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KPOW.93405

July 17, 2017

### VIA EMAIL (Sharla.Dillon@tn.gov) & FEDEX

Mr. David Price, Chairman  
c/o Sharla Dillon, Dockets & Records Manager  
Tennessee Public Utilities Commission  
502 Deaderick Street, 4th Floor  
Nashville, TN 37243

Re: Petition of Kingsport Power Company d/b/a AEP  
Appalachian Power for Approval of its Targeted  
Reliability Plan, and its TRP & MS Rider, an  
Alternative Rate Mechanism and Motion for  
Protective Order  
Docket No. 17-000032

Dear Chairman Price:

On behalf of Kingsport Power Company, we transmit herewith the following:

1. Discovery Requests of Kingsport Power Company d/b/a AEP Appalachian Power Directed to the Intervenor East Tennessee Energy Consumers.

The originals and four (4) copies are being sent via Federal Express.

Very sincerely yours,

HUNTER, SMITH & DAVIS, LLP

Joseph B. Harvey

Enclosures

cc: Monica L. Smith-Ashford, Esq. (w/enc.)  
David Foster (w/enc.)  
Wayne M. Irvin, Esq. (w/enc.)  
Michael J. Quinan, Esq. (w/enc.)

Mr. David Price, Chairman

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July 17, 2017

James R. Bacha, Esq (w/enc.)

Mr. William K. Castle (w/enc.)

Noelle J. Coates, Esq. (w/enc.)

Brian K. West (w/enc.)

William C. Bovender, Esq. (w/enc.)

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION**

**NASHVILLE, TENNESSEE**

IN RE:

PETITION OF KINGSPORT POWER COMPANY  
d/b/a AEP APPALACHIAN POWER FOR  
APPROVAL OF ITS TARGETED RELIABILITY  
PLAN, AND ITS TRP & MS RIDER, AN  
ALTERNATIVE RATE MECHANISM AND  
MOTION FOR PROTECTIVE ORDER

DOCKET NO.: 17-00032

**DISCOVERY REQUESTS OF PETITIONER KINGSPORT POWER COMPANY d/b/a**  
**AEP APPALACHIAN POWER DIRECTED TO INTERVENOR**  
**EAST TENNESSEE ENERGY CONSUMERS**

Comes Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power and submits the following Discovery Request to Intervenor East Tennessee Energy Consumers (“ETEC”), to be responded to in accordance with the applicable Tennessee Rules of Civil Procedure and the Procedural Schedule entered in this matter, with responses due on or before July 24, 2017:

**REQUEST NO. 1:** Has ETEC witness Baron ever testified as to the appropriate use of riders, rate adjustment clauses, or similar mechanisms in any docket in any state? If yes, please identify the state and the case or docket number for each filing. If the documents (testimony, orders, *etc.*) for each case are not available electronically, please provide copies.

**RESPONSE:**

Respectfully submitted,

**KINGSPORT POWER COMPANY d/b/a  
AEP APPALACHIAN POWER**

By: 

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Joseph B. Harvey (BPR #028891)

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*Attorneys for Kingsport Power Company  
d/b/a AEP Appalachian Power*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and exact copy of the foregoing **INTERROGATORY OF KINGSPORT POWER COMPANY d/b/a AEP APPALACHIAN POWER DIRECTED TO INTERVENOR EAST TENNESSEE ENERGY CONSUMERS** has been served upon the following by mailing a copy of same by United States mail, postage prepaid, as follows, on this the 17<sup>th</sup> day of July, 2017.

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By

  
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