



CHRISTIAN & BARTON, LLP
ATTORNEYS AT LAW

MICHAEL J. QUINAN
Direct Dial: 804.697.4149
Direct Fax: 804.697.6149
E-mail: mquinan@cblaw.com

July 17, 2017

via E-MAIL and OVERNIGHT MAIL

David Foster, Chief – Utilities Division
c/o Sharla Dillon
Dockets and Records Manager
Tennessee Public Utility Commission
502 Deaderick St.
Nashville, TN 37243

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)

Dear Ms. Dillon:

Enclosed please find an original and 4 copies of the *Informal First Discovery Requests of East Tennessee Energy Consumers to Consumer Protection and Advocate Division of the Attorney General's Office (First Set)* to be filed on behalf of East Tennessee Energy Consumers in the above-referenced docket.

Thank you for your kind attention to this request.

Sincerely yours,

Michael J. Quinan

MJQ
Enclosures

cc: Ms. Kelly Grams
Mr. James R. Bacha
Mr. William C. Bovender
Mr. Joseph B. Harvey
Ms. Noelle J. Coates
Mr. William K. Castle
Mr. David Foster
Hon. Herbert H. Slatery, III
Mr. Wayne M. Irvin

**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

**INFORMAL FIRST DISCOVERY REQUESTS OF
EAST TENNESSEE ENERGY CONSUMERS
TO CONSUMER PROTECTION AND ADVOCATE DIVISION OF THE
ATTORNEY GENERAL'S OFFICE (First Set)**

Comes East Tennessee Energy Consumers ("ETEC"), by counsel, and propounds the following informal discovery requests to the Consumer Protection and Advocate Division of the Attorney General's Office ("CPAD"). Responses are requested no later than Monday, July 24, 2017, at 4:00 p.m. (CDT).

INSTRUCTIONS

1. These interrogatories and requests for production of documents are continuing and require further and supplemental responses if the CPAD receives, discovers, or generates additional, different, or updated information or documents within their scope after its initial response.

2. If any document or requested information is withheld by the CPAD on a claim of privilege or on some other basis, identify: (a) the document withheld and each

and every person listed as an addressor, addressee, or indicated on blind copies; (b) all persons to whom the document or information was distributed, shown, or explained; and (c) the nature and legal basis of the privilege or other reason asserted for withholding the document or information.

2. If any document called for has been destroyed or transferred beyond the control of the Company: (a) identify the person who destroyed it and the person authorizing destruction and state the time, place, and method of, and reasons for, its destruction; if destroyed or disposed of by operation of a retention policy, state the retention policy; and, if transferred, identify the person authorizing transfer and state the time, place, and method of, and reason for, the transfer; and (b) identify each and every person listed as an addressor, addressee, or indicated on blind copies, or to whom it was distributed, shown or explained. In addition, identify the date, subject matter, and number of pages of the document and any attachments and appendices thereto.

4. If no documents containing the exact information requested exist, but documents that contain portions thereof or that contain substantially similar information do exist, then the definition of “document” includes the documents that do exist.

3. In responding to each question in the attached interrogatories and requests for production of documents, provide information available from all corporate and individual files of your company, of all affiliated companies, and of all companies over which your company exercises control or that exercise control over your company, as well as from all past and present board members, officers, and management-level employees of any such companies.

4. In responding to any of the questions contained in the attached

interrogatories and requests for production of documents that require any calculations, analyses, assumptions, or studies, identify and provide copies of such calculations, analyses, assumptions, studies, and all work papers relating thereto.

5. In responding to any of the questions contained in the attached interrogatories and requests for production of documents, please first restate the question asked and also provide the name and title of the corporate officer or employee who has responsibility for the subject matter addressed therein.

6. The CPAD is requested to provide one copy of its responses to the interrogatories and requests for production of documents to the following person:

Michael J. Quinan, Esq.
Christian & Barton, LLP
909 East Main Street, Suite 1200
Richmond, VA 23219-3095

DEFINITIONS

1. "You," "your," and "CPAD" mean the CPAD or any of its employees, attorneys, consultants, or agents.
2. "Commission" means the Tennessee Public Utility Commission.
3. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, microfiche, pictures, data processing cards or discs, computer tapes and other computer-generated and stored information or databases, work papers, calendars, minutes of meetings or any other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession.
4. When used in reference to an individual person, "identify," "identity," and

“identification” mean to state that person’s full name and residence address, including zip code and phone number, if known, and present or last known business position and duties and business address, if known.

