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June 13, 2025

KPOW-18155

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

David F. Jones, 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 June 13, 2025 at 1:15 p.m.

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

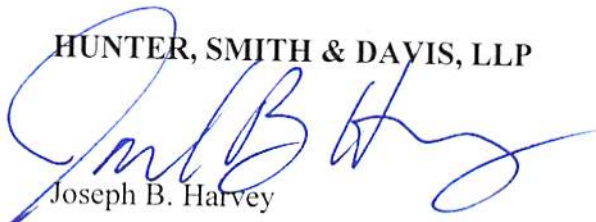
Dear Chairman Jones:

On behalf of Kingsport Power Company d/b/a AEP Appalachian Power, we transmit herewith  
Rebuttal Testimony of John A. Stevens.

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.)  
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**REBUTTAL TESTIMONY OF  
JOHN A. STEVENS  
ON BEHALF OF KINGSPORT POWER COMPANY  
D/B/A AEP APPALACHIAN POWER  
BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
DOCKET NO. 25-00022**

1   **Q.   PLEASE STATE YOUR NAME.**

2   **A.   My name is John A. Stevens.**

3   **Q.   ARE YOU THE SAME JOHN A. STEVENS WHO SUBMITTED DIRECT**  
4   **TESTIMONY IN THIS PROCEEDING?**

5   **A.   Yes.**

6   **Q.   WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

7   **A.   My rebuttal testimony responds to six recommendations contained in the direct testimony**  
8   **of the Consumer Advocate Unit (Consumer Advocate) of the Office of the Tennessee**  
9   **Attorney General witness Clark D. Kaml. Specifically, I respond to Consumer Advocate**  
10   **witness Kaml's recommendations that the Commission: (i) repeat its requirement that the**  
11   **Company include all supporting workpapers, in both pdf and native formats, in future**  
12   **TRP&MS filings; (ii) accept the Company's revenue request of \$13,006,130 as the**  
13   **appropriate amount for TRP&MS Rider recover; (iii) approve the Company's proposal**  
14   **to recover the \$4,999,371 of O&M costs associated with Hurricane Helene over a two-**  
15   **year period; (iv) approve KgPCo's request to recover \$10,506,444 through the**  
16   **TRP&MS Rider; (v) require the Company to provide notice of the costs of its anticipated**  
17   **capital projects in accordance with Commission rules; and (vi) require KgPCo to**  
18   **highlight in future TRP&MS filings, changes to those customer classes where no**  
19   **customers previously existed.**

1 Q. DO YOU HAVE ANY COMMENTS REGARDING MR. KAML'S  
2 RECOMMENDATION THAT THE COMMISSION REPEAT ITS REQUIREMENT  
3 THAT THE COMPANY INCLUDE ALL SUPPORTING WORKPAPERS, IN BOTH  
4 PDF AND NATIVE FORMATS, IN FUTURE TRP&MS FILINGS?

5 A. Yes. The Company included all supporting workpapers, in both pdf and native formats in this  
6 current proceeding and will continue to do so in future proceedings.

7 Q. MR. KAML RECOMMENDS THAT THE COMMISSION ACCEPT THE REVENUE  
8 REQUEST OF \$13,006,130 AS THE APPROPRIATE AMOUNT FOR THE TRP&MS  
9 RIDER RECOVERY. DO YOU HAVE ANY COMMENTS?

10 A. Yes. The Company agrees with Mr. Kaml's recommendation that \$13,006,130 is the  
11 appropriate amount for the TRP&MS Rider recovery.

12 Q. MR. KAML RECOMMENDS THAT THE COMMISSION APPROVE THE  
13 COMPANY'S PROPOSAL TO RECOVER THE \$4,999,371 OF O&M COSTS  
14 ASSOCIATED WITH HURRICANE HELENE OVER A TWO-YEAR PERIOD. THIS  
15 WILL RECOVER \$2,499,685 IN THIS DOCKET AND DEFER \$2,499,685 TO NEXT  
16 YEAR. DO YOU HAVE ANY COMMENTS?

17 A. Yes. The Company agrees with this recommendation and notes that it reduces the level of  
18 deferred actual TRP&MS costs that will be recovered through the rates proposed in this case  
19 from \$13,006,130 to \$10,506,444. This reduces the increase that Residential customers will  
20 see in the service charge component on their monthly bill from \$4.61 to \$2.99.

21 Q. MR. KAML RECOMMENDS THAT THE COMMISSION APPROVE THE  
22 COMPANY'S REQUEST TO RECOVER \$10,506,444 THROUGH THE TRP&MS  
23 RIDER IN THIS CASE. DO YOU HAVE ANY COMMENTS?

24 A. Yes. The Company also agrees with this recommendation.

1 Q. DO YOU HAVE ANY COMMENTS REGARDING MR. KAML'S  
2 RECOMMENDATION THAT THE COMMISSION REQUIRE THE COMPANY TO  
3 PROVIDE NOTICE OF THE COST OF ITS FUTURE ANTICIPATED CAPITAL  
4 PROJECTS?

5 A. Yes. In accordance with Chapter 1220-4-1-.01 of the Rules of the Tennessee Public Utility  
6 Commission, the Company is required to submit a Capital Expenditure Forecast to the  
7 Commission each year. The Company will submit this Capital Expenditure Forecast in the  
8 future, in accordance with Commission rules.

9 Q. MR. KAML RECOMMENDS THAT THE COMMISSION REQUIRE KINGSPORT TO  
10 HIGHLIGHT IN FUTURE TRP&MS FILINGS, CHANGES TO THOSE CUSTOMER  
11 CLASSES WHERE NO CUSTOMERS PREVIOUSLY EXISTED. HOW DO YOU  
12 RESPOND?

13 A. The Company does not oppose this recommendation.

14 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

15 A. Yes. It does.