



An **AEP** Company

BOUNDLESS ENERGY™

Appalachian Power
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VIA EMAIL (TPUC.DocketRoom@tn.gov)

April 30, 2020

20-00047

Robin Morrison, Chairman
c/o Ectory Lawless, Dockets & Records Manager
Tennessee Public Utility Commission
Andrew Jackson State Office Building
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Re: REPORT REQUIRED BY MARCH 31, 2020 ORDER

Dear Chairman Morrison,

On behalf of Kingsport Power Company d/b/a AEP Appalachian Power (KgPCo), we transmit the following report as required by Commission Order dated March 31, 2020.

If you have any questions regarding the enclosed material, please feel free to contact me at ekkeeton@aep.com.

Sincerely,

A handwritten signature in black ink that reads "Eleanor K. Keeton". The signature is written in a cursive, flowing style.

Eleanor K. Keeton
Regulatory Consultant
Regulatory Services-VA/TN

Enclosures

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE TENNESSEE

IN RE: EMERGENCY PETITION OF THE)
CONSUMER ADVOCATE UNIT OF THE)
FINANCIAL DIVISION OF THE OFFICE) DOCKET NO.: 20-00047
OF THE TENNESSEE ATTORNEY)
GENERAL)

Comes now Kingsport Power Company d/b/a AEP Appalachian Power (“KgPCo” or the “Company”), as directed by ordering paragraph 3 of the Commission’s March 31, 2020 Order in this docket (“Emergency Order”), and submits herewith its “report describing any grace period, payment plan, and other options that will be implemented or will continue following the expiration or lifting of the public health emergency declaration,” as follows:

1. KgPCo understands the critical nature of the services it provides and is committed to the health and safety of its customers, communities, and employees. While the Company prepares for all types of emergencies, it has updated its practices for the COVID-19 pandemic. The Company continues to closely monitor the situation and does not anticipate COVID-19 will disrupt its ability to provide electric service for its customers.
2. Because KgPCo realized that many of its customers were facing unusual financial hardship from the effects of the COVID-19 pandemic, on a temporary basis, it voluntarily suspended service disconnections for non-payment on March 13, 2020. When the Commission issued its Emergency Order in this case, the Company also implemented the Commission’s additional directives, including restoring service to customers disconnected on March 12, 2020. Since March 12, approximately 3,400 impacted KgPCo customers have not had their service disconnected as a result of these actions.
3. The Company is urging customers to keep their accounts current. Any customer having trouble paying his or her bill, should contact the Company by phone or through Facebook or Twitter to discuss payment options.
4. In addition, the Company has temporarily waived customer deposits for credit changes, suspended outgoing credit recovery calls to residential customers with past due balances, and changed outgoing recovery calls to commercial and industrial (C&I) customers to focus on setting up payment arrangement plans.
5. To support its business customers, KgPCo has compiled information on its website about stimulus funding the federal government has announced to help businesses during this time. The Company has also sent communications to its business customers to encourage them to take advantage of these offerings and to visit www.appalachianpower.com or SBA.gov to review the available programs.
6. KgPCo recognizes that the expiration or lifting of the public health emergency declaration may occur in phases and that it could potentially be several months before it

is fully lifted. With that in mind, paragraphs 7 through 9, below, set out the steps that the Company plans to take either when the public health emergency declaration is lifted or expires, or the Commission vacates its Emergency Order, on its own motion or at the request of one or more parties. Because this is a rapidly evolving situation, the Company's plans are dependent upon when one of these events occurs and the circumstances that exist at that time. It is the Company's intention to remain flexible in order to respond to changing conditions and evolving customer and company needs.

7. Once it is known when the Emergency Order will be vacated or modified to permit disconnections, KgPCo would start communicating its plans to customers. Overall communications would utilize social media, bill messages, and the Company's website. Additional communications to delinquent customers could include phone, email, and mail messages.
8. The Company may extend the temporary suspension of service disconnections for non-payment for a period of time after the Commission vacates or modifies the Emergency Order to permit disconnections. Some period of time may be necessary to allow individuals to return to work and to give the Company adequate time to communicate its plans with customers. The Company would continue to communicate with customers during this period to help them stay informed of their electricity use and set up payment arrangement plans.
9. Additionally, KgPCo expects to provide customers who set up a payment arrangement plan with the option to pay any unpaid balances over an extended period of time. The Company intends to allow up to a 3 month payment agreement for C&I customers and up to a 6 month payment agreement for residential customers. During this period, the Company would not assess late fees or disconnect customers on a payment arrangement plan as long as the required payments are made by the monthly due date.
10. Lastly, there is widespread agreement that the declaration of a public health emergency is an exceptional and unusual situation. Because access to safe, reliable, and affordable utility service is essential to maintain public health and safety during this emergency, Governor Lee and the Commission have taken steps to ensure the continuation of and enhanced access to such services. Responding to these directives, and engaging in other actions that utilities need to take during this period, will likely result in the incurrence of incremental costs and/or foregone revenues which are outside of a utility's control. Accordingly, the Company recommends that the Commission authorize jurisdictional utilities to defer the incremental costs they incur, and any foregone revenues they experience, as a result of State directives, Commission orders, and modified business practices related to the COVID-19 pandemic.
11. These plans have been made with the health, safety, and financial well-being of the Company's customers, communities, and employees as a first priority. KgPCo will continue to look for solutions that satisfy the needs of customers, as well as recognize the short and long-term needs of the Company, as it focuses on providing safe, reliable, and affordable electric service to customers.

Respectfully submitted,

Kingsport Power Company
d/b/a AEP Appalachian Power

By: 

TITLE: Regulatory Consultant

DATE: April 30, 2020