

S. Morris Hadden  
William C. Bovender  
William C. Argabrite  
Jimmie Carpenter Miller  
Mark S. Dessauer  
Gregory K. Haden  
Michael L. Forrester  
Stephen M. Darden  
Edward J. Webb, Jr.  
James N. L. Humphreys<sup>1</sup>  
Suzanne Sweet Cook<sup>1</sup>  
Michael S. Lattier<sup>5,6</sup>  
Scott T. Powers

**HUNTER·SMITH·DAVIS**  
SINCE 1916 LLP

**Kingsport Office**  
1212 North Eastman Road  
P.O. Box 3740  
Kingsport, TN 37664  
Phone (423) 378-8800  
Fax (423) 378-8801

**Johnson City Office**  
100 Med Tech Parkway  
Suite 110  
Johnson City, TN 37604  
Phone (423) 283-6300  
Fax (423) 283-6301

Leslie Tentler Ridings  
Christopher D. Owens<sup>1,3</sup>  
Jason A. Creech  
Meredith Bates Humbert  
Joseph B. Harvey<sup>4</sup>  
Caroline Ross Williams<sup>1</sup>  
Marcy E. Walker<sup>2</sup>  
Sarah Blessing Valk  
Sydney B. Gilbert  
Joseph A. Matherly  
Will A. Ellis  
Jordan T. Richardson

**Respond to:**  
Kingsport Office  
William C. Bovender  
423-378-8858, 423-534-7897 (mobile)  
bovender@hdsdlaw.com

All Attorneys Licensed in Tennessee  
Unless Noted

Additional Bar Memberships:  
VA<sup>1</sup>, NC<sup>2</sup>, KY<sup>3</sup>, GA<sup>4</sup>, FL<sup>5</sup>, MT<sup>6</sup>, CA only<sup>7</sup>

Of Counsel:  
Jeannette Smith Tysinger  
John B. Buda<sup>7</sup>

[www.hdsdlaw.com](http://www.hdsdlaw.com)

June 9, 2022

KPOW-10311

Electronically Filed in TPUC Docket  
Room on June 9, 2022 at 12:44 p.m.

**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

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 Motion for Leave to Allow David M. Roush to Present the Direct/Rebuttal Testimony of Witness Katharine I. Walsh.

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.)

Via US Mail and Email: [david.foster@tn.gov](mailto:david.foster@tn.gov)  
Via US Mail and Email: [monica.smith-ashford@tn.gov](mailto:monica.smith-ashford@tn.gov)

Michael J. Quinan, Esq. (w/enc.)  
Vance L. Broemel (w/enc.)  
Karen H. Stachowski (w/enc.)  
James R. Bacha, Esq. (w/enc.)  
Noelle J. Coates, Esq. (w/enc.)  
Joseph B. Harvey, Esq. (w/enc.)

*Via US Mail and Email: mquinan@t-mlaw.com*  
*Via US Mail and Email: vance.broemel@ag.tn.gov*  
*Via US Mail and Email: Karen.Stachowski@ag.tn.gov*  
*Via Email: jrbacha@aep.com*  
*Via Email: njcoates@aep.com*  
*Via Email: jharvey@hsdlaw.com*

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 LEAVE TO ALLOW DAVID M. ROUSH TO PRESENT THE  
DIRECT/REBUTTAL TESTIMONY OF WITNESS KATHARINE I. WALSH ON  
BEHALF OF KINGSPORT POWER COMPANY d/b/a AEP APPALACHIAN POWER**

Comes Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power (“KgPCo”), and respectfully requests that David M. Roush, Managing Director, Regulatory Pricing and Analysis of American Electric Power Service Corporation, be permitted to present the pre-filed direct and rebuttal testimony of Katharine I. Walsh. Ms. Walsh has developed a conflict which prevents her from presenting her testimony in person or by telephone.

Ms. Walsh is Manager, Regulatory Pricing & Analysis for AEPSC. Mr. Roush and Ms. Walsh are in the same business organization and Ms. Walsh reports up to Mr. Roush in that organization. Mr. Roush is thoroughly familiar with Ms. Walsh’s testimony and the subject matter discussed therein. He is equally qualified to be cross-examined by the other parties to the Docket. Mr. Roush will be present at the hearing in Nashville, Tennessee.

Attached as EXHIBIT 1 supporting this Motion is information concerning Mr. Roush. Attached as EXHIBIT 2 is the direct and rebuttal testimony of Ms. Walsh which Mr. Roush will sponsor and present.

PREMISES CONSIDERED, Kingsport Power Company d/b/a AEP Appalachian Power requests the Commission allow Mr. Roush to present the direct and rebuttal testimony of Ms. Walsh at the hearing on this Docket on June 20, 2022. FOR GOOD CAUSE SHOWN.

Respectfully submitted,

KINGSPORT POWER COMPANY  
d/b/a AEP APPALACHIAN POWER

BY: 

William C. Bovender, Esq. (BPR #000751)  
Joseph B. Harvey, Esq. (BPR #028891)  
Hunter, Smith & Davis, LLP  
P.O. Box 3740  
Kingsport, TN 37655  
Tel: 423.378.8858  
Email: [bovender@hdsdlaw.com](mailto:bovender@hdsdlaw.com)  
Email: [jharvey@hdsdlaw.com](mailto:jharvey@hdsdlaw.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing *MOTION FOR LEAVE TO ALLOW DAVID M. ROUSH TO PRESENT THE DIRECT/REBUTTAL TESTIMONY OF WITNESS KATHARINE I. WALSH ON BEHALF OF KINGSPORT POWER COMPANY d/b/a AEP APPALACHIAN POWER* has been served upon the following by emailing a copy of same as follows, on this the 9th day of June, 2022.

VANCE L. BROEMEL (BPR #011421)  
Senior Assistant Attorney General  
KAREN H. STACHOWSKI (BPR #019607)  
Assistant Attorney General  
Office of the Tennessee Attorney General  
Financial Division, Consumer Advocate Unit  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
Email: [vance.broemel@ag.tn.gov](mailto:vance.broemel@ag.tn.gov)  
Email: [karen.stachowski@ag.tn.gov](mailto:karen.stachowski@ag.tn.gov)

MICHAEL J. QUINAN  
ThompsonMcMullan, P.C.  
100 Shockoe Slip, Third Floor  
Richmond, VA 23219  
Tel.: (804) 799-4127  
Email: [mquinan@t-mlaw.com](mailto:mquinan@t-mlaw.com)

HUNTER, SMITH & DAVIS, LLP

By 

William C. Bovender

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

IN RE:

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

DOCKET NO.: 21-00107

1 I. **PERSONAL DATA**

2 Q. **PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is David M. Roush, and my business address is 1 Riverside Plaza, Columbus,  
4 Ohio 43215.

5 Q. **BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

6 A. I am employed by American Electric Power Service Corporation (AEPSC) as Managing  
7 Director – Regulated Pricing and Analysis. AEPSC supplies engineering, financing,  
8 accounting, planning, advisory, and other services to the subsidiaries of the American  
9 Electric Power (AEP) system, one of which is Ohio Power Company (AEP Ohio or the  
10 Company).

11 Q. **WOULD YOU PLEASE DESCRIBE YOUR EDUCATIONAL AND**  
12 **PROFESSIONAL BACKGROUND?**

13 A. I graduated from The Ohio State University (OSU) in 1989 with a Bachelor of Science  
14 degree in mathematics and a computer and information science minor. In 1999, I earned a  
15 Master of Business Administration degree from The University of Dayton. I have  
16 completed both the EEI Electric Rate Fundamentals and Advanced Courses. In 2003, I  
17 completed the AEP/OSU Strategic Leadership Program. In 1989, I joined AEPSC as a



1 Rate Assistant. Since that time, I have progressed through various positions and was  
2 promoted to my current position of Managing Director – Regulated Pricing and Analysis  
3 in April 2019.

4 **Q. WHAT ARE YOUR RESPONSIBILITIES AS MANAGING DIRECTOR –**  
5 **REGULATED PRICING AND ANALYSIS?**

6 A. My responsibilities include the oversight of the preparation of cost of service and rate  
7 design analysis for the AEP System operating companies and oversight of the preparation  
8 of special customer contracts and pricing.

9 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN ANY REGULATORY**  
10 **PROCEEDINGS?**

11 A. Yes. I have testified in several rate cases and other proceedings before the Public Utilities  
12 Commission of Ohio (Commission), the Indiana Utility Regulatory Commission, the  
13 Public Service Commission of Kentucky, the Michigan Public Service Commission, and  
14 the Public Service Commission of West Virginia. Before the Commission, I have testified  
15 in a number of cases, including Case Nos. 11-351-EL-AIR and 11-352-EL-AIR.

**DIRECT TESTIMONY OF  
KATHARINE I. WALSH  
ON BEHALF OF KINGSPORT POWER COMPANY  
D/B/A AEP APPALACHIAN POWER  
BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
DOCKET NO. 21-00107**

1 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.**

2 A. My name is Katharine I. Walsh. My business address is 1 Riverside Plaza,  
3 Columbus, Ohio 43215. I am employed by the AEPSC as Manager, Regulatory  
4 Pricing & Analysis, in the Regulatory Services Department. AEPSC supplies  
5 engineering, financing, accounting, and planning and advisory services to the  
6 subsidiaries of the AEP System, one of which is KgPCo.

7 **Q. WHAT ARE YOUR PRINCIPAL AREAS OF RESPONSIBILITY AS**  
8 **MANAGER REGULATORY PRICING & ANALYSIS?**

9 A. I am responsible for assisting AEP electric utility operating companies in the  
10 preparation of their regulatory filings before this and other Commissions under  
11 whose jurisdiction these companies provide electric service.

12 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**  
13 **EMPLOYMENT HISTORY.**

14 A. I graduated from Xavier University in 2008 with a Bachelor of Science degree in  
15 Economics. Upon graduating, I joined AEPSC as an Energy Analyst in the  
16 Commercial Operations Group. This role included various positions in  
17 Commercial Operations. In 2010, I transferred to Regulatory Services as a  
18 Regulatory Analyst. In 2019, I was promoted to my current position.





1   **Q.    HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY**  
2       **PROCEEDINGS?**

3    A.    Yes. I have testified and/or submitted testimony before the Virginia State  
4       Corporation Commission on behalf of APCo, before the Public Service  
5       Commission of West Virginia on behalf of APCo and Wheeling Power Company,  
6       and before the Kentucky Public Service Commission on behalf of Kentucky  
7       Power Company. These companies, like KgPCo, are electric operating  
8       subsidiaries of AEP.

9    **I.    PURPOSE OF YOUR TESTIMONY**

10   **Q.    WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

11   A.    The purpose of my testimony in this proceeding is as follows:

- 12       • To explain how certain revenue and expense adjustments relating to  
13       weather-normalized sales levels, year-end customer sales levels, rate  
14       annualization, book to billed sales levels, and the removal of rider revenue  
15       and expense were calculated. These adjustments are designated as OR-1  
16       through OR-7, OM-14 and OT-33.
- 17       • To sponsor the modifications to KgPCo's Tariffs and to sponsor the rate  
18       design underlying the charges included in those tariffs. Also included in  
19       the rate design are new offerings for Outdoor Lighting (OL) and Street  
20       Lighting (SL) LED lamps. Company witness Keeton sponsors the  
21       modifications to KgPCo's Terms and Conditions of Service.
- 22       • To sponsor certain draft minimum filing requirements (MFRs) that are  
23       being provided concurrently with the Company's petition.

24   **Q.    WHAT EXHIBITS ARE YOU SPONSORING?**

25   A.    I am sponsoring the following exhibits:

26       KgPCo Exhibit No. 1 (KIW), Revenue Proof

27       KgPCo Exhibit No. 2 (KIW), Current and Proposed Rates

1 KgPCo Exhibit No. 3 (KIW), Typical Bills

2 **Q. WERE THE EXHIBITS THAT YOU ARE SPONSORING PREPARED OR**  
3 **ASSEMBLED BY YOU OR UNDER YOUR DIRECTION?**

4 A. Yes.

5 **Q. ARE YOU SPONSORING ANY MFRs?**

6 A. Yes. I am sponsoring the follow MFRs: 12a-d, 13, 14a-d, 15, 16, 17, 18, 19, 21,  
7 22, and 82.

8 **II. ADJUSTMENTS**

9 **Q. LIST THE ADJUSTMENTS YOU ARE SPONSORING.**

10 A. I am sponsoring the following operating revenue (OR) adjustments:

11 OR-1 Weather Normalization Adjustment: Increase base revenues to  
12 reflect normal weather.

13 OR-2 Year-End Customer Adjustment: Reduce base revenues to  
14 reflect the year-end number of customers and usage levels.

15 OR-3 Book to Bill Adjustment: Decrease base revenues to reflect a  
16 billed rather than booked basis.

17 OR-4 Remove Franchise Fee Revenue: Remove revenue associated  
18 with the franchise fee local privilege tax.

19 OR-5 Rate Annualization Adjustment - FTRAR: Increase revenue to  
20 reflect the annualized FTRAR rate.

21 OR-6 Remove FPPAR Rider Revenue: Remove billed revenue  
22 associated with the FPPAR

23 OR-7 Remove TRP & MS Rider Revenue: Remove billed revenue  
24 associated with the TRP&MS Rider

25 I am also sponsoring the following O&M expense and OT adjustments:

26 OM-14 Remove FPPAR Expense: Remove expense associated with the  
27 FPPAR

1 OT-33 Remove Franchise Fee Tax Expense: Remove expense  
2 associated with the franchise fee local privilege tax

3 **Q. PLEASE DESCRIBE ADJUSTMENT OR-1: WEATHER**  
4 **NORMALIZATION.**

5 A. Adjustment OR-1 removes the impact of abnormal weather on the test year level  
6 of base revenues for the RS class. The test year impact of abnormal weather for  
7 these classes was provided by AEPSC's Economic Forecasting department.  
8 These impacts were then used to adjust the class billing determinants. The  
9 difference between the revenue generated by applying base rates to the  
10 differences between weather-normalized billing determinants and the actual test  
11 year billing determinants resulted in an increase in base revenue of \$19,838.

12 **Q. PLEASE DESCRIBE ADJUSTMENT OR-2: YEAR-END CUSTOMER.**

13 A. Adjustment OR-2 decreases base revenues by \$170,354 to develop test year  
14 revenues that KgPCo would have received based upon the actual number of  
15 customers, by tariff, at the end of the test year, which was 12 months-ended June  
16 2021. These are the number of customers expected during the rate year, which  
17 will begin when the approved rates become effective.

18 **Q. DID THE OPERATIONS OF A LARGE INDUSTRIAL CUSTOMER**  
19 **IMPACT ADJUSTMENT OR-2?**

20 A. Yes. A large industrial customer, taking service on tariff Industrial Power (IP),  
21 ceased operating at their historic level of production prior to the test year.  
22 However, their test year billing determinants, and resulting base revenue, still  
23 required an adjustment. In accordance with the IP tariff, this customer was billed

1 using their high previous demand (HPD) for 9 out of 12 months of the test year.

2 The HPD utilized for billing in months July 2020 through March 2021 was  
3 significantly higher than their actual on-peak billing demand. Since this customer  
4 anticipates operating at their current level of production, and does not intend to  
5 increase load, adjustments to their billing determinants and related revenue are  
6 necessary to ensure the rate year reflects the appropriate customer load.

7 **Q. PLEASE DESCRIBE ADJUSTMENT OR-3: BOOK TO BILL.**

8 A. Adjustment OR-3 is necessary to reconcile the revenue difference between billed  
9 and accrued revenue as recorded on the Company's books and the revenue  
10 generated by applying the test year billing determinants to test year rates. This  
11 resulted in a decrease in revenues of \$128,916.

12 **Q. PLEASE DESCRIBE ADJUSTMENT OR-4: REMOVE FRANCHISE FEE**  
13 **REVENUE.**

14 A. Adjustment OR-4 removes the franchise fee revenue collected from customers  
15 who live within the city limits of Kingsport. The franchise fee is paid to the City  
16 of Kingsport. An offsetting adjustment, Adjustment OT-33, removes the  
17 franchise fee tax expense. Adjustment OR-4 resulted in a decrease of \$4,026,094.

18 **Q. PLEASE DESCRIBE ADJUSTMENT OR-5: RATE ANNUALIZATION**  
19 **FTRAR.**

20 A. Adjustment OR-5 increases test year base rate revenues by \$22,329. The purpose  
21 of this adjustment is to appropriately reflect the revenues that KgPCo would have  
22 received if each customer had been billed for the entire 12 months of the test year  
23 at the FTRAR rates in effect at the end of the test year. The FTRAR credits

1 customer bills for changes due to tax reform. This rider will be included in base  
2 rates going forward; therefore, the mid-year rate change should be annualized and  
3 included in the going-level cost-of-service.

4 **Q. PLEASE DESCRIBE ADJUSTMENT OR-6: REMOVE FPPAR RIDER**  
5 **REVENUE.**

6 A. Adjustment OR-6 removes the amount of FPPAR revenue collected from  
7 customers during the test year. The revenue and expense associated with the  
8 FPPAR are separate from base distribution rates and need to be removed for the  
9 purposes of setting base rates. This adjustment removes \$118,380,068 of billed  
10 FPPAR revenue. Adjustment OM-14 removes FPPAR expense.

11 **Q. PLEASE DESCRIBE ADJUSTMENT OR-7: REMOVE TRP & MS RIDER**  
12 **REVENUE.**

13 A. Adjustment OR-7 removes the amount of TRP&MS Rider revenue collected from  
14 customers during the test year. This adjustment removes \$6,018,227 of TRP&MS  
15 Rider revenue. Company witness Allen supports adjustment OM-10 to remove  
16 the test year over/under recovery of TRP&MS Rider expense. The test year  
17 TRP&MS revenue, as well as the over/under recovery expense in OM-10, reflect  
18 prior period revenue and expense. These were removed in order to account for  
19 the fact that the test year level of expense and capital investment would be  
20 included in base rates once new rates go into effect. As described by Company  
21 witness Castle, the current TRP&MS Rider revenue will reset to zero concurrent  
22 with the requested base rate change.

1   **Q.   PLEASE DESCRIBE ADJUSTMENT OM-14: REMOVE FPPAR**  
2       **EXPENSE.**

3   A.   Adjustment OM-14 decreases FPPAR expense by \$117,746,450. This adjustment  
4       removes all FPPAR expense since it is recovered in the rider and not base rates.

