

S. Morris Hadden
Jimmie Carpenter Miller
Gregory K. Haden
Michael L. Forrester
Stephen M. Darden
James N. L. Humphreys¹
Michael S. Lattier^{5,6}
Scott T. Powers
Leslie Tentler Ridings
Jason A. Creech
Meredith Bates Humbert
Joseph B. Harvey⁴
Caroline Ross Williams¹

Respond to:
Kingsport Office
Joseph B. Harvey
423-378-8854
jharvey@hdsdlaw.com

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

All Attorneys Licensed in Tennessee
Unless Noted

Additional Bar Memberships:
VA¹, NC², KY³, GA⁴, FL⁵, MT⁶, CA only⁷,
TX & MD (TN Pending)⁸

Marcy E. Walker²
J. Christopher Rose¹
Sydney B. Gilbert
Will A. Ellis
Jordan T. Richardson
Laura Medlin Mickel²
Colin M. Wyvill
Luis A. Treviño⁸
Daniel J. Edwards
Georgia R. Seay

Of Counsel:
William C. Bovender
William C. Argabrite
Mark S. Dessauer
Christopher D. Owens^{1,3}
Jeannette Smith Tysinger
John B. Buda⁷
Sarah E. Larkin

www.hdsdlaw.com

July 22, 2025

Hon. David F. Jones, Chair
c/o Ectory Lawless
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Via Email and FedEx Delivery

Electronically Filed in TPUC Docket
Room on July 22, 2025 at 12:16 p.m.

RE: *Petition of Kingsport 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, TPUC Docket No. 25-00022*

Dear Chairman Jones:

Since the submission of Kingsport Power Company’s (“Kingsport” or “Company”) Petition in the above-referenced matter on March 28, 2025, Kingsport and the Consumer Advocate Division (“Consumer Advocate”) have been involved in cooperative discussions and have exchanged various types of information related to the Petition. Additionally, Kingsport has responded to data requests received from TPUC Staff. With the submission of discovery responses by Kingsport; the submission of Kingsport’s Testimony of Jason E. Baker, Malinda L. Dielman, and John A. Stevens; the Consumer Advocate’s Testimony of Clark D. Kaml; the Consumer Advocate’s discovery responses, and Kingsport’s Rebuttal Testimony of Mr. Baker and Mr. Stevens, the Parties hereby jointly represent that there are no outstanding procedural matters requiring resolution by the Hearing Officer.

The parties agree to the following: a revenue requirement of \$13,006,130 as the appropriate amount for the TRP&MS Rider recovery, with \$4,999,371 of O&M costs associated with Hurricane Helene to be recovered over a two-year period, and \$10,506,444 to be recovered through the TRP&MS Rider, according to the Consumer Advocate’s revenue allocation and rate design, for purposes of this proceeding only, all of which are embodied in the accompanying rate schedule. In addition, the parties agree that, as indicated in Mr. Stevens’ rebuttal testimony, the Company will make available all supporting workpapers contemporaneously with future TRP&MS filings, including a set of workpapers in Excel format. The Parties also agree that the Company will include in its next TRP&MS filing a report that identifies outages by cause according to the subcategories of outage causes listed in Mr. Baker’s rebuttal testimony.

Moreover, after considering the entire record, it is the joint position of the Parties that this matter is ripe for consideration on the merits by the Tennessee Public Utility Commission. At this time, there remain no outstanding disputes between the Parties with respect to this Docket, as clarified by and through

Hon. David F. Jones, Chair

Page 2

July 22, 2025

discovery, the Parties' pre-filed testimony, and the Parties' subsequent discussions. After the filing of Mr. Stevens's and Mr. Baker's Rebuttal Testimony, the Parties met and agreed that there are no contested issues between the Parties on the merits of this case.

Consistent with agency practice, the Parties hereby jointly request that the entire official record in this Docket, including discovery, be made part of the evidentiary record.

With the foregoing in mind, unless otherwise requested by the Commission, the Parties hereby waive both opening statements and cross-examination of witnesses by the Parties. Kingsport's witnesses, Jason E. Baker, Malinda L. Dielman, and John A. Stevens, and the Consumer Advocate witness, Clark Kaml, will provide summaries of pre-filed testimony, if requested, and will be available for questions by the Commissioners or Commission Staff at the Hearing scheduled for August 18, 2025. Kingsport's witnesses anticipate requesting permission to participate telephonically if called upon to testify.

As required, an original of this filing along with four hard copies will follow. Should you have any questions concerning this filing or need additional information, please do not hesitate to contact me.

Respectfully,



Joseph B. Harvey

cc: Shilina B. Brown, Esq.
Karen H. Stachowski, Esq.
Vance L. Broemel, Esq.
Terra N. Allen
Kelly Grams, General Counsel
David Foster
Monica L. Smith-Ashford, Esq.
William K. Castle, Director, Regulatory Services VA/TN
Elisabeth Bruce, Esq.
William C. Bovender, Esq.

Via Email

Via Email

Via Email

Via Email

Via Email

Via Email

Via Email

Via Email

Via Email

Via Email