

S. Morris Hadden  
Jimmie Carpenter Miller  
Gregory K. Haden  
Michael L. Forrester  
Stephen M. Darden  
James N. L. Humphreys<sup>1</sup>  
Michael S. Lattier<sup>5,6</sup>  
Scott T. Powers  
Leslie Tentler Ridings  
Christopher D. Owens<sup>1,3</sup>  
Jason A. Creech  
Meredith Bates Humbert

**HUNTER·SMITH·DAVIS**  
SINCE 1916 LLP

**Kingsport Office**  
1212 North Eastman Road  
P.O. Box 3740  
Kingsport, TN 37664  
Phone (423) 378-8800  
Fax (423) 378-8801

**Johnson City Office**  
100 Med Tech Parkway  
Suite 110  
Johnson City, TN 37604  
Phone (423) 283-6300  
Fax (423) 283-6301

Joseph B. Harvey<sup>4</sup>  
Caroline Ross Williams<sup>1</sup>  
Marcy E. Walker<sup>2</sup>  
J. Christopher Rose<sup>1</sup>  
Sydney B. Gilbert  
Will A. Ellis  
Jordan T. Richardson  
Laura Medlin Mickel<sup>2</sup>  
Colin M. Wyvill

Of Counsel:  
William C. Bovender  
William C. Argabrite  
Mark S. Dessauer  
Jeannette Smith Tysinger  
John B. Buda<sup>7</sup>  
Sarah E. Larkin

[www.hsdllaw.com](http://www.hsdllaw.com)

**Respond to:**

Kingsport Office  
Joseph B. Harvey  
423-378-8854  
[jharvey@hsdlaw.com](mailto:jharvey@hsdlaw.com)

All Attorneys Licensed in Tennessee  
Unless Noted

Additional Bar Memberships:  
VA<sup>1</sup>, NC<sup>2</sup>, KY<sup>3</sup>, GA<sup>4</sup>, FL<sup>5</sup>, MT<sup>6</sup>, CA only<sup>7</sup>

May 30, 2024

KPOW-15921

**VIA EMAIL ([tpuc.docketroom@tn.gov](mailto:tpuc.docketroom@tn.gov)) & FEDEX**

Herbert H. Hilliard, Chairman  
c/o Ectory Lawless, Dockets & Records Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4th Floor  
Nashville, TN 37243

Electronically Filed in TPUC Docket  
Room on May 30, 2024 at 3:06 p.m.

Re: IN RE: PETITION OF KINGSFORT POWER  
COMPANY d/b/a AEP APPALACHIAN POWER  
FOR JANUARY, 2023 – DECEMBER 2023 ANNUAL  
RECOVERY UNDER THE TARGETED RELIABILITY  
PLAN AND MAJOR STORM RIDER (“TRP&MS”),  
ALTERNATIVE RATE MECHANISMS APPROVED IN  
DOCKET NO. 17-00032  
DOCKET NO.: 24-00010

Dear Chairman Hilliard:

On behalf of Kingsport Power Company d/b/a AEP Appalachian Power, we transmit herewith First  
Discovery Requests to the Consumer Advocate Division.

The original and four (4) copies are being sent via Federal Express.

Very sincerely yours,

**HUNTER, SMITH & DAVIS, LLP**

Joseph B. Harvey

Enclosure

cc: Kelly Grams, General Counsel (w/enc.)  
Monica L. Smith-Ashford, Esq. (w/enc.)

*Via U.S. Mail and Email: [Kelly.Grams@tn.gov](mailto:Kelly.Grams@tn.gov)*

David Foster (w/enc.)  
Vance Broemel, Esq. (w/enc.)

*Via U.S. Mail and Email: [monica.smith-ashford@tn.gov](mailto:monica.smith-ashford@tn.gov)*

*Via U.S. Mail and Email: [david.foster@tn.gov](mailto:david.foster@tn.gov)*

*Via U.S. Mail and Email: [vance.broemel@ag.tn.gov](mailto:vance.broemel@ag.tn.gov)*

Page 2  
May 30, 2024

Shilina B. Brown, Esq. (w/enc.)

*Via U.S. Mail and Email: [Shilina.Brown@ag.tn.gov](mailto:Shilina.Brown@ag.tn.gov)*

Michael J. Quinan, Esq. (w/enc.)

