

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT 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 IMPCAT OF)	
FEDERAL TAX REFORM ON THE)	
REVENUE REQUIRMEENT OF KgPCo)	

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

To:

William C. Bovender, Esq.
Joseph B. Harvey, Esq.
Hunter, Smith & Davis, LLP
P.O. Box 3740
Kingsport, TN 37665
Phone: 423-378-8858
Fax: 423-378-8801
Email: Bovender@hsdlaw.com

James R. Bacha, Esq.
American Electric Power Service
Corporation
1 Riverside Plaza
Columbus, OH 43215
Phone: 615-716-1615
Fax: 614-716-2950
Email: jrbacha@aep.com

Philip A. Wright
American Electric Power Service
Corporation
500 Lee Street, Suite 800
Laidley Tower
Charleston, WV 25301
Email: pawright@aep.com

Noelle J. Coates, Senior Counsel
American Electric Power Service
Corporation
Three James Center
Suite 110 1051 E. Cary Street
Richmond, VA 23219-4029
Phone: 804-698-5541
Email: njcoates@aep.com

This Second 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) September 25, 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. 18-00038 (this Docket).

PRELIMINARY MATTERS AND DEFINITIONS

These Additional Discovery Requests incorporate by reference the same Preliminary Matters and Definitions as set forth in the *Consumer Advocate's First (Informal) Discovery Request to Kingsport Power Company d/b/a AEP Appalachian Power* sent to the Company on August 3, 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. Provide the underlying calculations and all supporting documents and workpapers with cell references intact supporting the 21-year life associated with Protected Excess Accumulated Deferred Income Tax (ADIT).

RESPONSE:

- 2-2. Refer to the Company's Response to CPAD 1-14. Provide the account balance of the Net Operating Loss Carryover along with the corresponding account number where such balance is recorded.

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*.

RESPONSE:

- 2-3. Provide a reconciliation of the timing differences associated with the (a) Protected and (b) Unprotected excess ADIT line items as shown within CPAD 1-5 with the balances of Protected and Unprotected excess ADIT as reflected on page 2 of the March 29, 2018 filing in Docket No. 18-00001, in the amounts of \$9,329,605, and \$4,262,215, respectively. Include in this response a file with all cell references and calculations intact.

RESPONSE:

- 2-4. For all spreadsheets provided in response to the Consumer Advocate's requests within the first set of discovery, provide excel files with formulas intact.

RESPONSE:

- 2-5. Refer to the Company's Response to CPAD 1-3. Provide the underlying calculations and all documents and support for the "Tennessee Retail" balances of Protected and Unprotected ADIT of \$7,370,388 and \$3,367,150 respectively which was provided in the attachment to CPAD 1-3.

RESPONSE:

- 2-6. Refer to the response to CPAD 1-7. Provide the underlying calculations, including a file containing cell references for each component of the journal entry provided within this response. Each journal entry should contain an explanation describing the transaction.

RESPONSE:

RESPECTFULLY SUBMITTED,

Karen H Stachowski

KAREN H. STACHOWSKI (BPR #019607)

Assistant Attorney General

DANIEL P. WHITAKER, III (BPR #035410)

Assistant Attorney General

Office of the Tennessee Attorney General

Public Protection Section

Consumer Protection and Advocate Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

Phone: (615) 741-2370

Fax: (615) 532-2910

Karen.Stachowski@ag.tn.gov

Daniel.Whitaker@ag.tn.gov

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:

William C. Bovender, Esq.
Joseph B. Harvey, Esq.
Hunter, Smith & Davis, LLP
P.O. Box 3740
Kingsport, TN 37665
Email: Bovender@hsdlaw.com


Michael J. Quinan, Esq.
Christian & Barton, LLP
909 East Main St., Suite 1200
Richmond, VA 23219
Email: mquinan@cblaw.com

James R. Bacha, Esq.
American Electric Power Svc. Corp.
1 Riverside Plaza
Columbus, OH 43215
Email: jrbacha@aep.com

Noelle J. Coates, Senior Counsel
American Electric Power Svc. Corp.
Three James Center
Suite 110 1051 E. Cary Street
Richmond, VA 23219-4029
Email: njcoates@aep.com

Philip A. Wright
American Electric Power Service Corporation
500 Lee Street, Suite 800
Laidley Tower
Charleston, WV 25301
Email: pawright@aep.com

This the 12 day of September, 2018.


KAREN H. STACHOWSKI
Assistant Attorney General