5   **Q.   PLEASE DESCRIBE ADJUSTMENT OT-33: REMOVE FRANCHISE FEE**  
6       **TAX EXPENSE.**

7   A.   Adjustment OT-33 decreases other tax expense by \$4,026,094 to remove the  
8       Kingsport franchise fee tax expense which is an offset to adjustment OR-4.

9   **III.   RATE DESIGN**

10  **Q.   PLEASE DESCRIBE THE COMPANY'S GENERAL APPROACH TO**  
11       **RATE DESIGN.**

12  A.   In general, the Company's approach is to design rates and rate components which  
13       reflect the underlying costs of the Company. This includes collecting service-  
14       related costs through service charges and recognizing the differences in the costs  
15       to serve customers at different service delivery voltages. As with the allocation of  
16       the revenue increases to the customer classes discussed in Company witness  
17       Castles' testimony, the concept of gradualism must be considered in the  
18       movement toward full cost-based rate components to avoid undue impacts on  
19       customers.

1   **Q.   PLEASE SUMMARIZE THE TARIFF MODIFICATIONS PROPOSED BY**  
2   **THE COMPANY.**

3   A.   The modifications proposed by the Company are as follows:

4 <u>Tariff</u>	<u>Tariff Modification</u>
5       All Tariffs	a) Move rate components toward full costs.
6       RS-STOU	a) Introduce RS-STOU – a dynamic smart
7	time of use tariff offering
8       O.L.	a) Introduce LED offerings and conversion
9	charges
10      S.L.	a) Include the Street Lighting class in the
11	retail tariff and introduce base lamp and
12	rider rates
13	b) Introduce LED offerings and conversion
14	charges

15   **Q.   WHAT IS THE IMPACT OF THE COMPANY'S PROPOSAL ON THE**  
16   **BASE RATE MONTHLY SERVICE CHARGE APPLICABLE TO THE**  
17   **RESIDENTIAL AND SMALL GENERAL SERVICE TARIFFS AS A**  
18   **RESULT OF COMBINING THE TRP&MS RIDER WITH BASE RATES?**

19   A.   The Company's proposal retains the service charge approved in Docket 16-0001  
20   and adds the service charge currently included in the TRP&MS Rider. Since the  
21   TRP&MS Rider revenue will be reset to \$0 concurrent with new base rates going  
22   into effect, and going-level TRP&MS costs will be recovered in base rates, the  
23   new base rates were designed to reflect the same levels of rates as previously  
24   approved under base and TRP&MS. The previous RS and SGS TRP&MS Rider  
25   rates were dollar per month charges. These charges were simply relocated into  
26   the proposed base rate service charges.

1    **Q.    WHY IS THE COMPANY PROPOSING TO CLOSE TARIFF RS-TOD?**

2    A.    The RS-TOD tariff is an optional schedule with time varying rates for residential  
3           customers. It is meant to incentivize customers to conserve on-peak usage, and  
4           instead, shift usage to off-peak hours. A review of the five customers currently  
5           taking service on RS-TOD showed that only one was benefitting from the rate  
6           structure<sup>1</sup>. As an alternative, the Company is introducing a new optional tariff –  
7           RS-STOU.

8    **Q.    PLEASE DESCRIBE THE OPTIONAL RESIDENTIAL SMART TIME OF**  
9           **USE RATE SCHEDULE THE COMPANY IS PROPOSING.**

10   A.    Schedule RS-STOU utilizes a rate structure with a monthly service charge, on-  
11           peak and off-peak kWh energy charges, and a critical on-peak kWh charge. The  
12           critical on-peak period, is limited to 7:00 AM – 10:00 AM in the months of  
13           December through February and 4:00 PM – 7:00 PM in the months of June  
14           through September, Monday through Friday. The critical on-peak periods  
15           coincide with the Company's winter heating peak hours and summer cooling peak  
16           hours. The goal of this optional rate structure is to send targeted price signals that  
17           will reward customers for shifting usage away from the peak time periods that  
18           cause the Company to incur higher costs. Additionally, it is possible that some  
19           electric heating customers could benefit under this rate structure due to their  
20           potentially higher load factor usage characteristics and potentially through  
21           undertaking pre-heating and smart thermostat strategies. The regular on-peak

---

<sup>1</sup> The Company has contacted the affected customers and moved 3 of the 5 customers to the RS standard rate schedule.



1 period is 6:00 AM – 9:00 PM for all weekdays, Monday through Friday that are  
2 not defined as critical on-peak hours. The off-peak period consists of all  
3 remaining hours not considered critical or on-peak. The use of a shorter,  
4 “critical” period will make it more practical for customers to shift usage away  
5 from the period, and thus more likely they can save money.

6 **Q. PLEASE EXPLAIN HOW THE RS-STOU PRICING WILL BE**  
7 **IMPLEMENTED.**

8 A. KgPCo customers pay for distribution service through their base rates. As  
9 distribution service is a fixed cost, meaning it does not vary with a customer’s  
10 day-to-day usage, the dynamic RS-STOU pricing will not be realized in base  
11 rates. Rather the price differential will be realized in the FPPAR rate.

12 **Q. PLEASE EXPLAIN HOW THE COMPANY DESIGNED THE**  
13 **RESIDENTIAL SMART TIME OF USE RATES.**

14 A. Base rates for RS-STOU were set equal to the proposed RS Standard tariff  
15 offering. As previously described, the dynamic pricing will be reflected in the  
16 FPPAR. I began with the total RS revenue requirement from the most recently  
17 filed and accepted FPPAR update: Docket No. 16-00001 filed September 29,  
18 2021. I estimated approximately 462 hours would occur in the critical on-peak  
19 period; therefore, these hours were backed out of the regular on-peak period.  
20 These hours were priced at 17.5 cents per kWh in order to encourage customers to  
21 reduce usage during these time periods. The remaining revenue targets were  
22 divided between the remaining hours to calculate the on-peak rate of 9.895 cents  
23 per on-peak kWh and 6.394 cents per off-peak kWh.

1    **Q.    PLEASE EXPLAIN THE CURRENT STREET LIGHTING SITUATION.**

2    A.    An SL tariff schedule is currently not included as part of the retail tariff; rather,  
3           the Company has entered into separate contracts with those customers who take  
4           service for SL lamps.

5    **Q.    WHAT IS THE COMPANY PROPOSING IN THIS PROCEEDING IN**  
6           **REGARDS TO SL?**

7    A.    The Company is proposing to include SL in the retail tariff going forward. In the  
8           prior case (Docket 16-0001), the revenue apportionment approved by the  
9           Commission included revenues assigned to the Street Lighting class, but the  
10          Company did not have an avenue to adjust SL rates due to the contracts in place.  
11          Including this class within the retail tariff will ensure fair and equitable treatment  
12          of all KgPCo customers in this Petition and future base rate and rider proceedings.

13   **Q.    PLEASE DESCRIBE ANY ADMINISTRATIVE CHANGES AS A RESULT**  
14          **OF THE PROPOSED SL CHANGES.**

15   A.    SL customers have historically paid a single lamp rate for their entire cost-of-  
16          service. I have designed separate base, FPPAR, and TRP&MS (\$0) Rider rates  
17          going forward.

18   **Q.    HOW WERE SL RIDER RATES DETERMINED?**

19   A.    FPPAR and TRP&MS Rider revenues were imputed when billing out total test  
20          year SL revenue. The imputed rider revenue was removed at going-level in the  
21          same manner that OL rider revenue was calculated and then removed by various  
22          adjustments. The remaining revenue was considered base revenue and included in  
23          the going-level base distribution cost-of-service.

1    **Q.    WHY IS THE COMPANY PROPOSING TO ADD LED LIGHTING**  
2    **OPTIONS TO SCHEDULES OL AND SL?**

3    A.    The Company has received numerous inquiries from customers as LED  
4           technology has become more prevalent. Due to these customer inquiries, KgPCo  
5           recently issued a request for proposals to determine what the costs would be to  
6           provide this technology to customers. The Department of Energy has noted that  
7           LEDs are longer-lasting, more durable and offer comparable to better quality of  
8           light than traditional lighting included in the Company's current offerings, all at a  
9           fraction of the energy usage.<sup>2</sup> The traditional lighting technologies, such as High  
10          Pressure Sodium or High Intensity Discharge, are becoming increasingly difficult  
11          to source a sufficient volume at a reasonable cost. Converting to these LED  
12          products will provide customers with a better quality light, more attractive color  
13          temperature options, and reduced monthly energy consumption and cost.  
14          Additionally, LED technology will be much more compatible with future  
15          technology enhancements to the system, such as dimming and smart street light  
16          technology.

17   **Q.    WILL CUSTOMERS HAVE THE OPTION TO REPLACE CURRENT**  
18   **LIGHTING WITH LED LIGHTS?**

19   A.    Yes, customers will be able to replace current lighting with LED technology.  
20          KgPCo is proposing a conversion charge for any customer that has a functioning  
21          non-LED luminaire. This conversion charge would not apply to a customer if the

---

<sup>2</sup> LED Lighting, Department of Energy, <https://www.energy.gov/energysaver/save-electricity-andfuel/lighting-choices-save-you-money/led-lighting> (March 10, 2020).

1 ballast or housing of the existing luminaire fails, or if their existing luminaire is  
2 out of stock. In these cases, the Company would replace such luminaire with an  
3 LED luminaire of similar lumen output and lighting distribution, if the customer  
4 requests that luminaire as the replacement.

5 **Q. PLEASE FURTHER EXPLAIN THE CONVERSION CHARGE.**

6 A. In the event a customer wishes to replace a non-LED luminaire with a new LED  
7 option, the Company designed a fee, or "conversion charge," to recover the  
8 average remaining book value of the non-LED luminaire.

9 **IV. REVENUE PROOF & BILL IMPACTS**

10 **Q. HAS THE COMPANY PREPARED A SUMMARY THAT REFLECTS**  
11 **CURRENT AND PROPOSED RATES FOR EACH CUSTOMER CLASS?**

12 A. Yes. Current and proposed rates are shown in KgPCo Exhibit No. 2 (KIW).

13 **Q. HAVE YOU PREPARED A SUMMARY OF THE COMPANY'S**  
14 **PROPOSED RATE INCREASE?**

15 A. Yes. KgPCo Exhibit No. 1 (KIW) shows the base rate increase and the rate  
16 increase by tariff class. The base rate proposed increase is \$14,375,626.  
17 However, as a result of setting the TRP&MS Rider rates to \$0 concurrent with the  
18 base rate increase, the net increase to customers is approximately \$6,886,565. The  
19 net increase results in an approximate 4.7% increase over test year going-level  
20 revenue. Customer impacts by class will vary in accordance with the proposed  
21 revenue allocation as discussed by Company witnesses Castle and Ward.

1   **Q.    WHAT IMPACT WILL THE PROPOSED RATES HAVE ON**  
2       **CUSTOMER BILLS?**

3    A.    Upon implementation, residential customers using 1,500 kWh of electricity per  
4           month would see a monthly rate increase of \$10.21, or 7.0%. KgPCo Exhibit No.  
5           3 (KIW) shows the percentage increase at various “typical” usage levels for  
6           KgPCo’s major tariff schedules.

7   **Q.    DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

8    A.    Yes it does.

**Exhibit No. 1 (KIW)**

1-8) Excludes franchise fee revenue

Proposed Increase -	Increase Detail	Revenue Proof Amount	Difference	Notes
JCOS	\$ 14,375,626	\$ 14,375,017	\$	per rate design
Less: Current TRP & MS Rider	(7,485,051)			see JCOS reconciliation tab
Net increase	6,890,565			
A 3% Overall Increase of Current's TRP & MS Riders Revenue				

This sheet contains data from the rate design process.  
It is designed to identify revenue differences between Class Cost of Service Study and the application of  
new rates to the test year billing determinants

Tariff Sheet	Calculated Base Revs	Rate Design Difference	Subtotal	CCOS Revenue	Variance
RS					
RS EMP	\$15,123,341				
RS TOD	\$22,685				
	\$3,587				
Total Residential	\$15,149,613	-\$3,905	\$15,145,708	\$15,145,708	\$0
SGS Fixed Total (231)					
SGS-Meas (232)	\$1,553,699				
SGS NM	\$105,368				
	\$20,524				
Total SGS	\$1,679,591	\$90	\$1,679,681	\$1,679,680	\$1
MGS SEC					
GS TOD	\$5,134,674				
MGS PRI	\$10,735				
	\$0				
MGS	\$5,145,410	-\$81	\$5,145,329	\$5,145,329	\$0
LGS SEC					
LGS PRI	\$7,432,507				
	\$1,413,449				
LGS	\$8,845,956	-\$69	\$8,845,887	\$8,845,887	\$0
IP PRI	\$633,958				
IP SUB	\$3,351,630				
IP	\$3,985,587	\$4,091	\$3,989,678	\$3,989,678	\$0
EHG (208, 209)					
	\$1,255,602	\$99	\$1,255,701	\$1,255,701	\$0
CS (221)					
	\$450,814	-\$10	\$450,804	\$450,804	\$0
PS (640)					
PS (641)	\$216,238				
PS (642)	\$17,861				
	\$377,646				
PS Total	\$611,745	-\$101	\$611,644	\$611,645	-\$1
OL					
	\$816,926	-\$676	\$816,250	\$816,256	-\$6
SL					
	\$1,407,340	\$172	\$1,407,512	\$1,407,512	\$0
Total	\$39,348,584	-\$390	\$39,348,194	\$39,348,200	-\$6



KINGSPORT POWER BILLING ANALYSIS  
TEST YEAR ENDED JUNE 30, 2021  
GOING LEVEL SUMMARY

Tariff	Statement Revenue (1)	Per Books (Income)		Book to Bill (2)-(3)-(1)	Per Books Billing		FTRAR Annualization Adjustment (4)-(5)-(2)	Weather		Year-End Customer Adjustment to Revenue (8)-(9)-(7)	Year-End Customer & Weather		% Difference (11)-(12)/(3)	Number of Customers* (12)	Annualized Number of Customers (13)	FPPAR Test Year Revenue (14)	TRP & MS Test Year Revenue (15)	COS Going Level Revenue (16) = (9)-(14)-(15)
		Billed Adjustment (2)	Revenue (1)		Analysis Revenue (3)	Adjusted Revenue (6)		Adjusted Revenue (7)	Adjusted Revenue (9)		Adjusted Revenue (10)							
RS Total (011, 015)	\$64,614,138			(\$162,425)	\$64,471,713	\$7,308	\$64,479,022	\$19,824	\$64,498,846	\$6,569	\$64,505,415	\$33,701	0.05%	42,223	42,270	\$55,499,593	\$1,913,844	\$7,091,978
RS EMP (016, 051)	\$122,313			(435)	\$121,878	\$10	\$121,888	\$0	\$121,888	(\$493)	\$121,394	(\$493)	-0.40%	75	71	\$109,681	\$3,400	\$8,313
RSTOD Total (030)	\$25,919			(\$183)	\$25,736	\$3	\$25,739	\$15	\$25,753	(\$263)	\$25,490	(\$246)	-0.96%	6	5	\$22,270	\$245	\$2,975
SGS Firm Total (231)	\$2,812,692			\$9,716	\$2,802,976	\$1,082	\$2,804,058	\$0	\$2,804,058	\$6,727	\$2,810,785	\$7,809	0.28%	3,633	3,656	\$1,455,910	\$208,311	\$1,146,564
SGS-Max (232)	\$215,374			(\$651)	\$214,713	\$75	\$214,788	\$0	\$214,788	(\$232)	\$214,556	(\$157)	-0.07%	216	215	\$122,892	\$12,383	\$79,180
SGS NM Total (233)	\$31,971			(\$889)	\$31,282	\$14	\$31,296	\$0	\$31,296	(\$40)	\$31,257	(\$26)	-0.08%	59	59	\$13,255	\$3,403	\$14,569
MS Sec Total (235)	\$11,839,980			(\$8,939)	\$11,830,441	\$3,258	\$11,833,700	\$0	\$11,833,700	\$49,885	\$11,883,585	\$53,143	0.45%	1,258	1,276	\$7,592,151	\$855,956	\$3,435,478
MGSTOD (239)	\$27,040			(\$262)	\$26,778	\$6	\$26,784	\$0	\$26,784	\$1,552	\$26,336	\$1,559	5.82%	4	5	\$15,251	\$501	\$8,475
MS Pn Total (237)	\$4,306			\$275	\$4,581	\$4	\$4,585	\$0	\$4,585	(\$2,005)	\$2,579	(\$2,002)	-43.70%	1	0	\$2,358	\$260	(\$38)
LGS Sec Total (240, 242)	\$18,116,620			(\$19,720)	\$18,096,900	\$4,792	\$18,101,692	\$0	\$18,101,692	\$109,483	\$18,211,154.95	\$114,255	0.63%	183	187	\$12,100,339	\$1,257,687	\$4,853,118
LGS Pn Total (244)	\$3,003,039			\$30,012	\$3,033,051	\$843	\$3,033,894	\$0	\$3,033,894	\$116,766	\$3,150,659.54	\$117,609	3.88%	15	17	\$1,943,636	\$197,403	\$1,009,620
IP Pn (322)	\$3,708,700			\$2,660	\$3,711,360	\$372	\$3,711,732	\$0	\$3,711,732	\$0	\$3,711,732	\$372	0.01%	2	2	\$3,289,249	\$79,428	\$343,054
IP Tran (324)	\$33,893,141			\$26,394	\$33,919,535	\$2,746	\$33,922,280	\$0	\$33,922,280	(\$473,948)	\$33,448,332	(\$471,203)	-1.39%	4	4	\$31,105,684	\$785,908	\$1,556,741
EHG (209, 209)	\$2,950,190			\$22,540	\$2,972,729	\$720	\$2,973,449	\$0	\$2,973,449	\$2,374	\$2,975,823	\$3,054	0.10%	616	618	\$1,944,603	\$272,450	\$758,770
CS (221)	\$1,020,767			(\$1,585)	\$1,018,181	\$288	\$1,018,469	\$0	\$1,018,469	\$8,107	\$1,027,576	\$8,395	0.82%	188	193	\$646,874	\$71,260	\$306,442
PS (640)	\$656,028			(\$514)	\$655,414	\$112	\$655,526	\$0	\$655,526	\$12	\$655,538	\$124	0.02%	14	14	\$505,710	\$40,720	\$109,108
PS (641)	\$73,080			(\$137)	\$72,944	\$6	\$72,950	\$0	\$72,950	\$0	\$72,950	\$6	0.01%	1	1	\$62,712	\$5,049	\$5,188
PS (642)	\$1,673,305			\$2,800	\$1,686,505	\$87	\$1,686,593	\$0	\$1,686,593	\$2,500	\$1,691,193	\$2,687	0.16%	15	16	\$1,488,780	\$120,477	\$71,938
OL (093 - 126)	\$879,594			\$2,474	\$877,120	\$534	\$877,538	\$0	\$877,534	\$969	\$878,662	\$1,542	0.18%	3,687	3,687	\$159,743	\$55,047	\$866,872
SL (523)	\$1,556,437			(\$156)	\$1,556,281	\$0	\$1,556,281	\$0	\$1,556,281	1,634	\$1,557,915	\$1,634	0.10%	4	4	\$285,257	\$124,383	\$1,146,264

