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November 6, 2017

VIA ELECTRONIC FILING

Tennessee Public Utility Commission
c/o Sharla Dillon
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Re: First Discovery Requests
Docket No. 17-00087

Dear Sharla:

Attached for filing are the "First Discovery Requests" of Bristol Tennessee Essential Services to Kingsport Power Company.

Sincerely,

BRADLEY ARANT BOULT CUMMINGS LLP

By:


Henry Walker

HW/dbi
cc: William Bovender

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

IN RE:)
)
RESOLUTION OF BOUNDARY DISPUTE)
BETWEEN KINGSPORT POWER COMPANY) DOCKET NO.: 17-00087
d/b/a AEP APPALACHIAN POWER AND)
BRISTOL TENNESSEE ESSENTIAL SERVICES)
AS AUTHORIZED BY T.C.A. § 65-34-105)

**FIRST DISCOVERY REQUESTS OF
BRISTOL TENNESSEE ESSENTIAL SERVICES**

Comes Bristol Tennessee Essential Services (“BTES”), and submits the following Interrogatories and Requests for Production to the Petitioner, Kingsport Power Company d/b/a AEP Appalachian Electric Power (“Kingsport Power Company”):

DEFINITIONS

A. “The Company,” “Kingsport,” and “Kingsport Power Company” mean the Kingsport Power company d/b/a AEP Appalachian Power, as well as its agents, attorneys, representatives or any other person acting or purporting to act on its behalf.

B. “And” and “or” shall be construed conjunctively or disjunctively as necessary to make the interrogatory inclusive rather than exclusive. The singular shall include the plural, and vice-versa, where appropriate.

C. “Communication” means any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means including, but not limited to, telephone conversations, letters, memoranda, electronic correspondence, meetings and personal conversations.

D. “Document” means, in the broadest sense possible, any medium upon which information has been recorded or retrieved, whether in draft or final form, and includes the original and each copy thereof if the copy contains additional material or is not identical to the original, which is in your or your agent’s possession, custody or control or which was, but is no longer, in your or your agent’s possession, custody or control.

E. The word “identify” with respect to:

- (1) any natural person, means to state the full name; telephone number; and the last known residence and business addresses of the person and that person’s relationship, whether business, commercial, professional, or personal with you;
- (2) any legal person, business entity or association, means to state the full name; telephone number; and last known address of such person or entity;
- (3) any document, means to state the type of document (e.g., a letter); the title; the subject matter; the date the document bears and the date it was written; and
- (4) any oral communication, means to state the date when and the place where it was made; the identity of the person who made it; the identity of the person to whom it was made; the identity of any other person or persons who were present or who heard it; and the substance of it.

F. “Person” shall mean an individual, partnership, proprietorship, corporation, association, and any other kind of business or legal entity.

G. “Relates to” means constitutes, contains, records, discusses, summarizes, discloses, and/or refers to, in whole or in part.

H. “Petition,” “case,” “proceeding,” and “docket” refer to the above-captioned case.

INSTRUCTIONS

1. To the extent that the information sought is incorporated or contained in a document, please identify the document.

2. If you object to a question on the basis of privilege, state in detail the facts on which you base your objection. If you claim a document is privileged, identify the document and state the basis for the privilege.

3. These interrogatories shall be deemed to be continuing and to require supplemental answers to the extent required by the Tennessee Rules of Civil Procedure and the rules of the Tennessee Public Utility Commission.

DISCOVERY REQUESTS

1. Please identify each and every customer of Kingsport Power Company that, as of February 16, 1989, was taking electricity from Kingsport Power Company on the property described in Exhibit 7 and/or Exhibit 8 to the Petition of Kingsport Power Company, and for each such customer, please provide the name, the billing address, the service address, account number, a copy of the customer’s monthly bill for the billing period that included February 16, 1989, and a description of and location of the premises where such power was utilized.

ANSWER:

2. Does Kingsport Power Company contend that it was providing electric service on February 16, 1989 to the property described in Exhibit 7 to the Petition of Kingsport Power? If so, please state each and every fact and produce each and every document relating to your contention.

ANSWER:

3. Does Kingsport Power Company contend that it was providing electric service on February 16, 1989 to the property described in Exhibit 8 to the Petition of Kingsport Power? If so, please state each and every fact and produce each and every document relating to your contention.

ANSWER:

4. Please state the monthly revenue received from power sales to consumers of electric power on Tax Map 079, Parcel Number 036.00 for the months of January, February and March of 1989. Please also include the name, the billing address, the service address and account number for any customer served at that location and provide a copy of each customer's monthly bill for January, February and March of 1989.

ANSWER:

5. Please state the monthly revenue received from power sales to consumers of electric power on Tax Map 064, Parcel Number 024.00 for the months of January, February and March of 1989. Please also include the name, the billing address, the service address and account number for any customer served at that location and provide a copy of each customer's monthly bill for January, February and March of 1989.

ANSWER:

6. Please state the monthly revenue received from power sales to consumers of electric power on Tax Map 079, Parcel Number 36.20 for the months of January, February and March of 1989. Please also include the name, the billing address, the service address and account number for any customer served at that location and provide a copy of each customer's monthly bill for January, February and March of 1989.

ANSWER:

7. Please state what electric facilities, including, without limitation. poles, transformers, conductors, capacitors, meters and similar equipment AEP owned, maintained or otherwise utilized on Tax Map 079, Parcel Number 036.00 as of February 16, 1989. Please produce all system maps, drawings, work orders or job orders evidencing the existence of such facilities on February 16, 1989.

ANSWER:

8. Please state what electric facilities, including, without limitation. poles, transformers, conductors, capacitors, meters and similar equipment AEP owned, maintained or otherwise utilized on Tax Map 064, Parcel Number 24.00 as of February 16, 1989. Please produce all system maps, drawings, work orders or job orders evidencing the existence of such facilities on February 16, 1989.

ANSWER:

9. Please state what electric facilities, including, without limitation. poles, transformers, conductors, capacitors, meters and similar equipment AEP owned, maintained or otherwise utilized on Tax Map 079, Parcel Number 036.20 as of February 16, 1989. Please produce all system maps, drawings, work orders or job orders evidencing the existence of such facilities on February 16, 1989.

ANSWER:

10. Please state whether Kingsport Power Company, Bristol Tennessee Electric System, and/or Johnson City Power Board entered into one or more agreements pursuant to, in furtherance of or in any way related to the April 19, 1989 letter that is attached as Exhibit 10 to the Petition of Kingsport Power in this Docket, and produce each and every document related to your response.


ANSWER:

11. Please produce a copy of each and every agreement entered into between Kingsport Power Company, Bristol Tennessee Electric System, and/or Johnson City Power Board on or after February 16, 1989 that relates in any way to the respective retail electric service areas of one or more such parties in Sullivan County, Tennessee.

ANSWER:

Respectfully Submitted,


By: _____


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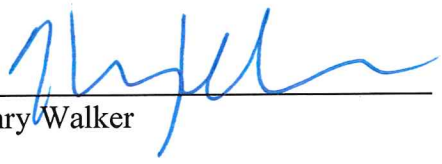

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*Attorneys for Bristol Tennessee Essential
Services*

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of November, 2017, a copy of the foregoing document was served on the parties of record, via electronic delivery and U.S. Mail, postage prepaid, addressed as follows:

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