

Consumer Protection and Advocate Division, 315 Deaderick Street, 20th Floor, Nashville, Tennessee 37243, c/o Wayne M. Irvin, on or before 4:00 p.m. (CDT) on June 21, 2017, or at such other time as may be ordered by the Hearing Officer in the adoption or approval of a procedural schedule in this Tennessee Public Utility Commission (TPUC) Docket.

PRELIMINARY MATTERS AND DEFINITIONS

These additional discovery requests incorporate the same Preliminary Matters and Definitions set forth in the Informal First Discovery Request of the Consumer Protection and Advocate Division to Kingsport Power Company served on the Company and counsel to the Company on May 24, 2017 (CPAD Informal Discovery Request), and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by KgPCo and any KgPCo affiliate which would make a prior response inaccurate, incomplete, or incorrect.

SECOND DISCOVERY REQUESTS

2-1. Refer to KgPCo's response to CPAD Informal Discovery Request 1-16 regarding the existing "performance-based" vs. the proposed "cyclical" approaches to vegetation management:

- (a) Explain fully and with specificity the reasons, to the extent not already identified in CPAD Informal Discovery Requests 1-7 and 1-16, for the Company's proposal to change from a "performance-based" approach to a "cyclical" vegetation management program. Include in your response (i) the Company's reasons that the "performance-based" approach is no longer appropriate or adequate and (ii) the specific benefits that would result from such a change.

- (b) State whether or not the \$903,372 in base rates would adequately pay for the full implementation of the “performance-based” approach for a year. If it would not, explain fully and with specificity why it would not, and further provide the Company’s estimates of the incremental costs that would be needed under the “performance based” approach on an annual basis.

RESPONSE:

2-2. KgPCo’s SAIDI and SAIFI Statistics.

- (a) Refer to Page 5 of Company witness Wright’s testimony regarding System Average Interruption Duration Index (SAIDI):
- i. Provide the raw data used in Figure 1 by year for 2010-2016.
 - ii. If available, provide this data excluding Major Event Days (MED) and including MED.
- (b) Refer to Page 6 of Company witness Wright’s testimony regarding System Average Interruption Frequency Index (SAIFI):
- i. Provide the raw data used in Figure 2 by year for 2010-2016.
 - ii. If available, provide this data excluding Major Event Days (MED) and including MED.
- (c) Refer to the testimony of Company witness Castle regarding the Company’s proposed annual “true-up” filing under the TRP & MS Rider.
- i. Will the Company be providing a service quality report stating system SAIDI and SAIFI indices with each annual filing?

- ii. Does the Company have target SAIDI and SAIFI numbers for any of the first four years of the implementation of the TRP & MS Rider? If so, provide such target number(s)?
- (d) Refer to pages 4 and 17 of Company witness Wright's testimony regarding measuring the reliability of the Company's distribution network and the definition of "major storm" and "major event day." Provide the full text of IEEE Standard 1366-2012. In addition, state in detail with specificity the definitions of and calculations related to (as described on page 17, lines 14-23, of Company witness Wright's testimony) "major storm" and "major event day" that the Company is requesting the TPUC to adopt and approve in this Docket.

RESPONSE:

- 2-3. Refer to CPAD Informal Discovery Request 1-17 and KgPCo's response to that request regarding the SAIFI and SAIDI indices for each affiliate of KgPCo from 2010 through 2016.
 - (a) CPAD respectfully requests that the Company reconsider its objection to this response and provide the requested information.
 - (b) Provide the definition of major event in Tennessee and each referenced State.

RESPONSE:

- 2-4. With reference to Exhibit A to this Second Discovery Request, confirm that the data set out on Exhibit A is complete and accurate. If the Company is not able to confirm that the data on Exhibit A is complete and accurate, provide:
 - (a) a detailed explanation as to how such data is not complete and accurate; and

- (b) any additional information and/or corrections to the data on Exhibit A that would make the data on Exhibit A complete and accurate.

RESPONSE:

- 2-5. Refer to KgPCo's response to CPAD Informal Discovery Request 1-11 regarding source data (e.g., general ledger, trial balance schedules, etc.) to be included with the annual TRP & MS Rider filing. Provide a copy of this data that the Company expects to file for the 12 months ended September 30, 2016.

