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February 17, 2022

Via Electronic Filing & UPS 2-Day

Dr. Kenneth C. Hill, Chairman c/o Tory Lawless Dockets and Records Manager Tennessee Public Utility Commission 502 Deaderick St., 4th Floor Nashville, TN 37243 Electronically Filed in TPUC Docket Room on February 17, 2022 at 11:01 a.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 (Second 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. Willia

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. 21-00107
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 (Second 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").

SECOND DISCOVERY REQUESTS

ETEC 2-1. Please reconcile the price proposed by Kingsport in Rider R.E.C. for RECs of \$10.70/REC (\$0.0107/kWh) with the REC prices proposed by AEP affiliate APCo in West Virginia in its Renewable Power Plus tariff of \$3.25/REC in the first year.

Respectfully submitted this 17th day of February, 2022,

By Counsel:

/s/ Michael J. Quinan

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CERTIFICATE OF SERVICE

I hereby certify that, on February 17, 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.

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