

S. Morris Hadden
William C. Bovender
William C. Argabrite
Jimmie Carpenter Miller
Mark S. Dessauer
Gregory K. Haden
Michael L. Forrester
Stephen M. Darden
Edward J. Webb, Jr.
James N. L. Humphreys
Suzanne Sweet Cook
Michael S. Lattier
Scott T. Powers

Respond to:

Kingsport Office
William C. Bovender
423-378-8858; 423-534-7897 mobile
bovender@hdsdlaw.com

HUNTER·SMITH·DAVIS
SINCE 1916 LLP

Kingsport Office
1212 North Eastman Road
P.O. Box 3740
Kingsport, TN 37664
Phone (423) 378-8800
Fax (423) 378-8801

Johnson City Office
100 Med Tech Parkway
Suite 110
Johnson City, TN 37604
Phone (423) 283-6300
Fax (423) 283-6301

Leslie Tentler Ridings
Christopher D. Owens
Jason A. Creech
Meredith Bates Humbert
Joseph B. Harvey
Rachel Ralston Mancl
Caroline Ross Williams
Marcy E. Walker
Matthew F. Bettis
Sarah Blessing Valk
Sydney B. Gilbert
Michael A. Eastridge *
Jeannette Smith Tysinger*

**Of Counsel*

www.hsdllaw.com

KPOW.99311

June 9, 2021

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

Dr. Kenneth C. Hill, Chairman
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 Chairman Hill:

On behalf of Kingsport Power Company d/b/a AEP Appalachian Power, we transmit herewith for filing, Motion for Leave to Appear as Witnesses by Telephone at Tennessee Public Utility Commission Conference of July 13, 2021.

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

Very sincerely yours,

HUNTER, SMITH & DAVIS, LLP



William C. Bovender

Robin Morrison, Chairman

Page 2

June 9, 2021

cc: Karen H. Stachowski, Esq. *Via U.S. Mail and Email: Karen.Stachowski@ag.tn.gov*
Vance L. Broemel, Esq. *Via U.S. Mail and Email: vance.broemel@ag.tn.gov*
Kelly Grams, General Counsel *Via U.S. Mail and Email: Kelly.Grams@tn.gov*
Monica L. Smith-Ashford, Dep. Gen. Counsel *Via U.S. Mail and Email: monica.smith-ashford@tn.gov*
David Foster *Via U.S. Mail and Email: david.foster@tn.gov*

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

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"),)	DOCKET NO.: 20-00127
ALTERNATIVE RATE MECHANISMS APPROVED)	
IN DOCKET NO. 17-00032)	

**MOTION FOR LEAVE TO APPEAR AS WITNESSES BY TELEPHONE AT
TENNESSEE PUBLIC UTILITY COMMISSION CONFERENCE OF JULY 13, 2021 ON
BEHALF OF KINGSFORT POWER COMPANY d/b/a AEP APPALACHIAN POWER**

Comes Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power ("Kingsport"), by counsel, and respectfully moves that its direct testimony witnesses, Eleanor K. Keeton and A. Wayne Allen, be permitted to testify by telephone at the Tennessee Public Utility Commission ("TPUC") Conference on July 13, 2021, 9:00 a.m. CDT, relative to their direct testimony previously filed in this Docket.

Kingsport would show unto TPUC that Ms. Keeton, Regulatory Consultant Regulatory Services – VA/TN of Appalachian Power, is located in Richmond, Virginia and Mr. Allen, Accounting Senior Manager for American Electric Power Service Corporation, is located in Columbus, Ohio.

As TPUC is aware, Kingsport and the Consumer Advocate Unit in the Financial Office of the Office of the Attorney General ("Consumer Advocate") have submitted, through the Consumer Advocate's Office, a letter dated May 11, 2021, supported by a Kingsport letter from Counsel also dated May 11, 2021, which states the joint position of those parties that the matter is ripe for consideration on the merits and there remain no outstanding disputes between the parties. See, Letters filed in Docket 20-00127 on May 11, 2021.

Due to circumstances and existing conflicts, Ms. Keeton and Mr. Allen seek to present their testimony summaries by telephone during said July 13, 2021 Conference, as they have previously done in this Docket.

PREMISES CONSIDERED, Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power, respectfully requests that Ms. Keeton and Mr. Allen be allowed to present their testimony by telephone on July 13, 2021. A duly-authorized Notary Public will be present to administer the Oath and remain during the testimonies of Ms. Keeton and Mr. Allen.

Respectfully submitted this the 9th day of June 2021.

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

By: _____

William C. Bovender, Esq.

Joseph B. Harvey, Esq.

HUNTER, SMITH & DAVIS, LLP

PO Box 3740

Kingsport, TN 37665

Ph: (423) 378-8858

OF COUNSEL:

James R. Bacha, Esq., Associate General Counsel
American Electric Power Service Corporation
1 Riverside Plaza
Columbus, OH 43215
Ph: (615) 716-1615; Fax: (614) 716-2950
Email: jrbacha@aep.com

Noelle J. Coates, Esq., Senior Counsel
American Electric Power Service Corporation
Three James Center
Suite 1100 1051 E. Cary Street
Richmond, VA 23219-4029
Ph: (804) 698-5541
Email: njcoates@aep.com

*Attorneys for Kingsport Power Company
d/b/a AEP Appalachian Power*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **MOTION FOR LEAVE TO APPEAR AS WITNESS BY TELEPHONE AT TENNESSEE PUBLIC UTILITY COMMISSION CONFERENCE OF JULY 13, 2021** have been served by mailing a copy of same by United States mail, postage prepaid, and Email, to the below on this the 9th day of June, 2021, as follows:


Karen H. Stachowski, Esq.
Vance L. Broemel, Esq.
Office of the Tennessee Attorney General
Public Protection Section
Consumer Protection and Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
Karen.Stachowski@ag.tn.gov
Vance.broemel@ag.tn.gov

David N. Dittmore
Office of the Tennessee Attorney General
P.O. Box 20207
Nashville, Tennessee 37202-0207
David.dittmore@ag.tn.gov

Kelly Grams, General Counsel
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
Email: kelly.grams@tn.gov

Monica L. Smith-Ashford, Deputy General Counsel
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
Email: monica.smith-ashford@tn.gov

David Foster, Chief-Utilities Division
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
Email: David.Foster@tn.gov

HUNTER, SMITH & DAVIS, LLP
By: 
William C. Bovender