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November 9, 2022

Via Electronic Filing & UPS 2-Day

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

Electronically Filed in TPUC Docket Room on November 9, 2022 at 9:57 a.m.

Re:

Petition of Kingsport Power Company d/b/a AEP Appalachian Power Company

for a General Rate Increase - Tariff Changes to Fuel and Purchased Power

Adjustment Rider

(Docket No. 22-00111)

Dear Chairman Hill:

Enclosed please find one original and four copies of East Tennessee Energy Consumers' Response to Motion to Dismiss, in the above-referenced docket.

Michael J. Quinan, TN BPR No. 011104

MJQ Enclosures

Certificate of Service cc:

TENNESSEE PUBLIC UTILITY COMMISSION NASHVILLE, TENNESSEE

In Re:

PETITION OF KINGSPORT POWER COMPANY d/b/a AEP APPALACHIAN POWER COMPANY FOR A GENERAL RATE CASE – TARIFF CHANGES TO FUEL AND PURCHASED POWER ADJUSTMENT RIDER Docket No. 22-00111

EAST TENNESSEE ENERGY CONSUMERS' RESPONSE TO MOTION TO DISMISS

East Tennessee Energy Consumers ("ETEC"), by counsel, pursuant to Rule 1220-01-02-.06 of the Rules and Regulations of the Tennessee Public Utility Commission ("TPUC" or the "Commission"), submits this response to the Motion to Dismiss of Kingsport Power Company d/b/a AEP Appalachian Power ("Kingsport Power" or the "Company") in this Docket.

On September 29, 2022, the Kingsport Power filed changes to its existing tariff regarding its Fuel and Purchased Power Adjustment Rider ("FPPAR") charges.

On October 28, 2022, the Consumer Advocate Division of the Office of Attorney General ("Consumer Counsel") filed a Petition to Intervene in this proceeding.

On October 31, 2022, ETEC filed its Petition to Intervene in this proceeding.

On October 31, 2022, Kingsport Power filed a Motion to Dismiss the Petitions to Intervene of both the Consumer Counsel and ETEC.

On November 4, 2022, Consumer Counsel filed a Response in Opposition to Kingsport Power's Motion to Dismiss.

On November 4, 2022, Kingsport Power filed a Motion to file a Reply Brief to Consumer Advocate's Response.

On November 8, 2022, the Hearing Officer conducted a status conference at which she ruled that ETEC may file this Response to Kingsport Power's Motion to Dismiss by today, November 9, 2022, and that Kingsport Power may file a brief in reply to the Responses of Consumer Counsel and ETEC by Wednesday, November 16, 2022.

ETEC has no objection to the proposed changes to the FPPAR charges submitted by Kingsport Power on September 29, 2022. ETEC filed its Petition to Intervene in reaction to the Petition to Intervene filed by the Consumer Counsel. ETEC filed its Petition in order to allow ETEC to protect the interests of its members in any proceeding that might change or otherwise affect the FPPAR Rider or related charges, including any such charges that may be proposed as a result of Consumer Counsel's intervention.

WHEREFORE, ETEC respectfully requests that, if any further proceedings are to be conducted on Kingsport Power's proposed changes to its FPPAR charges, ETEC's Petition to Intervene be granted and that ETEC be permitted to participate fully as a party in any such proceedings.

November 9, 2022.

Respectfully submitted,

EAST TENNESSEE ENERGY

CONSUMERS

Bv:

Michael X Quinan

(Tenn. Sup. Ct. No. 11104)

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Counsel for East Tennessee Energy Consumers

CERTIFICATE OF SERVICE

I certify that, on November 9, 2022, this document was served by prepaid U.S. Mail, and by electronic mail, on the following:

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