

responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Protection and Advocate Division, UBS Tower, 315 Deaderick Street, 20th Floor, Nashville, Tennessee 37243, c/o Karen H. Stachowski, on or before 4:00 p.m. (CDT) April 30, 2018, or at such other time as may be ordered by the Hearing Officer in the adoption or approval of a procedural schedule in this TPUC Docket No. 17-00143 (this Docket).

PRELIMINARY MATTERS AND DEFINITIONS

These Additional Discovery Requests incorporate by reference the same Preliminary Matters and Definitions as set forth in the *First Informal Discovery Request of the Consumer Protection and Advocate Division to Kingsport Power Company d/b/a AEP Appalachian Power* sent to the Company on February 12, 2018¹, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

SECOND DISCOVERY REQUESTS

2-1. Refer to the Company's Response to TPUC Data Request #1-9. In this response, the Company states that a deferred tax liability was recorded associated with the storm damage:

- (a) Was the portion of ADIT liability associated with storm damage referenced within Response #1-9 included within the balance of ADIT used as an offset to rate base within TPUC Docket No. 16-00001?
- (b) If so, provide the detailed analysis or workpapers support demonstrating these costs translated to an offset to rate base.
- (c) If not, provide a narrative explanation supporting the rationale for not including this ADIT component as a rate base deduction.

RESPONSE:

¹ On February 23, 2018, Kingsport filed with TPUC its response to the *First Informal Discovery Request of the Consumer Protection and Advocate Division to Kingsport Power Company d/b/a AEP Appalachian Power*.

2-2. Provide the annual amount of overtime labor incurred by the Company and charged to O&M, inclusive of costs incurred in the subject storm damage cases for the period 2010 through 2017.

RESPONSE:

2-3. Provide the amount of overtime incorporated into the revenue requirement approved in the Company's most recent rate case.

RESPONSE:

2-4. Provide the annual amount of outside services costs incurred by the Company and charged to O&M, inclusive of costs incurred in the subject storm damage cases for the period 2010 through 2017.

RESPONSE:

2-5. Provide the amount of outside services incorporated into the revenue requirement approved in the Company's most recent rate case.

RESPONSE:

2-6. Refer to the Company's Response to TPUC Data Request #3. Specifically, refer to "Staff 1-003 Attachment 5.pdf" and "Staff 1-3_Attachment_2.xlsx":

- (a) Provide the reasoning for inclusion of the costs supported in the "Staff 1-003 Attachment 5.pdf" as it appears to have been incurred outside the relevant period (March 18, 2013).
- (b) In regards, to "Staff 1-3_Attachment_2.xlsx," does the charge located on row 31 relate to the invoice included in "Staff 1-003 Attachment 5.pdf"?

RESPONSE:

2-7. Refer to the Company's Response to TPUC Data Request #3 in this Docket. Specifically, refer to "Staff 1-003 Attachment 11.pdf." Provide the following regarding this attachment:

- (a) A description of what this document is and how the charge was developed.

- (b) Was this a yearly service?
- (c) Provide copy of the contract for this service.
- (c) Rather or not this service cost was included in the Company's rate case 92-04425?

RESPONSE:

2-8. Identify each person who you expect to call as an expert witness at the hearing on the merits in this Docket, and for each such expert witness:

- (a) State the field in which the witness is to be offered as an expert;
- (b) Provide complete background information, including the witness's current employer, as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify;
- (c) Identify all publications written or presentations presented in whole or in part by the witness, including either a copy of all such publications and presentations or a reference to where such publications and presentations may be publicly obtained;
- (d) Provide the grounds for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;
- (e) List and describe any matter in which the witness has testified (through deposition or otherwise) by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and provide the transcripts of any such testimony;
- (f) Provide the terms of the retention or engagement of each witness including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;
- (g) Identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the witness or the Company; and
- (h) Produce copies of all documents, summaries, charts, trade articles, journals, treatises, publications, workpapers, file notes, chart notes, tests, test results, interview notes, and consultation notes provided to, reviewed by, utilized by, relied upon, created by, or produced by any proposed witness in evaluating, reaching conclusions or formulating an opinion in this Docket.

RESPONSE:

2-9. Identify all persons having knowledge of discoverable matters in this Docket.

RESPONSE:

2-10. Produce copies of all documents referred to or relied upon in responding to these discovery requests and preparing the Company's Petition.

RESPONSE:

2-11. Produce copies of all hearing exhibits that you plan to introduce, use, or reference at the hearing on the merits in this Docket.

RESPONSE:

2-12. Produce copies of all documents -- including, without limitation, workpapers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications, reports, records, statements, Internet web pages, or financial information -- relied upon or otherwise used by any of your witnesses in evaluating, reaching conclusions, or formulating an opinion in this Docket.

RESPONSE:

2-13. Identify all information, documents and things filed in this Docket record, including all responses to discovery, informal and formal, of the Parties and data request from the TPUC Staff, which the Company produced in this Docket and does not agree to stipulate to the authenticity of such information, documents and things in this Docket.

RESPONSE:


2-14. For each separate piece of information, documents and things which the Company produced in this Docket and the Company contends is not admissible as evidence describe in specific detail any objection(s) the Company claims as to admissibility into the evidentiary record of that document in this Docket.

RESPONSE:

2-15. For each of these discovery requests, identify the person(s) who assisted with answering each of the requests.

RESPONSE:

RESPECTFULLY SUBMITTED,


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Brewer*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

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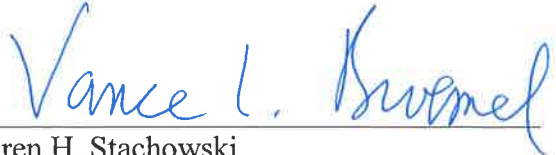
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This the 19th day of March, 2018.



Karen H. Stachowski