\*Excludes number of OL jumps

SOURCE: 12 MONTHS  
BILLED AND ACCRUED  
TARIFF SUMMARY -  
June 2021

SOURCE: 12 MONTHS BILLED AND ACCRUED TARIFF SUMMARY - June 2021				Current Revenues		Book to Billed Revenue Adjustment	
TARIFF	BILLED AND ACCRUED PER BOOKS REVENUE	FRANCHISE FEE REVENUE	BILLING ANALYSIS REVENUES	DIFFERENCE	PERCENT		
RS Total (011, 015)	66,384,134	1,749,996	\$64,471,713	(\$162,425)	-0.24%		
RS EMP (018, 051)	125,538	3,225	\$121,878	(\$3,660)	-0.35%		
RSTOD Total (030)	26,922	1,003	25,736	(\$185)	-0.68%		
Residential - Total	66,536,594	1,754,224	64,619,327	(163,043)	-0.25%		
CS (221)	1,053,167	32,401	1,019,181	(\$1,585)	-0.15%		
SGS Fixed Total (231)	2,896,529	83,837	2,802,976	(\$9,716)	-0.34%		
SGS-Meas (232)	222,985	7,611	214,713	(\$661)	-0.30%		
SGS NM Total (233)	32,779	808	31,282	(\$689)	-2.10%		
SGS - Total	3,152,293	92,256	3,048,971	(11,066)	-0.35%		
MGS Sec Total (235)	12,347,567	508,187	11,830,441	(\$8,939)	-0.07%		
MGSTOD (229)	27,250	210	26,778	(\$362)	-0.96%		
MGS - Total Secondary	12,374,817	508,398	11,857,219	(9,200)	-0.07%		
MGS Pn Total (237)	4,505	199	4,581	\$275	6.09%		
LGS Sec (240, 242)	18,951,682	835,061	18,096,900	(\$19,720)	-0.10%		
LGS Pn Total (244)	3,143,877	140,839	3,033,051	\$30,012	0.95%		
IP Pn (322)	3,791,749	83,050	3,711,360	\$2,660	0.07%		
IP Tran (324)	34,179,321	286,180	33,919,535	\$26,394	0.08%		
EHG (208, 209)	3,067,598	117,408	2,972,729	\$22,540	0.73%		
PS (640)	675,114	19,085	655,414	(\$614)	-0.09%		
PS (641)	76,626	3,546	72,944	(\$137)	-0.18%		
PS (642)	1,747,211	55,905	1,688,505	(\$2,800)	-0.16%		
PS - Total	2,498,951	78,536	2,416,863	(3,552)	-0.14%		
OL (093 - 126)	901,527	21,932	877,120	(\$2,474)	-0.27%		
SL (523)	1,632,047	75,610	1,556,281	(\$156)	-0.01%		
Total Retail	151,288,129	4,026,094	147,133,119	(128,916) OR-3	-0.09%		
		OR-4		(128,916)			
	151,288,129	147,262,035					

0 check

check (sb 0) =

KINGSPORT POWER BILLING ANALYSIS  
TEST YEAR ENDED JUNE 30, 2021  
RIDER SUMMARY

Tariff	Per Books (Income) Statement Revenue (1)	Book to Billed Adjustment (2)	Billing Analysis Revenue (3)	Annualization Adjustment (4)=(5)-(3)	Annualized Revenue (5)	Test Year		Test Year TRP & MS Test Year	Current TRP&MS	FTRAR Annualized	Test Year FTRAR Test Year	Prompt Pay Going Level
						FPPAR Test Year	TRP & MS Test Year					
RS Total (011, 015)	\$64,634,138	(162,425)	\$64,471,713	\$7,308	\$64,479,022	\$55,499,593	\$1,913,844		\$2,433,344	(\$458,948)	(\$466,368)	(\$982,316)
RS EMP (018, 051)	\$122,313	(435)	\$121,878	\$10	\$121,888	\$109,681	\$3,400		\$4,116	(\$608)	(\$618)	(\$1,849)
RSTOD Total (030)	\$25,919	(\$183)	\$25,736	\$3	\$25,739	\$22,270	\$245		\$283	(\$206)	(\$209)	(\$388)
SGS Fixed Total (231)	\$2,812,692	(\$9,716)	\$2,802,976	\$1,082	\$2,804,058	\$1,455,910	\$208,311		\$266,366	(\$67,440)	(\$68,539)	(\$42,804)
SGS-Meas (232)	\$215,374	(\$661)	\$214,713	\$75	\$214,788	\$122,892	\$12,383		\$15,695	(\$4,715)	(\$4,792)	(\$3,267)
SGS NM Total (233)	\$31,971	(\$689)	\$31,282	\$14	\$31,296	\$13,255	\$3,403		\$4,319	(\$862)	(\$876)	(\$476)
MGS Sec Total (235)	\$11,839,380	(\$8,939)	\$11,830,441	\$3,258	\$11,833,700	\$7,592,151	\$855,956		\$1,104,186	(\$203,357)	(\$206,665)	(\$180,969)
MGSTOD (229)	\$27,040	(\$262)	\$26,778	\$6	\$26,784	\$19,261	\$601		\$924	(\$418)	(\$425)	(\$432)
MGS Pn Total (237)	\$4,306	\$275	\$4,581	\$4	\$4,585	\$2,358	\$260		\$0	(\$116)	(\$120)	(\$39)
LGS Sec Total (240, 242)	\$18,116,620	(\$19,720)	\$18,096,900	\$4,762	\$18,101,662	\$12,100,339	\$1,257,697		\$1,629,713	(\$286,249)	(\$291,084)	(\$277,327)
LGS Pn Total (244)	\$3,003,039	\$30,012	\$3,033,051	\$843	\$3,033,894	\$1,943,636	\$197,403		\$284,098	(\$51,029)	(\$51,885)	(\$47,880)
IP Pn (322)	\$3,708,700	\$2,660	\$3,711,360	\$372	\$3,711,732	\$3,285,249	\$79,429		\$100,672	(\$22,788)	(\$23,166)	(\$56,524)
IP Tran (324)	\$33,893,141	\$26,394	\$33,919,535	\$2,746	\$33,922,280	\$31,105,684	\$785,908		\$781,984	(\$165,129)	(\$167,916)	(\$509,365)
EHG (208, 209)	\$2,950,190	\$22,540	\$2,972,729	\$720	\$2,973,449	\$1,944,603	\$272,450		\$347,792	(\$45,720)	(\$46,450)	(\$45,317)
CS (221)	\$1,020,767	(\$1,585)	\$1,019,181	\$288	\$1,019,469	\$649,874	\$71,260		\$92,929	(17,899)	(\$18,192)	(\$15,648)
PS (640)	\$656,028	(\$614)	\$655,414	\$112	\$655,526	\$505,710	\$40,720		\$51,722	(\$6,791)	(\$6,905)	(\$9,983)
PS (641)	\$73,080	(\$137)	\$72,944	\$6	\$72,950	\$62,712	\$5,049		\$6,413	(\$359)	(\$365)	(\$1,111)
PS (642)	\$1,591,306	(\$2,800)	\$1,688,505	\$87	\$1,688,593	\$1,498,780	\$120,477		\$157,066	(\$5,421)	(\$5,509)	(\$25,754)
OL (093 - 126)	\$879,594	(\$2,474)	\$877,120	\$634	\$877,753.58	\$156,743	\$65,047		\$3,045.66	(\$38,172)	(\$38,815)	(\$13,381)
SL (523)	\$1,556,437	(\$156)	\$1,556,281	\$0	\$1,556,281	\$285,267	\$124,383		124,383	0	0	0
Total	\$147,262,035	(\$128,916)	\$147,133,119	\$22,329	\$147,155,447	\$118,380,068	\$6,018,227		\$7,489,061	(\$1,376,229)	(\$1,398,897)	(\$2,214,929)

KINGSFORD POWER BILLING ANALYSIS  
 PER BOOKS REVIEW  
 TEST YEAR ENDED JUNE 30, 2021  
 RESIDENTIAL SERVICE (011 015)

	Jul - Dec	Jan-Jun	Current Billing (1)	Current Rate (2)	Current Bookings (3) = (1) x (2)	Annualized Rate (4)	Annualized Bookings (5) = (4) x (117.14)	Weather Adjustment to Billing (6)	Weather Adjusted Billing (7) = (6) + (5)	Weather Adjusted Revenue (8) = (7) x (117.14)	Year-End Customer Adjustments to Billing (9)	Year-End Customer Adjusted Billing (10) = (9) + (7)	Year-End Customer Adjusted Revenue (11) = (10) x (117.14)	Going Level Revenue	Proposed Rates	Proposed Revenue
<b>Billing kWh All kWh</b>	331,477,432.40	333,793,776.95	665,271,209	-50.00225	\$2,162,131	\$0.000325	\$2,162,131	8,545,705	471,816,914	\$2,183,425	475,431	672,292,344	\$2,184,550	\$6,329,717	\$0.00643	\$6,329,717
Storage Water Heating	33,723.60	35,489.45	69,213	\$0.00000	\$0	\$0.00000	\$0	869.60	70,072	\$0	4,337	74,409	\$0	\$460	\$0.00618	\$460
Metered kWh			665,340,411		\$2,162,131		\$2,162,131	8,546,574	471,886,985	\$2,183,425	479,768	672,366,753	\$2,184,550	\$6,340,177		\$6,340,177
Service Charge	251,157.58	251,153.57	502,311	\$12.63	\$6,344,316	\$12.63	\$6,344,316	-	502,321	\$6,344,315	436	502,757	\$6,349,000	\$17,477	\$	\$17,477
Number of Customers	253,774.00	253,921.00	506,795					-	506,795		440	507,235				\$6,763,164
<b>Sum</b>					<b>\$0,506,448</b>		<b>\$0,506,448</b>			<b>\$0,527,721</b>			<b>\$0,534,770</b>	<b>\$15,123,341</b>		<b>\$15,123,341</b>
All kWh Fuel Purchased Power Adj. Rider Jul-Dec	201,395,940.21	463,875,268.74	201,395,940	\$0.00644	\$16,200,269		\$16,200,269			\$16,200,269			\$16,200,269	\$16,200,269		\$16,200,269
All kWh Fuel Purchased Power Adj. Rider Nov-Jan	21,167.79	48,004.26	48,004	\$0.00601	\$3,121		\$3,121			\$3,294,874			\$3,294,874	\$3,294,874		\$3,294,874
Water Heating Fuel Purchased Power Adj. Rider Nov-Jan	251,157.58	251,153.57	502,321	\$3.81	\$1,913,844		\$1,913,844			\$3,121			\$3,121	\$3,121		\$3,121
TRP & IG Rider - per customer										\$1,913,844			\$1,913,844	0		0
<b>Sub Total</b>					<b>\$65,919,884</b>		<b>\$65,919,884</b>			<b>\$65,941,158</b>			<b>\$65,949,307</b>	<b>\$70,622,934</b>		<b>\$70,622,934</b>
Federal Tax Rate Adjustment Rider Jul-Dec	4,249,421.91	4,257,025.63		-5.6%	(\$236,689)		(\$236,689)							0		0
Federal Tax Rate Adjustment Rider Jan-Jun				-5.4%	(\$225,679)		(\$225,679)			(\$60,096,144)			(\$60,096,144)	(\$60,096,144)		(\$60,096,144)
<b>Sub Total</b>					<b>\$95,453,516</b>		<b>\$95,453,516</b>			<b>\$95,481,061</b>			<b>\$95,487,731</b>	<b>\$70,622,934</b>		<b>\$70,622,934</b>
Prompt Payment Discount				-1.5%	(\$881,803)		(\$881,803)			(\$882,219)			(\$882,219)	(\$882,219)		(\$882,219)
<b>Total</b>					<b>\$84,471,713</b>		<b>\$84,471,713</b>			<b>\$84,490,846</b>			<b>\$84,505,415</b>	<b>\$84,505,415</b>		<b>\$84,505,415</b>

PER BOOK'S REVENUE														
TEST YEAR ENDED JUNE 30, 2021														
RESIDENTIAL SERVICE - EMPLOYEE (018 051)														
	Jul - Dec	Jan - Jun	Current Billing Units (1)	Current Billing Rate (2)	Current Billing Units (3)+(1)+(2)	Annualized Rate (4)	Annualized Revenue (5)=(1)*(4)	Weather Adjustment Billing Units (6)	Weather Adjusted Billing Rate (7)=(1)*(6)	Weather Adjusted Billing Revenue (8)=(4)*(7)	Year-End Customer and Weather Adjusted Billing Units (10)=(7)+(8)	Year-End Customer and Weather Adjusted Billing Revenue (11)=(4)*(10)	Proposed Rates	Proposed Revenue
Billing kWh														
All kWh	676,121	638,165	1,314,276	\$0.00000	\$0	\$0.00000	\$0	13,400	1,327,676	\$0	1,263,604	\$0	\$0.00618	\$7,809
Storage Water Heating	1,634	1,406	3,040	\$0.00000	\$0	\$0.00000	\$0	37	3,077	\$0	3,077	\$0	\$0.00618	\$19
Mixed kWh			1,317,316		\$0		\$0	13,437	1,330,753	\$0	1,266,681	\$0		\$7,828
Service Charge	460	432	892	\$12.63	\$11,271	\$12.63	\$11,271	-	892	\$11,271	850	\$10,741	\$	\$14,857
Number of Customers	461	433	894					-	894		852			
Sum					\$11,271		\$11,271			\$11,271		\$10,741		\$22,685
All kWh Fuel Purchased Power Adj. Rider Jul-Oct	432,146		432,146	\$0.08044	\$34,762		\$34,762			\$34,762		\$34,762		\$34,762
All kWh Fuel Purchased Power Adj. Rider Nov-Jun	892,130		892,130	\$0.08471	\$74,725		\$74,725			\$74,725		\$74,725		\$74,725
Water Heating Fuel Purchased Power Adj. Rider Jul-Oct	1,022		1,022	\$0.06174	\$63		\$63			\$63		\$63		\$63
Water Heating Fuel Purchased Power Adj. Rider Nov-Jun	2,016		2,016	\$0.05501	\$131		\$131			\$131		\$131		\$131
TRP & MS Rider - per customer	460	432	892	\$3.81	\$3,400		\$3,400			\$3,400		\$3,400		0
Sub Total	9,819.59	5,457.00		-5.6% (\$324)	\$124,352	-5.4% (\$108)	\$124,352		\$11,271	\$124,352	\$10,741	\$123,622		\$132,367
Federal Tax Rate Adjustment Rider Jul-Dec				-5.6% (\$294)										-
Federal Tax Rate Adjustment Rider Jan -Jun														
Sub Total					\$123,734		\$123,744			\$123,744		\$123,243		\$132,367
Prompt Payment Discount				-1.5% (\$1,856)		-1.5% (\$1,856)								(\$1,985)
Total					\$111,878		\$121,888			\$121,888		\$121,394		\$130,331

[illegible]

KINGSFORD POWER BILLING ANALYSIS  
 PER BOOKS REVENUE  
 TEST YEAR ENDING JUNE 30, 2021  
 SMALL GENERAL SERVICE - FIXED (231)

	Jul - Dec	Jan - Jun	Current Billing Year (1)	Current Rate (2)	Current Revenue (3)=(1)*(2)	Amplified Rate (4)	Amplified Revenue (5)=(4)*(3)	Weather Adjustment to Billing Year (6)	Weather Adjusted Billing Year (7)=(1)+(6)	Weather Adjusted Revenue (8)=(4)*(7)	Year-End Customer Adjustment to Billing Year (9)	Year-End Customer Weather Adjusted Billing Year (10)=(7)+(9)	Year-End Customer Weather Adjusted Revenue (11)=(8)+(10)	Proposed Rates	Proposed Revenue
Block WAH															
Block 1	6,273,207		5,947,841	\$0.00256	\$3,944,179	\$0.00256	\$3,944,179	-	5,947,841	\$3,944,179	69,211	6,017,052	\$3,944,179	\$0.02215	\$213,444
Block 2	4,640,620		4,705,690	- \$0.00076	\$184,029	\$0.00076	\$184,029	-	4,705,690	\$184,029	42,850	4,748,540	\$184,029	\$0.02215	\$207,972
Metered WAH			21,967,358		\$308,158		\$308,158	-	21,967,358	\$308,158	598,158	22,565,516	\$308,158	\$	\$21,35
Services Charge	21,674		43,398	\$15.25	\$661,821	\$15.25	\$661,821	-	43,398	\$661,821	269	43,667	\$661,821	\$	\$21,35
Number of Customers	21,798		43,397					-	43,397		270	43,667			\$21,35
Sum					\$1,246,979		\$1,246,979			\$1,246,979			\$1,246,979		\$1,553,699
ALMWA Fuel Purchased Power Adj. Rater Jul-Dec	7,070,956		7,010,996	\$0.00517	\$456,907		\$456,907			\$456,907			\$456,907		\$456,907
ALMWA Fuel Purchased Power Adj. Rater Mar-Jun			14,555,362	\$0.00653	\$95,653		\$95,653			\$95,653			\$95,653		\$95,653
TRP & MS Rater - per customer	21,674		43,398	\$4.90	\$208,311		\$208,311			\$208,311			\$208,311		\$208,311
Sub Total					\$2,914,189		\$2,914,189			\$2,914,189			\$2,914,189		\$3,036,608
Federal Tax Rate Adjustment Rater Jul-Dec	629,184			-5.6%	(\$35,045)		(\$35,045)			(\$35,045)			(\$35,045)		0
Federal Tax Rate Adjustment Rater Jan-Jun				-5.4%	(\$33,494)		(\$33,494)			(\$33,494)			(\$33,494)		0
Sub Total					\$2,845,651		\$2,845,651			\$2,845,651			\$2,845,651		\$3,003,608
Prompt Payment Discount				-1.5%	(\$42,865)		(\$42,865)			(\$42,865)			(\$42,865)		(\$42,865)
Total					\$2,802,786		\$2,802,786			\$2,802,786			\$2,802,786		\$2,864,444

