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April 6, 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 TPUC Docket
Room on April 6, 2022 at 2:23 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 for filing Discovery Requests of Petitioner Kingsport Power Company d/b/a AEP Appalachian Power to Intervenor Consumer Advocate, Office of the Tennessee Attorney General Financing Division. 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



William C. Bovender

Enclosure: As stated

cc: David Foster (w/enc.)
Monica L. Smith-Ashford, Esq. (w/enc.)
Michael J. Quinan, Esq. (w/enc.)

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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

**DISCOVERY REQUESTS OF PETITIONER KINGSPORT POWER COMPANY d/b/a
AEP APPALACHIAN POWER DIRECTED TO INTERVENOR
CONSUMER ADVOCATE DIVISION, OFFICE OF THE TENNESSEE ATTORNEY
GENERAL FINANCIAL DIVISION**

Comes Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power, (herein, "Company") and pursuant to Tenn. R. Civ. P. 26, 33, and 34 and Tenn. Comp. R. & Reg. 1220-01-1-.11, submits the following Discovery Requests to be answered fully, completely, under oath, and in compliance with said Rules of Discovery. The Responses are to be produced to William C. Bovender, HUNTER, SMITH & DAVIS, LLP, 1212 N. Eastman Road, P.O. Box 3740, Kingsport, Tennessee 37664 and Noelle J. Coates, AMERICAN ELECTRIC POWER SERVICE CORPORATION, Three James Center, Suite 1100 1051 E. Cary Street, Richmond, VA 23219, as required by the Scheduling Order in this proceeding.

DISCOVERY REQUESTS

REQUEST NO 1: Please provide the attrition period on-peak demand (kW) for tariff code IP Tran 324 split between Domtar load and all other loads.

RESPONSE:

REQUEST NO 2: WHN Other Revenue, tab “Forfeited Discounts” – The Company cannot tie \$23,271,568 to WHN Revenue Workpaper R-1-1.00. Please provide support for this amount. Additionally, please explain the use of only base revenue instead of total revenue for the forfeited discount ratio.

RESPONSE:

REQUEST NO 3: CA Exhibits for Revenue Requirement in KPC Rate Case 21-00107 3-29-2022, “Excise&IncomeTax”, Line 25 indicates “FIT Rate” of 28% and reference C/ states this is “Statutory Rates”. Please explain the rationale of utilizing a 28% federal tax rate when the federal statutory rate is 21%.

RESPONSE:

REQUEST NO 4: CA Exhibits for Revenue Requirement in KPC Rate Case 21-00107 3-29-2022, “RevCnvsn”, please explain the rationale of excluding the Tennessee Regulatory Authority Inspection Fee from the calculation of the revenue conversion factor.

RESPONSE:

REQUEST NO 5: Regarding page 16 of Consumer Advocate witness Novak’s testimony, please explain how “unpaid interest that is accrued on these (customer) deposits and owed to the

customer when the deposit is refunded” is a “source of non-investor supplied funds which the Company has available to finance a portion of its utility investment” when the Company already provides a rate base reduction for customer deposit balances.

RESPONSE:

REQUEST NO 6: Regarding page 21 of Consumer Advocate witness Bradley’s testimony, please confirm that the \$377,702 shown on line 15 should have been \$77,702.


RESPONSE:

REQUEST NO 7: Regarding worksheet “Social Security - 1.3” of workpaper “21-00107 AB-2” to Consumer Advocate witness Bradley’s testimony, please confirm that the formula in Cell H24 inadvertently includes a reference to Cell H14. Please also confirm that if the formula in Cell H24 is corrected, then Mr. Bradley’s adjustment to decrease O&M expense for Social Security Tax (FERC Account 408) would be changed from \$77,702 to \$38,289.

RESPONSE:

Respectfully submitted,

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

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing **INTERROGATORY OF KINGSPORT POWER COMPANY d/b/a AEP APPALACHIAN POWER DIRECTED TO INTERVENOR CONSUMER ADVOCATE, OFFICE OF THE TENNESSEE ATTORNEY GENERAL FINANCING DIVISION** has been served upon the following by electronic mail and by mailing a copy of same by United States mail, postage prepaid, as follows, on this the 6th day of April, 2022.

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HUNTER, SMITH & DAVIS, LLP

By 
William C. Bovender