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January 27, 2022

KPOW-10311

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

Electronically Filed in TPC Docket Room on
January 27, 2022 at 1:56 p.m.

Re: IN RE: PETITION OF KINGSFORT
POWER COMPANY d/b/a AEP
APPALACHIAN POWER
FOR A GENERAL RATE CASE
DOCKET NO.: 21-00107

Dear Chairman Hill:

On behalf of Kingsport Power Company d/b/a AEP Appalachian Power, we transmit herewith the Fourth Partial Response to CAD's First Discovery Request No. 73. The original and four copies are being sent by overnight delivery.

Should you have any questions, please do not hesitate to contact the undersigned.

Very sincerely yours,

HUNTER, SMITH & DAVIS, LLP

s/ Joseph B. Harvey

Joseph B. Harvey

Enclosure: As stated

cc: Kelly Grams, General Counsel (w/enc.)
David Foster (w/enc.)
Monica L. Smith-Ashford, Esq. (w/enc.)

Via US Mail and Email: Kelly.Grams@tn.gov
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Dr. Kenneth C. Hill, Chairman

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January 27, 2022

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BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

IN RE:

DOCKET NO.: 21-00107

PETITION OF KINGSPORT POWER
COMPANY d/b/a AEP APPALACHIAN
POWER GENERAL RATE CASE

**FOURTH PARTIAL RESPONSE OF
KINGSPORT POWER COMPANY TO FIRST DISCOVERY REQUEST OF
THE CONSUMER PROTECTION AND ADVOCATE DIVISION**

Comes Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power (“Company” or “KgPCo”) and hereby submits its fourth and final partial response to the First Discovery Request of the Consumer Protection and Advocate Division (“CAD”) as to certain of the multiple-part discovery requests which have been served on KgPCo. KgPCo is providing partial responses as they become available in part because there were many more requests contained in CAD’s First Set of Discovery Requests than were anticipated when the parties agreed to the deadline in the Procedural Schedule, and in part because KgPCo is in the process of preparing responses to the CAD’s additional supplemental discovery requests that were first received on January 11, 2022. It is anticipated that KgPCo will be able to respond to the remainder of said Requests on or before February 4, 2022.

The following portions of the CAD’s First Request are being responded to 73; subject to general objections set forth herein below or any objections to individual requests as contained in said responses.

GENERAL STATEMENTS AND OBJECTIONS

The responses set forth herein constitute the best information presently available to KgPCo. The answers set forth herein are provided without prejudice to KgPCo's right to timely amend, supplement, or change said answers if and when additional, different, or more accurate information becomes available, including the review of documents produced by intervenors. Moreover, said responses are subject to correction for inadvertent errors or omissions, if any such errors or omissions are later found to exist.

By responding to CAD's discovery requests, KgPCo does not waive any objections that may be appropriate to the use, for any purpose, by any party, of any of the information contained in the responses set forth herein or to the admissibility, relevancy, or materiality of such information as to any issue in this case.

The following General Objections apply to each of KgPCo's responses. Specific objections provided in response to any request are made without waiver of or prejudice to any General Objection.

1. KgPCo objects to CAD's requests to the extent they seek to impose on KgPCo any obligations or responsibilities beyond those required by TPUC's Rules & Regulations, the Tennessee Rules of Civil Procedure, and/or the controlling Procedural Scheduled entered in this matter.

2. KgPCo objects to CAD's requests to the extent they seek information protected by the attorney-client privilege, the work product doctrine, and/or any other applicable privilege or immunity (collectively referred to as "privileged" documents or information). Nothing contained in these responses is intended to be, or in any way constitutes, a waiver of any such applicable privilege or immunity.

3. An objection to a request based on privilege should not be construed as a representation that responsive information or documents exists or existed and is being withheld based upon the asserted privilege. Such an objection indicates only that the request is of such a scope as to potentially embrace privileged information or documents.

4. To the extent KgPCo responds to a discovery request to which it has objected, KgPCo reserves the right to maintain such objection with respect to any additional information responsive to such discovery request and such objections are not waived by the furnishing of such additional information.

5. KgPCo objects to CAD's requests to the extent they seek information that is neither relevant to the issues in the case nor proportional to the needs of the case. KgPCo also objects to CAD's requests to the extent they are overly broad.

6. KgPCo objects to CAD's requests that contain terms or phrases that are vague, ambiguous, and undefined; call for speculation, conjecture or opinion; or are based on the assumption of facts not in evidence. Likewise, KgPCo's response to any particular interrogatory in no way constitutes acquiescence or agreement to any definition, characterization, or meaning proposed by CAD.

7. All responses and any production of documents by KgPCo in response to CAD's requests are made based on KgPCo's current knowledge and without waiver of any general or specific objections. KgPCo reserves the right to revise, modify, supplement and/or amend its responses, for form or substance.

