

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

March 19, 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 4 copies of East Tennessee Energy Consumers' Discovery Requests to Kingsport Power Company (First Set) to be filed on behalf of East Tennessee Energy Consumers in the above-referenced docket.

Sincerely yours,

Michael J. Quinan

Thank you for your kind attention to this request.

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:

**DOCKET No. 17-000143** 

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

## EAST TENNESSEE ENERGY CONSUMERS' DISCOVERY REQUESTS TO KINGSPORT POWER COMPANY (First Set)

Comes East Tennessee Energy Consumers ("ETEC"), by counsel, and propounds the following discovery requests to Kingsport Power Company d/b/a AEP Appalachian Power ("Kingsport" or "Company") pursuant to Rule 1220-1-2-.11 of the Rules of Practice and Procedure of the Tennessee Public Utility Commission ("TPUC.") and Rules 26, 33 and 34 of the Tennessee Rules of Civil Procedure. Responses are requested no later than Tuesday, April 10, 2018.

### **Discovery Requests**

ETEC-1. Please provide copies of all discovery responses and information provided by the Company in this case to the Staff, Attorney General or other party. This should be considered a continuing request covering all such Kingsport responses.

Respectfully submitted this 19th day of March, 2018,

By Counsel:

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 March 19, 2018, 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

James R. Bacha American Electric Power Service Corp. P.O. Box 16637 Columbus, OH 43216

Kelly Grams
General Counsel
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

This 19<sup>th</sup> day of March, 2019.

William K. Castle Director, Regulatory Services VA/TN Appalachian Power Company Three James Center Suite 1100, 1051 E. Cary St. Richmond, VA 23219-4029

Noelle J. Coates Appalachian Power Company Service Corp Three James Center 1051 E. Cary St., Suite 1100 Richmond, VA 23219-4029

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