[illegible]



PER BOOKS REVENUE										Proposed Rates		Proposed Revenue	
TEST YEAR ENDED JUNE 30, 2021													
SMALL GENERAL SERVICE - NON METREDD (133)													
	Jul - Dec	Jan - Jun	Current Billing Units (1)	Current Rate (\$)	Current Revenue (\$)(1)(2)	Annualized Rate (\$)	Annualized Revenue (\$)(1)(3)	Weather Adjustment to Billing Units (6)	Weather Adjusted Billing Units (7)(1)+(6)	Weather Adjusted Billing Units (9)	Year-End Customer Billing Units (10)=(7)+(9)	Year-End Customer Adjusted Billing Units (11)=(4)+(10)	Year-End Customer Revenue
Block 1	-	50,035	34,638	\$0.03225	\$3,062	\$0.03225	\$3,062	\$4,336	\$3,062	\$2,666	94,672	\$3,053	\$3,185
Block 2	-	51,915	49,376	\$0.02078	\$2,103	\$0.02076	\$2,103	101,291	\$2,103	(899)	100,392	\$2,084	\$2,234
Metered kWh			156,229	\$5.165	\$5,165		\$5,165	-		(1,165)	155,064	\$5,137	\$5,408
Service Charge		355.00	769	\$15.25	\$10,812	\$15.25	\$10,812	-		(1)	768	\$10,797	\$15,116
Number of Customers		355.00	769					-	769		768		
<b>Sub Total</b>					<b>\$15,977</b>	<b>\$15,977</b>	<b>\$15,977</b>					<b>\$15,934</b>	<b>\$20,554</b>
Fuel Purchased Power Adj. Rate Jul-Dec 1		61.360	61,368	\$0.06517	\$3,999	\$0.06517	\$3,999					\$3,969	\$3,969
Fuel Purchased Power Adj. Rate Oct-Jun			134,861	\$0.06683	\$3,256	\$0.06683	\$3,256					\$3,256	\$3,256
TIP & MS Rider - per customer		305	769	\$4.80000	\$3,403	\$3,403	\$3,403					\$3,403	\$3,403
<b>Sub Total</b>					<b>\$32,635</b>	<b>\$32,635</b>	<b>\$32,635</b>					<b>\$32,592</b>	<b>\$33,779</b>
Federal Tax Rate Adjustment Rider Jul-Dec		8,105		-5.6%	(\$451)	-5.6%	(\$451)						
Federal Tax Rate Adjustment Rider Jan-Jun			7,672	-5.6%	(\$425)	-5.6%	(\$425)						
<b>Sub Total</b>					<b>\$31,759</b>	<b>\$31,759</b>	<b>\$31,759</b>					<b>\$31,723</b>	<b>\$33,779</b>
Prompt Payment Discount				-1.5%	(\$476)	-1.5%	(\$477)						
<b>Total</b>					<b>\$11,262</b>	<b>\$11,262</b>	<b>\$11,266</b>					<b>\$11,267</b>	<b>\$13,779</b>



KINGSFORT POWER BILLING ANALYSIS  
 PER BOOKS RESUME  
 TEST YEAR BEGINS JUNE 30 2021  
 GENERAL SERVICE TIME-OF-DAY (22%)

	Jul-Dec	Jan-Jun	Current Billing	Current Rate	Current Seasonal Billing	Current Seasonal Rate	Annualized Billing	Annualized Rate	Weather Adjustment	Weather Adjusted Billing	Weather Adjusted Rate	Year-End Customer Billing	Year-End Customer Rate	Going Forward Revenue	Proposed Rates	Proposed Revenue
On-peak kWh	57,178	61,132	118,311	\$0.0422	\$5,232	\$0.0422	\$5,232	\$0.0422	118,311	\$5,232	\$0.0422	144,670	\$6.357	\$3,359	\$0.02322	\$4,360
Off-peak kWh	81,123	74,912	156,035	\$0.00000	\$0	\$0.00000	\$0	\$0.00000	156,035	\$0	\$0.00000	187,749	\$0	\$0	\$0.02322	\$4,360
Metered kWh			274,346		\$5,232		\$5,232		0	\$5,232		332,419	\$6.357	\$7,719		
Customer Charge	24	26	50	\$50.00	\$2,517	\$50.00	\$2,517	\$50.00	50	\$2,517	\$50.00	60	\$3,017	\$3,017	\$	\$3,017
Number of Customers	24	26	50						50			60				
<b>Sum</b>					<b>\$7,748</b>		<b>\$7,748</b>			<b>\$7,748</b>			<b>\$9,414</b>			<b>\$10,735</b>
On-peak kWh Fuel Purchased Power Adj. Rate Jul-Oct	43,232	75,079	43,232	\$0.07794	\$3,357	\$0.07794	\$3,357	\$0.07794	\$3,357	\$3,357	\$0.07794	\$3,357	\$3,357	\$3,357	\$3,357	\$3,357
On-peak kWh Fuel Purchased Power Adj. Rate Nov-Jun	39,920	116,115	39,920	\$0.08177	\$3,262	\$0.08177	\$3,262	\$0.08177	\$3,262	\$3,262	\$0.08177	\$3,262	\$3,262	\$3,262	\$3,262	\$3,262
On-peak kWh Fuel Purchased Power Adj. Rate Jul-Oct	138,302	138,044	274,346	\$0.00219	\$591	\$0.00219	\$591	\$0.00219	\$591	\$591	\$0.00219	\$591	\$591	\$591	\$591	\$591
<b>Sub Total</b>					<b>\$7,250</b>		<b>\$7,250</b>			<b>\$7,250</b>			<b>\$8,540</b>			<b>\$9,830</b>
Federal Tax Rate Adjustment Rate Jul-Dec	3,728	4,020		-5.6%	(\$208)	-5.6%	(\$208)	-5.6%	(\$208)	(\$208)	-5.6%	(\$208)	(\$208)	(\$208)	(\$208)	(\$208)
<b>Sub Total</b>					<b>\$6,942</b>		<b>\$6,942</b>			<b>\$6,942</b>			<b>\$8,332</b>			<b>\$9,622</b>
Prompt Payment Discount				+1.5%	(\$408)	+1.5%	(\$408)	+1.5%	(\$408)	(\$408)	+1.5%	(\$408)	(\$408)	(\$408)	(\$408)	(\$408)
<b>Total</b>					<b>\$6,534</b>		<b>\$6,534</b>			<b>\$6,534</b>			<b>\$7,924</b>			<b>\$9,214</b>

KINGSFORD POWER BILLING ANALYSIS  
 PER BOOKS REVENUE  
 TEST YEAR ENDED JUNE 30, 2021  
 MEDIUM GENERAL SERVICE - PRIMARY (217)

kgfco Enrte No. 1  
 Witness: KW  
 Page 14 of 25

	Jul - Dec	Jan - Jun	Current Billing JUNE (1)	Current Billing JUNE (2)	Current Billing JUNE (3) (2020-11-12)	Annualized Billing JUNE (4)	Annualized Billing JUNE (5) (2020-11-14)	Weather Adjustment to Billing JUNE (6)	Weather Adjusted Billing JUNE (7) (177-1146)	Weather Adjusted Billing JUNE (8) (10-17149)	Year-End Customer and Weather Adjusted Billing JUNE (9) (177-61110)	Gong Level Revenue	Proposed Rates	Proposed Revenue
Block 1	17,502		17,502	\$0.03927	\$512	\$0.03927	\$512	-	17,502	\$512	-	\$0	\$0.03927	\$0
Block 2	16,567		16,567	\$0.00000	\$0	\$0.00000	\$0	-	16,567	\$0	-	\$0	\$0.00000	\$0
Weather kWh	34,069		34,069	\$512	\$512	\$512	\$512	-	34,069	\$512	-	\$0		\$0
Billing kW														
Standard	121		121	\$2.15	\$259	\$2,150.00	\$259	-	121	\$259	-	\$0	\$ 4.91	\$0
Service Charge	7		7	\$180.00	\$1,381	\$180.00	\$1,381	-	7,267	\$1,381	-	\$0	\$ 180.00	\$0
Number of Customers	7		7					-	7,000	-	-			
<b>Sum</b>					<b>\$2,152</b>		<b>\$2,152</b>			<b>\$2,152</b>		<b>\$0</b>		<b>\$0</b>
Block 1 Fuel Purchased Power Adj. Rate Jul-Oct			17,502	\$0.02254	\$1,270	\$1,270	\$1,270		17,502	\$1,270		\$1,270		\$1,270
Block 1 Fuel Purchased Power Adj. Rate Nov-Jan			0	\$0.07638	\$0	\$0	\$0		0	\$0		\$0		\$0
Block 2 Fuel Purchased Power Adj. Rate Jul-Oct			16,567	\$0.05659	\$1,088	\$1,088	\$1,088		16,567	\$1,088		\$1,088		\$1,088
Block 2 Fuel Purchased Power Adj. Rate Nov-Jan			0	\$0.09918	\$0	\$0	\$0		0	\$0		\$0		\$0
TDP & MS Rider - Billing MS			121	\$2.16	\$260	\$260	\$260		121	\$260		\$260		0
<b>Sub Total</b>					<b>\$4,771</b>		<b>\$4,771</b>			<b>\$4,771</b>		<b>\$2,618</b>		<b>\$2,358</b>
Federal Tax Rate Adjustment Rate Jul-Dec				-5.6%	(\$120)		(\$120)			(\$120)		-		-
Federal Tax Rate Adjustment Rate Jan-Jun				-5.4%	\$0		\$0			\$2,152		\$0		\$0
<b>Sub Total</b>					<b>\$4,651</b>		<b>\$4,651</b>			<b>\$4,651</b>		<b>\$2,618</b>		<b>\$2,358</b>
Prompt Payment Discount				-1.5%	(\$70)		(\$70)			(\$70)		(\$39)		(\$39)
<b>Total</b>					<b>\$4,581</b>		<b>\$4,581</b>			<b>\$4,581</b>		<b>\$2,579</b>		<b>\$2,323</b>

[illegible]

KINGSFORD POWER BILLING ANALYSIS  
PER MONTHS REVIEW  
TEST YEAR ENDED JUNE 30, 2021  
LARGE GENERAL SERVICE - PRIMARY (244)

	Jul - Dec	Jan - Jun	Current Billing Units (1)	Current Revenue (\$1,117.12)	Current Rate (2)	Annualized Rate (4)	Annualized Revenue (\$1,117.12)	Weather Adjustment Billing Units (6)	Weather Adjusted Billing Units (7) = (1) x (6)	Weather Adjusted Revenue (\$1,117.12)	Year-End Customer and Weather Adjusted Billing Units (10) = (1) + (9)	Year-End Customer and Weather Adjusted Revenue (\$1,117.12)	Proposed Rate	Revenue
Billing kWh	15,250,312		30,698,707	\$0.00851	\$0.00851	\$0.00851	\$261,246		30,698,707	\$261,246	35,041,823	\$261,246	\$0.00775	\$271,574
CDS kWh (MVA Adjusted)			30,698,707						30,698,707		35,041,823			
Weathered Volume Adj.			30,740,740						30,740,740		35,087,591			
Billing kVA (Dem Og per kVA)	55,595		105,002	\$5.96	\$5.96	\$5.96	\$625,810		105,002	\$625,810	118,670	\$708,465	\$	\$ 8.63 \$1,026,311
Customer Charge	88		90	\$330.00	\$330.00	\$330.00	\$58,740		178,029	\$58,740	203	\$66,964	\$	\$ 330.00 \$58,964
Number of Customers	88		91						179		204			
AFS	9,000		9,000	\$2.46	\$2.46	\$2.46	\$44,280		18,000	\$44,280	18,000	\$44,280	\$	\$ 2.70 \$48,600
Sum							\$690,085			\$690,085		\$1,117,915	\$	\$1,413,449
All kWh Fuel Purchased Power Adj. Rider Jul-Dec	10,417,922		10,417,922	\$0.0427	\$0.0427	\$0.0427	\$446,410			\$446,410		\$446,410		\$446,410
All kWh Fuel Purchased Power Adj. Rider Jan-Jun	20,280,785		20,280,785	\$0.03714	\$0.03714	\$0.03714	\$754,036			\$754,036		\$754,036		\$754,036
kVA Fuel Purchased Power Adj. Rider Jul-Dec	38,918		38,918	\$4.80000	\$4.80000	\$4.80000	\$186,805			\$186,805		\$186,805		\$186,805
kVA Fuel Purchased Power Adj. Rider Jan-Jun	66,084		66,084	\$5.00000	\$5.00000	\$5.00000	\$334,385			\$334,385		\$334,385		\$334,385
TDP & MS Rider - all billing kVA	55,595		105,002	\$1.88	\$1.88	\$1.88	\$197,403			\$197,403		\$197,403		\$197,403
Sub Total							\$3,131,124			\$3,131,124		\$3,250,954		\$3,357,085
Federal Tax Rate Adjustment Rider Jul-Dec	455,639			-5.6%	(\$27,302)		(\$27,302)			(\$27,302)		(\$27,302)		(\$27,302)
Federal Tax Rate Adjustment Rider Jan-Jun				-5.4%	(\$24,583)		(\$24,583)			(\$24,583)		(\$24,583)		(\$24,583)
Sub Total							\$3,079,239			\$3,079,239		\$3,199,639		\$3,257,085
Promer Payment Discount				-1.5%	(\$46,189)		(\$46,189)			(\$46,189)		(\$46,189)		(\$46,189)
Total							\$3,033,051			\$3,033,051		\$3,153,450		\$3,210,729

## INDUSTRIAL POWER - PRIMARY (322)

[illegible]

[illegible]



KINGSFORT POWER BILLING ANALYSIS														Proposed Rates	Proposed Revenue
KINGSFORT POWER BILLING ANALYSIS															
PER BOOKS REVENUE														Going Level Revenue	
TEST YEAR ENDED JUNE 30, 2021															
ELECTRIC HEATING GENERAL (208-209)															
	Jul-Dec	Jan-Jun	Current Billing Units (1)	Current Rate (2)	Current Revenue (3)=(1)*(2)	Annualized Rate (4)	Annualized Revenue (5)=(1)*(4)	Weather Adjustment Billing Units (6)	Weather Adjusted Billing Units (7)=(1)+(6)	Weather Adjusted Revenue (8)=(7)*(4)	Year-End Customer Billing Units (9)	Year-End Customer Weather Adjusted Billing Units (10)=(7)+(9)	Year-End Customer Weather Adjusted Revenue (11)=(8)+(10)		
Billing kWh	12,891,730	12,934,110	25,925,840	\$0.01569	\$406,776	\$0.01569	\$406,776	-	25,925,840	\$406,776	117,944	26,043,784	\$408,627	\$0.02908	\$757,353
Metered kWh															
Billing kW	8,503	11,573	20,076	\$3.51	\$70,467	\$3.51	\$70,467	-	20,076	\$70,467	(30)	20,046	\$70,953	\$	\$127,395
Standard - in excess of 30kW															
Customer Charge	3,682	3,695	7,377	\$50.18	\$370,153	\$50.18	\$370,153	-	7,376,507	\$370,153	16	7,392	\$370,954	\$	\$370,954
Number of Customers															
	3,688	3,707	7,395						7,395		16	7,411			
Sum															
AI KW Fuel Purchased Power Adj. Rider Jul-Dec	8,328,932		8,328,932	\$0.07240	\$603,015		\$603,015			\$603,015			\$603,015		\$603,015
AI KW Fuel Purchased Power Adj. Rider Nov-Jun	17,596,908		17,596,908	\$0.07624	\$1,341,588		\$1,341,588			\$1,341,588			\$1,341,588		\$1,341,588
TRP A MS Rider - all billing kW	58,786		63,389	\$2.23	\$272,450		\$272,450			\$272,450			\$272,450		0
Sub Total															
Federal Tax Rate Adjustment Rider Jul-Dec	411,428			-5.6%	(\$23,305)		(\$23,305)			\$847,356			\$849,944		\$3,200,205
Federal Tax Rate Adjustment Rider Jan-Jun				-5.4%	(\$23,144)		(\$23,144)			(45,719.58)			(45,857.04)		-
Sub Total															
Prompt Payment Discount				-1.5%	(45,270)		(45,270)			\$3,018,730			\$3,021,140		\$3,200,205
Total															
					\$2,972,729		\$2,973,448			\$5,973,449			\$2,975,823		\$3,192,205

KINGSPORT POWER BILLING ANALYSIS  
PER BOOKS REVENUE  
TEST YEAR ENDED JUNE 30, 2021  
CHURCH SERVICE (221)

