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KPOW.99311

March 25, 2021

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

Dr. Kenneth C., Hill, Chair
c/o Ectory Lawless, Dockets & Records Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Re: IN RE: PETITION OF KINGSFORT POWER
COMPANY d/b/a AEP APPALACHIAN POWER
FOR OCTOBER, 2019 – SEPTEMBER, 2020
ANNUAL RECOVERY UNDER THE
TARGETED RELIABILITY PLAN AND MAJOR
STORM RIDER (“TRP&MS”), ALTERNATIVE
RATE MECHANISMS APPROVED IN DOCKET
NO. 17-00032
DOCKET NO.: 20-00127

Dear Chair Hill

On behalf of Kingsport Power Company, we transmit herewith the following Responses to Data Requests and Requests for Production of Documents of The Consumer Advocate Unit of the Attorney General’s Office Informal Set 3 to Kingsport Power.

The original and four copies of the Responses are being sent via Federal Express.

Should there be any questions, contact the writer or Joseph B. Harvey.

Dr. Kenneth C. Hill, Chair
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March 25, 2021

Very sincerely yours,

HUNTER, SMITH & DAVIS, LLP


William C. Bovender

Enclosures: As stated

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TENNESSEE PUBLIC UTILITY COMMISSION
PETITION OF
Kingsport Power Company
DOCKET NO. TPUC 20-00127
Data Requests and Requests for the Production
of Documents by the THE CONSUMER PROTECTION AND ADVOCATE DIVISION OF
THE ATTORNEY GENERAL'S OFFICE
CAPD Informal Set 3
To Kingsport Power Company

Data Request CAPD 3-1:

Please provide KgPCo's last filed state excise tax return.

Response CAPD 3-1:

Please see CAPD 3-1 Attachment 1 for KgPCo's 2019 state excise tax return.

TENNESSEE PUBLIC UTILITY COMMISSION
PETITION OF
Kingsport Power Company
DOCKET NO. TPUC 20-00127
Data Requests and Requests for the Production
of Documents by the THE CONSUMER PROTECTION AND ADVOCATE DIVISION OF
THE ATTORNEY GENERAL'S OFFICE
CAPD Informal Set 3
To Kingsport Power Company

Data Request CAPD 3-2:

Concerning responses to DR 1-10 and 2-07, CA is having some trouble fully understanding the supporting invoices and their associated coding. Response 2-07 indicates that the work order codes beginning with “BKP” and “DKP” are the appropriate codes for tracking Tennessee-related expenditures. However, our review indicates that these codes typically involve expenditures coded to GL account 1860092. Our original 1-10 request asked for support for O&M expenses. In reviewing KgPCo’s supporting invoice attachments associated with CA DR 1-10, the invoices that appropriately support certain O&M expenses and their Journal IDs were coded to work order G0000230 and to GL account 5930000. Please see the attached file (provided by KgPCo in response to DR 1-10) CAPD_Informal_Confidential_Attachment_16.pdf as an example of one that does not appear to support the requested Journal IDs per DR 1-10. Please take a look at the attachments provided by KgPCo in response to CA DR 1-10 to ensure they properly tie to the fifteen requested Journal ID codes or provide additional guidance as to how to interpret these supporting invoices.

Response CAPD 3-2:

The Company has reviewed the 16 attachments provided in the response to CAPD 1-10, which consist of 15 attachments of supporting invoices and one summary attachment, and each of these invoices support costs appropriately charged to Kingsport TRP&MS projects listed on KGPCo Exhibit No. 6 (AWA) to Company witness Allen's testimony. Out of the 15 attachments of invoices provided in CAPD 1-10, thirteen of these attachments show charges to O&M accounts 593 and 584 for TN vegetation management/forestry activities. The other two sets of invoices provided in CAPD 1-10 consist of charges to other non-forestry TRP projects that are administered through the compatible unit work management system and initially charged to Account 1860092, Compatible Unit/Wrk Mgt Sys Clearing.

See the Company's response to CAPD 1-6 for an explanation of the compatible unit work management process including the clearing of accumulated costs in Account 1860092 by distributing the charges to the appropriate capital, retirement and O&M accounts based on predetermined percentages in the Work Management system.

