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July 24, 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

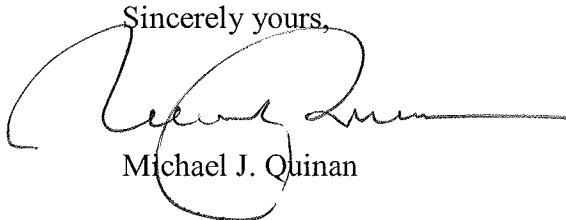
In Re: PETITION OF KINGSPORT POWER COMPANY d/b/a AEP
APPALACHIAN POWER FOR APPROVAL OF ITS TARGETED RELIABILITY
PLAN, AND ITS TRP & MS RIDER, AN ALTERNATIVE RATE MECHANISM,
AND MOTION FOR PROTECTIVE ORDER (Docket No. 17-00032)

Dear Ms. Dillon:

Enclosed for filing in this docket please find an original and four copies of the East Tennessee Energy Consumers Discovery Responses to Kingsport Power Company d/b/a Appalachian Power (First Set) submitted on behalf of East Tennessee Energy Consumers, an Intervenor in this matter.

Thank you for your kind attention to this request.

Sincerely yours,



Michael J. Quinan

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

**EAST TENNESSEE ENERGY CONSUMERS DISCOVERY RESPONSES TO
KINGSPORT POWER COMPANY d/b/a AEP APPALACHIAN POWER (First Set)**

Intervenor East Tennessee Energy Consumers ("ETEC") provides the following responses to the Discovery Requests of Petitioner Kingsport Power Company d/b/a AEP Appalachian Power.

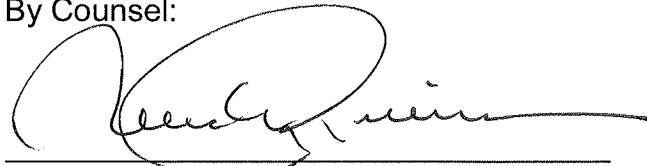
1. Has ETEC witness Baron ever testified as to the appropriate use of riders, rate adjustment clauses, or similar mechanisms in any docket in any state? If yes, please identify the state and the case or docket number for each filing. If the documents (testimony, orders, *etc.*) for each case are not available electronically, please provide copies.

Response: ETEC objects to Kingsport's Request No. 1 as overly broad, unduly burdensome and beyond the scope of discovery in this matter. Mr. Baron has testified in approximately 400 cases over 40 years. He does not know each and every case in which

he addressed riders, etc. Subject to and without waiving the foregoing objection, See Exhibit ____ (SJB-1). Notwithstanding this, as stated in his direct testimony Mr. Baron testified in WV Case No. 14-1152-E-42T on the issue of a vegetation management surcharge rider for Appalachian Power. His testimony in WV Case No. 14-0702-E-42T addressed a vegetation management surcharge rider for Monongahela Power Company and The Potomac Edison Company. Those testimonies are available on the Public Service Commission of West Virginia's website.

Respectfully submitted this 24th day of July, 2017,

By Counsel:

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

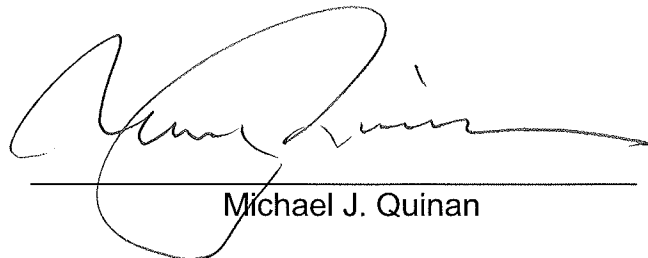
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Counsel for East Tennessee Energy
Consumers

CERTIFICATE OF SERVICE

I hereby certify that, on July 24, 2017, the foregoing discovery responses 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.

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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



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