Subject to said GENERAL OBJECTIONS and any specific objections made to individual requests as contained in these or upcoming responses, KgPCo responds to the portions of the First Discovery Request as follows.

Kingsport Power Company d/b/a Appalachian
Power Company

By: William K. Castle
William K. Castle

Title: Director, Regulatory Services VA/TN

COMMONWEALTH OF VIRGINIA)

CITY OF RICHMOND)

WILLIAM K. CASTLE, being first duly sworn upon oath, deposes and says that he is the Director, Regulatory Services VA/TN for Kingsport Power Company d/b/a AEP Appalachian Power, the Petitioner in the above-entitled action, and that he is authorized to make this Affidavit on its behalf; that he has read the foregoing Responses to Discovery Requests, by him subscribed and knows the contents thereof; that there is no single person employed by or otherwise connected with Kingsport Power Company d/b/a AEP Appalachian Power, who has personal knowledge of all the facts and information requested herein; that said Responses were prepared with the assistance and advice of counsel and the assistance of various employees and representatives of the corporation upon which he has relied; that the Responses to Discovery Requests, set forth herein, subject to inadvertent or undiscovered errors, are based on, and therefore necessarily limited by, the records and information still in existence, presently recollected and thus far discovered in the course of the preparation of these Responses; that the foregoing Responses to Discovery Requests are thus based upon corporate knowledge and are true and correct to the best of his knowledge and belief; that consequently, Kingsport Power Company d/b/a AEP Appalachian Power reserves the right to make any changes in the Responses if it appears at any time that omissions or errors have been made therein or that more accurate information is available; and that subject to the limitations set forth herein, the said Responses are true to the best of his knowledge, information and belief.

William K. Castle

WILLIAM K. CASTLE

Sworn to and subscribed before me, this the 18th of January, 2022.

Catharine Meriwether Broadus

Notary Public

My Commission Expires: Sept. 30, 2025
Notary Registration No.: 7759549



CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing **FOURTH PARTIAL RESPONSES OF KINGSPORT POWER COMPANY TO FIRST DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE DIVISION** has been served upon the following by emailing a true and accurate copy on this the 27th day of January, 2022:

KAREN H. STACHKOWSKI
Senior Assistant Attorney General
VANCE L. BROEMEL (BPR #011421)
Senior Assistant Attorney General
RACHEL C. BOWEN (BPR #039091)
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HUNTER, SMITH & DAVIS, LLP

s/ Joseph B. Harvey

Joseph B. Harvey

TENNESSEE PUBLIC UTILITY COMMISSION
PETITION OF
Kingsport Power Company
DOCKET NO. TPUC 21-00107 Rate Case Discovery
Data Requests and Requests for the Production
of Documents by the THE CONSUMER PROTECTION AND ADVOCATE DIVISION OF
THE ATTORNEY GENERAL'S OFFICE
CA Set 1
To Kingsport Power Company

Data Request CA 1-073:

Refer to pages 8 and 9 of the testimony of Company witness Aaron D. Walker. Concerning the installation of AMI meters, provide the following: a. Identify the actual number of AMI meters installed in each year 2017 – 2020, as well as the estimated number of installed meters in 2021. b. Identify the actual AMI capital expenditures in each year 2017 – 2020, as well as the estimated cost of AMI meters installed in 2021. Confirm that all 2021 AMI meter costs are incorporated into the proposed rate base in this case. c. Has the Company incorporated the O&M savings associated with the installation of 2021 AMI meters into its as-adjusted O&M costs reflected in the Company proposal? If so, provide a comprehensive discussion of how such savings were identified and incorporated into the revenue requirement. Further, provide the analytical support confirming such savings are reflected in the Company's test year proposal.

Response CA 1-073:

- a. Please see CA 1-073 Attachment 1.
- b. Please see CA 1-073 Attachment 2.
- c. Yes, the Company reduced MRO Servicer headcount by 50%, going from 4 to 2 in 2019. The Company eliminated these positions preemptively as the AMI meters were being deployed. The test year reflects the full annual realized O&M savings of \$155,802 resulting from the installation of AMI meters which required fewer people to read meters. Additionally, the use of AMI meters has allowed for remote diagnostic capabilities which reduces the need to dispatch resources to the service address when unnecessary, for example to perform the verification of service or conduct unnecessary equipment troubleshooting.

Table 1.

	2017	2018	2019	2020	20201	AMI Total	Non- AMI Total	Grand Total
Count of MFR_DEVC_ SER_NBR	10	1	47,517	1,074	1,516	50,118	461	50,579

Table 2.

	2017	2018	2019	2020	2021	Grand Total
230 Kingsport Power Co – Distribution	-	26,584.00	4,891,622.76	193,060.91	211,999.91	5,323,267.58