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170

Round to the nearest dollar

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Taxable Year	Taxpayer Name	Account No./FEIN
01/01/2019-12/31/2019	Kingsport Power Company	54-0272625

Schedule D - Schedule of Credits

1. Gross Premiums Tax Credit (cannot exceed Schedule C, Line 8) (1) _____
2. Tennessee income tax (cannot exceed Schedule B, Line 5) (2) _____
3. Green Energy Tax Credit from business plans filed prior to July 1, 2015 (3) _____
4. Brownfield Property Credit (4) _____
5. Broadband Internet Access Tax Credit carryover for service providers (5) _____
6. Industrial Machinery and Research and Development Tax Credit from Schedule T, Line 11 (6) _____
7. Job Tax Credit from Schedule X, Line 46 (7) _____
8. Additional Annual Job Tax Credit from Schedule X, Line 38 (8) _____
9. Total credit (add Lines 1 through 8; enter here and on Schedule C, Line 9) (9) _____

Schedule E - Schedule of Required Quarterly Installments and Payments

	Required Quarterly Installments	Amount Paid
1. Overpayment from previous year, if available.	(1) _____	51679
2. First quarterly estimate (2a) _____	(2b) _____	
3. Second quarterly estimate. (3a) _____	(3b) _____	100000
4. Third quarterly estimate. (4a) _____	(4b) _____	100000
5. Fourth quarterly estimate (5a) _____	(5b) _____	137000
6. Extension payment (6) _____	(6) _____	95100
7. Total payments (add Lines 1 through 6; enter here and on Schedule C, Line 11)	(7) _____	483779

Computation of Franchise Tax

Schedule F1 - Non-Consolidated Net Worth

1. Net worth (total assets less total liabilities) (1) 71025698
2. Indebtedness to or guaranteed by parent or affiliated corporation (cannot be a deduction) . Stmt. 1 (2) 14499188
3. Total (add Lines 1 and 2) (3) 85524886
4. Franchise tax apportionment ratio (Schedules N, O, P, R or S if applicable or 100%) (4) 98.246073 %
5. Total (multiply Line 3 by Line 4; enter here and on Schedule A, Line 1) (5) 84024842

Schedule F2 - Consolidated Net Worth

Schedule F2 is to be completed only if the Consolidated Net Worth Election Registration Application has been filed.

1. Consolidated net worth (total assets less total liabilities of the affiliated group) (1) _____
2. Franchise tax apportionment ratio (Schedule 170NC, 170SF or 170SC) (2) %
3. Total (multiply Line 1 by Line 2; enter here and on Schedule A, Line 1) (3) _____

Schedule G - Determination of Real and Tangible Property

Book Value of Property Owned - Cost less accumulated depreciation

In Tennessee

1. Land (1) _____
2. Buildings, leaseholds, and improvements (2) _____
3. Machinery, equipment, furniture, and fixtures (3) 165013517
4. Automobiles and trucks (4) _____
5. Prepaid supplies and other tangible personal property. Stmt. 1 (5) _____
6. Ownership share of real and tangible property of a partnership that does not file a return. (6) _____
7. a. Inventories and work in progress (7a) _____
- b. Exempt finished goods inventory in excess of \$30 million. (7b) _____
8. Certified pollution control equipment (include copy of certificate) and equipment used to produce electricity at a certified green energy production facility. (8) _____
9. Exempt required capital investment (9) _____
10. Subtotal (add Lines 1 through 7a, subtract Lines 7b through 9) (10) 165013517

Rental Value of Property Used but Not Owned

Net Annual Rental Paid for:

In Tennessee

11. Real property. 463312 x8 (11) 3706496
12. Machinery and equipment used in manufacturing and processing x3 (12) _____
13. Furniture, office machinery, and equipment x2 (13) _____
14. Delivery or mobile equipment. x1 (14) _____
15. Tennessee total (add Lines 10 through 14; enter here and on Schedule A, Line 2) (15) 168720013

Schedule H - Gross Receipts

1. Gross receipts or sales per federal income tax return (1) 161465928

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Taxable Year 01/01/2019 - 12/31/2019	Taxpayer Name Kingsport Power Company	Account No./FEIN 54-0272625
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Computation of Excise Tax

Schedule J1 - Computation of Net Earnings for Entities Treated as Partnerships

Additions:

1. Ordinary income or loss (federal Form 1065, Line 22) (1) _____
2. Income items specifically allocated to partners, including guaranteed payments to partners (2) _____
3. Any net loss or expense distributed to a publicly traded REIT. (3) _____
4. Total additions (add Lines 1 through 3) (4) _____

Deductions:

5. Expense items specifically allocated to partners not deducted elsewhere (5) _____
6. Amount subject to self-employment taxes distributable or paid to each partner or member net of any pass-through expense deducted elsewhere on this return (if negative, enter zero) (include on Schedule K, Line 3) (6) _____
7. Amount of contribution to qualified pension or benefit plans of any partner or member, including all IRC 401 plans (include on Schedule K, Line 3) (7) _____
8. Any net gain or income distributed to a publicly traded REIT (8) _____
9. Any loss on the sale of an asset sold within 12 months after the date of distribution (9) _____
10. Total deductions (add Lines 5 through 9) (10) _____
11. Total (subtract Line 10 from Line 4; enter here and on Schedule J, Line 1) (11) _____