	Jul-Dec	Jan-Jun	Current Billing Units (1)	Current Rate (2)	Current Revenue (3)=(1)*(2)	Annualized Rate (4)	Annualized Revenue (5)=(1)*(4)	Weather Adjustment to Billing Units (6)	Weather Adjusted Billing Units (7)=(1)+(6)	Weather Adjusted Revenue (8)=(7)*(4)	Year-End Customer and Weather Adjusted Billing Units (10)=(7)+(6)	Year-End Customer and Weather Adjusted Revenue (11)=(8)+(10)	Proposed Rates	Revenue
Billing kWh	4,283,461	4,185,769	8,469,230	\$0.03011	\$255,009	\$0.03011	\$255,009		8,469,230	\$255,009	226,935	\$261,842	\$0.04280	\$372,196
Metered kWh			8,469,230					0	8,469,230		226,935	8,696,165		
Customer Charge	1,129	1,129	2,257	\$34.00	\$76,751	\$34.00	\$76,751	-	2,257,375	\$76,751	55	\$78,618	\$	\$78,618
Number of Customers	1,131	1,130	2,261					-	2,261		55	2,316		
<b>Sum</b>					<b>\$331,759</b>		<b>\$331,759</b>			<b>\$331,759</b>		<b>\$340,459</b>		<b>\$450,814</b>
Fuel Purchased Power Adj. Rider Jul-Dec	2,743,798		2,743,798	\$0.07407	\$203,233		\$203,233			\$203,233		\$203,233		\$203,233
Fuel Purchased Power Adj. Rider Nov-Jun		5,725,432	5,725,432	\$0.07801	\$446,641		\$446,641			\$446,641		\$446,641		\$446,641
TRF & NS Rider all billing kWh	4,283,461	4,185,769	8,469,230	\$0.00841	\$71,260		\$71,260			\$71,260		\$71,260		0
<b>Sub Total</b>					<b>\$1,052,893</b>		<b>\$1,052,893</b>			<b>\$1,052,893</b>		<b>\$1,061,593</b>		<b>\$1,100,688</b>
Federal Tax Rate Adjustment Rider Jul-Dec	167,354			-5.6%	(\$9,321)		(\$9,321)			(\$9,321)		(\$9,321)		\$0
Federal Tax Rate Adjustment Rider Jan-Jun		164,406		-5.4%	(\$8,970)		(\$8,970)			(\$8,970)		(\$8,969)		\$0
<b>Sub Total</b>					<b>\$1,094,702</b>		<b>\$1,094,702</b>			<b>\$1,094,702</b>		<b>\$1,093,225</b>		<b>\$1,100,688</b>
Prompt Payment Discount				-1.5%	(\$15,521)		(\$15,521)			(\$15,521)		(\$15,521)		(\$15,510)
<b>Total</b>					<b>\$1,019,181</b>		<b>\$1,019,181</b>			<b>\$1,019,181</b>		<b>\$1,027,570</b>		<b>\$1,084,172</b>

KINGSFORD PEAKS BILLING ANALYSIS  
 PER BOOKS REVENUE  
 TEST YEAR ENDED JUNE 30, 2021  
 PUBLIC SCHOOLS (640)

	Jul - Dec	Jan - Jun	Current Billing Units (1)	Current Rate (2)	Current Revenue (3)=(1)*(2)	Annualized Rate (4)	Annualized Revenue (5)=(1)*(4)	Weather Adjustment to Billing Units (6)	Weather Adjusted Billing Units (7)=(1)+(6)	Weather Requested Billing Units (8)=(4)*(7)	Year-End Customer Adjustment to Billing Units (9)	Year-End Customer and Weather Adjusted Billing Units (10)=(7)+(9)	Year-End Customer and Weather Adjusted Revenue (11)=(3)+(9)	Proposed Rates	Proposed Revenue
Billing kWh	3,116,552	2,898,454	6,015,006	\$0.01932	\$116,210	\$0.01932	\$116,210		6,015,006	\$116,210	651	6,015,657	\$116,222	\$0.03434	\$206,578
Block 2 kWh Standard Electric Heating															
Metered kWh			6,015,006					0	6,015,006		651	6,015,657			
Customer Charge	84	84	168	\$57.50	\$9,660	\$57.50	\$9,660	-	168	\$9,660	-	168	\$9,660	\$	\$9,660
Number of Customers	84	84	168					-	168		-	168			
Sum					\$125,870		\$125,870						\$125,882		\$216,238
Fuel Purchased Power Adj. Rider Jul-Oct	2,100,782		2,100,782	\$0.08127	\$170,731		\$170,731						\$170,731		\$170,731
Fuel Purchased Power Adj. Rider Nov-Jun	3,914,224		3,914,224	\$0.08558	\$334,979		\$334,979						\$334,979		\$334,979
TRP & MS Rider - all billing kWh	3,116,552		6,015,006	\$0.00677	\$40,720		\$40,720						\$40,720		0
Sub Total					\$672,300		\$672,300						\$672,312		\$721,947
Federal Tax Rate Adjustment Rider Jul-Dec	65,042			-5.6%	(\$3,623)		(\$3,623)								
Federal Tax Rate Adjustment Rider Jan-Jun				-5.4%	(\$3,282)		(\$3,282)								
Sub Total					\$665,395		\$665,395		\$125,870	\$665,508		\$125,882	\$665,520		\$721,947
Prompt Payment Discount				-1.5%	(\$9,981)		(\$9,981)			\$665,508			\$665,520		\$721,947
Total					\$655,414		\$655,414			\$655,526			\$655,538		\$711,118

KINGSFORD POWER BILLING ANALYSIS  
PERT BOOKS REVIEW  
TEST YEAR BEED JUNE 30, 2021  
PUBLIC SCHOOLS (641)

	Jul-Dec	Jan-Jun	Current Usage MWh (1)	Current Rate (2)	Current Expense (3)=(1)*(2)	Annualized Rate (4)	Annualized Expense (5)=(1)*(4)	Weather Adjustment to Base Rate (6)	Weather Adjusted Rate (7)=(1)+(6)	Weather Adjusted Expense (8)=(4)*(7)	Year-End Customer Adjustment to Base Rate (9)	Year-End Customer and Weather Adjusted Rate (10)=(7)+(9)	Year-End Customer and Weather Adjusted Expense (11)=(8)+(10)	Proposed Rates	Proposed Revenue
<b>Billing kWh</b>															
Block 1 kWh Standard			81,356	\$0.0832	\$2,881	\$0.0832	\$2,881	-	154,321	\$2,981	-	154,321	\$2,981	\$0.0834	\$5,299
Block 2 kWh Special Pricing			314,789	\$0.09505	\$2,987	\$0.09505	\$2,987	-	591,521	\$2,987	-	591,521	\$2,987	\$0.09007	\$11,872
<b>Metered kWh</b>			745,842					0	745,842		-	745,842		\$	\$50
Customer Charge	6	6	12	\$57.50	\$690	\$57.50	\$690	-	12	\$690	-	12	\$690		\$690
<b>Number of Customers</b>	6	6	12					-	12		-	12			
<b>Sum</b>					<b>\$8,050</b>		<b>\$8,050</b>			<b>\$8,050</b>			<b>\$8,050</b>		<b>\$17,861</b>
Fuel Purchased Power Adj. Rate Jul-Dec			259,173	\$0.08127	\$21,063		\$21,063		\$21,063				\$21,063		\$21,063
Fuel Purchased Power Adj. Rate Jan-Jun			486,669	\$0.08558	\$41,649		\$41,649		\$41,649				\$41,649		\$41,649
TRE & MS Rider - all Billing kWh			395,198	\$0.00677	\$3,049		\$3,049		\$3,049				\$3,049		0
<b>Sub Total</b>					<b>\$74,420</b>		<b>\$74,420</b>			<b>\$74,420</b>			<b>\$74,420</b>		<b>\$80,573</b>
Federal Tax Rate Adjustment Rider Jul-Dec			3,507	-5.6%	(\$195)		(\$195)		\$6,659	(\$6,25)		\$6,659	(\$6,25)		-
Federal Tax Rate Adjustment Rider Jan-Jun				-5.4%	(\$355)		(\$355)								
<b>Sub Total</b>					<b>\$74,055</b>		<b>\$74,055</b>			<b>\$74,055</b>			<b>\$74,055</b>		<b>\$80,573</b>
<b>Prorated Payment Discount</b>				-1.5%	(\$1,111)		(\$1,111)			(\$1,111)			(\$1,111)		(\$1,209)
<b>Total</b>					<b>\$72,944</b>		<b>\$72,944</b>			<b>\$72,944</b>			<b>\$72,944</b>		<b>\$79,366</b>

KINGSPORT POWER BILLING ANALYSIS  
 PER BOOK'S REVENUE  
 TEST YEAR ENDED JUNE 30, 2021  
 PUBLIC SCHOOLS (642)

	Jul - Dec	Jan - Jun	Current Billing MWh (1)	Current Rate (\$/MWh) (2)	Current Revenue (\$M) (3)=(1)*(2)	Annualized Rate (\$/MWh) (4)	Annualized Revenue (\$M) (5)=(1)*(4)	Weather Adjustment Billing MWh (6)	Weather Adjusted Billing MWh (7)=(1)+(6)	Weather Adjusted Revenue (\$M) (8)=(7)*(4)	Year-End Customer Billing MWh (9)	Year-End Customer Adjusted Billing MWh (10)=(7)+(6)	Year-End Customer Adjusted Revenue (\$M) (11)=(10)*(4)	Going Forward Level Revenue	Proposed Rates	Proposed Revenue
Billing MWh			0	\$0.01932	\$0	\$0.01932	\$0	-	-	\$0	-	-	\$0		\$0.03434	\$0
Book's MWh Standard		9,013,884	17,796,457	\$0.03605	\$640,872	\$0.03605	\$640,872	17,796,457	17,796,457	\$640,872	18,287,946	18,287,946	\$666,638		\$0.03607	\$666,638
Book's MWh Heating			91,413					0	91,413		91,413	91,413	\$3,253			
Meined Voltage Adjustment			17,887,870					0	17,887,870		17,887,870	17,887,870	\$640,872			
Meined MWh																
Customer Charge		89	184	\$57.50	\$10,599	\$57.50	\$10,599	-	184	\$10,599	7	191	\$11,009		\$57.50	\$11,009
Number of Customers		90	185					-	185		7	192				
<b>Sum</b>					<b>\$100,471</b>		<b>\$100,471</b>			<b>\$100,471</b>			<b>\$103,262</b>			<b>\$377,846</b>
Fuel Purchased Power Adj. Rider Jul-Dec		5,624,362	5,624,362	\$0.08177	\$459,892	\$459,892	\$459,892			\$459,892			\$459,892			\$459,892
Fuel Purchased Power Adj. Rider Oct-Jun			12,172,095	\$0.08556	\$1,041,686	\$1,041,686	\$1,041,686			\$1,041,686			\$1,041,686			\$1,041,686
TRP & MS Rider - all Billing MWh		9,013,884	17,796,457	\$0.00677	\$120,477	\$120,477	\$120,477			\$120,477			\$120,477			0
<b>Sub Total</b>					<b>\$1,719,728</b>		<b>\$1,719,728</b>			<b>\$1,719,728</b>			<b>\$1,722,519</b>			<b>\$1,876,426</b>
Federal Tax Rate Adjustment Rider Jul-Dec		59,683		-5.6%	(\$2,822)	(\$2,822)	(\$2,822)			(\$2,822)			(\$2,822)			-
Federal Tax Rate Adjustment Rider Jan-Jun				-5.4%	(\$2,487)	(\$2,487)	(\$2,487)			(\$2,487)			(\$2,487)			-
<b>Sub Total</b>					<b>\$1,714,219</b>		<b>\$1,714,219</b>			<b>\$1,714,219</b>			<b>\$1,716,947</b>			<b>\$1,876,426</b>
Prompt Payment Discount				-1.5%	(\$25,713)	(\$25,713)	(\$25,713)			(\$25,713)			(\$25,713)			(\$25,713)
<b>Total</b>					<b>\$1,688,505</b>		<b>\$1,688,505</b>			<b>\$1,688,505</b>			<b>\$1,691,993</b>			<b>\$1,850,713</b>





**Exhibit No. 2 (KIW)**



Docket No. 21-0019

CURRENT DATA										PROPOSED DATA				
Item	Reaction					Reaction								
	Demand [MW]	Capacity [MW]	Cost [\$/kW]	Efficiency [%]	Location	Demand [MW]	Capacity [MW]	Cost [\$/kW]	Efficiency [%]	Location				
1.	10	10	10	10	10	10	10	10	10	10				
2. Solar Panel Array	15	15	15	15	15	15	15	15	15	15				
	15	15	15	15	15	15	15	15	15	15				
	15	15	15	15	15	15	15	15	15	15				
3. Wind Turbine Farm	20	20	20	20	20	20	20	20	20	20				
	20	20	20	20	20	20	20	20	20	20				
	20	20	20	20	20	20	20	20	20	20				
4. Hydroelectric Dam	25	25	25	25	25	25	25	25	25	25				
	25	25	25	25	25	25	25	25	25	25				
	25	25	25	25	25	25	25	25	25	25				
5. Geothermal Plant	30	30	30	30	30	30	30	30	30	30				
	30	30	30	30	30	30	30	30	30	30				
	30	30	30	30	30	30	30	30	30	30				
6. Biomass Power Station	35	35	35	35	35	35	35	35	35	35				
	35	35	35	35	35	35	35	35	35	35				
	35	35	35	35	35	35	35	35	35	35				
7. Nuclear Reactor	40	40	40	40	40	40	40	40	40	40				
	40	40	40	40	40	40	40	40	40	40				
	40	40	40	40	40	40	40	40	40	40				
8. Coal Power Plant	45	45	45	45	45	45	45	45	45	45				
	45	45	45	45	45	45	45	45	45	45				
	45	45	45	45	45	45	45	45	45	45				
9. Natural Gas Plant	50	50	50	50	50	50	50	50	50	50				
	50	50	50	50	50	50	50	50	50	50				
	50	50	50	50	50	50	50	50	50	50				
10. Oil Refinery	55	55	55	55	55	55	55	55	55	55				
	55	55	55	55	55	55	55	55	55	55				
	55	55	55	55	55	55	55	55	55	55				
11. Paper Mill	60	60	60	60	60	60	60	60	60	60				
	60	60	60	60	60	60	60	60	60	60				
	60	60	60	60	60	60	60	60	60	60				
12. Textile Factory	65	65	65	65	65	65	65	65	65	65				
	65	65	65	65	65	65	65	65	65	65				
	65	65	65	65	65	65	65	65	65	65				
13. Food Processing	70	70	70	70	70	70	70	70	70	70				
	70	70	70	70	70	70	70	70	70	70				
	70	70	70	70	70	70	70	70	70	70				
14. Chemical Plant	75	75	75	75	75	75	75	75	75	75				
	75	75	75	75	75	75	75	75	75	75				
	75	75	75	75	75	75	75	75	75	75				
15. Pharmaceutical	80	80	80	80	80	80	80	80	80	80				
	80	80	80	80	80	80	80	80	80	80				
	80	80	80	80	80	80	80	80	80	80				
16. Electronics Assembly	85	85	85	85	85	85	85	85	85	85				
	85	85	85	85	85	85	85	85	85	85				
	85	85	85	85	85	85	85	85	85	85				
17. Automotive Plant	90	90	90	90	90	90	90	90	90	90				
	90	90	90	90	90	90	90	90	90	90				
	90	90	90	90	90	90	90	90	90	90				
18. Aerospace	95	95	95	95	95	95	95	95	95	95				
	95	95	95	95	95	95	95	95	95	95				
	95	95	95	95	95	95	95	95	95	95				
19. Shipyard	100	100	100	100	100	100	100	100	100	100				
	100	100	100	100	100	100	100	100	100	100				
	100	100	100	100	100	100	100	100	100	100				
20. Ship Repair	105	105	105	105	105	105	105	105	105	105				
	105	105	105	105	105	105	105	105	105	105				
	105	105	105	105	105	105	105	105	105	105				
21. Shipbuilding	110	110	110	110	110	110	110	110	110	110				
	110	110	110	110	110	110	110	110	110	110				
	110	110	110	110	110	110	110	110	110	110				
22. Ship Maintenance	115	115	115	115	115	115	115	115	115	115				
	115	115	115	115	115	115	115	115	115	115				
	115	115	115	115	115	115	115	115	115	115				
23. Ship Refitting	120	120	120	120	120	120	120	120	120	120				
	120	120	120	120	120	120	120	120	120	120				
	120	120	120	120	120	120	120	120	120	120				
24. Ship Conversion	125	125	125	125	125	125	125	125	125	125				
	125	125	125	125	125	125	125	125	125	125				
	125	125	125	125	125	125	125	125	125	125				
25. Ship Disassembly	130	130	130	130	130	130	130	130	130	130				
	130	130	130	130	130	130	130	130	130	130				
	130	130	130	130	130	130	130	130	130	130				
26. Ship Recycling	135	135	135	135	135	135	135	135	135	135				
	135	135	135	135	135	135	135	135	135	135				
	135	135	135	135	135	135	135	135	135	135				
27. Ship Scrapping	140	140	140	140	140	140	140	140	140	140				
	140	140	140	140	140	140	140	140	140	140				
	140	140	140	140	140	140	140	140	140	140				
28. Ship Salvage	145	145	145	145	145	145	145	145	145	145				
	145	145	145	145	145	145	145	145	145	145				
	145	145	145	145	145	145	145	145	145	145				
29. Ship Decommissioning	150	150	150	150	150	150	150	150	150	150				
	150	150	150	150	150	150	150	150	150	150				
	150	150	150	150	150	150	150	150	150	150				
30. Ship Recycling Plant	155	155	155	155	155	155	155	155	155	155				
	155	155	155	155	155	155	155	155	155	155				
	155	155	155	155	155	155	155	155	155	155				
31. Ship Recycling Facility	160	160	160	160	160	160	160	160	160	160				
	160	160	160	160	160	160	160	160	160	160				
	160	160	160	160	160	160	160	160	160	160				
32. Ship Recycling Center	165	165	165	165	165	165	165	165	165	165				
	165	165	165	165	165	165	165	165	165	165				
	165	165	165	165	165	165	165	165	165	165				
33. Ship Recycling Plant	170	170	170	170	170	170	170	170	170	170				
	170	170	170	170	170	170	170	170	170	170				
	170	170	170	170	170	170	170	170	170	170				
34. Ship Recycling Plant	175	175	175	175	175	175	175	175	175	175				
	175	175	175	175	175	175	175	175	175	175				
	175	175	175	175	175	175	175	175	175	175				
35. Ship Recycling Plant	180	180	180	180	180	180	180	180	180	180				
	180	180	180	180	180	180	180	180	180	180				
	180	180	180	180	180	180	180	180	180	180				
36. Ship Recycling Plant	185	185	185	185	185	185	185	185	185	185				
	185	185	185	185	185	185	185	185	185	185				
	185	185	185	185	185	185	185	185	185	185				
37. Ship Recycling Plant	190	190	190	190	190	190	190	190	190	190				
	190	190	190	190	190	190	190	190	190	190				
	190	190	190	190	190	190	190	190	190	190				
38. Ship Recycling Plant	195	195	195	195	195	195	195	195	195	195				
	195	195	195	195	195	195	195	195	195	195				
	195	195	195	195	195	195	195	195	195	195				
39. Ship Recycling Plant	200	200	200	200	200	200	200	200	200	200				
	200	200	200	200	200	200	200	200	200	200				
	200	200	200	200	200	200	200	200	200	200				
40. Ship Recycling Plant	205	205	205	205	205	205	205	205	205	205				
	205	205	205	205	205	205	205	205	205	205				
	205	205	205	205	205	205	205	205	205	205				
41. Ship Recycling Plant	210	210	210	210	210	210	210	210	210	210				
	210	210	210	210	210	210	210	210	210	210				
	210	210	210	210	210	210	210	210	210	210				
42. Ship Recycling Plant	215	215	215	215	215	215	215	215	215	215				
	215	215	215	215	215	215	215	215	215	215				
	215	215	215	215	215	215	215	215	215	215				
43. Ship Recycling Plant	220	220	220	220	220	220	220	220	220	220				
	220	220	220	220	220	220	220	220	220	220				
	220	220	220	220	220	220	220	220	220	220				
44. Ship Recycling Plant	225	225	225	225	225	225	225	225	225	225				
	225	225	225	225	225	225	225	225	225	225				
	225	225	225	225	225	225	225	225	225	225				
45. Ship Recycling Plant	230	230	230	230	230	230	230	230	230	230				
	230	230	230	230	230	230	230	230	230	230				
	230	230	230	230	230	230	230	230	230	230				
46. Ship Recycling Plant	235	235	235	235	235	235	235	235	235	235				
	235	235	235	235	235	235	235	235	235	235				
	235	235	235	235	235	235	235	235	235	235				
47. Ship Recycling Plant	240	240	240	240	240	240	240	240	240	240				
	240	240	240	240	240	240	240	240	240	240				
	240	240	240	240	240	240	240	240	240	240				
48. Ship Recycling Plant	245	245	245	245	245	245	245	245	245	245				
	245	245	245	245	245	245	245	245	245	245				
	245	245	245	245	245	245	245	245	245	245				
49. Ship Recycling Plant	250	250	250	250	250	250	250	250	250	250				
	250	250	250	250	250	250	250	250	250					

\* Includes prewarmed changes in base rates, TRP & (M) R-generates and FTRAR rate.