5. When used in reference to a document, “identify,” “identity,” and “identification” mean to state the type of document (*e.g.*, computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, and its present location and custodian. If any such document was but no longer is in your possession or subject to your control, state what disposition was made of the document, and if the document was destroyed or disposed of pursuant to a retention policy, please state the retention policy.

6. When used in reference to a business organization, “identify,” “identity,” and “identification” mean to state the corporate name or other names under which the organization does business and the location of its principal place of business.

7. “Describe in detail” and “explain in detail” mean to describe and explain in detail each and every basis for the position taken or statement made and to identify each and every statement, study, and document relied upon by you and to provide a copy of all such identified statements, studies, and documents.

Discovery Requests

ETEC-1. Please provide copies of all discovery responses and information provided by the CPAD in this case to Kingsport Power Company (“KPC”), the Staff or other party. This should be considered a continuing request covering all such CPAD’s responses.

ETEC-2. Please provide electronic copies, in excel format with all formulas intact, of each exhibit, figure and table contained in the testimony of CPAD's witness Mr. Novak.

ETEC-3. Please provide all supporting workpapers used to develop the exhibits and tables contained in Mr. Novak's testimony.

ETEC-4. Please reference Mr. Novak's testimony commencing at page 6, line 11, where he testifies that the CPAD and Kingsport Power Company d/b/a AEP Appalachian Power Company ("KgPCo") "engaged in numerous meetings to discuss KgPCo's potential refiling of a number of the original VCR proposals. After these discussions, KgPCo made a determination to only include vegetation management, system improvement and major storm costs in the rider proposed in this Docket."

A. Is there a memorandum, email (or email "string") or other document that reflects any agreement between CPAD and KgPCo, including any agreement that KgPCo will "only include vegetation management, system improvement and major storm costs in the rider proposed in this Docket"? If so, please provide a copy.

B. Is it Mr. Novak's understanding that KgPCo has determined that it will forego seeking to include other types of costs – *i.e.*, costs not listed in the quoted portion of his testimony -- in future riders to be proposed by KgPCo in future dockets?

ETEC-5. Please reference Mr. Novak's testimony at page 2, line 17 regarding his testimony in prior KgPCo dockets.

A. From the following dockets listed by Mr. Novak, please identify those in which Mr. Novak's testimony addressed cost allocations and rate design: U-86-7472, 89-02126, 90-5735, 92-04425.

B. Please provide a copy Mr. Novak's pre-filed testimony identified in response to A.

Respectfully submitted this 17th day of July, 2017,

By Counsel:

A handwritten signature in black ink, appearing to read "Michael J. Quinan", written over a horizontal line.

Michael J. Quinan, Esq.
(Tenn. Sup. Ct. No. 11104)
CHRISTIAN & BARTON, LLP
909 East Main St., Suite 1200
Richmond, VA 23219
(804) 697-4149 (Telephone)
(804) 697-6149 (Fax)


Counsel for East Tennessee Energy
Consumers

CERTIFICATE OF SERVICE

I hereby certify that, on July 17, 2017, the foregoing discovery requests were served by hand-delivery, facsimile, overnight delivery service, or first class mail, postage prepaid, to all parties of record at their addresses shown below.

William C. Bovender Joseph B. Harvey HUNTER, SMITH & DAVIS, LLP P.O. Box 3704 Kingsport, TN 37664	William K. Castle Director, Regulatory Services VA/TN Appalachian Power Company Three James Center Suite 1100, 1051 E. Cary St. Richmond, VA 23219-4029
James R. Bacha American Electric Power Service Corp. P.O. Box 16637 Columbus, OH 43216	Noelle J. Coates Appalachian Power Company Service Corp Three James Center Suite 1100, 1051 E. Cary St. Richmond, VA 23219-4029
Kelly Grams General Counsel Tennessee Public Utility Commission 502 Deaderick St. Nashville, TN 37243	David Foster Chief - Utilities Division Tennessee Public Utility Commission 502 Deaderick St. Nashville, TN 37243
Herbert H. Slatery, III Attorney General and Reporter State Of Tennessee 425 Fifth Ave., North P.O. Box 20207 Nashville, TN 37202-0207	Wayne M. Irvin Assistant Attorney General Consumer Advocate and Protection Division. 425 Fifth Ave., North P.O. Box 20207 Nashville, TN 37202-0207

This 17th day of July, 2017.



Michael J. Quinan, Esq.

#2171412