

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

IN RE:)	
)	
PETITION OF KINGSFORT POWER)	
COMPANY D/B/A AEP APPALACHIAN)	
POWER FOR A GENERAL RATE CASE)	DOCKET NO. 22-00111
– TARIFF CHANGES TO FUEL AND)	
PURCHASES POWER ADJUSTMENT)	
RIDER)	
)	

**CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS
TO KINGSFORT POWER COMPANY**

This Second Set of Discovery Requests is hereby provided to Kingsport Power Company d/b/a AEP Appalachian Power (“Kingsport” or the “Company”) pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-01-02-.11. The Consumer Advocate Division of the Office of the Attorney General (“Consumer Advocate”) requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Mason C. Rush on or before 2:00 p.m. (CDT), March 3, 2023.

PRELIMINARY MATTERS AND DEFINITIONS

This Second Set of Discovery Requests incorporates by reference the same Preliminary Matters and Definitions as set forth in the *Consumer Advocate’s First Informal Discovery Request to Kingsport* sent to the Company on October 24, 2022, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

SECOND SET OF DISCOVERY REQUESTS

- 2-1. Refer to the Company's response to the Consumer Advocate's DR No. 1-4 regarding the NER adjustment of \$3,953 included on the "Schedule 1" tab of the "2022 Schedule 1-3 Recovery, Forecast and Rate Design Final - no links" spreadsheet provided with the Company's filing. Specifically refer to Cell I50 of the "revised" tab of this spreadsheet, which shows a revised total power cost charge of \$9,531,149 for September 2021. Next, refer to Cell AA82 of the "Schedule 1" tab of the "2022 Schedule 1-3 Recovery, Forecast and Rate Design Final - no links" spreadsheet, which also shows \$9,531,149 in power costs for September 2021. Given that both of these amounts are equal (i.e., have already been adjusted to reflect the corrected power costs), explain the Company's rationale for including the \$3,953 NER adjustment in Cell AC95 of this same spreadsheet.

RESPONSE:

- 2-2. Refer to the Company's response to the Consumer Advocate's DR No. 1-7 regarding estimated billings. Provide the following information related to the Company's estimated billing calculations:
- (a) Identify the specific customer accounts that are being estimated;
 - (b) Provide a narrative description as to why it is necessary to estimate certain accounts rather than using actual meter read billings; and
 - (c) Provide a narrative description of the Company's process for estimating customer billings.

RESPONSE:

- 2-3. Refer to the Company's response to the Consumer Advocate's DR No. 1-11 regarding the "Over/Under Recovery JE Support" and the "Journal Entry Detail Reports" for September 2021 through August 2022. We are having difficulty reconciling these reports with the net

“(Under)/Over” calculation (Column AC) for these same months shown on the “Schedule 1” tab of the “2022 Schedule 1-3 Recovery, Forecast and Rate Design Final - no links” spreadsheet provided with the Company’s filing. Specifically, we note the following discrepancies:

Month	Over/Under Recovery Reports				Company Filing - Schedule 1			Difference
	Report 1	Report 2	Report 3	Total	Over/Under	Adjustment	Total	
September 2021	\$758,809	\$4,308,148	\$128,576	\$5,195,533	\$762,762	\$3,953	\$766,715	\$4,428,818
October	1,305,728	-3,953		1,301,776	1,305,728		1,305,728	-3,953
November	4,308,148			4,308,148	4,452,466		4,452,466	-144,319
December	4,052,348			4,052,348	3,746,665		3,746,665	305,683
January 2022	4,480,657			4,480,657	-4,872,481		-4,872,481	9,353,138
February	2,259,849			2,259,849	940,229		940,229	1,319,619
March	86,540			86,540	3,403,254		3,403,254	-3,316,714
April	3,108,691			3,108,691	3,307,745		3,307,745	-199,054
May	3,696,403			3,696,403	4,086,142		4,086,142	-389,739
June	5,051,982			5,051,982	5,424,523		5,424,523	-372,541
July	5,589,149			5,589,149	6,274,037		6,274,037	-684,888
August	1,646,223	128,660		1,774,883	128,660		128,660	1,646,223
Total	\$36,344,526	\$4,432,855	\$128,576	\$40,905,957	\$28,959,732	\$3,953	\$28,963,684	\$11,942,273

Reconcile the difference between these amounts for September 2021 through August 2022 and provide a narrative explanation of the reconciliation process.

RESPONSE:

- 2-4. Refer to the Company’s response to the Consumer Advocate’s DR No. 1-12 that contains the Company’s monthly trial balance from September 2021 to August 2022. We are unable to reconcile the amounts from the Company’s monthly power bills from Appalachian Power Company to Kingsport Power Company with the trial balance for “Account 5550027 Non-Fuel” and “Account 5550046 Fuel” as shown in the table below:

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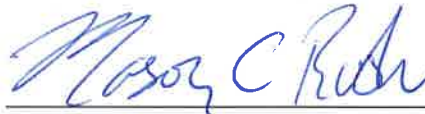
Item	Power Bill Calculations		Trial Balance		
	Account 5550027	Account 5550046	Account 5550027	Account 5550046	Account 5550551
	Non-Fuel	Fuel	Non-Fuel	Fuel	Over/Under
September 2021	\$6,444,118	\$3,087,031	-16,055,506	-5,822,865	-6,385,948
October	5,987,139	3,770,937	-10,068,367	-2,047,976	-7,695,629
November - Rev	7,162,847	7,280,171	-2,992,086	5,158,649	-12,003,776
December	6,449,351	8,224,379	3,214,574	13,045,314	-16,056,125
January 2022	4,798,350	5,603,009	-77,077,955	-41,811,192	15,020,645
February	7,805,650	4,961,876	-69,272,305	-36,849,316	12,760,796
March	7,694,833	5,325,448	-61,577,472	-31,038,798	12,189,186
April	6,829,873	5,449,666	-54,862,727	-25,673,058	9,080,495
May	6,878,180	7,141,906	-48,191,334	-18,714,105	5,384,092
June	7,141,764	9,675,618	-41,208,713	-9,251,885	332,111
July	7,122,850	10,318,606	-34,379,592	675,563	-5,257,038
August	5,855,365	6,215,790	-27,749,440	7,762,788	-7,031,922

Reconcile the difference between these amounts for September 2021 through August 2022

and provide a narrative explanation of the reconciliation process.

RESPONSE:

RESPECTFULLY SUBMITTED,



MASON C. RUSH (BPR No. 039471)

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CERTIFICATE OF SERVICE

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


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This the 17th day of February, 2023.



MASON C. RUSH
Assistant Attorney General