

IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE

IN RE:)	
)	
PETITION OF KINGSPORT POWER COMPANY)	
d/b/a AEP APPALACHIAN POWER FOR)	
JANUARY 2024 THROUGH DECEMBER 2024)	
ANNUAL RECOVERY UNDER THE TARGETED)	Docket No. 25-00022
RELIABILITY PLAN AND MAJOR STORM)	
RIDER ("TRP&MS"), ALTERNATIVE RATE)	
MECHANISMS APPROVED IN DOCKET)	
NO. 17-00032)	

PETITION TO INTERVENE

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 2024 Through December 2024 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"). The Consumer Advocate states 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.”¹ All of Kingsport’s electric power requirements are purchased from Appalachian Power Company.² The utility’s principal office is located in Kingsport, Tennessee.³

3. On March 28, 2025, the Company filed the instant Petition to request under recovery of \$13,006,130 of deferred actual Targeted Reliability Plan (“TRP”) costs and Major Storm (“MS”) expenses that were not offset by cumulative TRP&MS revenues and have not been recovered through base rates.⁴ However, \$2,499,685 million of this amount Kingsport proposes to defer until next year, leaving a net under recovery of \$10,506,444 million.⁵

4. If this Petition is approved as filed, Kingsport’s residential customers will see an increase of \$2.99 in the monthly residential customer rate according to the tariff and the Direct Testimony of Kingsport Witness John Stevens.⁶

5. The Company does not recover TRP costs or MS expenses through base rates and proposes to recover the TRP&MS costs through its TRP&MS Rider, approved as an alternative rate mechanism in TPUC Docket No. 17-00032.⁷

¹ *Petition of Kingsport Power Company d/b/a AEP Appalachian Power for January 2024 Through December 2024 Annual Recovery Under the Targeted Reliability Plan and Major Storm Rider (TRP&MS) Alternative Rate Mechanisms Approved in Docket No. 17-00032* (“Petition”), at 2, TPUC Docket No. 25-00022, (March 28, 2025).

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

³ *Id.* at 2.

⁴ *Id.* at 3.

⁵ *Petition*, Direct Testimony of John. A. Stevens, 3:16-20 and Exhibit <WP - 2025 KgPCo Exhibit No. 3 (JAS)>.

⁶ *Id.* at 6:17-21 and Exhibits <WP - 2025 KgPCo Exhibit No. 3 (JAS)> and <WP - 2025 KgPCo Exhibit No. 2 (JAS)>.

⁷ *Petition* at 1.

6. 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 regulatory provisions; and (2) the review and analysis of the documentation, financial spreadsheets, and materials provided by the Company.

7. 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,

Handwritten signature of Jonathan Skrmetti in blue ink, with the name "Jonathan Skrmetti" written in blue ink below it.

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

Handwritten signature of Shilina B. Brown in blue ink, with the name "Shilina B. Brown" written in blue ink below it.

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TPUC Docket No. 25-00022

Consumer Advocate's Petition to Intervene

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via electronic mail with a copy provided by U.S. Mail, upon request, to the following:

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This 17th day of April 2025.



SHILINA B. BROWN
Senior Assistant Attorney General