

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

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

**CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY
REQUESTS TO KINGSPORT POWER COMPANY**

In accordance with Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Regs. 1220-01-02-.11, the Consumer Advocate Division in the Office of the Tennessee Attorney General ("Consumer Advocate"), by and through counsel, hereby propounds this Second Set of Discovery Requests upon Kingsport Power Company ("Kingsport" or the "Company"). Full and complete responses shall be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Shilina B. Brown by May 9, 2025 at 2 p.m. Central.

PRELIMINARY MATTERS AND DEFINITIONS

These Additional Discovery Requests incorporate by reference the same Preliminary Matters and Definitions as set forth in the *Consumer Advocate's First Set of Discovery Requests to Kingsport* sent to the Company on April 17, 2025, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

SECOND SET OF DISCOVERY REQUESTS

2-1. See the attached Excel file <Kingsport Rate Base Calc> which sums the Rate Base values underlying the base rates from TPUC Docket No. 21-00107 and the December 2024 Rate Base values incorporated into Schedule MLD-1 with the total referred to as the Tennessee Rate Base. These totals equate to a net Rate Base associated with the Kingsport, Tennessee revenue stream of \$152,086,537. This value is then compared with selected 2024 balances from the Company's response to Consumer Advocate DR No. 1-4, Attachment 1, arriving at a Rate Base of \$132,114,932, as reflected in Column D. Also included are references to accounts contained in the Column D balances. Review the information provided in Column D and make any appropriate corrections the Company believes appropriate to calculate its Rate Base effective as of 12/31/24 in the same manner as was incorporated into the Settlement Agreement in TPUC Docket No. 21-00107. Incorporate into this reconciliation any portion of accounts 108, 190, 282 and 283 associated with the Company's Transmission function.

RESPONSE:

Respectfully submitted,



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CERTIFICATE OF SERVICE

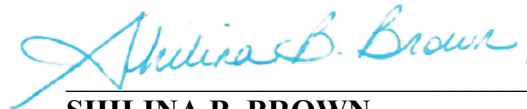
I hereby certify that a true and correct copy of the foregoing was served via electronic mail,
with a copy provided via U.S. Mail upon request, to the following:

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On this 2nd day of May 2025.



SHILINA B. BROWN

Senior Assistant Attorney General