RESPONSE:

- 2-6. Provide pro forma data and information – or describe in detail with specificity such data and information – that the Company proposes to file on a monthly or quarterly basis, as well as with each annual filing, under the TRP & MS Rider demonstrating the activity and results of the Rider over its term.
 - (a) In your response, specifically explain in detail the metrics the Company will use, and will file with its annual TRP & MS Rider filing (and other appropriate filings), that would enable the TPUC and Consumer Advocate to evaluate the reasons and benefits set out in the Company's response to CPAD Informal Discovery Request 1-16 and as expanded and/or clarified in Request 2-1 above.
 - (b) State the metrics that led to the approval of similar riders in West Virginia and Virginia and provide a copy of each report (and/or any analysis or studies) reflecting metrics approved in those States.

RESPONSE:

- 2-7. Refer to KgPCo's response to CPAD Informal Discovery Request 1-10 regarding the individuals that will be primarily responsible for calculating the annual TRP & MS Rider

filings and providing testimony. Identify these individuals and the individuals' titles, and provide a copy of each such individual's Vitae describing their qualifications to support these calculations.

RESPONSE:

- 2-8.** Refer to KgPCo's response to CPAD Informal Discovery Request 1-12 regarding attestation of the amounts included in the TRP & MS Rider. Identify the individual who the Company expects will provide this attestation and the individual's title, and provide a copy of their Vitae describing their qualifications to support these amounts.

RESPONSE:

- 2-9.** Provide a revised proposed tariff that reflects generally the form and applicable (to the requests made by the Company in the Petition) aspects of the substance of the definitions, formulas, mechanics, terms and conditions, and other information set out in, by way of example, the tariff approved in TPUC Docket No. 13-00130.

RESPONSE:

- 2-10.** For each class of customer, provide a pro forma customer bill that includes the proposed TRP & MS Rider surcharge identified as a separate line item.

RESPONSE:

- 2-11.** Provide an estimate of the incremental workforce that the Company expects to need, in terms of both employees and contractors, to undertake the proposed TRP & MS Rider.

RESPONSE:

- 2-12.** With reference to CPAD Informal Discovery Request No. 1-12 and the Company's response, confirm that the Company is willing to verify that no costs that are being recovered as a result of Docket No. 16-00001 are being recovered as a result of this

Docket No. 17-00032. In other words confirm that there will be no double counting of costs. Explain in detail and with specificity the procedures and practices that the Company will undertake to assure that no double counting occurs.

RESPONSE:

- 2-13.** Identify, for each response to the CPAD Informal Discovery Request and this Second Discovery Request, all persons assisting in the answering of each request. State the request(s) on which each such person(s) assisted.

RESPONSE:

- 2-14.** Identify each person who you expect to call as an expert witness at the hearing on the merits in this Docket, and for each such expert witness:

- (a) Identify the field in which the witness is to be offered as an expert;
- (b) Provide complete background information, including the witness's current employer, as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify;
- (c) Identify all publications written or presentations presented in whole or in part by the witness, including either a copy of all such publications and presentations or a reference to where such publications and presentations may be publicly obtained;
- (d) Provide the grounds for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;
- (e) Identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;

- (f) Identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;
- (g) Identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert; and
- (h) Produce copies of all documents, summaries, charts, trade articles, journals, treatises, publications, workpapers, file notes, chart notes, tests, test results, interview notes, and consultation notes provided to, reviewed by, utilized by, relied upon, created by, or produced by any proposed expert witness in evaluating, reaching conclusions or formulating an opinion in this matter.

RESPONSE:

- 2-15.** Produce copies of all documents referred to or relied upon in responding to these discovery requests.

RESPONSE:

- 2-16.** Produce copies of all hearing exhibits that you plan to introduce, use, or reference at the hearing on the merits in this Docket.

RESPONSE:

- 2-17.** Produce copies of all documents -- including, without limitation, work papers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications, reports, records, statements, Internet web pages, or financial information -- relied upon by any of your witnesses in evaluating, reaching conclusions, or formulating an opinion in this matter.

