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August 3, 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

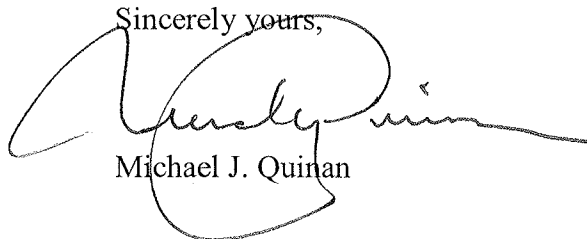
In Re: FILING OF KINGSPORT POWER COMPANY d/b/a AEP
APPALACHIAN POWER (“KgPCo”) IN RESPONSE TO THE TENNESSEE PUBLIC
UTILITY COMMISSION INVESTIGATION OF IMPACT OF FEDERAL TAX
REFORM ON THE REVENUE REQUIREMENT OF KgPCo (Docket No. 18-00038)

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
Mr. Daniel P. Whitaker
Ms. Karen H. Stachowski

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

IN RE:)	
)	
FILING OF KINGSFORT POWER)	DOCKET NO.
COMPANY d/b/a AEP)	18-00038
APPALACHIAN POWER (“KgPCo”))	
IN RESPONSE TO THE TENNESSEE)	
PUBLIC UTILITY COMMISSION)	
INVESTIGATION OF IMPACT OF)	
FEDERAL TAX REFORM ON THE)	
REVENUE REQUIREMENT OF)	
KgPCo)	

**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 (“Petition”), ETEC states as follows:

1. On February 6, 2018, TPUC issued its Order Opening an Investigation and Requiring Deferred Accounting Treatment in Docket No. 18-00001 (“Order Opening Investigation”) to account for the tax implications resulting from the 2017 Tax Cuts and Jobs Act, Pub. L. No. 115-97 (“2017 Tax Act”).
2. On March 29, 2018, Kingsport Power Company (“KgPCo” or “Kingsport”) filed its response to the TPUC’s Order Opening Investigation. In its response, Kingsport discussed how the 2017 Tax Act impacts the utility’s financial operations, including

its excess deferred tax reserve, and Kingsport proposed a method for how certain benefits should be addressed. Kingsport's response was assigned Docket No. 18-00038.

3. In an Order issued on May 18, 2018 in Docket No. 18-00038, the Commission convened the instant contested case proceeding and appointed the Commission's General Counsel, or her designee, to act as a Hearing Officer to prepare this matter for hearing, with authority to handle all preliminary matters, including but not limited to, establishing a procedural schedule, considering dispositive motions, ruling on intervention requests and discovery issues, and entering a protective order, as needed.
4. Kingsport is a subsidiary of American Electric Power Company, Inc. ("AEP"). 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.
5. ETEC is a group of large industrial customers of KgPCo. They take service under KgPCo's Industrial Power rate schedules.
6. ETEC's members will be directly affected by the Commission's determinations in this docket, including the treatment and allocation of excess deferred tax reserves. The interests of ETEC's members are not represented by any other party in this proceeding.
7. Accordingly, ETEC requests permission to intervene and participate in this proceeding.

8. Granting ETEC's Petition 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 are necessary to conduct this proceeding as a contested case, grant this Petition, and enter an Order allowing ETEC to become an intervening party of record in this docket.

Respectfully submitted this 3rd day of August, 2018.

By Counsel:



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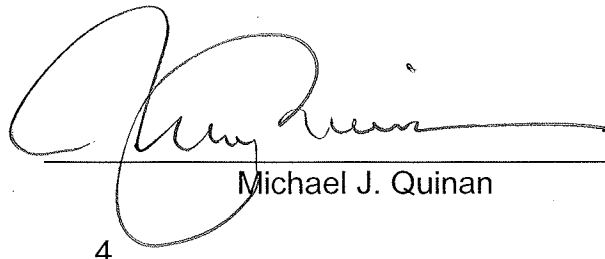
Counsel for East Tennessee Energy
Consumers

CERTIFICATE OF SERVICE

I hereby certify that, on August 3, 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
James R. Bacha American Electric Power Service Corp. P.O. Box 16637 Columbus, OH 43216	Noelle J. Coates Appalachian Power Company Service Corp Three James Center Suite 1100, 1051 E. Cary St. Richmond, VA 23219-4029
Kelly Grams General Counsel Tennessee Public Utility Commission 502 Deaderick St. Nashville, TN 37243	David Foster Chief - Utilities Division 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	Daniel P. Whitaker Assistant Attorney General Karen H. Stachowski Assistant Attorney General Office of the Tennessee Attorney General Public Protection Section Consumer Protection and Advocate Division P.O. Box 20207 Nashville, TN 37202-0207

This 3rd day of August, 2018.


Michael J. Quinan