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October 6, 2022

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KPOW-10725

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

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

Electronically filed in TPUC Docket
Room on October 6, 2022 at 3:57 p.m.

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

Dear Chairman Hill:

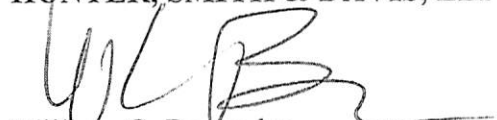
On behalf of Kingsport Power Company d/b/a AEP Appalachian Power, we transmit herewith Motion for Leave to Allow William Castle to Present the Direct Testimony of Witness Eleanor Keeton.

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

cc: Kelly Grams, General Counsel (w/enc.)
David Foster (w/enc.)

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BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

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

**MOTION FOR LEAVE TO ALLOW WILLIAM CASTLE TO PRESENT THE DIRECT
TESTIMONY OF WITNESS ELEANOR KEETON ON BEHALF OF KINGSFORT
POWER COMPANY d/b/a AEP APPALACHIAN POWER**

Comes Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power ("KgPCo"), and respectfully requests that William Castle, Director of Regulatory Services for KgPCo, be permitted to adopt and summarize the pre-filed direct testimony of Eleanor Keeton. Ms. Keeton is no longer an employee of Appalachian Power Company, KgPCo's sister company, which prevents her from summarizing her testimony at the hearing in person or by telephone.

Mr. Castle is thoroughly familiar with Ms. Keeton's testimony and the subject matter discussed therein. Mr. Castle will be presenting his own pre-filed rebuttal testimony via electronic participation at the hearing on October 10, 2022.

Attached as EXHIBIT 1 supporting this Motion is the direct testimony of Ms. Keeton which Mr. Castle will sponsor and present.

PREMISES CONSIDERED, Kingsport Power Company d/b/a AEP Appalachian Power requests the Commission allow Mr. Castle to summarize the direct testimony of Ms. Keeton at the hearing on this Docket on October 10, 2022. FOR GOOD CAUSE SHOWN.

Respectfully submitted,

KINGSPORT POWER COMPANY
d/b/a AEP APPALACHIAN POWER

BY: 

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing *MOTION FOR LEAVE TO ALLOW WILLIAM CASTLE TO PRESENT THE DIRECT TESTIMONY OF WITNESS ELEANOR KEETON 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 7th day of October, 2022.

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By 

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