

BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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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

**REQUESTS FOR PRODUCTION OF KINGSPORT POWER COMPANY
DIRECTED TO DEMAND RESPONSE PARTNERS, 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 34, submits the following REQUESTS FOR PRODUCTION to Demand Response Partners, Inc.:

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 Demand Response Partners, Inc., and any Demand Response Partners, Inc., customer within the service territory of KgPCo.

2. Produce copies of all current contracts between Demand Response Partners, Inc., and any Demand Response Partners, Inc., customers located within the KgPCo service territories which were effective at any time for the six (6) year period prior to the current contracts requested in Request No. 1.

3. Produce records of all demand response service curtailments experienced by each Demand Response Partners, Inc., customer within the KgPCo service territory for the period 2006-to date.

4. Produce all financial records which disclose the financial cost/benefit received by Demand Response Partners, Inc., as a result of participation of its customers, located in the KgPCo service territory, in any PJM Demand-Response program for the period 2006-to date.

5. Produce copies of all correspondence between Demand Response Partners, Inc. and all of its customers located in the KgPCo service territory for 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.

6. Provide all rules, regulations, and contract provisions currently used by your Company which detail the respective duties and responsibilities of you as a demand-response provider and those of your customers receiving such services.

7. Produce your Company's financial statements for 2009-to date.

8. Provide a copy of the application submitted by your Company to become a member of PJM. The response should include all attachments and appendices as well as a copy of the financial security (i.e. parental guarantee, letter of credit, etc.) provided to PJM by your Company.

9. Provide a copy of all documents received by your Company in 2011 and 2012 from PJM detailing conditions upon your Company which allow you to continue to be a member in good standing, particularly with regard to financial and technical resources.

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.

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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.