

S. Morris Hadden
Jimmie Carpenter Miller
Gregory K. Haden
Michael L. Forrester
Stephen M. Darden
James N. L. Humphreys²
Michael S. Lattier^{5,6}
Scott T. Powers
Leslie Tentler Ridings
Christopher D. Owens^{1,3}
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. Harvey⁴
Caroline Ross Williams¹
Marcy E. Walker²
J. Christopher Rose¹
Sydney B. Gilbert
Will A. Ellis
Jordan T. Richardson
Laura Medlin Mickel²
Colin M. Wyvill

Of Counsel:

William C. Bovender
William C. Argabrite
Mark S. Dessauer
Jeannette Smith Tysinger
John B. Buda⁷
Sarah E. Larkin

www.hsdllaw.com

Respond to:

Kingsport Office
Joseph B. Harvey
423-378-8854
jharvey@hsdlaw.com

All Attorneys Licensed in Tennessee
Unless Noted

Additional Bar Memberships:
VA¹, NC², KY³, GA⁴, FL⁵, MT⁶, CA only⁷

July 29, 2024

KPOW-15921

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

Electronically Filed In TPUC Docket
Room on July 29, 2024 at 2:30 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 the following:

Motion for Leave to Appear as Witness by Telephone at Tennessee Public Utility Commission Conference of August 12, 2024 on Behalf of Kingsport Power Company d/b/a AEP Appalachian Power

The original and six (6) 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.) *Via U.S. Mail and Email: Kelly.Grams@tn.gov*
Monica L. Smith-Ashford, Esq. (w/enc.) *Via U.S. Mail and Email: monica.smith-ashford@tn.gov*
David Foster (w/enc.) *Via U.S. Mail and Email: david.foster@tn.gov*
Vance Broemel, Esq. (w/enc.) *Via U.S. Mail and Email: vance.broemel@ag.tn.gov*
Shilina B. Brown, Esq. (w/enc.) *Via U.S. Mail and Email: Shilina.Brown@ag.tn.gov*
Michael J. Quinan, Esq. (w/enc.) *Via U.S. Mail and Email: mquinan@t-mlaw.com*
Christen M. Blend, Esq. (w/enc.) *Via Email: cblend@aep.com*
William K. Castle (w/enc.) *Via Email: wkcastle@aep.com*
Joseph B. Harvey, Esq. (w/enc.) *Via Email: jharvey@hsdlaw.com*

**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 FOR LEAVE TO APPEAR AS WITNESSES BY TELEPHONE AT
TENNESSEE PUBLIC UTILITY COMMISSION CONFERENCE OF AUGUST 12, 2024
ON BEHALF OF KINGSPORT POWER COMPANY d/b/a AEP APPALACHIAN
POWER**

Comes Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power (“Kingsport”), by counsel, and respectfully moves that its direct testimony witnesses, Jason E. Baker and Malinda L. Dielman (as a substitute for J. David Spring), be permitted to testify by telephone at the Tennessee Public Utility Commission (“TPUC”) Conference on August 12, 2024, 10:00 a.m. Central time, relative to the summaries of the direct testimony previously filed in this Docket.

Kingsport would show unto TPUC that Mr. Baker, Vice President of Distribution Operations for Appalachian Power Company, is located in Charleston, West Virginia and Ms. Dielman, Regulatory Accounting Case Manager for American Electric Power Service Corporation, who is seeking to substitute as a witness for witness J. David Spring due to his passing, is located in Columbus, Ohio.

This issue was discussed with Hearing Officer Monica Smith-Ashford during the Pre-Hearing Conference on July 29, 2024; and, the relief requested herein was not objected to by the Consumer Advocate Division, nor East Tennessee Energy Consumers.

Mr. Baker will be presenting a summary of his Direct Testimony, and Ms. Dielman seeks to present a summary of the Direct Testimony of J. David Spring, as said pre-filed testimony will be submitted into the record.

PREMISES CONSIDERED, Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power, respectfully requests that Mr. Baker and Ms. Dielman be allowed to present their testimony by telephone on August 12, 2024. A duly-authorized Notary Public will be present to administer the Oath and remain during the testimonies of Mr. Baker and Ms. Dielman.

Respectfully submitted this the 29th day of July, 2024. For good cause shown.

**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) 378-8854

Email: jharvey@hdsdlaw.com

Email: bovender@hdsdlaw.com

OF COUNSEL:

Christen M. Blend, Esq.

Associate General Counsel

American Electric Power Service Corporation

1 Riverside Plaza

Columbus, OH 43215

Ph: (615) 716-1915

Email: cblend@aep.com

Attorneys for Kingsport Power Company

d/b/a AEP Appalachian Power

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing ***MOTION FOR LEAVE TO APPEAR AS WITNESS BY TELEPHONE AT TENNESSEE PUBLIC UTILITY COMMISSION CONFERENCE OF August 12, 2024*** has been served by mailing a copy of same by United States mail, postage prepaid, and Email, to below on this the 29th day of July, 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, 4th Floor
Nashville, TN 37243
Email: kelly.grams@tn.gov

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

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

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

HUNTER, SMITH & DAVIS, LLP

By: _____

Joseph B. Harvey