

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

<b>IN RE: PETITION FOR APPROVAL OF A SPECIAL CONTRACT FOR ALTERNATIVE FEED SERVICE BETWEEN KINGSFORT POWER COMP ANY d/b/a AEP APPALACHIAN POWER AND EASTMAN CHEMICAL COMPANY</b>	) ) ) ) ) ) ) )	<b>Docket No. 16-00075</b>
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**PETITION TO INTERVENE**

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Herbert H. Slatery III, Attorney General and Reporter for the State of Tennessee, by and through the Consumer Protection and Advocate Division of the Office of the Attorney General (“Consumer Advocate”), pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Regulatory Authority (“TRA” or “Authority”) to grant the Consumer Advocate’s intervention into this proceeding because consumers’ interests, rights, duties or privileges may be determined or affected by the proceeding. For cause, Petitioner would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utilities services by initiating and intervening as a party in proceedings before the Authority in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. § 4-5-101 *et seq.*, and Authority rules.

2. Kingsport Power Company, d/b/a AEP Appalachian Power (“Kingsport Power” or “Company”), is a public utility regulated by the Authority. It provides electric utility services to consumers located in the state of Tennessee.

3. In the Petition for Approval of a Special Contract for Alternative Feed Service Between Kingsport Power Company, d/b/a AEP Appalachian Power and Eastman Chemical Company (“Petition”), filed on July 5, 2016, in TRA Docket 16-00075, Kingsport Power has

requested that the TRA approve a "special contract" between Kingsport Power and Eastman Chemical Company for the provision of an alternative feed service for electric power. The purpose of the alternative feed service is to provide electric power in the event of an electrical outage. Petition at ¶ 4.


4. By their very nature, special contracts offer customers a non-tariffed rate, that is, a rate that is not generally available to other customers.

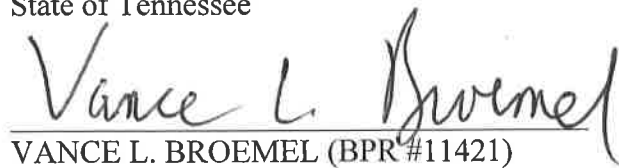
5. Consumers have an interest in ensuring that the special contract rate is just and reasonable and does not unfairly favor one particular customer.

6. Only by participating as a party to this proceeding can the Consumer Advocate adequately carry out its statutory duty to represent the interests of Tennessee consumers.

WHEREFORE, the Consumer Advocate requests the Authority to grant this Petition to Intervene.

RESPECTFULLY SUBMITTED,

  
HERBERT H. SLATTERY III (BPR #09077)  
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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 upon:

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This the 27 day of July, 2016.

  
Vance L. Broemel