Schedule J2 - Computation of Net Earnings for a Single Member LLC Filing as an Individual

Additions:

1. Business Income or loss from federal Form 1040, Schedule C (1) _____
2. Business Income or loss from federal Form 1040, Schedule D (2) _____
3. Business Income or loss from federal Form 1040, Schedule E (3) _____
4. Business Income or loss from federal Form 1040, Schedule F (4) _____
5. Business Income or loss from federal Form 4797 (5) _____
6. Other: federal Form _____, Schedule _____ (6) _____
7. Total additions (add Lines 1 through 6) (7) _____

Deductions:

8. Amount subject to self-employment taxes distributable or paid to the single member (if negative, enter zero; include on Schedule K, Line 3) (8) _____
9. Total (subtract Line 8 from Line 7; enter here and on Schedule J, Line 1) (9) _____

Schedule J3 - Computation of Net Earnings for Entities Treated as Subchapter S Corporations

Additions:

1. Ordinary income or loss (federal Form 1120S, Line 21) (1) _____
2. Income items to extent includable in federal income were it not for "S" status election (2) _____
3. Total additions (add Lines 1 and 2) (3) _____

Deductions:

4. Expense items to extent includable in federal expenses were it not for "S" status election (4) _____
5. Any loss on the sale of an asset sold within 12 months after the date of distribution (5) _____
6. Total deductions (add Lines 4 and 5) (6) _____
7. Total (subtract Line 6 from Line 3; enter here and on Schedule J, Line 1) (7) _____

Schedule J4 - Computation of Net Earnings for Entities Treated as Corporations and Other Entities

Additions:

1. Taxable income or loss before net operating loss deduction and special deductions (federal Form 1120, Line 28) (1) -4,517,778
2. a. REIT taxable income before net operating loss deduction and special deductions (federal Form 1120-REIT, Line 20) (2a) _____
- b. REIT deduction for dividends paid (federal Form 1120-REIT, Line 21b) . (2b) _____
- c. REIT taxable income after dividends paid deduction (subtract Line 2b from Line 2a) (2c) _____
3. Unrelated business taxable income (federal Form 990-T, Line 30) (3) _____
4. Other: federal Form _____ (4) _____
5. Contribution carryover from prior period(s) (5) _____
6. Capital gains offset by capital loss carryover or carryback (6) _____
7. Total additions (add Lines 1 through 6) (7) -4,517,778

Deductions:

8. Contributions in excess of amount allowed by federal government (8) _____
9. Portion of current year's capital loss not included in federal taxable income (9) _____
10. Total deductions (add Lines 8 and 9) (10) _____
11. Total (subtract Line 10 from Line 7; enter here and on Schedule J, Line 1) (11) -4,517,778

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Taxable Year	Taxpayer Name	Account No./FEIN
01/01/2019 - 12/31/2019	Kingsport Power Company	54-0272625

