

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

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

PETITION TO INTERVENE

The Consumer Advocate Division of the Office of the Tennessee Attorney General ("Consumer Advocate"), by and through Jonathan Skrmetti, Attorney General and Reporter for the State of Tennessee, pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Public Utility Commission ("TPUC" or the "Commission") to grant the Consumer Advocate's intervention into this proceeding because consumers' interests, rights, duties, or privileges may be determined or affected by the Petition filed by Kingsport Power Company d/b/a AEP Appalachian Power ("Kingsport" or the "Company") in this Docket. For cause, the Consumer Advocate would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utility services by initiating and intervening as a party in any matter or proceeding before the Commission in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. §§ 4-5-101, *et seq.*, and TPUC rules.
2. Kingsport, a public utility regulated by the Commission, distributes "electric power to approximately 50,000 retail customers in its service area which includes the City of Kingsport,

Tennessee, the Town of Mt. Carmel, Tennessee, and parts of Sullivan County, Washington County and Hawkins County, Tennessee.”¹ All of Kingsport’s electric power requirements are purchased from Appalachian Power Company.² The utility’s principal office is located in Kingsport, Tennessee.³

3. On March 10, 2023, the Company filed the instant Petition to request recovery of \$3,674,241 of deferred actual Targeted Reliability Plan (“TRP”) costs and Major Storm (“MS”) expenses that are not offset by cumulative TRP&MS revenues and have not been recovered through base rates for the review period of October 1, 2021, through December 31, 2022.⁴

4. The Company proposes to recover the TRP&MS costs beyond the amounts recovered through base rates by means of the TRP&MS Rider, approved as an alternative rate mechanism in TPUC Docket No. 17-00032.⁵

5. The interests of consumers, including without limitation the potential increase in rates to customers through the implementation of the TRP&MS Rider, may be affected by the determinations and orders made by the Commission with respect to: (1) the interpretation, application, and implementation of Tenn. Code Ann. § 65-5-103 and other relevant statutory and regulatory provisions; and (2) the review and analysis of the documentation, financial spreadsheets, and materials provided by the Company.

6. Only by participating as a party to this proceeding can the Consumer Advocate adequately carry out its statutory duty to represent the interests of Tennessee consumers.

¹ Pet. 2, TPUC Docket No. 23-00019 (Mar. 10, 2023).

² Pet. 3. The Company states that Appalachian Power Company’s rates and charges are subject to the jurisdiction of the Federal Energy Regulatory Commission. *Id.*

³ Pet. 2.


⁴ Pet. 1, 4.

⁵ Pet. 3; Direct Testimony of Melinda L. Dielman on Behalf of Kingsport Power Company d/b/a AEP Appalachian Power, at 4, TPUC Docket No. 23-00019 (Mar. 10, 2023) (included in the Petition filing); Direct Testimony of John A. Stevens on Behalf of Kingsport Power Company d/b/a AEP Appalachian Power, at 4, TPUC Docket No. 23-00019 (Mar. 10, 2023) (included in the Petition filing).

Wherefore, the Consumer Advocate requests the Commission grant the Consumer Advocate's Petition to Intervene.

RESPECTFULLY SUBMITTED,


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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 via electronic mail, upon:

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This the 14th day of MARCH 2023.

MASON RUSH with permission

MASON C. RUSH
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