

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:

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

DOCKET NO. 17-00143

**CONSUMER ADVOCATE'S THIRD DISCOVERY REQUEST
TO KINGSPORT POWER COMPANY d/b/a AEP APPALACIAN POWER**

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This Third Discovery Request is hereby served upon Kingsport Power Company d/b/a AEP Appalachian Power (Company), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Protection and Advocate Division of the Attorney General's Office (Consumer Advocate) requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The

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) May 18, 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.

THIRD DISCOVERY REQUESTS

- 3-1. Refer to “Staff_1-3_Attachment_1.xlsx” provided in response to TPUC Staff’s Discovery Request 3. Specifically, refer to rows 6, 7, 8, 12 and 14. Provide the following information:
- (a). Explain how an employee classified as exempt would be eligible for overtime compensation.
 - (b). Specify the type of employees represented by these charges?
 - (c). At what rate is this Overtime calculated at?

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*.

3-2. Provide an Income Statement for Kingsport by Account for the years 2016 and 2017.

RESPONSE:

3-3. Provide a Trial Balance for Kingsport by Account for the following periods:

(a). December 31, 2016

(b). November 30, 2017

(c). December 31, 2017

RESPONSE:

3-4. Identify, if possible, how Income Tax Expense was apportioned to customer classes in the last Kingsport rate case.

RESPONSE:

RESPECTFULLY SUBMITTED,

Karen Stachowski
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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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This the 30th day of April, 2018.


Karen H. Stachowski