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July 2, 2024

KPOW-15921

Electronically Filed in TPUC Docket
Room on July 2, 2024 at 12:49 p.m.

VIA EMAIL (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

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 Motion to Substitute Counsel.

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

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Vance Broemel, Esq. (w/enc.)

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

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

MOTION TO SUBSTITUTE COUNSEL

Petitioner Kingsport Power Company, d/b/a AEP Appalachian Power ("KgPCo" or "Company") respectfully moves to substitute the appearance of Christen M. Blend in the place of James R. Bacha and James G. Ritter, as counsel for Petitioner KgPCo.

Contact information for Attorney Blend is as follows:

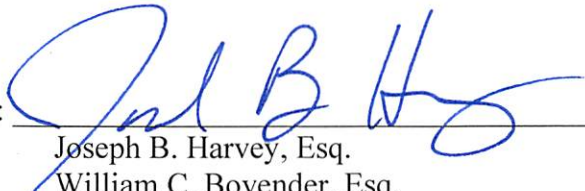
Christen M. Blend, Esq.
Associate General Counsel
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Columbus, OH 43215
Ph: (614) 716-1915
Email: cblend@aep.com

Joseph B. Harvey, Esq., and William C. Bovender, Esq., of Hunter, Smith, & Davis LLP, will remain counsel for KgPCo, and the requested substitution will not delay the disposition of this matter or prejudice any party.

Respectfully submitted this 2nd day of July, 2024.

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

By: _____


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Attorneys for Kingsport Power Company

d/b/a AEP Appalachian Power

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing ***Motion to Substitute Counsel on behalf of Kingsport Power Company D/B/A AEP Appalachian Power*** has been served by mailing a copy of same by United States mail, postage prepaid, and Email, to below on this the 2nd day of July, 2024, as follows:

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By: _____

Joseph B. Harvey