\*Please see KypCo Exhibit No. 1-KIV, Revenue Proof for detailed SL, current and proposed rates.

**Exhibit No. 3 (KIW)**

KINGSPORT POWER COMPANY  
TYPICAL ELECTRIC BILL COMPARISON

KgPCo Exhibit No. 3  
Witness KIW  
Page 1 of 3

Line No.	Current Tariff (1)	Proposed Tariff (2)	Billing Demand Peak (3)	Metered Energy (4)	Current Bill (5)	Current Bill w Prompt Pay (6)	Proposed Bill (7)	Proposed Bill w Prompt Pay (8)	Bill Increase (9)=(7)-(5)	% Change (10)=(9)/(5)
1	RS	RS	--	250	38.38	37.80	40.66	40.05	2.28	5.9%
2			--	500	59.99	59.09	63.85	62.89	3.86	6.4%
3			--	1,000	103.18	101.63	110.22	108.57	7.04	6.8%
4			--	1,500	146.39	144.19	156.60	154.25	10.21	7.0%
5			--	2,000	189.58	186.74	202.97	199.93	13.39	7.1%
6			--	4,000	362.37	356.93	388.47	382.64	26.10	7.2%
7	RS EMP	RS EMP	--	250	37.62	37.06	39.85	39.25	2.23	5.9%
8			--	500	58.45	57.57	62.22	61.29	3.77	6.4%
9			--	1,000	100.11	98.61	106.97	105.37	6.86	6.9%
10			--	1,500	141.77	139.64	151.72	149.44	9.95	7.0%
11			--	2,000	183.43	180.68	196.47	193.52	13.04	7.1%
12			--	4,000	350.07	344.82	375.47	369.84	25.40	7.3%
13	RS-TOD	RS-TOD	--	1,000	117.65	115.89	105.94	104.35	-11.71	-10.0%
14	On-Peak %	48%	--	1,500	161.43	159.01	150.17	147.92	-11.26	-7.0%
15	Off-Peak %	52%	--	2,000	205.21	202.13	194.40	191.48	-10.81	-5.3%
16			--	4,000	380.32	374.62	371.33	365.76	-8.99	-2.4%
17			--	5,000	467.87	460.85	459.80	452.90	-8.07	-1.7%
18			--	10,000	905.65	892.07	902.13	888.60	-3.52	-0.4%
19	SGS	SGS	--	250	45.03	44.35	46.64	45.94	1.61	3.6%
20			--	350	54.83	54.01	56.75	55.90	1.92	3.5%
21			--	400	59.73	58.83	61.81	60.88	2.08	3.5%
22			--	500	69.54	68.50	71.92	70.84	2.38	3.4%
23			--	1,000	114.19	112.48	117.89	116.12	3.70	3.2%
24			--	2,500	244.90	241.23	252.37	248.58	7.47	3.1%
25			--	4,000	375.61	369.98	386.84	381.04	11.23	3.0%
26	MGS-SEC	MGS-SEC	10	2,190	319.05	314.27	336.27	331.23	17.22	5.4%
27	Load Factor	30%	25	5,475	736.60	725.55	765.66	754.18	29.06	3.9%
28			50	10,950	1,432.53	1,411.04	1,481.33	1,459.11	48.80	3.4%
29			100	21,900	2,824.37	2,782.01	2,912.66	2,868.97	88.29	3.1%
30	MGS-SEC	MGS-SEC	10	2,920	371.93	366.35	389.15	383.31	17.22	4.6%
31	Load Factor	40%	25	7,300	868.83	855.80	897.89	884.42	29.06	3.3%
32			50	14,600	1,696.97	1,671.51	1,745.77	1,719.58	48.80	2.9%
33			100	29,200	3,353.25	3,302.95	3,441.54	3,389.92	88.29	2.6%
34	MGS-PRI	MGS-PRI	10	2,190	446.16	439.47	460.83	453.92	14.67	3.3%
35	Load Factor	30%	25	5,475	845.77	833.09	867.07	854.06	21.30	2.5%
36			50	10,950	1,511.80	1,489.12	1,544.14	1,520.98	32.34	2.1%
37			100	21,900	2,843.84	2,801.19	2,898.28	2,854.81	54.44	1.9%
38	MGS-PRI	MGS-PRI	10	2,920	495.83	488.39	510.50	502.84	14.67	3.0%
39	Load Factor	40%	25	7,300	969.94	955.39	991.24	976.37	21.30	2.2%
40			50	14,600	1,760.14	1,733.73	1,792.48	1,765.59	32.34	1.8%
41			100	29,200	3,340.53	3,290.43	3,394.97	3,344.05	54.44	1.6%
42	MGS-TOD	GS-TOD	--	2,000	233.89	230.38	238.14	234.57	4.25	1.8%
43	On-Peak %	47%	--	3,000	327.18	322.27	332.20	327.22	5.02	1.5%
44	Off-Peak %	53%	--	5,000	513.76	506.05	520.34	512.53	6.58	1.3%
45			--	10,000	980.21	965.51	990.68	975.82	10.47	1.1%
46	LGS-SEC	LGS-SEC	100	29,200	3,455.94	3,404.10	3,593.24	3,539.34	137.30	4.0%
47	Load Factor	40%	250	73,000	8,415.30	8,289.07	8,743.87	8,612.71	328.57	3.9%
48			500	146,000	16,676.65	16,426.50	17,321.28	17,061.46	644.63	3.9%
49			750	219,000	24,944.37	24,570.20	25,909.15	25,520.51	964.78	3.9%
50			1,000	292,000	33,212.08	32,713.90	34,497.02	33,979.56	1,284.94	3.9%
51			1,087							
51	LGS-SEC	LGS-SEC	100	36,500	3,890.77	3,832.41	4,032.19	3,971.71	141.42	3.6%
52	Load Factor	50%	250	91,250	9,502.37	9,359.83	9,841.24	9,693.62	338.87	3.6%
53			500	182,500	18,850.79	18,568.03	19,516.03	19,223.29	665.24	3.5%
54			750	273,750	28,205.57	27,782.49	29,201.27	28,763.25	995.70	3.5%
55			1,000	365,000	37,560.35	36,996.95	38,886.51	38,303.21	1,326.16	3.5%
56	LGS-SEC	LGS-SEC	100	43,800	4,325.60	4,260.71	4,471.14	4,404.07	145.54	3.4%
57	Load Factor	60%	250	109,500	10,589.44	10,430.60	10,938.62	10,774.54	349.18	3.3%
58			500	219,000	21,024.93	20,709.55	21,710.77	21,385.11	685.84	3.3%
59			750	328,500	31,466.78	30,994.78	32,493.39	32,005.99	1,026.61	3.3%
60			1,000	438,000	41,908.63	41,280.00	43,276.00	42,626.86	1,367.37	3.3%
61	LGS-SEC	LGS-SEC	100	51,100	4,760.43	4,689.02	4,910.09	4,836.44	149.66	3.1%
62	Load Factor	70%	250	127,750	11,676.50	11,501.35	12,035.99	11,855.45	359.49	3.1%
63			500	255,500	23,199.07	22,851.08	23,905.52	23,546.94	708.45	3.0%
64			750	383,250	34,727.98	34,207.06	35,785.50	35,248.72	1,057.52	3.0%
65			1,000	511,000	46,256.90	45,563.05	47,665.49	46,950.51	1,408.59	3.0%

KINGSPORT POWER COMPANY  
TYPICAL ELECTRIC BILL COMPARISON

KgPCo Exhibit No. 3  
Witness KIW  
Page 2 of 3

Line No.	Current Tariff (1)	Proposed Tariff (2)	Billing Demand Peak (3)	Metered Energy (4)	Current Bill (5)	Current Bill w Prompt Pay (6)	Proposed Bill (7)	Proposed Bill w Prompt Pay (8)	Bill Increase (9)=(7)-(5)	% Change (10)=(9)/(5)
66	LGS-PRI	LGS-PRI	100	29,200	3,316.96	3,267.21	3,392.71	3,341.82	75.75	2.3%
67	Load Factor	40%	250	73,000	7,821.29	7,703.97	7,982.44	7,862.70	161.15	2.1%
68			500	146,000	15,324.75	15,094.88	15,626.25	15,391.96	301.50	2.0%
69			750	219,000	22,833.84	22,491.34	23,278.69	22,929.51	444.65	1.9%
70			1,000	292,000	30,342.94	29,887.80	30,931.13	30,467.16	588.19	1.9%
71	LGS-PRI	LGS-PRI	100	36,500	3,714.24	3,658.52	3,787.78	3,730.96	73.54	2.0%
72	Load Factor	50%	250	91,250	8,814.47	8,682.26	8,970.13	8,835.58	155.66	1.8%
73			500	182,500	17,311.11	17,051.45	17,601.63	17,337.61	290.52	1.7%
74			750	273,750	25,813.38	25,426.18	26,241.76	25,848.13	428.38	1.7%
75			1,000	365,000	34,315.66	33,800.93	34,881.89	34,358.66	566.23	1.7%
76	LGS-PRI	LGS-PRI	100	43,800	4,111.51	4,049.84	4,182.86	4,120.12	71.35	1.7%
77	Load Factor	60%	250	109,500	9,807.66	9,660.54	9,957.83	9,808.46	150.17	1.5%
78			500	219,000	19,297.47	19,008.01	19,577.01	19,283.35	279.54	1.4%
79			750	328,500	28,792.93	28,361.04	29,204.83	28,766.76	411.90	1.4%
80			1,000	438,000	38,288.39	37,714.06	38,832.65	38,250.16	544.26	1.4%
81	LGS-PRI	LGS-PRI	100	51,100	4,508.78	4,441.15	4,577.93	4,509.26	69.15	1.5%
82	Load Factor	70%	250	127,750	10,800.83	10,638.82	10,945.51	10,781.33	144.68	1.3%
83			500	255,500	21,283.84	20,964.58	21,552.39	21,229.10	268.55	1.3%
84			750	383,250	31,772.47	31,295.89	32,167.91	31,685.39	395.44	1.2%
85			1,000	511,000	42,261.11	41,627.19	42,783.41	42,141.66	522.30	1.2%
86	IP-PRI	IP-PRI	1,000	620,500	42,245.84	41,612.15	44,799.67	44,127.67	2,553.83	6.0%
87	Load Factor	85%	5,000	3,102,500	209,412.79	206,271.60	222,078.35	218,747.17	12,665.56	6.0%
88			10,000	6,205,000	418,371.48	412,095.90	443,676.70	437,021.55	25,305.22	6.0%
89			15,000	9,307,500	627,330.16	617,920.21	665,275.05	655,295.92	37,944.89	6.0%
90			20,000	12,410,000	836,288.85	823,744.52	886,873.40	873,570.30	50,584.55	6.0%
91	IP-PRI	IP-PRI	1,000	657,000	43,769.35	43,112.81	45,233.18	44,554.68	1,463.83	3.3%
92	Load Factor	90%	5,000	3,285,000	217,030.34	213,774.88	224,245.90	220,882.21	7,215.56	3.3%
93			10,000	6,570,000	433,606.58	427,102.48	448,011.80	441,291.62	14,405.22	3.3%
94			15,000	9,855,000	650,182.81	640,430.07	671,777.70	661,701.03	21,594.89	3.3%
95			20,000	13,140,000	866,759.05	853,757.66	895,543.60	882,110.45	28,784.55	3.3%
96	IP-TRAN	IP-SUB/TRAN	1,000	474,500	37,964.17	37,394.71	38,862.46	38,279.52	898.29	2.4%
97	Load Factor	65%	5,000	2,372,500	175,213.91	172,585.70	178,872.30	176,189.22	3,658.39	2.1%
98			10,000	4,745,000	346,776.07	341,574.43	353,884.60	348,576.33	7,108.53	2.0%
99			15,000	7,117,500	518,338.24	510,563.17	528,896.90	520,963.45	10,558.66	2.0%
100			20,000	9,490,000	689,900.41	679,551.90	703,909.20	693,350.56	14,008.79	2.0%
101	IP-TRAN	IP-SUB/TRAN	1,000	547,500	40,963.01	40,348.57	41,861.30	41,233.38	898.29	2.2%
102	Load Factor	75%	5,000	2,737,500	190,208.11	187,354.99	193,866.50	190,958.50	3,658.39	1.9%
103			10,000	5,475,000	376,764.47	371,113.01	383,873.00	378,114.91	7,108.53	1.9%
104			15,000	8,212,500	563,320.84	554,871.03	573,879.50	565,271.31	10,558.66	1.9%
105			20,000	10,950,000	749,877.21	738,629.05	763,886.00	752,427.71	14,008.79	1.9%
106	IP-TRAN	IP-SUB/TRAN	1,000	620,500	43,961.85	43,302.43	44,860.14	44,187.24	898.29	2.0%
107	Load Factor	85%	5,000	3,102,500	205,202.31	202,124.27	208,860.70	205,727.79	3,658.39	1.8%
108			10,000	6,205,000	406,752.87	400,651.58	413,861.40	407,653.48	7,108.53	1.7%
109			15,000	9,307,500	608,303.44	599,178.89	618,862.10	609,579.17	10,558.66	1.7%
110			20,000	12,410,000	809,854.01	797,706.20	823,862.80	811,504.86	14,008.79	1.7%
111	IP-TRAN	IP-SUB/TRAN	5,000	3,467,500	220,196.51	216,893.56	223,854.90	220,497.08	3,658.39	1.7%
112	Load Factor	95%	10,000	6,935,000	436,741.27	430,190.16	443,849.80	437,192.05	7,108.53	1.6%
113			15,000	10,402,500	653,286.04	643,486.75	663,844.70	653,887.03	10,558.66	1.6%
114			20,000	13,870,000	869,830.81	856,783.34	883,839.60	870,582.01	14,008.79	1.6%

KINGSPORT POWER COMPANY  
TYPICAL ELECTRIC BILL COMPARISON

KgPCo Exhibit No. 3  
Witness: KIW  
Page 3 of 3

Line No.	Current Tariff (1)	Proposed Tariff (2)	Billing Demand Peak (3)	Metered Energy (4)	Current Bill (5)	Current Bill w Prompt Pay (6)	Proposed Bill (7)	Proposed Bill w Prompt Pay (8)	Bill Increase (9)=(7)-(5)	% Change (10)=(9)/(5)
115	EHG	EHG	10	2,500	300.44	295.93	310.33	305.66	9.89	3.3%
116			20	5,000	553.39	545.09	570.48	561.92	17.09	3.1%
117			30	8,000	851.26	838.49	882.66	869.42	31.40	3.7%
118			50	13,000	1,423.59	1,402.24	1,529.96	1,507.01	106.37	7.5%
119	CS	CS	--	500	90.12	88.77	93.76	92.35	3.64	4.0%
120			--	1,000	148.06	145.84	153.52	151.22	5.46	3.7%
121			--	2,000	263.95	259.99	273.04	268.94	9.09	3.4%
122			--	3,000	379.84	374.14	392.56	386.67	12.72	3.3%
123			--	4,000	495.73	488.29	512.08	504.40	16.35	3.3%
124			--	5,000	611.62	602.45	631.60	622.13	19.98	3.3%
125	PS	PS	--	5,000	609.63	600.49	650.05	640.30	40.42	6.6%
126			--	10,000	1,164.85	1,147.38	1,242.60	1,223.96	77.75	6.7%
127			--	20,000	2,275.31	2,241.18	2,427.70	2,391.28	152.39	6.7%
128			--	30,000	3,385.76	3,334.97	3,612.80	3,558.61	227.04	6.7%
129			--	40,000	4,496.22	4,428.78	4,797.90	4,725.93	301.68	6.7%
130	PS (Over 500 kWh Electric)	PS	--	50,000	4,938.42	4,864.34	5,276.64	5,197.49	338.22	6.8%
131			--	75,000	7,377.06	7,266.40	7,882.64	7,764.40	505.58	6.9%
132			--	100,000	9,815.70	9,668.46	10,488.64	10,331.31	672.94	6.9%
133			--	125,000	12,254.33	12,070.52	13,094.64	12,898.22	840.31	6.9%
134	PS (All Electric)	PS	--	50,000	4,931.67	4,857.69	5,269.50	5,190.46	337.83	6.9%
135			--	75,000	7,370.31	7,259.76	7,875.50	7,757.37	505.19	6.9%
136			--	100,000	9,808.94	9,661.81	10,481.50	10,324.28	672.56	6.9%
137			--	125,000	12,247.58	12,063.87	13,087.50	12,891.19	839.92	6.9%

**REBUTTAL TESTIMONY OF  
KATHARINE WALSH  
ON BEHALF OF KINGSPORT POWER COMPANY  
D/B/A AEP APPALACHIAN POWER  
BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
DOCKET NO. 21-00107**

1    **Q.    PLEASE STATE YOUR NAME.**

2    A.    My name is Katharine Walsh.

3    **Q.    ARE YOU THE SAME KATHARINE WALSH WHO SUBMITTED DIRECT**  
4    **TESTIMONY IN THIS PROCEEDING?**

5    A.    Yes.

6    **Q.    WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

7    A.    I respond to the direct testimony of Consumer Advocate Unit (CA) witness Novak's  
8    development of billing determinants, attrition year revenue calculation, gross revenue  
9    conversion factor (GRCF) calculation, and concerns regarding the prompt pay discount. I  
10    also address his Street Lighting rate design and recommend certain changes to the filed  
11    lighting proposals.