RESPONSE:

- 2-18.** Identify all information, documents and things filed in the present docket record, including all responses to discovery of the parties and data request from the TPUC Staff, which KgPCo produced in this Docket and does not agree to stipulate to the authenticity of such information, documents and things in this proceeding. For each separate piece of information, documents and things which KgPCo produced in this Docket and KgPCo contends is not admissible as evidence describe in specific detail any objection(s) KgPCo claims as to admissibility into the evidentiary record in this Docket.

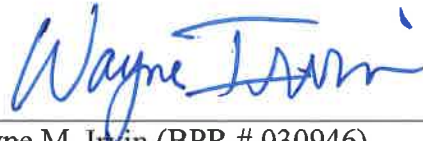
RESPONSE:

- 2-19.** Data or discovery requests of others.

- (a) Provide a copy of all data or discovery requests served on the Company from all parties concerning the testimony of KgPCo witnesses and other issues being addressed in this case.
- (b) Provide a copy of the Company's responses to all data requests from 2-19(a) above.
- (c) To the extent that any of the responses being provided in 2-19(b) involve calculations made using a program such as Microsoft Excel, or Access, include a complete copy of the electronic files, with formulas, calculations, macros and cell references intact.
- (d) Update continuously your response to this data request as the Company receives and responds to data requests of other parties.

RESPONSE:

RESPECTFULLY SUBMITTED,



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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 14th day of June, 2017.



Wayne M. Irvin

TPUC Docket 17-00032
Second Discovery Request 2-4
Exhibit A

| Data Year | Utility Number | Utility Name | State | SAIDI With MED | SAIDI Without MED | SAIFI With MED | SAIFI Without MED | Number of Customers |
|-----------|----------------|--------------------------------|-------|----------------|-------------------|----------------|-------------------|---------------------|
| 2015 | 10331 | Kingsport Power Co | TN | 199.800 | 199.800 | 1.381 | 1.381 | 47,302 |
| 2015 | 733 | Appalachian Power Co | VA | 343.000 | 311.500 | 1.701 | 1.655 | 525,734 |
| 2015 | 733 | Appalachian Power Co | WV | 1,066.900 | 641.600 | 3.123 | 2.771 | 428,721 |
| 2015 | 3278 | AEP Texas Central Company | TX | 260.900 | 176.900 | 2.023 | 1.681 | 823,421 |
| 2015 | 20404 | AEP Texas North Company | TX | 235.400 | 107.200 | 1.491 | 1.128 | 188,981 |
| 2015 | 15474 | Public Service Co of Oklahoma | OK | 399.100 | 112.100 | 1.577 | 1.171 | 540,140 |
| 2015 | 22053 | Kentucky Power Co | KY | 1,089.600 | 468.100 | 2.882 | 2.467 | 168,545 |
| 2015 | 17698 | Southwestern Electric Power Co | AR | 290.600 | 123.500 | 1.220 | 1.063 | 116,276 |
| 2015 | 17698 | Southwestern Electric Power Co | LA | 586.300 | 364.100 | 3.132 | 2.620 | 229,869 |
| 2015 | 17698 | Southwestern Electric Power Co | TX | 594.600 | 248.300 | 2.711 | 2.073 | 183,784 |
| 2015 | 9324 | Indiana Michigan Power Co | IN | 390.300 | 160.100 | 1.243 | 1.049 | 457,669 |
| 2015 | 9324 | Indiana Michigan Power Co | MI | 525.800 | 310.600 | 1.743 | 1.468 | 127,406 |
| 2014 | 10331 | Kingsport Power Co | TN | 299.000 | 215.800 | 1.681 | 1.495 | 47,216 |
| 2014 | 733 | Appalachian Power Co | VA | 363.000 | 334.200 | 1.705 | 1.668 | 524,605 |
| 2014 | 733 | Appalachian Power Co | WV | 818.800 | 640.800 | 2.891 | 2.727 | 431,544 |
| 2014 | 3278 | AEP Texas Central Company | TX | 182.300 | 136.700 | 1.887 | 1.449 | 813,976 |
| 2014 | 20404 | AEP Texas North Company | TX | 117.100 | 82.100 | 1.292 | 1.123 | 188,988 |

