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January 12, 2018

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 A STORM DAMAGE RIDER
TARIFF (Docket No. 17-00143)

Dear Ms. Dillon:

Enclosed please find an original and four copies of a Petition to Intervene 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
Ms. Karen H. Stachowski

**BEFORE THE
TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

In Re:

**PETITION OF KINGSFORT POWER
COMPANY d/b/a AEP APPALACHIAN
POWER FOR APPROVAL OF A STORM
DAMAGE RIDER TARIFF (RIDER SDR)**

DOCKET No. 17-00143

**PETITION TO INTERVENE OF
EAST TENNESSEE ENERGY CONSUMERS**

Comes East Tennessee Energy Consumers ("ETEC"), by counsel, pursuant to T.C.A. §§ 4-5-310 and 65-2-107 and the Rules and Regulations of the Tennessee Public Utility Commission ("TPUC" or "Commission"), and petitions to intervene in this docket as a party of record to a contested case as defined by T.C.A. § 65-2-101. In support of its Petition to Intervene, ETEC states as follows:

1. This proceeding was initiated upon the petition ("Petition") of Kingsport Power Company d/b/a AEP Appalachian Power ("KgPCo") for Approval of a Storm Damage Rider Tariff (Rider SDR).
2. In its Petition, Kingsport is seeking to recover \$1,415,021 of incremental storm costs as a result of a January 2013 sever winter storm, and \$90,333 of under-recovered 2009 storm costs. The total amount that KgPCo seeks to recover

through Rider SDR is \$1,505,354.

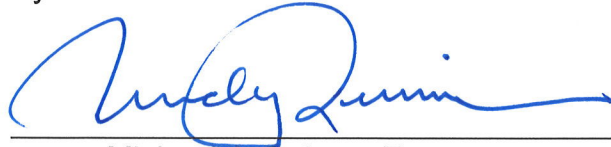
3. KgPCo is a subsidiary of American Electric Power Company, Inc. ("AEP"). According to the Petition, it is the electric distribution company ("EDC") for approximately 47,000 customers in its service territory, including the City of Kingsport and the Town of Mount Carmel, and portions of Sullivan, Washington and Hawkins Counties in Tennessee.
4. ETEC is a group of large industrial customers of KgPCo. They take service under KgPCo's Industrial Power rate schedules. ETEC's members include Air Products and Chemicals, Inc., Domtar Paper Company, Inc., Eastman Chemical Company and Wellmont Health Systems.
5. ETEC's members would be directly affected by implementation of Rider SDR requested by KgPCo. ETEC's members' interests are not represented by any other party in this proceeding.
6. Discovery will be needed to identify and address the extent to which Rider SDR is or is not just and reasonable and in the public interest.
7. Accordingly, ETEC requests permission to intervene and participate in this proceeding as a contested case.
8. Granting ETEC's Petition to Intervene will not impair the interests of justice or the orderly and prompt conduct of these proceedings.
9. All notices, correspondence, pleadings, copies of orders, communications and other material should be addressed to counsel for ETEC as follows:

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WHEREFORE, ETEC respectfully requests that the Commission enter such Orders and establish such procedures as necessary to conduct this proceeding as a contested case, grant this Petition to Intervene and enter an Order allowing ETEC to become an intervening party of record in this docket.

Respectfully submitted this 12th day of January, 2018.

By Counsel:



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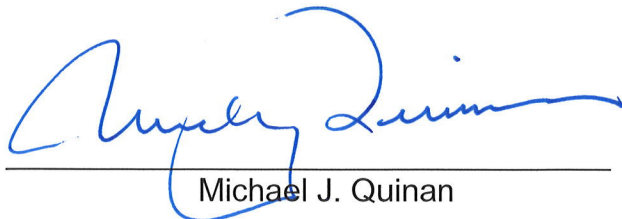
Counsel for East Tennessee Energy
Consumers

CERTIFICATE OF SERVICE

I hereby certify that, on January 12, 2018, the foregoing pleading was 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
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Herbert H. Slatery, III Attorney General and Reporter State Of Tennessee 425 Fifth Ave., North P.O. Box 20207 Nashville, TN 37202-0207	Karen H. Stachowski Assistant Attorney General Consumer Protection and Advocate Division. P.O. Box 20207 Nashville, TN 37202-0207

This 12th day of January, 2018.



Michael J. Quinan