Schedule J - Computation of Net Earnings Subject to Excise Tax

1. Adjusted federal income or loss (enter amount from Schedule J1, J2, J3, or J4)	(1)	-4517778
Additions:		
2. Intangible expenses paid, accrued, or incurred to an affiliated business entity or entities deducted for federal income tax purposes	(2)	
3. Any depreciation under the provisions of IRC Section 168 not permitted for excise tax purposes due to Tennessee permanently decoupling from federal bonus depreciation	(3)	NONE
4. Gain on the sale of an asset sold within 12 months after the date of distribution to a nontaxable entity	(4)	
5. Tennessee excise tax expense (to the extent reported for federal income tax purposes)	(5)	-5290
6. Gross premiums tax deducted in determining federal income and used as an excise tax credit.	(6)	
7. Interest income on obligations of states and their political subdivisions, less allowable amortization.	(7)	
8. Depletion not based on actual recovery of cost	(8)	
9. Excess fair market value over book value of property donated	(9)	
10. Excess rent to/from an affiliate.	(10)	
11. Net loss or expense received from a pass-through entity subject to the excise tax (attach schedule).	(11)	
12. An amount equal to five percent of IRC Section 951A global intangible low-taxed income deducted on Line 25	(12)	
13. Total additions (add Lines 2 through 12).	(13)	-5290
Deductions:		
14. Any depreciation under the provisions of IRC Section 168 permitted for excise tax purposes due to Tennessee permanently decoupling from federal bonus depreciation	(14)	2763084
15. Any excess gain (or loss) from the basis adjustment resulting from Tennessee permanently decoupling from federal bonus depreciation.	(15)	186161
16. Dividends received from corporations at least 80% owned	(16)	
17. Donations to qualified public school support groups and nonprofit organizations	(17)	
18. Any expense other than income taxes not deducted in determining federal taxable income for which a credit against the federal income tax was allowed	(18)	
19. Adjustments related to the safe harbor lease election (see instructions)	(19)	
20. Nonbusiness earnings (from Schedule M, Line 8)	(20)	
21. Intangible expenses paid, accrued, or incurred to an affiliated entity or entities (from Form IE, Line 4) Attach Form IE - Intangible Expense Disclosure	(21)	
22. Intangible income from an affiliated business entity or entities if the corresponding intangible expenses have not been deducted by the affiliate(s) under Tenn. Code Ann. § 67-4-2006(b)(2)(N).	(22)	
23. Net gain or income received from a pass-through entity subject to the excise tax (attach schedule)	(23)	
24. Grants from governmental units to the extent included in federal taxable income.	(24)	
25. IRC Section 951A global intangible low-taxed income	(25)	
26. Total deductions (add Lines 14 through 25).	(26)	2949245
Computation of Taxable Income		
27. Total business income (loss) (add Lines 1 and 13, subtract Line 26; if loss, enter on Schedule K, Line 1)	(27)	-7472313
28. Excise tax apportionment ratio (Schedules N, O, P, R or S if applicable or 100%)	(28)	98.246073 %
29. Apportioned business income (loss) (multiply Line 27 by Line 28)	(29)	-7341254
30. Nonbusiness earnings directly allocated to Tennessee (from Schedule M, Line 9).	(30)	
31. Loss carryover from prior years (from Schedule U)	(31)	22626787
32. Subject to excise tax (add Line 29 and 30, subtract Line 31; enter here and on Schedule B, Line 4).	(32)	-29968041

Schedule K - Determination of Loss Carryover Available

1. Net loss from Schedule J, Line 27	(1)	-7472313
Additions:		
2. Amounts reported on Schedule J, Lines 16 and 20	(2)	
3. Amounts reported on Schedule J1, Lines 6 and 7, or Schedule J2, Line 8.	(3)	
4. Reduced loss (add Lines 1 through 3; if net amount is positive, enter zero)	(4)	-7472313
5. Excise tax apportionment ratio (Schedules N, O, P, R or S if applicable or 100%)	(5)	98.246073%
6. Current year loss carryover available (multiply Line 4 by Line 5)	(6)	-7341254

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Taxable Year 01/01/2019 12/31/2019	Taxpayer Name Kingsport Power Company	Account No./FEIN 54-0272625
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Schedule N - Apportionment - Standard

Property	In Tennessee		Total Everywhere	
Use original cost of assets	a. Beginning of Taxable Year	b. End of Taxable Year	a. Beginning of Taxable Year	b. End of Taxable Year
1. Land, buildings, leaseholds, and improvements . . .				
2. Machinery, equipment, furniture, and fixtures . . .	221689945	242759578	221689945	242768828
3. Automobiles and trucks				
4. Inventories and work in progress	324522	346547	324522	346547
5. Prepaid supplies and other property				
6. Ownership share of real and tangible property of a partnership that does not file a return				
7. Excise tax total (add Lines 1 through 6).	a. 222014467	b. 243106125	a. 222014467	b. 243115375
8. Exempt inventory				
9. Franchise tax total (subtract Line 8 from Line 7) . .	a. 222014467	b. 243106125	a. 222014467	b. 243115375
10. Excise tax average value (add Lines 7(a) & (b), divide by two) . .		232560296		232564921
11. Franchise tax average value (add Lines 9(a) & (b), divide by two) .		232560296		232564921
12. Rented property (rent paid x 8)		3706496		3706496
Use triple weighted sales factor	a. In Tennessee	b. Total Everywhere	c. Franchise Ratio	d. Excise Ratio
13. Excise tax property factor (add Lines 10 and 12) . .	236266792	236271417		99.998043 %
14. Franchise tax property factor (add Lines 11 and 12) .	236266792	236271417	99.998043 %	
15. Payroll factor	4909198	4909198	100.000000 %	100.000000 %
16. Sales factor (business gross receipts)	158178448	162940480	97.077441 %	97.077441 %
17. Total ratios (add Lines 13-15 and (Line 16 x three))			491.230366 %	491.230366 %
18. Apportionment ratio (divide Line 17 by five, or by the number of factors with everywhere values greater than zero) (Enter franchise tax apportionment ratio on Sch. F1, Line 4. Enter excise tax apportionment ratio on Sch. J, Line 28.)			98.246073 %	98.246073 %