SAIDI: System Average Interruption Duration Index
SAIFI: System Average Interruption Frequency Index
MED: Major Event Day
Source: <https://www.eia.gov/electricity/data/eia861/>

TPUC Docket 17-00032
Second Discovery Request 2-4
Exhibit A

| Data Year | Utility Number | Utility Name | State | SAIDI With MED | SAIDI Without MED | SAIFI With MED | SAIFI Without MED | Number of Customers |
|-----------|----------------|--------------------------------|-------|----------------|-------------------|----------------|-------------------|---------------------|
| 2014 | 15474 | Public Service Co of Oklahoma | OK | 97.000 | 84.200 | 0.963 | 0.945 | 538,423 |
| 2014 | 22053 | Kentucky Power Co | KY | 761.900 | 505.300 | 2.677 | 2.373 | 169,342 |
| 2014 | 17698 | Southwestern Electric Power Co | AR | 307.900 | 104.600 | 1.368 | 0.852 | 115,532 |
| 2014 | 17698 | Southwestern Electric Power Co | LA | 707.100 | 274.200 | 3.013 | 2.247 | 229,453 |
| 2014 | 17698 | Southwestern Electric Power Co | TX | 507.800 | 213.900 | 2.631 | 1.900 | 182,936 |
| 2014 | 9324 | Indiana Michigan Power Co | IN | 305.900 | 127.500 | 0.963 | 0.771 | 456,997 |
| 2014 | 9324 | Indiana Michigan Power Co | MI | 1,078.600 | 286.900 | 1.685 | 1.299 | 127,230 |
| 2013 | 10331 | Kingsport Power Co | TN | 628.000 | 221.000 | 2.175 | 1.618 | 47,243 |
| 2013 | 733 | Appalachian Power Co | VA | 1,106.000 | 331.000 | 2.000 | 2.000 | 523,717 |
| 2013 | 733 | Appalachian Power Co | WV | 702.000 | 596.000 | 3.000 | 2.000 | 433,660 |
| 2013 | 3278 | AEP Texas Central Company | TX | 185.000 | 152.000 | 1.740 | 1.550 | 803,426 |
| 2013 | 20404 | AEP Texas North Company | TX | 227.000 | 88.000 | 1.514 | 1.133 | 187,749 |
| 2013 | 15474 | Public Service Co of Oklahoma | OK | 501.000 | 99.000 | 1.577 | 1.067 | 535,673 |
| 2013 | 22053 | Kentucky Power Co | KY | 446.000 | 383.000 | 2.239 | 2.144 | 170,896 |
| 2013 | 17698 | Southwestern Electric Power Co | AR | 329.000 | 104.000 | 1.366 | 1.130 | 115,046 |
| 2013 | 17698 | Southwestern Electric Power Co | LA | 683.000 | 251.000 | 3.095 | 2.085 | 228,435 |

SAIDI: System Average Interruption Duration Index
SAIFI: System Average Interruption Frequency Index
MED: Major Event Day
Source: <https://www.eia.gov/electricity/data/eia861/>

TPUC Docket 17-00032
Second Discovery Request 2-4
Exhibit A

| Data Year | Utility Number | Utility Name | State | SAIDI With MED | SAIDI Without MED | SAIFI With MED | SAIFI Without MED | Number of Customers |
|-----------|----------------|--------------------------------|-------|----------------|-------------------|----------------|-------------------|---------------------|
| 2013 | 17698 | Southwestern Electric Power Co | TX | 248.000 | 169.000 | 2.146 | 1.769 | 182,541 |
| 2013 | 9324 | Indiana Michigan Power Co | IN | 375.000 | 114.000 | 0.955 | 0.739 | 456,458 |
| 2013 | 9324 | Indiana Michigan Power Co | MI | 1,188.000 | 268.000 | 1.815 | 1.296 | 127,450 |

SAIDI: System Average Interruption Duration Index
SAIFI: System Average Interruption Frequency Index
MED: Major Event Day
Source: <https://www.eia.gov/electricity/data/eia861/>