

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**In Re:**

**PETITION OF KINGSPORT POWER COMPANY  
FOR APPROVAL OF DEMAND RESPONSE  
PROGRAMS AND ASSOCIATED DEMAND  
RESPONSE TARIFFS**

**DOCKET No. 12-00012**

**In Re:**

**PETITION OF EASTMAN CHEMICAL  
COMPANY AND AIR PRODUCTS AND  
CHEMICALS, INC., FOR EXPEDITED REVIEW  
TO ALLOW CERTAIN END USE CUSTOMERS  
OF KINGSPORT POWER COMPANY TO  
PARTICIPATE IN PJM INTERCONNECTION  
DEMAND RESPONSE PROGRAMS**

**DOCKET No. 12-00026**

**INTERROGATORIES TO AIR PRODUCTS AND CHEMICALS, INC.**

Comes Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power ("KgPCo"), and, pursuant to Tennessee Regulatory Authority Rule 1220-1-2-.11 and Tennessee Rules of Civil Procedure 26 and 33, submits the following INTERROGATORIES to Air Products and Chemicals, Inc., to be answered separately and fully in writing, under oath, within 30 days after service of same:

1. When did Air Products and Chemicals, Inc. first begin utilizing demand-response services from curtailment service providers ("CSP") in the KgPCo service territory?
2. Provide in detail the identities (names and addresses) of all CSP's utilized by Air Products and Chemicals, Inc., from the date disclosed in Interrogatory No. 1 to the present, and

supply the dates said CSP provided such services to Air Products and Chemicals, Inc.

3. Describe in detail every service provided by the CSP(s) listed in response to Interrogatory No. 2.

4. Is Air Products and Chemicals, Inc., responsible for paying any out-of-pocket penalties for its failure to comply with the contractual obligations of any Demand Reponse program(s) within the KgPCo's service territory.

5. Relative to Air Products and Chemicals, Inc.'s CSP contract(s) for committed load reduction, provide the following information:

a. The average payment per megawatt (per month or per year) paid to you during the 2010-2011 and 2011-2012 PJM delivery years.

b. The average payment anticipated for the 2012-2013, 2013-2014 and 2014-2015 PJM delivery years.

6. For the period June 1, 2009 to the present, describe in detail the number of curtailments Air Products and Chemicals, Inc., was called upon to perform in accordance with its contract with its CSP, including, but not limited to, the date and time of curtailment.

7. When did Air Products and Chemicals, Inc., first become aware that it was required to receive approval from the Tennessee Regulatory Authority to participate in any demand response program because it receives services from an electric distribution company which delivers 4 million MWh or less per fiscal year?

Kingsport Power Company, d/b/a AEP  
Appalachian Power

By Counsel:

A handwritten signature in black ink, appearing to read 'W. Bovender', is written over a horizontal line.

William C. Bovender, Esq.

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Counsel for Kingsport Power Company

### CERTIFICATE OF SERVICE

I hereby certify that, on June 25, 2012, the foregoing pleading was served via e-mail to all parties of record at their addresses shown below.

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This 25<sup>th</sup> day of June, 2012.

  
William C. Bovender, Esq.