

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

<b>IN RE:</b>	<b>March 22, 2024</b>	)	
		)	
<b>PETITION OF KINGSPORT POWER COMPANY</b>		)	
<b>d/b/a AEP APPALACHIAN POWER FOR</b>		)	
<b>JANUARY 2023 THROUGH DECEMBER 2023</b>		)	
<b>ANNUAL RECOVERY UNDER THE TARGETED</b>		)	<b>Docket No. 24-00010</b>
<b>RELIABILITY PLAN AND MAJOR STORM</b>		)	
<b>RIDER ("TRP&amp;MS"), ALTERNATIVE RATE</b>		)	
<b>MECHANISMS APPROVED IN DOCKET</b>		)	
<b>NO. 17-00032</b>		)	

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**PETITION TO INTERVENE**

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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 of Kingsport Power Company d/b/a AEP Appalachian Power for January 2023 Through December 2023 Annual Recovery Under the Targeted Reliability Plan and Major Storm Rider (TRP&MS) Alternative Rate Mechanisms Approved in Docket No. 17-00032* ("Petition") filed by Kingsport Power Company d/b/a AEP Appalachian Power ("Kingsport" or the "Company"). 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 49,000 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.”<sup>1</sup> All of Kingsport’s electric power requirements are purchased from Appalachian Power Company.<sup>2</sup> The utility’s principal office is located in Kingsport, Tennessee.<sup>3</sup>

3. On March 5, 2024, the Company filed the instant Petition to request recovery of \$5,917,276 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.<sup>4</sup>

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.<sup>5</sup>

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

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<sup>1</sup> *Petition of Kingsport Power Company d/b/a AEP Appalachian Power for January 2023 Through December 2023 Annual Recovery Under the Targeted Reliability Plan and Major Storm Rider (TRP&MS) Alternative Rate Mechanisms Approved in Docket No. 17-00032* (“Petition”), p. 2, TPUC Docket No. 24-00010, (March 5, 2024).

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

<sup>3</sup> *Id.* at 2.

<sup>4</sup> *Id.* at 1, 4.

<sup>5</sup> *Petition* at 3 and Direct Testimony of Jason E. Baker on Behalf of Kingsport Power Company d/b/a AEP Appalachian Power, at 2, TPUC Docket No. 24-00010 (March 5, 2024) (attached to Petition); Direct Testimony of John A. Stevens on Behalf of Kingsport Power Company d/b/a AEP Appalachian Power, p. 2, TPUC Docket No. 24-00010 (March 5, 2024) (attached to Petition).

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.

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

RESPECTFULLY SUBMITTED,

A handwritten signature in blue ink, appearing to read "Jonathan Skremetti", is written over a horizontal line.

JONATHAN SKRMETTI (BPR No. 031551)  
Attorney General and Reporter  
State of Tennessee

A handwritten signature in blue ink, appearing to read "Shilina B. Brown", is written over a horizontal line.

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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 22 day of March 2024.



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SHILINA B. BROWN  
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