

Michael J. Quinan Direct Dial: (804) 799-4127 Facsimile: (804) 780-1813 E-mail: mguinan@t-mlaw.com

100 Shockoe Slip, Richmond, Virginia 23219-4140

Telephone: 804.649.7545 Facsimile: 804.780.1813

Website: www.t-mlaw.com

January 14, 2022

### Via Electronic Filing & UPS 2-Day

David Foster, Chief – Utilities Division c/o Tory Lawless Dockets and Records Manager Tennessee Public Utility Commission 502 Deaderick St., 4<sup>th</sup> Floor Nashville, TN 37243 Electronically Filed in TPUC Docket Room on January 14, 2022 at 1:07 p.m.

Re:

PETITION OF KINGSPORT POWER COMPANY d/b/a AEP APPALACHIAN

POWER COMPANY FOR A GENERAL RATE INCREASE

(Docket No. 21-00107)

Dear Ms. Lawless:

Enclosed please find an original and four copies of East Tennessee Energy Consumers' Discovery Requests to Kingsport Power Company (First Set) in the above-referenced docket.

Thank you for your kind attention to this request.

Sincerely yours,

/s/ Michael J. Quinan Michael J. Quinan

MJQ Enclosures

cc:

Mr. William C. Bovender

Mr. Joseph B. Harvey

Mr. James R. Bacha

Mr. Vance L Broemel

Ms. Rachel C. Bowen

Ms. Noelle J. Coates

## BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION NASHVILLE, TENNESSEE

In Re:	)	
	) Docket No. 2	1-00107
PETITION OF KINGSPORT POWER	)	
COMPANY d/b/a AEP APPALACHIAN	)	
POWER COMPANY FOR A GENERAL	)	
RATE INCREASE	)	
	)	
	)	
	)	

# EAST TENNESSEE ENERGY CONSUMERS' DISCOVERY REQUESTS TO KINGSPORT POWER COMPANY (First Set)

Comes East Tennessee Energy Consumers ("ETEC"), by counsel, and propounds the following discovery requests to Kingsport Power Company d/b/a AEP Appalachian Power ("Kingsport" or "Company").

#### FIRST DISCOVERY REQUESTS

- ETEC 1. Please provide copies of all responses issued by Kingsport to the discovery of other parties in this case.
- ETEC 2. Please provide the supporting workpapers of each Kingsport witness submitting testimony in this case. This includes, but is not limited to, all excel files used to develop exhibits in native format (i.e., excel spreadsheets or workbooks with formulas intact).
- ETEC 3. Please provide a copy of the class cost of service study in excel, with all formulas intact.
- ETEC 4. Please provide, to the extent that such files exist, the excel files used to develop the MFRs filed by the Company in this case.
- **ETEC 5.** Refer to Table 4 of Michael Ward's testimony at page 19.
  - a. Confirm that the Company is proposing a rate of return for the IP rate class of 89.72%.

- b. Confirm that at proposed rates, the IP rate class will produce a relative rate of return of 14.1 (i.e., the IP rate class will earn a rate of return on investment that is 14 times the average proposed Kingsport rate of return.
- c. Please explain why the Company believes that it is reasonable to set IP rates such that they will produce a rate of return 14 times the average Kingsport rate of return.
- d. Please indicate whether any other AEP East operating utility has large industrial rates designed to earn a relative rate of return of 14. If so, identify the Company and provide a copy of a summary table showing the rate of return and relative rate of return for each rate class for such Company.
- ETEC 6. Please provide a schedule, in excel, showing TRP&MS revenues by rate class, by month, for the period January 1, 2020 through December 31, 2021.
- ETEC 7. Please provide a schedule, in excel, showing FPPAR revenues by rate class, by month, for the period January 1, 2020 through December 31, 2021.
- ETEC 8. Please provide a copy of APCo's 2021/2022 and 2022/2023 FRR capacity plans. To the extent that it is not separately identified in the plan, please provide that MW of demand response included in the plans for each delivery year.
- ETEC 9. With regard to the previous question, please provide the same information for the AEP East FRR entities on a combined basis.
- **ETEC 10.** With regard to proposed REC Rider, please provide the following:
  - a. The market price of RECs, by month, for the period January 2021 through December 2021.
  - b. The Company's projected cost of RECs for 2022 and 2023.
  - c. The support for the administrative and marketing charges proposed by the Company.
- **ETEC 11.** With regard to Ms. Keeton's at page 9, lines 3-5, please provide a narrative discussing how this large customer REC Rider program would work. Also provide examples of similar programs currently being offered by other AEP Companies in other jurisdictions.

# Respectfully submitted this 14th day of January, 2022,

By Counsel:

# /s/ Michael J. Quinan

Michael J. Quinan, Esq. ThompsonMcMullan, P.C. 100 Shockoe Slip, Third Floor Richmond VA 23219 Tel.: (804) 799-4127

Email: mquinan@t-mlaw.com

#### CERTIFICATE OF SERVICE

I hereby certify that, on January 14, 2022, the foregoing discovery requests were served by email and/or first class mail, postage prepaid, to all parties of record at their addresses shown below.

William C. Bovender, Esq. Joseph B. Harvey, Esq. Hunter, Smith & Davis, LLP P.O. Box 3740 Kingsport, TN 37655 bovender@hsdlaw.comjharvey@hsdlaw.com

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

Vance L. Broemel, Esq.
Rachel C. Bowen, Esq.
Office of the Tennessee Attorney General
Financial Division, Consumer Advocate Unit
P.O. Box 20207
Nashville, TN 37202-0207
vance.broemel@ag.tn.gov
rachel.bowen@ag.tn.gov

Noelle J. Coates, Esq, Senior Counsel American Electric Power Service Corp. Three James Center 1051 E. Cary Street, Suite 1100 Richmond, VA 23219-4029 njcoates@aep.com

/s/ Michael J. Quinan Michael J. Quinan, Esq.