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KPOW.95206

October 30, 2018

VIA EMAIL (tpuc.docketroom@tn.gov) & FEDEX

Mr. David Jones, Chairman
c/o Sharla Dillon, Dockets & Records Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

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

Dear Chairman Jones:

On behalf of Kingsport Power Company, we transmit herewith the following:

First Discovery Requests of Kingsport Power Company d/b/a AEP Appalachian Power
Directed to Consumer Protection and Advocate Division

The original and four (4) copies are being sent via Federal Express.

Very sincerely yours,

HUNTER, SMITH & DAVIS, LLP


Joseph B. Harvey

Enclosure: As stated

cc: Daniel P. Whitaker, III, Asst. Attorney General (w/enc.)

Via U.S. Mail and Email: Daniel.Whitaker@ag.tn.gov

Karen H. Stachowski, Esq. (w/enc.) *Via U.S. Mail and Email: Karen.Stachowski@ag.tn.gov*

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Mr. David Jones, Chairman

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October 30, 2018

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BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

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

**FIRST DISCOVERY REQUESTS OF KINGSPORT POWER COMPANY
d/b/a AEP APPALACHIAN POWER DIRECTED TO
CONSUMER PROTECTION AND ADVOCATE DIVISION**

Comes Petitioner Kingsport Power Company d/b/a AEP Appalachian Power and submits the following Discovery Requests to the Consumer Advocate, to be responded to in accordance with the applicable Tennessee Rules of Civil Procedure.

DEFINITIONS

1. As used in this document, the terms "Consumer Advocate," "CPAD," "you," and/or "your" shall refer to the Consumer Protection and Advocate Division, Office of the Tennessee Attorney General, a party to this matter, including all employees, managers, supervisors, owners, agents, representatives, and other persons acting or purporting to act on its behalf.

2. As used in this document, the terms "KgPCo," "Kingsport Power," or "Petitioner" shall refer to Petitioner Kingsport Power Company d/b/a AEP Appalachian Power, including all employees, managers, supervisors, owners, agents, representatives, and other persons acting or purporting to act on its behalf.

3. As used herein, “document” is used in its customary broad sense to mean every writing, record, document, or thing of every type and description that is in your possession, custody or control, whether hard copy or electronic, whether in draft or final form, and every copy of every such writing or record where such copy contains any commentary or notation whatsoever that does not appear on the original.

4. As used herein, “relate” or “relating to,” when used with respect to a person, document, agreement, subject, or fact, means reflecting, embodying, containing, evidencing, concerning, pertaining to, regarding, reciting, recording, supporting, refuting, or referring to such matter.

COMPLETE ANSWERS

5. In answering these discovery requests you are requested to furnish all information available to CPAD, including that which has been obtained by and that which is now in the possession of CPAD’s attorneys, employees, agents and other representatives, and not merely the information known by the individual(s) preparing this response.

6. If you are unable to answer any of these discovery requests fully and completely, after exercising due diligence to secure the information necessary to make such full and complete answers, so state, and in addition, answer each such discovery request to the fullest extent possible specifying your knowledge, and the reason for your inability to answer the remainder, and state whatever information or knowledge you may have concerning the answered portions thereof.

DUTY TO SUPPLEMENT

A. Each of the following discovery requests is a continuing one. If you later obtain, or become aware of, any further information responsive to any of these interrogatories, you are requested to serve upon KgPCo amended answers setting forth such information.

B. KgPCo requests that counsel for the responding party confer with counsel for all parties affected by a discovery request and make a reasonable effort to resolve any discovery disputes prior to filing a motion or seeking court intervention regarding any discovery request or objection submitted.

II.

DISCOVERY REQUEST

REQUEST NO. 1:

Please provide all calculations and supporting work papers prepared by Dave Dittmore related to this matter. This request specifically includes, but is not limited to, all calculations and work papers supporting the \$621,000 reduction to Unprotected Accumulated Deferred Income Tax referenced on page 11, line 12 through page 12, line 22 of Mr. Dittmore's prefiled direct testimony.

RESPONSE:

Respectfully submitted this the 30th day of October, 2018

**KINGSPORT POWER COMPANY d/b/a AEP
APPALACHIAN POWER**

By: 

William C. Bovender (BPR #000751)

Joseph B. Harvey (BPR #028891)

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Attorneys for Kingsport Power Company

d/b/a AEP Appalachian Power

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **Discovery Requests Of Kingsport Power Company d/b/a AEP Appalachian Power to Consumer Protection and Advocate Division** has been served upon the following by mailing a copy of same by United States mail, postage prepaid, and by Email, as follows, on this the 30th day of October, 2018.

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By


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