

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

IN RE:)	
)	
PETITION OF KINGSPORT POWER)	
COMPANY D/B/A AEP APPALACHIAN FOR)	
OCTOBER, 2021 THROUGH DECEMBER,)	
2022 ANNUAL RECOVERY UNDER THE)	DOCKET NO. 23-00019
TARGETED RELIABILITY PLAN AND)	
MAJOR STORM RIDER ("TRP&MS"),)	
ALTERNATIVE RATE MECHANISMS)	
APPROVED IN DOCKET NO. 17-00032)	
)	

**CONSUMER ADVOCATE'S FIRST SET OF DISCOVERY
REQUESTS TO KINGSPORT POWER COMPANY**

In accordance with Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Regs. 1220-01-02-.11, the Consumer Advocate Division in the Office of the Tennessee Attorney General ("Consumer Advocate"), by and through counsel, hereby propounds this First Set of Informal Discovery Requests upon Kingsport Power Company ("Kingsport" or the "Company"). Full and complete responses shall 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, at a date and time to be determined by the parties.

PRELIMINARY MATTERS AND DEFINITIONS

1. **Continuing Request.** These discovery requests are to be considered continuing in nature and are to be supplemented from time to time as information is received by the Company and any of its affiliates which would make a prior response inaccurate, incomplete, or incorrect.

2. **Clear References.** To the extent that the data or information requested is incorporated or contained in a document, identify the document including page/line number if applicable.

3. **Format of Responses.** Provide all responses in the format in which they were created or maintained, for example, Microsoft Word or Microsoft Excel format with all cells and formulas intact and in working order. If a document (including without limitation a financial or other spreadsheet or work paper) is not created or maintained in Microsoft Excel format, convert the document to Microsoft Excel format or provide the document in a format that enables or permits functionality like or similar to Microsoft Excel (including without limitation the functionality of working cells and formulas), or provide the software program(s) that will enable the Consumer Advocate to audit and analyze the data and information in the same manner as would be enabled or permitted if the document were provided in Microsoft Excel format.

4. **Objections.** If any objections to this discovery are raised on the basis of privilege or immunity, include in your response a complete explanation concerning the privilege or immunity asserted. If you claim a document is privileged, identify the document and state the basis for the privilege or immunity asserted. If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

5. **Singular/Plural.** The singular shall include the plural, and vice-versa, where appropriate.

6. **Definitions.** As used in this Request:

(a) “You,” “Your,” “Company,” “KgPCo,” or “Kingsport” shall mean Kingsport Power Company and all employees, agents, attorneys, representatives or any other person acting or purporting to act on its behalf.

(b) “Affiliate” shall mean any entity who, directly or indirectly, is in control of, is controlled by, or is under common control with the Company. For greater

clarification, "control" is the ownership of 20% or more of the shares of stock entitled to vote for the election of directors in the case of a corporation, or 20% or more of the equity interest in the case of any other type of entity, or status as a director or officer of a corporation or limited liability company, or status as a partner of a partnership, or status as an owner of a sole proprietorship, or any other arrangement whereby a person has the power to choose, direct, or manage the board of directors or equivalent governing body, officers, managers, employees, proxies, or agents of another person. In addition, the term "Affiliate" shall mean any entity that directly or indirectly provides management or operational services to the Company or any affiliate (as defined in the preceding sentence) of the Company, or to which the Company provides management or operational services. Further, the payment of money to the Company or receipt by the Company of money from an entity with which the Company has any relationship, other than such payment or receipt, shall include the payor or recipient of such money as an "Affiliate".

(c) "Communication" shall mean any transmission of information by oral, graphic, written, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, meetings and personal conversations, or otherwise.

(d) "Document" shall have the broadest possible meaning under applicable law. "Document" shall mean any medium upon which intelligence or information can be recorded or retrieved, such as any written, printed, typed, drawn, filmed, taped, or recorded medium in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, letter, note, report, electronic mail, memorandum (including memoranda, electronic mail, report, or note of a meeting or communication), work paper, spreadsheet, photograph, videotape, audio tape, computer disk or record, or any other data compilation in any form without limitation, which is in your possession, custody or control. If any such document was, but no longer is, in your possession, custody or control, state what disposition was made of the document and when it was made.

