

**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

**REQUESTS FOR PRODUCTION OF KINGSPORT POWER COMPANY
DIRECTED 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 REQUESTS FOR PRODUCTION to Air Products and Chemicals, Inc., to be answered separately and fully in writing, under oath, within 30 days after service of same:

A. REQUESTS FOR PRODUCTION

Produce the following documents/contracts/things within 30 days after the service of these Requests:

1. Produce copies of all current contracts between Air Products and Chemicals, Inc., and any curtailment service provider (“CSP”) covering any Air Products and Chemicals, Inc., facility located within the service territory of KgPCo.

2. Produce records of all demand response service curtailments experienced by Air Products and Chemicals, Inc., at any facility/site within the KgPCo service territory for the period 2006-to the present.

3. Produce all financial records which disclose the financial cost/benefit received by Air Products and Chemicals, Inc., as a result of participation in any PJM Demand-Response program, either directly, or through a CSP, for the period 2006-to the present (in the KgPCo service territory).

4. Produce copies of all contracts between Air Products and Chemicals, Inc., and any CSP covering any Air Products and Chemicals, Inc., facility located within the service territory of KgPCo that were in effect during the six (6) years prior to the current contract(s) requested in Request No. 1.

5. Produce copies of all correspondence between Air Products and Chemicals, Inc., and any CSP it has done business with during the period 2006 – present, concerning, in any manner, the FERC rules and the Open Access Transmission Tariff of PJM Interconnection, LLC, requirement that an end-user customer which receives service from an electric distribution company which delivers 4 million MWh or less per fiscal year, must receive approval from the “Relevant Electrical Retail Regulatory Authority” in order to participate in any demand response program.

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

By Counsel:

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

William C. Bovender, Esq.

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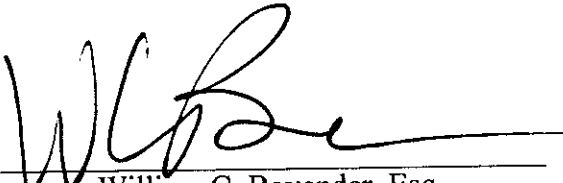
Counsel for Kingsport Power Company

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 25th day of June, 2012.


William C. Bovender, Esq.