12   **Q.    ARE YOU SPONSORING ANY REBUTTAL EXHIBITS?**

13   A.    Yes, I am sponsoring the following exhibit:

- 14   •   KgPCo Rebuttal Exhibit No. 1 (KIW) Proposed Lighting Revisions to Tariff

15   **Q.    DO YOU AGREE WITH THE BILLING UNITS WITNESS NOVAK**  
16   **DEVELOPED?**

17   A.    No. Witness Novak used a regression model which utilizes historic averages to develop  
18   attrition year billing units. While his model differs from the Company's preferred  
19   approach as filed in this proceeding, it results in similar billing units with the exception of  
20   three tariffs: 324 Industrial Power Transmission (IP Tran), 208 Electric Heating General

(EHG), and 229 General Service Time-of-Day (GS-TOD). In all three instances, witness Novak's erroneous calculations result in higher billing units.

**Q. PLEASE DESCRIBE THE PROBLEM WITH WITNESS NOVAK'S IP TRAN BILLING DEMAND.**

A. Witness Novak has overstated IP Tran billing demand by applying a specific customer adjustment to an overstated level of attrition year billing demand. The Commission should rely on the going-level kW demand I calculated for 324 IP Tran, based on current and known operations of the customers, of 759,217 kW which results in \$181,521 lower attrition year revenue than computed by witness Novak. The Company's four largest customers are served on the IP Tran tariff. One customer in particular ceased its normal level of operations and plans to continue operating at a much lower load than it has historically. Witness Novak calculated an adjustment to decrease that customer's billing demand by 210,630 kW. I do not disagree with the adjustment amount, as I have developed a similar adjustment, but have determined that witness Novak applied his adjustment to an historic average usage which significantly overstates the IP Tran attrition year level of demand.

While the Commission should adopt the IP Tran billing demand as filed, at minimum, the Commission should correct witness Novak's calculations. Witness Novak shows attrition year billing demand for the four IP Tran customers in his support R-91-1.00, R-91-2.00, R-91-3.00 and R-91-5.00. The sum of attrition year billing demand from his workpaper, WHN Analysis of KPC 25 Largest Customers -2022, is 793,298 kW, which is 41,239 kW lower than the overstated calculation of 834,537 shown in WHN IP

1 Revenue Calculation. Rectifying this error using witness Novak's own calculation results  
2 in \$99,386 less attrition year revenue than proposed by the CA.

3 **Q. PLEASE DESCRIBE THE PROBLEM WITH WITNESS NOVAK'S EHG**  
4 **BILLING DEMAND.**

5 A. Tariff code 208 EHG applies a demand charge for each kW of monthly billing demand in  
6 excess of 30 kW. Therefore the first 30 kW used in each month is not assessed any base  
7 demand charge. When witness Novak developed attrition year revenue, he applied the  
8 base demand charge to *all* monthly demand instead of only demand in excess of 30 kW.  
9 In doing so, he has overstated EHG billing demand by 85,146 kW compared to my  
10 calculation. Rectifying this error, using the filed tariff code 208 base billing demand, as  
11 provided in KgPCo Exhibit No. 1 (KIW) Revenue Proof, results in \$298,863 less attrition  
12 year revenue than proposed by the CA.

13 **Q. PLEASE DESCRIBE THE PROBLEM WITH WITNESS NOVAK'S GS-TOD**  
14 **ENERGY.**

15 A. Tariff 229 GS-TOD applies energy charges for on and off peak billing periods. When  
16 witness Novak developed on and off peak energy, he used *total* metered energy as if it  
17 were on-peak energy. This effectively doubled their usage. In doing so, he has overstated  
18 GS-TOD on-peak energy by 129,378 kWh. Rectifying this error, using the filed tariff  
19 code 229 on-peak energy as provided in KgPCo Exhibit No. 1 (KIW) Revenue Proof,  
20 results in \$5,721 less attrition year revenue than proposed by the CA.



1   **Q.   DO YOU HAVE ANY OTHER CONCERNS ABOUT WITNESS NOVAK'S**  
2       **ATTRITION YEAR REVENUE?**

3   A.   Yes, witness Novak has overstated the Company's Street Lighting attrition year revenue  
4       by applying a 113% gross-up to that revenue, resulting in an additional \$213,581 of  
5       fictitious revenue.

6   **Q.   WHAT IS THE BASIS FOR THIS GROSS-UP?**

7   A.   Witness Novak asserts that the Commission ordered an approximate \$215,000 increase to  
8       the Street Lighting class in Docket No. 16-00001. While the Settlement and Order did  
9       impute a revenue increase to the Street Lighting class, it also recognized that the  
10      Company was obligated to continue charging Street Lighting customers their contracted  
11      rates. Effectively the result was that all other retail customers would not pay \$215,000  
12      that was identified as related to Street Lighting.

13  **Q.   WHAT IS THE EFFECT OF WITNESS NOVAK'S REVENUE GROSS-UP?**

14  A.   Witness Novak has imputed additional revenue to the Company by falsely increasing  
15      Street Light lamp rates to reach higher attrition year revenue. In order to reach the  
16      proposed level of revenue for the Street Lighting class recommended by Mr. Novak, the  
17      communities with Street Lighting would receive an almost 30% increase under CA's  
18      proposal instead of the 13.18% increase shown in witness Novak's exhibit CA Exhibits  
19      for Revenue Requirement in KPC Rate Case 21-00107.

20  **Q.   IS THE STREETLIGHTING CLASS ALREADY EARNING OVER THE**  
21       **JURISDICTIONAL RATE OF RETURN?**

22  A.   Yes, as discussed by Company witness Ward, the Street Lighting class earned a 2.6%  
23      ROR which is higher than the jurisdictional average of -0.83%. Under their current

1 contract rates, they are already paying higher than the jurisdictional average when  
2 considering the costs to serve them. It would be totally inappropriate to impose an  
3 increase of almost 30% on these customers when the cost of service does not warrant  
4 doing so.

5 **Q. WHAT LEVEL OF BASE ATTRITION YEAR REVENUE HAS THE COMPANY**  
6 **PROPOSED?**

7 A. As shown in KgPCo Exhibit No. 1 (KIW) Revenue Proof, the Commission should rely on  
8 my attrition year SL revenue of \$1,148,264. Accepting my number, results in \$307,039  
9 less attrition year revenue than proposed by the CA.

10 **Q. WITNESS NOVAK HAS ASKED THE COMMISSION TO QUESTION THE**  
11 **PROMPT PAYMENT DISCOUNT CUSTOMERS RECEIVE FOR PAYING**  
12 **THEIR BILL ON TIME. DO YOU AGREE THE PROMPT PAYMENT**  
13 **DISCOUNT POSES A PROBLEM?**

14 A. No, I do not. Kingsport customers have long enjoyed a 1.5% prompt payment discount  
15 which motivates customers to pay their bill and stay current on their account. Witness  
16 Novak is correct that the full prompt payment gross-up is included in base rates while the  
17 credit is assessed on the entire bill. However, I disagree that the Commission need open a  
18 separate docket to address the prompt pay discount. It would be an unnecessary use of  
19 resources and not to customers' benefit. Rather, there are two effectively equivalent  
20 options to address witness Novak's concern:

21 1. Retain the full prompt pay gross-up in base rates the way it has been  
22 calculated for decades. This will also ensure that there continues to be matching of the  
23 full prompt pay gross-up in base rates along with any forfeited discounts in base rates.

1                   2.     Gross-up the individual rate components (base and riders) for the prompt  
2     pay discount. This would require changes to the current FPPAR and TRP&MS rates in  
3     order to capture the total prompt pay discount across base and rider rates.

4     **Q.     WITNESS NOVAK HAS CALCULATED A LOWER GRCF THAN THE**  
5     **COMPANY. DO YOU AGREE WITH HIS GRCF?**

6     A.    No, I do not. There are a number of differences between the Company's calculation and  
7     CA's calculation. Company witness Criss addresses witness Novak's inappropriate  
8     removal of the TN PUC Inspection Fee component from the gross-up. Additionally, I  
9     find fault with his calculation of the forfeited discount ratio applied to the gross-up.

10    **Q.     PLEASE EXPLAIN THE FORFEITED DISCOUNT DIFFERENCE.**

11    A.    It is proper to first gross-up operating revenue by a representative level of forfeited  
12    discounts otherwise known as the forfeited discount ratio. The forfeited discount ratio  
13    includes a test year level of forfeited discounts divided by total test year revenue to reach  
14    a forfeited discount ratio. Witness Novak used a similar level of forfeited discount  
15    revenue but divided by base revenue instead of total revenue. This results in a much  
16    higher forfeited discount ratio in his GRCF calculation. As previously discussed,  
17    forfeited discounts are reflective of total bills and it is incorrect to calculate the forfeited  
18    discount ratio using only base revenue as the denominator.

19    **Q.     IS HIS APPROACH CONSISTENT WITH HIS CALCULATION OF THE**  
20    **UNCOLLECTIBLE RATIO?**

21    A.    No. While he used only base revenue in the forfeited discount ratio, he used total revenue  
22    to compute the uncollectible ratio. This inconsistency should be corrected and both ratios  
23    should utilize total revenue as the denominator.

1   **Q.   DO YOU AGREE WITH WITNESS NOVAK'S RECOMMENDATION TO**  
2       **APPLY THE ENTIRE REVENUE INCREASE TO ONLY THE FIXED**  
3       **PORTIONS OF CUSTOMER RATES?**

4    A.   Yes, I do. The base rates reflect the distribution cost-of-service and ought to be recovered  
5       in fixed charges. Therefore, I agree that customer and demand charges, not energy  
6       charges, ought to be increased to collect the increase granted by the TPUC in this case.

7   **Q.   DO YOU HAVE ANY OTHER GENERAL CONCERNS WITH THE RATE**  
8       **DESIGN PROPOSED BY WITNESS NOVAK.**

9    A.   Yes, I believe one minor rate design issue should be considered regarding Street Lighting  
10       lamp rates. Witness Novak simply spread the increase to all existing street light lamp  
11       rates. In contrast, the Company has proposed to first consolidate the lamp rates by  
12       wattage, similar to the current Outdoor Lighting rates, then apply the revenue increase.  
13       This consolidation reduces the number of Street Light lamp rates by 39, significantly  
14       simplifies Street Light customer bills and tariff administration, and should be approved.

15   **Q.   DO YOU HAVE ANY FURTHER COMMENTS REGARDING THE LIGHTING**  
16       **PROPOSALS IN THIS PROCEEDING?**

17   A.   Yes. Through the course of discovery and additional review, the Company has  
18       determined there are some necessary changes to the proposed lighting tariffs.  
19       Additionally, Witness Novak is expected to offer supplemental testimony regarding the  
20       new LED lighting proposals and the Company would like to respond accordingly at that  
21       time if necessary.

1   **Q.    WHAT CHANGES TO THE FILED LIGHTING PROPOSALS HAVE YOU**  
2   **IDENTIFIED?**

3   A.    I have included revisions to the Company's proposed tariff in red-line format for OL, SL  
4       and the lighting section of the FPPAR relative to those originally filed in  
5       MFR\_5b\_Attachment\_1. This is provided as KgPCo Rebuttal Exhibit No. 1 (KIW)  
6       Proposed Lighting Revisions to Tariff. These revisions have no dollar effect on the  
7       Company's original filing or customer bills. The revisions are summarized below:

8               1. Correct OL conversion charge from \$31 to \$30.

9               2. Revise SL FPPAR rate to a single per kWh rate instead of separate per lamp  
10       charges. It was determined the Company's billing system cannot charge separate rider  
11       lamp rates for a single Street Light Tariff code, 523. Since the lamp rates were originally  
12       designed based on a uniform per kWh rate, this has no impact.

13              3. Correct name of Tariff code OL 173 from UG to OH

14              4. Remove OL lamps that are no longer offered or used: Tariff codes 99, 104, 121  
15       and 125

16              5. Include a rate for 200 watt HPS SL UG lamps. It was determined that some of  
17       the 200 watt HPS SL lamps are fed via underground circuit; therefore a separate rate  
18       should be shown for them.

19              6. Add a new OL and SL LED option for 480 watt Flood lamp.

20   **Q.    DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

21   A.    Yes.

**KINGSPORT POWER COMPANY**  
d/b/a AEP Appalachian Power  
Kingsport, Tennessee

**Original Sheet Number 2-15**  
**T.P.U.C. Tariff Number 3**

### **FUEL AND PURCHASED POWER ADJUSTMENT RIDER**

Kingsport Power is authorized under the terms of this rider to apply a charge to all customer bills rendered by the Company to recover the total cost of fuel and purchased power from the Company's wholesale power supplier under the Federal Energy Regulatory Commission implemented rate schedules, including, but not limited to, all demand charges, energy charges and fuel charges which are paid by the Company to its wholesale power supplier in connection with the electric service provided to the Company.

1. Updates to Fuel and Purchased Power Expense

Fuel and Purchased Power Adjustment Rider rates shall remain in effect until such time as new Rider rates are approved by the Tennessee Public Utility Commission. At least annually, the Company will file information regarding actual fuel and purchased power expenses and revenues collected under this Rider as well as any proposed adjustment to the Rider rates. The Fuel and Purchased Power Adjustment Rider rates will be designed to collect the approved level of fuel and purchased power expense including any prior period over/under recovery balance and any refunds from the Company's wholesale power supplier. Prior period over/under recovery balances result from differences between the Company's actual total costs from its wholesale supplier and actual billing under the Rider.

2. Determination of Adjustments to Surcharges by Tariff

Adjustments to the level of recovery under the Fuel and Purchased Power Adjustment Rider shall be applied proportionally to all Fuel and Purchased Power Adjustment Rider rate components for all tariffs and special contracts.

3. Notification of Change in Charge by the Company

The Company will provide no less than a 30-day notice of the proposed effective date in any change in the purchased power charge to its customers. The Company will also provide the calculations and other information supporting the proposed purchased power charges to the Staff of the Tennessee Public Utility Commission 30 days prior to the effective date of such charge.

4. Charge

Pursuant to the provisions of this Rider, a Fuel and Purchased Power Adjustment Rider charge will be applied to each kilowatt-hour, kilowatt or lamp as billed under the Company's filed tariffs.

The Fuel and Purchased Power Adjustment Rider charge applicable to each tariff is set below:

<u>Tariff</u>	<u>Energy Rate</u>	<u>Demand Rate</u>	<u>Lamp Rate</u>
	(¢) / kWh	(\$) / KW	(\$) / Lamp
<u>Residential</u>			
All kWh	8.332		
Storage Water Heating	6.394		
<u>Residential Employee</u>			
All kWh	8.332		
Storage Water Heating	6.394		
<u>Residential Smart Time-of-Use</u>			
Critical On-peak kWh	17.500		
On-peak kWh	9.895		
Off-peak kWh	6.394		

Issued:  
By: Christian T. Beam, President

Effective: July 1, 2022  
Pursuant to an Order in  
Docket Number 21-00107

**KINGSPORT POWER COMPANY**  
d/b/a AMERICAN ELECTRIC POWER  
Kingsport, Tennessee

**Original Sheet Number 2-15**  
**T.P.U.C. Tariff Number 3**

**FUEL AND PURCHASED POWER ADJUSTMENT RIDER**

<u>Tariff</u>	<u>Energy Rate</u>	<u>Demand Rate</u>	<u>Lamp Rate</u>
	(¢) / kWh	(\$)/ KW	(\$)/ Lamp
<u>Residential Time-of-Day</u>			
On-peak kWh	9.539		
Off-peak kWh	6.394		
<u>Small General Service (SGS)</u>			
First 600 kWh	6.750		
Over 600 kWh	6.750		
<u>Medium General Service (MGS) Secondary</u>			
First 200 kWh per kW	7.512		
Over 200 kWh per kW	7.245		
<u>General Service Time-of-Day (GS-TOD)</u>			
On-peak kWh	8.042		
Off-peak kWh	6.236		
<u>Medium General Service (MGS) Primary</u>			
First 200 kWh per kW	7.513		
Over 200 kWh per kW	6.804		
<u>Large General Service (LGS) Secondary</u>			
Demand - kVA		\$4.98	
All kWh	5.212		
<u>Large General Service (LGS) Primary</u>			
Demand - kVA		\$4.98	
All kWh	4.637		
<u>LGS Subtransmission/Transmission</u>			
Demand - kVA		\$ 4.88	
All kWh	4.550		
<u>Industrial Power (IP) Secondary</u>			
Demand - On-Peak kW		\$10.95	
All kWh	4.310		
<u>Industrial Power (IP) Primary</u>			
Demand - On-Peak kW		\$ 10.63	
All kWh	4.174		
<u>Industrial Power (IP) Subtransmission/Transmission</u>			
Demand - On-Peak kW		\$11.51	
All kWh	4.108		

