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January 6, 2022

KPOW-10311

VIA EMAIL (tpuc.docketroom@tn.gov) & FEDEX

Dr. Kenneth C. Hill, Chairman
c/o Ectory Lawless, Dockets & Records Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Re: IN RE: PETITION OF KINGSFORT POWER
COMPANY d/b/a AEP APPALACHIAN POWER
TO OPEN A DOCKET AND ISSUE A
PROTECTIVE ORDER IN ADVANCE OF FILING
OF A GENERAL RATE CASE IN THE DOCKET
SO OPENED
DOCKET NO.: 21-00107

Dear Chairman Hill:

On behalf of Kingsport Power Company d/b/a AEP Appalachian Power, we transmit herewith for filing, the Response to Consumer Advocates Motion for Leave to Issue More than Forty Discovery Requests.

The original and six (6) copies are being sent via Federal Express.

Very sincerely yours,

HUNTER, SMITH & DAVIS, LLP


William C. Bovender

Enclosure: as stated

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

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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

**RESPONSE OF KINGSPORT POWER COMPANY d/b/a AEP APPALACHIAN
POWER TO CONSUMER ADVOCATES MOTION FOR LEAVE TO ISSUE MORE
THAN FORTY DISCOVERY REQUESTS**

Comes Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power ("Kingsport"), and responds to the Motion of the Consumer Advocate (herein, "CAD") for leave to issue more than forty discovery requests as follows:

Kingsport does not object to the Motion as such but does reserve the right to object to individual requests.

Kingsport would also note that at Page 7 of the CAD Motion, mention is made of CAD's discovery opportunities. Kingsport would point out that CAD intervention is of recent vintage; and, CAD was provided access to Kingsport's responses to the TPUC Staff's Minimum Filing Requirement (herein, "MFR") inquiries. Also, on December 1, 2021, Kingsport permitted CAD to access the Confidential Information supplied in response to the TPUC Staff's MFR's.

Kingsport has been most cooperative relative to informal discovery/MFR's and will continue to be cooperative.

Respectfully submitted,

KINGSPORT POWER COMPANY
d/b/a AEP APPALACHIAN POWER

BY: 

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **Response of Kingsport Power Company d/b/a AEP Appalachian Power to Consumer Advocates Motion for Leave to Issue More Than Forty Discovery Request** has been served upon the following by emailing a copy of same as follows, on this the 6th day of January, 2022.

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