

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

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|---|---|----------------------------|
| IN RE: |) | |
| |) | |
| PETITION OF KINGSPORT POWER |) | |
| COMPANY d/b/a AEP APPALACHIAN |) | |
| POWER FOR OCTOBER, 2020 THROUGH |) | |
| SEPTEMBER, 2021 ANNUAL RECOVERY |) | DOCKET NO. 21-00142 |
| UNDER THE TARGETED RELIABILITY |) | |
| PLAN AND MAJOR STORM RIDER |) | |
| (“TRP&MS”), ALTERNATIVE RATE |) | |
| MECHANISMS APPROVED IN DOCKET |) | |
| NO. 17-00032 |) | |

**JOINT MOTION TO HOLD THE FILING OF A
PROPOSED PROCEDURAL SCHEDULE IN ABEYANCE**

1. The Consumer Advocate Unit in the Financial Division of the Office of the Tennessee Attorney General (“Consumer Advocate”) requests that the required filing of a proposed procedural schedule, as directed by the Hearing Officer, be held in abeyance until the resolution of TPUC Docket No. 21-00107.

2. The Consumer Advocate has conferred with the Petitioner, Kingsport Power Company d/b/a AEP Power (“Kingsport”), and Kingsport does not oppose the request for abeyance.

3. Kingsport has filed its rate case with the Commission, TPUC Docket No. 21-00107. The parties are currently engaged in the latter half of the procedural schedule in that case. More specifically, the Consumer Advocate has just filed its direct testimony on March 30, 2022, and the deadline for Kingsport’s rebuttal testimony is April 27, 2022. An issue for discussion is the inclusion, in base rates, of major storm expenses amounting to \$392,381 and of vegetation management expense amounting to \$903,372, which expenses were established in Kingsport’s

previous rate case, TRA Docket No. 16-00001. The under/over recovery of these two expenses is addressed through the Targeted Reliability Plan and Major Storm ("TRP&MS") Rider.

4. The resolution of issues concerning the major storm and vegetation management expenses in Kingsport's rate cases (TPUC Docket No. 21-00107) could directly impact the proceedings in this docket concerning the TRP&MS.

Therefore, the parties respectfully request that the filing of a proposed procedural schedule in this matter be held in abeyance until the resolution of TPUC Docket No. 21-00107 so that the parties may attempt to address issues regarding the TRP&MS rider in the current rate case.

RESPECTFULLY SUBMITTED:

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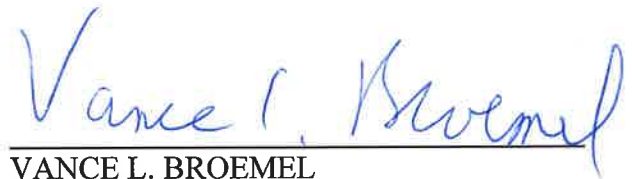
Dated: April 20th, 2022.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via electronic mail, with a courtesy copy by U.S. mail, upon:

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This the 20th day of April, 2022.



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