Issued:  
By: Christian T. Beam, President

Effective: July 1, 2022  
Pursuant to an Order in  
Docket Number 21-00107

**KINGSPORT POWER COMPANY**  
d/b/a AMERICAN ELECTRIC POWER  
Kingsport, Tennessee

**Original Sheet Number 2-16**  
**T.P.U.C. Tariff Number 3**

**FUEL AND PURCHASED POWER ADJUSTMENT RIDER**

<u>Tariff</u>	<u>Energy Rate</u> (¢) / kWh	<u>Demand Rate</u> (\$)/ KW	<u>Lamp Rate</u> (\$)/ Lamp
<u>Church Service</u>			
All kWh	7.672		
<u>Public Schools (PS)</u>			
Block 1 kWh Standard	8.417		
Block 2 kWh Electric Heating	8.417		
<u>Electric Heating General (EHG)</u>			
All kWh	7.498		
<u>Outdoor Lighting (OL)</u>			
Overhead Lighting Service			
High Pressure Sodium			
100 watts, 9,500 Lumens (094)			\$1.30
200 watts, 22,000 Lumens (097)			\$2.91
Flood Lighting Service			
High Pressure Sodium - Floodlight			
100 watts, 9,500 Lumens (115)			\$1.30
200 watts, 22,000 Lumens (107)			\$2.91
400 watts, 50,000 Lumens (109)			\$5.75
High Pressure Sodium - Shoebox			
400 watts, 50,000 Lumens (120)			\$5.75
Metal Halide - Floodlight			
250 watts, 17,000 Lumens (110)			\$3.46
400 watts, 28,800 Lumens (116)			\$5.47
Mercury Vapor			
175 watts, 7,000 Lumens (093)			\$2.49
400 watts, 20,000 Lumens (095)			\$5.47
Post Top Lighting Service			
High Pressure Sodium - PT			
100 watts, 9,500 Lumens (111)			\$1.30
70 watts, 6,300 Lumens (121)			\$0.98
150 watts, 16,000 Lumens (122)			\$2.02
250 watts, 27,500 Lumens (103)			\$3.56
400 watts, 50,000 Lumens (104))			\$5.75
Flood Lighting Service - PT			
High Pressure Sodium - Floodlight			
200 watts, 22,000 Lumens (123)			\$2.91
400 watts, 50,000 Lumens (124)			\$5.75
Metal Halide - PT			
400 watts, 36,000 Lumens (125)			\$5.47
Metal Halide - Floodlight - PT			
400 watts, 36,000 Lumens (126)			\$5.47
Mercury Vapor - PT			
175 watts, 7,000 Lumens (099)			\$2.49

Issued:  
By: Christian T. Beam, President

Effective: July 1, 2022  
Pursuant to an Order in  
Docket Number 21-00107



**KINGSPORT POWER COMPANY**  
d/b/a AMERICAN ELECTRIC POWER  
Kingsport, Tennessee

**Original Sheet Number 2-17**  
**T.P.U.C. Tariff Number 3**

<b>Outdoor Lighting (OL) – cont'd</b>			
<b>LED Overhead Lighting Service</b>			
50 watts, 5,000 Lumens OH (163)			\$0.56
100 watts, 9,800 Lumens OH (152)			\$1.11
200 watts, 23,000 Lumens OH (165)			\$2.22
150 watts, 20,400 Lumens Flood OH (167)			\$1.67
300 watts, 38,700 Lumens Flood OH (172)			\$3.35
480 watts, 73,000 Lumens Flood OH (174)			\$5.34
<b>LED Underground Lighting Service</b>			
50 watts, 5,000 Lumens UG (164)			\$0.56
100 watts, 9,800 Lumens UG (153)			\$1.11
115 watts, 15,700 Lumens Shoebox UG (169)			\$1.28
200 watts, 23,000 Lumens UG (166)			\$2.22
40 watts, 4,300 Lumens Postop UG (171)			\$0.44
65 watts, 6,300 Lumens Postop UG (158)			\$0.72
150 watts, 20,400 Lumens Flood UG (168)			\$1.67
300 watts, 38,700 Lumens Flood UG (173)			\$3.35
480 watts, 73,000 Lumens Flood UG (175)			\$5.34
<b>Street Lighting (SL) tariff code (523)</b>			
All kWh	3.379		

Issued:  
By: Christian T. Beam, President

Effective: July 1, 2022  
Pursuant to an Order in  
Docket Number 21-00107

**KINGSPORT POWER COMPANY**  
d/b/a AMERICAN ELECTRIC POWER  
Kingsport, Tennessee

**Original Sheet Number 2-18**  
**T.P.U.C. Tariff Number 3**

**FUEL AND PURCHASED POWER ADJUSTMENT RIDER**

<u>Tariff</u>	<u>Energy Rate</u> (¢) / kWh	<u>Demand Rate</u> (\$)/ KW	<u>Lamp Rate</u> (\$)/ Lamp
<b><u>Backup Service</u></b>			
<b>Service Reliability Level A</b>			
Secondary		\$ 0.47	
Primary		\$ 0.46	
Sub/Transmission		\$ 0.44	
<b>Service Reliability Level B</b>			
Secondary		\$ 0.93	
Primary		\$ 0.91	
Sub/Transmission		\$ 0.89	
<b>Service Reliability Level C</b>			
Secondary		\$ 1.42	
Primary		\$ 1.39	
Sub/Transmission		\$ 1.35	
<b>Service Reliability Level D</b>			
Secondary		\$ 1.88	
Primary		\$ 1.83	
Sub/Transmission		\$ 1.80	
<b>Service Reliability Level E</b>			
Secondary		\$ 2.36	
Primary		\$ 2.30	
Sub/Transmission		\$ 2.25	
<b>Service Reliability Level F</b>			
Secondary		\$ 2.82	
Primary		\$ 2.74	
Sub/Transmission		\$ 2.69	
<b><u>Maintenance Service</u></b>			
Secondary	4.537		
Primary	4.397		
Sub/Transmission	4.326		

Issued:  
By: Christian T. Beam, President

Effective: July 1, 2022  
Pursuant to an Order in  
Docket Number 21-00107

**KINGSPORT POWER COMPANY**  
d/b/a AEP Appalachian Power  
Kingsport, Tennessee

**Original Sheet Number 16-1**  
**T.P.U.C. Tariff Number 3**

**TARIFF O. L.**  
**(Outdoor Lighting)**

**AVAILABILITY OF SERVICE**

Available for outdoor lighting distribution service to individual customers, provided the lighting location designated by the customer is reasonably accessible to the Company's service vehicles without causing damage to the customer's or other's property. No light shall be installed on streets covered by municipal street lighting systems or at a location which might interfere with such system. LED Equivalent options will be utilized for all new installations. Mercury vapor lamps will no longer be available for new installations or for repair or replacement of existing units.

**MONTHLY RATE**

**OVERHEAD LIGHTING SERVICE**

- A. For each of the following, the Company will provide lamp, photo-electric relay control equipment, luminaire and an upsweep arm not over 6 feet in length, an shall mount same on an existing wood distribution pole which is connected to secondary facilities of the Company:

Tariff Code	Size of Lamp In Lumens (Approximate)	Nominal Lamp Wattage (Approximate)	Lamp Type	Rate Per Lamp Per Month	
094	9,500	100	High Pressure Sodium	\$8.47	I
097	22,000	200	High Pressure Sodium	\$12.07	I
115	9,500	100	High Pressure Sodium Floodlight	\$11.05	I
107	22,000	200	High Pressure Sodium Floodlight	\$12.86	I
109	50,000	400	High Pressure Sodium Floodlight	\$16.65	I
120	50,000	400	High Pressure Sodium Shoebox Fixture	\$20.55	I
110	17,000	250	Metal Halide Floodlight	\$14.86	I
116	28,000	400	Metal Halide Floodlight	\$17.11	I
163	5,000	50	LED OH	\$4.90	P
152	9,800	100	LED OH	\$5.48	P
165	23,000	200	LED OH	\$7.99	P
167	20,400	150	LED Flood OH	\$7.99	P
172	38,700	300	LED Flood OH	\$10.23	P
174	73,000	480	LED Flood OH	\$30.08	

Each kilowatt-hour of energy consumed is subject to all applicable riders and surcharges.

When other additional overhead facilities are to be installed by the Company, the customer will, in addition to the above monthly charge, pay a CIAC in advance representing the installation cost of such additional overhead facilities extending from the nearest or most suitable pole of the Company to the point designated by the customer for the installation of said fixture, provided the location designated by the customer is reasonably accessible to the Company's service vehicles without causing damage to the customer's or other's property. In lieu of paying in advance for the installation of additional facilities, the customer may, for the following facilities only, pay the following:

For each additional pole and overhead wire span not over 150 feet:  
Wood Pole \$ 7.95 per month (35 foot/5)

When service cannot be supplied from an existing pole of the Company carrying a secondary circuit, the Company will install one pole and one span of secondary circuit of not over 150 feet for an additional charge of \$7.95 per month or one span of secondary circuit only of not over 150 feet for an additional charge of \$1.40 per month.

- B. After January 1, 1983 Mercury Vapor outdoor lighting service will be available only to customers then being served at the rates set out herein and at the present service location.

Tariff Code	Size of Lamp in Lumens	Nominal Lamp Wattage	Lamp Type	Rate Per Lamp Per Month	
093	7,000	175	Mercury Vapor	\$10.57	I
095	20,000	400	Mercury Vapor	\$17.38	I

Issued:  
By: Christian T. Beam, President

Effective: July 1, 2022  
Pursuant to an Order in  
Docket Number 21-00107

KINGSPORT POWER COMPANY  
d/b/a AEP Appalachian Power  
Kingsport, Tennessee

Original Sheet Number 16-2  
T.P.U.C. Tariff Number 3

**TARIFF O. L.**  
**(Outdoor Lighting)**

**UNDERGROUND LIGHTING SERVICE**

- A. For each of the following, the Company will provide lamp, photo-electric relay control, post-top luminaire, post, and installation, (the type and height of which will be consistent with the Company's construction standards) including underground wiring, for a distance of 30 feet from the Company's existing secondary facilities.

Tariff Code	Size of Lamp In Lumens (Approximate)	Nominal Lamp Wattage (Approximate)	Lamp Type	Rate Per Lamp Per Month
121	6,300	70	High Pressure Sodium	\$13.54
111	9,500	100	High Pressure Sodium	\$14.42
122	16,000	150	High Pressure Sodium	\$44.17
103	27,500	250	High Pressure Sodium	\$46.37
104	50,000	400	High Pressure Sodium	\$49.54
123	22,000	200	High Pressure Sodium Floodlight	\$41.48
124	50,000	400	High Pressure Sodium Floodlight	\$48.90
125	36,000	400	Metal Halide	\$49.66
126	36,000	400	Metal Halide Floodlight	\$49.17
164	5,000	50	LED UG	\$13.33
153	9,800	100	LED UG	\$13.91
169	15,700	115	LED SHOEBOX UG	\$16.99
166	23,000	200	LED UG	\$16.41
171	4,300	40	LED Postop UG	\$14.45
158	6,300	65	LED Postop UG	\$14.63
168	20,400	150	LED Flood UG	\$16.75
173	38,700	300	LED Flood UG/H	\$18.99
175	73,000	480	LED Flood UG	\$38.84

- B. After January 1, 1983 Mercury Vapor outdoor lighting service will be available only to customers then being served at the rates set out herein and at the present service location.

Tariff Code	Size of Lamp in Lumens	Nominal Lamp Wattage	Lamp Type	Rate Per Lamp Per Month
099	7,000	175	Mercury Vapor	\$16.16

- C. When a customer requires an underground circuit longer than 30 feet from existing secondary facilities for underground lighting service, the customer will pay to the Company, in advance, a charge for the additional length of underground circuit.
- (1) Pay to the Company in advance a charge of \$5.62 per foot for the length of underground circuit in excess of 30 feet; or
  - (2) Pay a monthly facilities charge of \$1.00 for each 25 feet (or fraction thereof) of underground circuit in excess of 30 feet.

In addition, the customer shall reimburse the Company for all state and federal income taxes associated with such charges.

Fixtures and poles will be standard utility grade secured from the Company's normal suppliers. The Company will be the sole judge of the suitability of the types of fixtures and poles used.

**RIDERS**

Monthly charges computed under this tariff shall be adjusted in accordance with the applicable Commission-approved riders as contained herein.

**PROMPT PAYMENT DISCOUNT**

A discount of 1.5 percent will be allowed if account is paid in full within 15 days of date of bill.

**TERM OF CONTRACT**

Contracts under this tariff will be for not less than 1 year for residential or farm customers, not less than 3 years for commercial or industrial customers, or not less than 5 years for other customers. The Company reserves the right to include in the contract such other provisions as it may deem necessary to insure payment of bills throughout the term of the contract.

**HOURS OF LIGHTING**

All lamps shall burn from one-half hour after sunset until one-half hour before sunrise, every night and all night, or approximately 4,000

Issued:  
By: Christian T Beam, President

Effective: July 1, 2022  
Pursuant to an Order in  
Docket Number 21-00107

hours per annum.

KINGSPORT POWER COMPANY  
d/b/a AEP Appalachian Power  
Kingsport, Tennessee

Original Sheet Number 16-3  
T.P.U.C. Tariff Number 3

**TARIFF O. L.  
(Outdoor Lighting)**

OWNERSHIP OF FACILITIES

All facilities necessary for service including fixtures, controls, poles, transformers, secondaries, lamps and other appurtenances shall be owned and maintained by the Company. All service and necessary maintenance will be performed only during the regular scheduled working hours of the Company. Burned out lamps will normally be replaced within 48 hours after notification by the customer.

TERM

The minimum billing term for new residential outdoor lighting installations will be 12 months. At the Company's option, a written agreement may be required pursuant to the Extension of Service provision of the Company's Terms and Conditions of Standard Service. The minimum billing term for new commercial, industrial and other non-residential outdoor lighting installations will be 36 months. At the Company's option, a written agreement may be required pursuant to the Extension of Service provision of the Company's Terms and Conditions of Standard Service.

SPECIAL TERMS AND CONDITIONS

This tariff is subject to the Company's Terms and Conditions of Service.

In cases where the Company is requested to replace an existing mercury vapor lamp with a high pressure sodium or metal halide lamp, the right is reserved to charge the customer an amount commensurate with the cost involved.

All new lighting installations must be requested by property owner.

CONVERSION CHARGE

Upon Customer request, the Company will convert an existing non-LED luminaire, currently billed in accordance with the Company's Schedule O.L., to an available LED luminaire upon payment, in advance, by the Customer to the Company of the applicable Conversion Charge.

The Conversion Charge for replacing an existing non-LED luminaire to a LED luminaire will be \$304.00.

Issued:

By: Christian T Beam, President

Effective: July 1, 2022

Pursuant to an Order in

Docket Number 21-00107

**KINGSPORT POWER COMPANY**  
d/b/a AEP Appalachian Power  
Kingsport, Tennessee

**Original Sheet Number 17-1**  
**T.P.U.C. Tariff Number 3**

**TARIFF S. L.**  
**(Street Lighting)**

AVAILABILITY OF SERVICE

Available for street lighting distribution service to individual customers, provided the lighting location designated by the customer is reasonably accessible to the Company's service vehicles without causing damage to the customer's or other's property. LED Equivalent options will be utilized for all new installations.

MONTHLY RATE (Tariff Code 523)

OVERHEAD LIGHTING SERVICE

- A. For each of the following, the Company will provide lamp, photo-electric relay control equipment, luminaire and upsweep arm not over 6 feet in length, and shall mount same on an existing wood distribution pole which is connected to secondary facilities of the Company:

Size of Lamp In Lumens (Approximate)	Nominal Lamp Wattage (Approximate)	Lamp Type	Rate Per Lamp Per Month	Cost of Facilities Included in Rates (\$) <sup>1</sup>	
9,500	100	High Pressure Sodium	\$7.45		P
16,000	150	High Pressure Sodium	\$8.62		P
22,000	200	High Pressure Sodium	\$9.09		P
28,000	250	High Pressure Sodium	\$22.26		P
50,000	400	High Pressure Sodium	\$27.16		P
5,000	50	LED OH	\$4.90	\$342.48	P
9,800	100	LED OH	\$5.48	\$379.70	P
23,000	200	LED OH	\$7.99	\$541.38	P
73,000	480	LED Flood OH	30.08	\$1,958.64	P

When facilities other than those specified above are to be installed by the Company, the customer will, in addition to above monthly charge or charges, pay in advance the installation cost for the new overhead facilities extending from nearest or most suitable pole of the Company to the point designated by the customer for the installation of said lamp

- B. After January 1, 1983 Mercury Vapor outdoor lighting service will be available only to customers then being served at the rates set out herein and at the present service location.

Size of Lamp in Lumens (Approximate)	Nominal Lamp Wattage (Approximate)	Lamp Type	Rate Per Lamp Per Month	
7,000	175	Mercury Vapor	\$7.74	P
20,000	400	Mercury Vapor	\$16.36	P

Issued:  
By: Christian T Beam, President

Effective: July 1, 2022  
Pursuant to an Order in  
Docket Number 21-00107

Effective: July 1, 2022  
Pursuant to an Order in  
Docket Number 21-00107



KINGSPORT POWER COMPANY  
d/b/a AEP Appalachian Power  
Kingsport, Tennessee

Original Sheet Number 17-3  
T.P.U.C. Tariff Number 3

TARIFF S. L.  
(Street Lighting)  
(Continued)

OWNERSHIP OF FACILITIES

All facilities necessary for service including fixtures, controls, poles, transformers, secondaries, lamps and other appurtenances shall be owned and maintained by the Company. All service and necessary maintenance will be performed only during the regular scheduled working hours of the Company. Burned out lamps will normally be replaced within 48 hours after notification by the customer.

SPECIAL TERMS AND CONDITIONS

This tariff is subject to the Company's Terms and Conditions of Service.

CONVERSION CHARGE

Upon Customer request, the Company will convert an existing non-LED luminaire, currently billed in accordance with the Company's Schedule O.L., to an available LED luminaire upon payment, in advance, by the Customer to the Company of the applicable Conversion Charge.

The Conversion Charge for replacing an existing non-LED luminaire to a LED luminaire will be \$165.00.

In cases where the Company is requested to replace an existing mercury vapor lamp with a high pressure sodium or metal halide lamp, the right is reserved to charge the customer an amount commensurate with the cost involved.

SMART LIGHTING SERVICES

The light post and power together means other Smart Lighting devices could be attached to the light post at the same time as the upgrade to LED luminaires. Other devices could include environmental sensors, cameras, Wi-Fi network devices, smart parking and smart trash removal devices, speakers, signs etc. The installation of these devices at the same time as the street light upgrade may be more cost effective than adding these devices to the light post at a later date. If a customer desires to receive Smart Lighting services, the Company may provide a proposal to address individual customer needs. The customer agrees to execute a Service Agreement to contract with the Company for the pricing and terms of such Smart Lighting services.

Issued:  
By: Christian T Beam, President

Effective: July 1, 2022  
Pursuant to an Order in  
Docket Number 21-00107