(e) "Person" shall mean any natural person, corporation, firm, company, proprietorship, partnership, business, unincorporated association, or other business or legal entity of any sort whatsoever.

(f) "Identify" with respect to:

- i. Any natural person, means to state the full name, telephone number, email address and the current or last known business address of the person (if no business address or email address is available provide any address known to you) and that person's relationship, whether business, commercial, professional, or personal with you;

- ii. Any legal person, business entity or association, means to state the full name, the name of your contact person with the entity, all trade name(s), doing business as name(s), telephone number(s), email address(es), and current or last known business address of such person or entity (if no business address is available provide any address known to you);
 - iii. Any document, means to state the type of document (e.g., letter), the title, identify the author, the subject matter, the date the document bears and the date it was written; and
 - iv. Any oral communication, means to state the date when and the place where it was made, identify the person who made it, identify the person or persons who were present or who heard it, and the substance of it.
- (g) “And” and “or” shall be construed conjunctively or disjunctively as necessary to make the discovery request inclusive rather than exclusive.
- (h) “Including” shall be construed to mean including but not limited to.

FIRST SET OF DISCOVERY REQUESTS

- 1-1. Missing Data. Refer to the Company’s petition filed March 10, 2023, in TPUC Docket No. 23-00019 (“Petition”). Paragraph 7 of the Petition refers to an “Exhibit 1” containing a letter to the Commission Staff dated November 11, 2022. We are unable to locate this exhibit in the Company’s filing. Provide a copy of this exhibit.

RESPONSE:

- 1-2. Source & Support. Refer to the testimony of Company witness Robert K. Cope (included in the Petition filing). Identify and provide the source and support for “Figure 1” through “Figure 5” on pages 9–13 of Mr. Cope’s testimony in Excel format, if possible, with all formulas intact.

RESPONSE:

- 1-3. Source & Support. Refer to “KgPCo Exhibit No. 1” and “KgPCo Exhibit No. 2” to the testimony of Company witness Robert K. Cope (included in the Petition filing). Identify and provide the source and support for these two exhibits in Excel format, if possible, with all formulas intact.

RESPONSE:

- 1-4. Source & Support. Refer to “KgPCo Exhibit No. 1” to the testimony of Company witness John A. Stevens (included in the Petition filing) regarding rate design. Provide the source and support for this exhibit including all supporting workpapers in Excel format, if possible, with all formulas intact.

RESPONSE:

- 1-5. Source & Support. Refer to “KgPCo Exhibit No. 3” to the testimony of Company witness John A. Stevens (included in the Petition filing) regarding bill comparisons. Provide the source and support for this exhibit including all supporting workpapers in Excel format, if possible, with all formulas intact.

RESPONSE:

- 1-6. Source & Support. Provide a copy of the Company’s monthly trial balance in Excel format for all subaccounts from September 2021 through December 2022.

RESPONSE:

- 1-7. Source & Support. Provide a copy of all third-party invoices for the TRP rider that were recorded and paid in July 2022.

RESPONSE:

- 1-8. Source & Support. Provide a copy of all third-party invoices for the MS rider that were recorded and paid from October 2021 through December 2022.

RESPONSE:

- 1-9. Source & Support. Provide a copy of the monthly entries (for both O&M and capital costs) along with the relevant cost queries for the TRP&MS Rider from October 2021 through December 2022.

RESPONSE:

- 1-10. Data Confirmation. Confirm that the storm costs requested for recovery in this docket met the IEEE criteria for classification as a major storm.

