

**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 ENERNOC, INC. 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 ENERNOC, 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 EnerNOC, Inc., to be answered separately and fully in writing, under oath, within 30 days after service of same:

1. Provide a detailed description of your qualifications to offer demand-response programs. Such description should:
 - a. Specify when your Company began providing demand-response services to retail end-users;
 - b. Describe your capabilities and qualifications for identifying demand-

response opportunities;

c. Describe your capabilities and qualifications for installing and maintaining demand-response equipment including disclosing the number of employees/contractors engaged in such activities broken down into areas of expertise;

d. Describe how you coordinate communications between your demand-response customers and PJM Interconnection, LLC;

e. Describe the specific services you offer to customers in the KgPCo service territory;

f. Describe what penalties exist for non-performance by either you or your customers when the level of curtailments are achieved are below the contracted amount;

g. Disclose the names, addresses and amount of contracted capacity for demand-response of each of your current customers located in the KgPCo service territory.

2. Describe all steps your Company is taking to assure its programs are effective, reliable, and verifiable with respect to your customers in the KgPCo service territory.

3. What are your qualifications to provide demand-response services in Tennessee?

4. With reference to page 11 of the Schisler testimony, describe how your Company manages its customers' performance risk such that said customers will not have to pay out-of-pocket penalties as a result of poor performance.

5. For the PJM planning years beginning in 2006 through May 31, 2016, how many megawatts (per month or per year) did your Company bid into the respective RPM Auctions in total, and as to your customers in the KgPCo service territory?

6. With respect to each such year referenced in Interrogatory No. 5, how many MW (per month or per year) were accepted in the respective auction in total, and as to your customers in the KgPCo's service territory.

7. With respect to each such year referenced in Interrogatory No. 5, how many megawatts (per month or per year) did you have under contract in total and as to your customers in the KgPCo service territory?

8. What is the average payment per megawatt (per month or per year) of promised load reduction that your Company, pursuant to contracts with KgPCo customers:

- a. Paid to KgPCo customers during the 2010-2011 and 2011-2012 PJM delivery years;
- b. Will pay during the 2012-2013 delivery year; and
- c. Will pay in any future years you are contractually bound for?

9. For the period June 1, 2009 – to the present, please describe in detail the number of events where KgPCo customers were called upon to perform in accordance with the contractual DR Program, including but not limited to, the date and time of the event as well as the aggregate KgPCo customer performance relative to each event.

10. Per the PJM demand response program rules, your Company must perform a test to determine if its customers in the KgPCo service territory are prepared to curtail if necessary. Please provide the results of any tests and describe in detail how your Company has conducted or will conduct the tests.

11. Detail the steps your Company needed to take in order to become a member of PJM, particularly with regard to showing of technical and financial fitness to participate as a demand response provider.

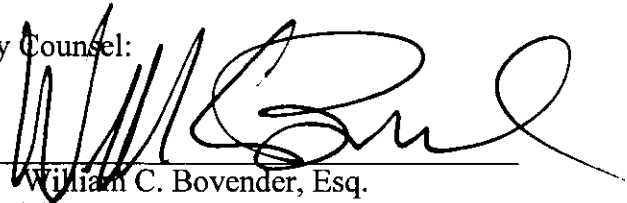
12. Provide details to support how your Company has responded to the February 24, 2012 FERC order in Docket No. ER11-3322-001.

13. Describe the “energy efficiency services” provided by EnerNOC to the Memphis City School System.

14. If applicable, explain whether any of your customers within KgPCo’s territory has contractually committed load to the PJM program beyond May 31, 2013.

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

By Counsel:

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

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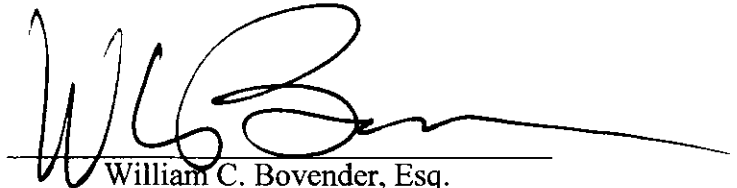
Counsel for Kingsport Power Company

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 25th day of June, 2012.


William C. Bovender, Esq.