtained in the www.arizonagoessolar.org website following the tabs from the home page **Arizonagoessolar.org** → **Utility Programs** → **Salt River Project** → **Installations**.

REQUEST NO. 11:

Did Ms. Sanders personally prepare or review the data that was presented on pages 8 and 9 of her testimony?

RESPONSE NO. 11:

Yes.

REQUEST NO. 12:


Please provide any files, in electronic format if that was how they were prepared, used to summarize the data provided in Figure 2 at page 9 of Ms. Sanders' testimony.

RESPONSE NO. 12:

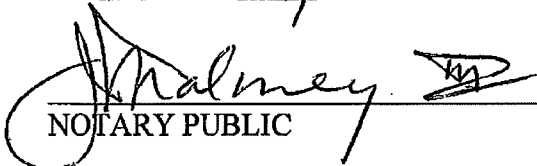
See response to Request No. 8.

AFFIDAVIT OF KIMBERLY SANDERS

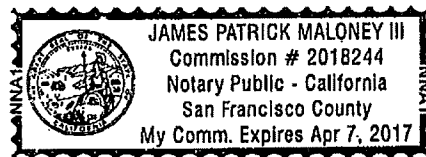
I, Kimberly R. Sanders, being first duly sworn upon oath, have read the foregoing Responses to the discovery requests of Kingsport Power Company regarding my pre-filed testimony and affirm that these Responses are true and correct to the best of my knowledge.


KIMBERLY R. SANDERS

Sworn to and subscribed before me,
this 19th day of July, 2016.


NOTARY PUBLIC

My Commission Expires: April 7, 2017



CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of July, 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:

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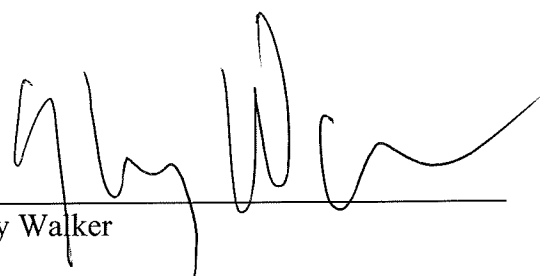
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