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June 9, 2023

Hon. Herbert H. Hilliard, Chairperson
c/o Ectory Lawless
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Electronically Filed in TPUC Docket
Room on June 9, 2023 at 3:29 p.m.

RE: *Petition of Kingsport Power Company d/b/a AEP Appalachian Power for October, 2021 – December, 2022 Annual Recovery Under the Targeted Reliability Plan and Major Storm Rider (“TRP&MS”), Alternative Rate Mechanisms Approved in Docket No. 17-00032, TPUC Docket No. 23-00019*

Dear Chairperson Hilliard:

Since the submission of Kingsport Power Company’s (“Kingsport” or “Company”) Petition in the above-referenced matter on March 10, 2023, Kingsport and the Consumer Advocate Division of the Office of the Attorney General (“Consumer Advocate”) have been involved in cooperative discussions and have exchanged various information related to the Petition. With the submission of discovery responses by Kingsport; the submission of Kingsport’s Testimony of Robert K. Cope, Malinda L. Dielman, and John A. Stevens; the Consumer Advocate’s Testimony of William H. Novak; and Kingsport’s Rebuttal Testimony of Mr. Stevens, the Parties hereby jointly represent that there are no outstanding procedural matters requiring resolution by the Hearing Officer.

The parties agree to the following: a revenue requirement of \$3,539,703, which reflects the Consumer Advocate’s proposed revenue requirement, as corrected in Kingsport’s rebuttal, and the Consumer Advocate’s revenue allocation and rate design, for purposes of this proceeding only, all of which are embodied in the accompanying rate schedule. In addition, the parties agree that, as indicated in Mr. Stevens’ rebuttal testimony, the Company will make available all supporting workpapers contemporaneously with future TRP & MS filings, including a set of workpapers representing each monthly TRP & MS calculation similar to what has been provided through the discovery process in past filings.

Moreover, after considering the entire record, it is the joint position of the Parties that this matter is ripe for consideration on the merits by the Tennessee Public Utility Commission. At this time, there remain no outstanding disputes between the Parties with respect to this Docket, as clarified by and through discovery, the Parties' pre-filed testimony, and the Parties' subsequent discussions. After the filing of Mr. Stevens's Rebuttal Testimony, the Parties met and agreed that there are no contested issues between the Parties on the merits of this case. It is the position of the Parties that this matter should be resolved in favor of the positions set forth in Kingsport's Rebuttal Testimony as set out above. Consistent with agency practice, the Parties hereby jointly request that the entire official record in this Docket, including discovery, be made part of the evidentiary record.

With the foregoing in mind, unless otherwise requested by the Commission, the Parties hereby waive both opening statements and cross-examination of witnesses by the Parties. Kingsport's witnesses, Robert K. Cope, Malinda L. Dielman, and John A. Stevens, and the Consumer Advocate witness, William H. Novak, will provide summaries of pre-filed testimony and will be available for questions by the Commissioners or Commission Staff at the Hearing scheduled for June 20, 2023.

As required, an original of this filing along with four hard copies will follow. Should you have any questions concerning this filing or need additional information, please do not hesitate to contact me.

Respectfully,

William C. Bovender

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