

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

IN RE:)	
)	
FILING OF KINGSPORT 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)	

MOTION FOR PROTECTIVE ORDER

Comes East Tennessee Energy Consumers (“ETEC”), an Intervenor in this matter, by counsel, and moves the Commission for entry of a Protective Order. In support of this motion, ETEC would show as follows:

1. On August 28, 2018, the Commission entered a Protective Order in this matter,

which provides as follows:

Parties or non-Parties subject to this Order shall include Kingsport Power Company, d/b/a AEP Appalachian Power (“Company”) and the Consumer Protection and Advocate Division of the Office of the Tennessee Attorney General (“Attorney General”). If other Parties are permitted to intervene, they will be allowed access to Confidential Information only to the extent and under the conditions permitted by a separate order consistent with this Order.

(Protective Order, p. 2, ¶ 5.)

2. On September 6, 2018, the Commission entered and Order granting the petition to intervene of ETEC and allowing ETEC to participate as a party in this proceeding.

3. In order to participate fully as a party in this proceeding, ETEC should have the protections and privileges afforded to the other parties by the Commission's Protective Order.

WHEREFORE, ETEC moves the Commission for entry of a separate order consistent with the Commission's Protective Order of August 28, 2018 by making ETEC a party subject to that Order. A proposed form of Order is appended to this Motion.

Respectfully Submitted,

EAST TENNESSEE ENERGY CONSUMERS

WE ASK FOR THIS:

Counsel for East Tennessee Energy Consumers

BY: Michael J. Quinan by permission (vte)
MICHAEL J. QUINAN, Esq., BPR# 011104
Christian & Barton, LLP
909 East Main St., Suite 1200
Richmond, Virginia 23219
(804) 697-4149
mquinan@cblaw.com

AGREED:

Counsel for KgPCo:

BY: William C. Bovender by permission (vte)
WILLIAM C. BOVENDER, Esq., BPR# 000751
JOSEPH B. HARVEY, Esq., BPR# 028891
Hunter, Smith & Davis, LLP
P.O. Box 3740
Kingsport, TN 37655
(423)378-8858
Email: bovender@hsdlaw.com
Email: jharvey@hsdlaw.com

BY: Karen H Stachowski
KAREN H. STACHOWSKI, BPR# 019607
DANIEL P. WHITAKER, BPR# 35410
Assistant Attorney General
Office of the Tennessee Attorney General
Public Protection Section
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202
(615) 741-2370
Email: karen.stachowski@ag.tn.gov
Email: daniel.whitaker@ag.tn.gov

Dated: October 3, 2018.

IN RE:)	
)	
FILING OF KINGSPORT 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)	

It appearing that the Motion for Protective Order submitted by East Tennessee Energy Consumers, an Intervenor in this matter, is well taken, it is hereby

Monica Smith-Ashford, Hearing Officer

4