

IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE

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

ENERGY FREEDOM COALITION OF AMERICA, LLC
RESPONSES TO FIRST DATA REQUESTS OF KINGSFORT POWER COMPANY

COMES NOW Energy Freedom Coalition of America, LLC (“EFCA”), by and through undersigned counsel, hereby submits its responses to the Data Request of Kingsport Power Company filed on

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: EFCA does not offer Ms. Sanders as a witness in this proceeding and did not participate or assist in any way with the preparation or filing of her testimony. Accordingly, EFCA has no knowledge or information available to it to provide a response to Request No. 1

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: Please see response to Request No. 1.

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: Please see response to Request No. 1.

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: Please see response to Request No. 1.

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: Please see response to Request No. 1.

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: Please see response to Request No. 1.

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: Please see response to Request No. 1.

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: Please see response to Request No. 1.

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: Please see response to Request No. 1.

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: Please see response to Request No. 1.

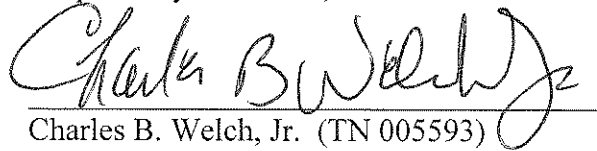
REQUEST NO. 11: Did Ms. Sanders personally prepare or review the data that was presented on pages 8 and 9 of her testimony?

RESPONSE: Please see response to Request No. 1.

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: Please see response to Request No. 1.

Respectfully submitted,

A handwritten signature in black ink, reading "Charles B. Welch, Jr.", written over a horizontal line.

Charles B. Welch, Jr. (TN 005593)

FARRIS BOBANGO PLC

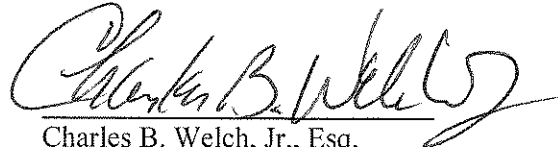
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Nashville, TN 37219

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail to all parties of record in this proceeding on July 20, 2016.


Charles B. Welch, Jr., Esq.