RESPONSE:

- 1-11. Source and Support. Refer to “KgPCo Exhibit No. 1 (MLD)” to the testimony of Company witness Malinda L. Dielman (included in the Petition filing) regarding the TRP&MS Rider costs and recoveries and provide the following information in Excel format with all formulas intact:

- a. Provide the source and support for the monthly TRP O&M Expenses in Column C of the corresponding spreadsheet that are included here as hard-coded numbers;
- b. Provide the source and support for the monthly TRP Capital Additions in Column E of the corresponding spreadsheet that are included here as hard-coded numbers;
- c. Provide the source and support for the monthly TRP Accumulated Deferred Income Taxes in Column I of the corresponding spreadsheet that are included here as hard-coded numbers;
- d. Provide the source and support for the monthly TRP Depreciation Expense in Column Q of the corresponding spreadsheet that are included here as hard-coded numbers;
- e. Provide the source and support for the monthly MS O&M Expenses in Column Z of the corresponding spreadsheet that are included here as hard-coded numbers;

- f. Provide the source and support for the monthly TRP&MS Rider Revenues in Column AF of the corresponding spreadsheet that are included here as hard-coded numbers; and
- g. Provide a copy of all workpapers and supporting documents that were used to prepare this exhibit.

RESPONSE:

1-12. Source and Support. Refer to “KgPCo Exhibit No. 2 (MLD)” to the testimony of Company witness Malinda L. Dielman (included in the Petition filing) regarding the TRP&MS Rider revenues and provide the following information in Excel format with all formulas intact:

- a. Provide the source and support for the monthly Billed Surcharges in Column B of the corresponding spreadsheet that are included here as hard-coded numbers;
- b. Provide the source and support for the monthly Billed KWH in Column C of the corresponding spreadsheet that are included here as hard-coded numbers;
- c. Provide the source and support for the estimated KWH in Column E of the corresponding spreadsheet that are included here as hard-coded numbers;
- d. Provide the source and support for the Unbilled KWH in Column F of the corresponding spreadsheet that are included here as hard-coded numbers; and
- e. Provide a copy of all workpapers and supporting documents that were used to prepare this exhibit.

RESPONSE:

1-13. Source and Support. Refer to “KgPCo Exhibit No. 7 (MLD)” to the testimony of Company witness Malinda L. Dielman (included in the Petition filing) regarding the repairs percentage calculation and provide the following information in Excel format with all formulas intact:

- a. Refer to the “2021_51013C” tab of this spreadsheet. Provide the source and support for the data included in Columns C, D, E and F of the corresponding spreadsheet that are included here as hard-coded numbers;

- b. Refer to the "2022 Provision" tab of this spreadsheet. Provide the source and support for the data included in Columns E, G and H of the corresponding spreadsheet that are included here as hard-coded numbers;
- c. Refer to the "2022 Forecast Adds" tab of this spreadsheet. Provide the source and support for the data included in Columns I - N of the corresponding spreadsheet that are included here as hard-coded numbers; and
- d. Provide a copy of all workpapers and supporting documents that were used to prepare this exhibit.

RESPONSE:

Respectfully submitted,

Mason Rush with Permission

Mason C. Rush (BPR No. 039471)

Assistant Attorney General

Karen H. Stachowski (BPR No. 019607)

Senior Assistant Attorney General

Office of the Tennessee Attorney General

Consumer Advocate Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

Phone: (615) 741-2357

Fax: (615) 741-8151

Email: Mason.Rush@ag.tn.gov

Email: Karen.Stachowski@ag.tn.gov

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 via electronic mail, upon:

William C. Bovender
Joseph B. Harvey
Hunter, Smith & Davis, LLP
P.O. Box 3740
Kingsport, TN 37664
Email: bovender@hdsdlaw.com
Email: jharvey@hdsdlaw.com

William K. Castle
American Electric Power Service Corporation
Three James Center
1041 E. Cary Street, Suite 1100
Richmond, VA 23219-4029
Email: wkcastle@aep.com

James R. Bacha
American Electric Power Service Corporation
1 Riverside Plaza
Columbus, OH 43215
Email: jrbacha@aep.com

Noelle J. Coates
American Electric Power Service Corporation
Three James Center
1051 E. Cary Street, Suite 1100
Richmond, VA 23219-4029
Email: njcoates@aep.com

This the 24th day of March 2023.

Mason Rush with permission

MASON C. RUSH
Assistant Attorney General