*Via U.S. Mail and Email: [mquinan@t-mlaw.com](mailto:mquinan@t-mlaw.com)*

James R. Bacha, Esq. (w/enc.)

*Via Email: [jrbacha@aep.com](mailto:jrbacha@aep.com)*

James G. Ritter, Esq. (w/enc.)

*Via Email: [jritter@aep.com](mailto:jritter@aep.com)*

William C. Bovender, Esq. (w/enc.)

*Via Email: [bovender@hsdlaw.com](mailto:bovender@hsdlaw.com)*

William K. Castle (w/enc.)

*Via Email: [wkcastle@aep.com](mailto:wkcastle@aep.com)*

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

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

---

**KINGSPORT POWER COMPANY'S FIRST DISCOVERY REQUESTS  
TO THE CONSUMER ADVOCATE DIVISION**

---

This First Set of Discovery Requests is hereby provided to the Consumer Advocate Division of the Office of the Attorney General ("Consumer Advocate") pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and TENN. COMP. R. & REG. 1220-01-02-.11. Kingsport Power Company d/b/a AEP Appalachian Power ("Kingsport" or the "Company") requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced pursuant to the Joint Procedural Schedule on or before 2:00 p.m. (CDT), June 6, 2024.

**FIRST SET OF DISCOVERY REQUESTS**

- 1-1.**    Supporting Data.    Reference Consumer Advocate Witness Novak's testimony at page 7 and provide the following information:
- a.    Please provide the methodology or rationale for the determination (inclusion or exclusion) of members of the "Kingsport Power Tennessee Peer Group."
  - b.    Please explain how the members of the Peer Group are "similarly situated."

**RESPONSE:**

- 1-2.** Supporting Data. Please provide any data or analysis performed that quantifies the level of vegetation management spending of each of the Peer Group utilities for each of the years 2017-2022.

**RESPONSE:**

Respectfully submitted this the 30th day of May, 2024.

**KINGSPORT POWER COMPANY d/b/a  
AEP APPALACHIAN POWER**

By: 

Joseph B. Harvey, Esq.

William C. Bovender, Esq.

**HUNTER, SMITH & DAVIS, LLP**

PO Box 3740

1212 N. Eastman Road

Kingsport, TN 37664

Ph: (423) 378-8858

Email: [jharvey@hsdlaw.com](mailto:jharvey@hsdlaw.com)

Email: [bovender@hsdlaw.com](mailto:bovender@hsdlaw.com)

OF COUNSEL:

James R. Bacha, Esq., Associate General Counsel  
American Electric Power Service Corporation  
1 Riverside Plaza  
Columbus, OH 43215  
Ph: (615) 716-1615; Fax: (614) 716-2950  
Email: jrbacha@aep.com

James G. Ritter, Esq., Senior Counsel  
American Electric Power Service Corporation  
Three James Center  
Suite 1100 1051 E. Cary Street  
Richmond, VA 23219-4029  
Ph: (804) 698-5544  
Email: jritter@aep.com

*Attorneys for Kingsport Power Company  
d/b/a AEP Appalachian Power*

### CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing *Kingsport Power Company D/B/A AEP Appalachian Power's First Discovery Request to the Consumer Advocate Division* has been served by mailing a copy of same by United States mail, postage prepaid, and Email, to below on this the 30th day of May, 2024, as follows:

Shilina B. Brown, Assistant Attorney General  
Vance L Broemel, Managing Attorney  
Office of the Tennessee Attorney General  
Consumer Advocate Division  
P.O. Box 20207  
Nashville, TN 37202-0207  
Email: Shilina.Brown@ag.tn.gov  
Email: Vance.Broemel@ag.tn.gov

Kelly Grams, General Counsel  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243  
Email: kelly.grams@tn.gov

David Foster, Chief-Utilities Division  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243  
Email: David.Foster@tn.gov

Monica L. Smith-Ashford  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243  
Email: monica.smith-ashford@tn.gov

Michael J. Quinan, Esq.  
ThompsonMcMullan, P.C.  
100 Shockoe Slip, 3<sup>rd</sup> Floor  
Richmond, VA 23219  
Email: mquinan@t-mlaw.com

**HUNTER, SMITH & DAVIS, LLP**

By: \_\_\_\_\_

Joseph B. Harvey