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May 6, 2022

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KPOW-10311

**VIA EMAIL ([tpuc.docketroom@tn.gov](mailto: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 May 6, 2022 at 11:02 a.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 Motion for Permission to Respond to Supplemental Testimony of Consumer Advocate Unit Witness William H. Novak.

The originals 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.)  
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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

**MOTION FOR PERMISSION TO RESPOND TO SUPPLEMENTAL TESTIMONY OF  
CONSUMER ADVOCATE UNIT WITNESS WILLIAM H. NOVAK**

Comes Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power (“KgPCo”), and hereby requests permission to file a response to the Supplemental Testimony of Consumer Advocate Unit Witness William H. Novak:

1. Previously, counsel for KgPCo was contacted by the Hearing Officer regarding whether KgPCo objected to witnesses of the Consumer Advocate Unit, Mr. William H. Novak and Alex Bradley, filing Supplemental Testimony. KgPCo’s counsel responded that KgPCo did not object, subject to the right to respond, if necessary.

2. On May 5, 2022, an Order was entered granting Consumer Advocate’s Motion for Revised Testimony and Supplemental Testimony. Said testimony was entered into the Docket.

3. KgPCo seeks permission to file a response to the Supplemental Testimony of William H. Novak relative to the limited subject: LED RATE OFFERINGS FOR OUTDOOR AND STREET LIGHTING. This responsive testimony would come from Katharine Walsh, who previously submitted direct and rebuttal testimony on this subject matter.


4. It is anticipated the responsive testimony would be brief in nature and would be filed on or before Friday, May 13, 2022.

5. KgPCo asserts the Walsh testimony would contribute significantly to the complete record the Commission seeks in rate proceedings.

PREMISES CONSIDERED, Petitioner, Kingsport Power Company requests it be permitted to file testimony responsive to the Supplemental Testimony of Consumer Advocate Unit Witness William H. Novak. FOR GOOD CAUSE SHOWN.

Respectfully submitted,

KINGSPORT POWER COMPANY  
d/b/a AEP APPALACHIAN POWER

BY: 

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing **Motion for Permission to Respond to Supplemental Testimony of Consumer Advocate Unit Witness William H. Novak** has been served upon the following by emailing a copy of same as follows, on this the 6<sup>th</sup> day of May, 2022.

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By \_\_\_\_\_

William C. Bovender