Schedule O - Apportionment - Common Carriers (railroads, motor carriers, pipelines and barges)

	In Tennessee	Total Everywhere	Ratio
1. Total franchise mileage (odometer miles)			
2. Tennessee gross intrastate receipts and interstate gross receipts everywhere . . .			%
3. Total ratios (add Lines 1 and 2)			%
4. Apportionment ratio (divide Line 3 by two, or by the number of factors with everywhere values greater than zero) (Enter franchise tax apportionment ratio on Schedule F1, Line 4. Enter excise tax apportionment ratio on Schedule J, Line 28.)			%

Schedule P - Apportionment - Air Carriers

	In Tennessee	Total Everywhere	Ratio
1. Originating revenue			
2. Air miles flown (Include in Tennessee column only air miles flown on flights either originating from or ending in Tennessee or both)			%
3. Total ratios (add Lines 1 and 2)			%
4. Apportionment ratio (divide Line 3 by two, or by the number of factors with everywhere values greater than zero) (Enter franchise tax apportionment ratio on Schedule F1, Line 4. Enter excise tax apportionment ratio on Schedule J, Line 28.)			%

Schedule R - Apportionment - Air Express Carriers

	In Tennessee	Total Everywhere	Ratio
1. Originating revenue			%
2. Air miles flown and ground miles traveled (Include in Tennessee column only air miles flown on flights either originating from or ending in Tennessee or both. Include only ground miles traveled with respect to actual common carriage of persons or property for hire.)			%
3. Total ratios			%
4. Apportionment ratio (divide Line 3 by two, or by the number of factors with everywhere values greater than zero) (Enter franchise tax apportionment ratio on Schedule F1, Line 4. Enter excise tax apportionment ratio on Schedule J, Line 28.)			%

Schedule S - Apportionment - Manufacturer Single Sales Factor

	In Tennessee	Total Everywhere	Ratio
1. Sales factor (business gross receipts) (Enter franchise tax apportionment ratio on Schedule F1, Line 4. Enter excise tax apportionment ratio on Schedule J, Line 28.) .			%

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Taxable Year - 01/01/2019 12/31/2019	Taxpayer Name Kingsport Power Company	Account No./FEIN 54-0272625
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Schedule U - Schedule of Loss Carryover

Year	Period Ended (MM/YY)	Original Return or as Amended	Used in Prior Year(s)	Expired	Loss Carryover Available
1	12/04				
2	12/05				
3	12/06				
4	12/07				
5	12/08				
6	12/09	1188739	1188739		
7	12/10				
8	12/11				
9	12/12				
10	12/13				
11	12/14	2227242			2227242
12	12/15	4389380			4389380
13	12/16	921051			921051
14	12/17	10079058			10079058
15	12/18	5010056			5010056
Total Amount (Enter here and on Schedule J, Line 31)					22626787

Schedule V - Schedule of Industrial Machinery and Research and Development Equipment Credit Carryover

Year	Period Ended (MM/YY)	Original Return or as Amended	Used in Prior Year(s)	Expired or Recaptured	Industrial Machinery Credit Carryover Available
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
Total Amount (Enter here and on Schedule T, Line 4).					

Tennessee Franchise & Excise Tax Return, Page 2 Detail

Sch F1, Ln 2 - Indebtedness to or Guaranteed by Parent or Affiliate


Corp Borrow Program	14,499,188.
Total	14,499,188.

Sch G, Ln 5 - Prepaid Supplies/Other Tangible Personal Prop. In Tennessee

Other Tangible Property	
Total	

Respectfully submitted this the 25th day of March, 2021.

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

By: 

William C. Bovender, Esq.

Joseph B. Harvey, Esq.

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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 **KINGSPORT POWER COMPANY d/b/a AEP APPALACHIAN POWER RESPONSES TO CONSUMER ADVOCATE'S INFORMAL SET 3 DISCOVERY REQUESTS** have been served by mailing a copy of same by United States mail , postage prepaid, and Email, to the below on this the 25th day of March, 2021, as follows:

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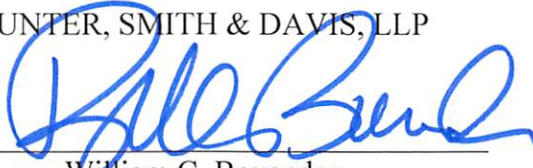
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By:



William C. Bovender