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June 13, 2025

KPOW-18155

VIA EMAIL (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

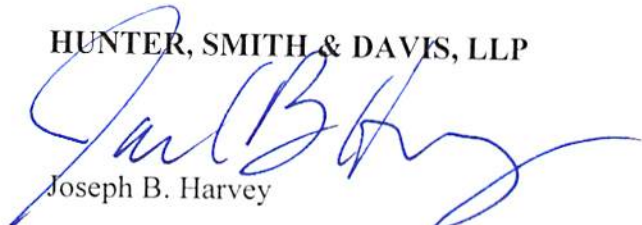
Dear Chairman Jones:

On behalf of Kingsport Power Company d/b/a AEP Appalachian Power, we transmit herewith
Rebuttal Testimony of Jason E. Baker.

The original and four (4) copies are being sent via Federal Express.

Very sincerely yours,

HUNTER, SMITH & DAVIS, LLP



Joseph B. Harvey

Enclosure

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**REBUTTAL TESTIMONY OF
JASON E. BAKER
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 Jason E. Baker.

3 **Q. ARE YOU THE SAME JASON E. BAKER WHO SUBMITTED DIRECT**
4 **TESTIMONY IN THIS PROCEEDING?**

5 A. Yes.

6 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS**
7 **PROCEEDING?**

8 A. I am responding to the direct testimony filed by Clark D. Kaml, on behalf of The
9 Consumer Advocate Division of the Office of the Tennessee Attorney General,
10 specifically, his recommendation that the Commission require Kingsport to include, in
11 its next TRP&MS filing, a report that identifies outages by cause including weather
12 (with sub-categories of weather-related vegetation, equipment failure, other), non-
13 weather-related vegetation, human activity, equipment failure, and other categories
14 considered relevant;¹ and his assertion that the Targeted Reliability Plan has not been
15 effective at decreasing service outages for Kingsport's customers.²

¹ Direct testimony of Clark D. Kaml, Page 3.

² Direct testimony of Clark D. Kaml, Page 5.

1 **Q. PLEASE DISCUSS MR. KAML'S RECOMMENDATION RELATED TO A**
2 **REPORT THAT IDENTIFIES OUTAGES BY CAUSE.**

3 A. Mr. Kaml recommends that the Commission require Kingsport to include, in its next
4 TRP&MS filing, a report that identifies outages by cause including weather (with sub-
5 categories of weather-related vegetation, equipment failure, other), non-weather-related
6 vegetation, human activity, equipment failure, and other categories considered
7 relevant.³

8 **Q. HOW DOES THE COMPANY RESPOND TO MR. KAML'S**
9 **RECOMMENDATION RELATED TO AN OUTAGE REPORT THAT**
10 **IDENTIFIES OUTAGES BY SPECIFIC SUBCATEGORIES?⁴**

11 A. The Company does not oppose Mr. Kaml's recommendation to require Kingsport to
12 include a report that identifies outages by outage causes in the next filing if ordered by
13 the Commission. However, the Company is unable to provide a report with the
14 subcategories that Mr. Kaml recommends, specifically weather (with sub-categories of
15 weather-related vegetation, equipment failure, other). Figure 1 below lists the
16 subcategories of outage causes that the Company is able to provide in future TRP&MS
17 filings if ordered by the Commission.

³ Direct testimony of Clark D. Kaml, Page 3.

⁴ Direct testimony of Clark D. Kaml, Page 3.

Figure 1: Outage Cause Subcategories

OUTAGE CAUSE SUBCATEGORIES		
ABNORMAL FEED	FIRE - CUSTOMER, 1 CUSTOMER OUT	TREE REMOVAL (NON AEP)
AEP - OUTDOOR/STREET LIGHTS	FIRE-AEP, OR AFFECTING > 1 CUSTOMER	TRIP CHARGE
ANIMAL - BIRD	FOREIGN OBJECT (NON ANIMAL)	UG CONST. /DIG-INS (NON AEP)
ANIMAL - NON BIRD	GALLOPING CONDUCTOR	UG LOCATE
ANIMAL - OTHER	GENERATION	UNBALANCE
ANIMAL BUS	LOAD SHED	UNKNOWN (NON WEATHER)
ANIMAL BUSHING XFMR	MAP MANIPULATION	UNNECESSARY TRIP
BLAST/EXPLOSION (NON AEP)	OTHER	VANDALISM
CONTAMINATION/FLASHOVER	OTHER UTILITY	VEHICLE ACCIDENT
CORROSION	OTHER UTILITY CUSTOMER OUT	VEHICLE ACCIDENT (NON AEP)
CUST. EQUIPMENT > 1 CUSTOMER	OVERLOAD	VINE
CUSTOMER EQUIPMENT, 1 CUSTOMER OUT	OVERVOLTAGE	WEATHER - FLOOD/SLIDE
DISCONNECT/RECONNECT	POWER QUALITY (FLICKERING, DIM, BRIGHT LIGHTS ETC>)	WEATHER - HIGH WINDS (EXCEEDING 60 MPH)
DNP	RELAY MIS-OPERATION	WEATHER - HURRICANE
DUPLICATE OUTAGE TICKET	SCHEDULED COMPANY	WEATHER - ICE (1/2 INCH OR > 6" SNOW)
EQUIPMENT FAILURE	SCHEDULED OUTSIDE REQUEST > 1 CUSTOMER	WEATHER - LIGHTNING
ERROR - FIELD	SWITCHING SURGE	WEATHER - TORNADO
ERROR - OPERATIONS	TRANSMISSION INFORMATION NEEDED	WEATHER - UNKNOWN
FACILITATION OF WORK	TREE INSIDE ROW	WEATHER-FLOOD/SLIDE
FIRE - AEP, OR AFFECTING > 1 CUSTOMER	TREE OUT OF ROW	

Q. DO YOU AGREE WITH MR. KAML'S ASSERTION THAT THE TARGETED RELIABILITY PLAN HAS NOT BEEN EFFECTIVE AT DECREASING SERVICE OUTAGES FOR KINGSPORT'S CUSTOMERS?⁵

A. No. Mr. Kaml's assertion is based on his comparison of Kingsport's reliability indices against other Tennessee electric utility company values.⁶ Mr. Kaml uses 2017 as his starting point, and excludes 2024, noting correctly, "the usefulness of the data is limited because each is a single data point associated with a volatile index." While that is true for 2024, it is also true for 2017. The peer group average SAIDI for 2017 was 46, the average for the next 6 years (2018-2023) was 162. In short, 2017 was clearly an anomalous year and should not be used as the starting point to draw any sort of conclusions about the effectiveness of Kingsport's program. Similarly, the peer group

⁵ Direct testimony of Clark D. Kaml, Page 5.

⁶ Direct testimony of Clark D. Kaml, Page 6.

1 SAIFI average was 1.72 in 2017, but 1.97 over the next six years. Using 2018, the first
2 year of Kingsport's program implementation (not the year it was approved) and also a
3 more "typical" year, better demonstrates the improvement in reliability attributable to the
4 TRP.

5 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

6 **A. Yes.**