

BEFORE THE TENNESSEE REGULATORY COMMISSION
NASHVILLE, TENNESSEE

RECEIVED

2012 JUL 25 PM 4:09

IN RE:

PETITION FOR APPROVAL OF DEMAND
RESPONSE PROGRAM AND ASSOCIATED
DEMAND RESPONSE TARIFFS ON BEHALF
OF KINSPORT POWER COMPANY D/B/A
AEP APPALACHIAN POWER

DOCKET NO.
12-00012

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

DOCKET NO.
12-00026

**MOTION FOR ADMISSION *PRO HAC VICE*
OF GREGORY J. POULOS**

EnerNOC, Inc. ("EnerNOC"), having been granted intervention in Docket No. 12-00012 of this consolidated matter, requests that an Order be entered admitting Gregory J. Poulos, Esq. *pro hac vice* for the purpose of representing EnerNOC in association with Frank J. Scanlon, Esq. of the Nashville law firm of Watkins & McNeilly, PLLC.

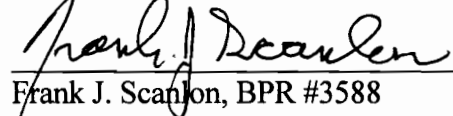
In support of its Motion, EnerNOC has attached hereto the Affidavit of Mr. Poulos. The Affidavit attests to the fact that Mr. Poulos is associated with Mr. Scanlon with respect to his representation of EnerNOC in this matter. The affidavit further attests that Mr. Poulos is admitted to practice before the Supreme Court of Ohio and a member in good standing with that Court.

In addition, by his signature below to this Motion, Mr. Scanlon states that he is admitted to practice before the Supreme Court of Tennessee and a member in good standing with that Court.

WHEREFORE, EnerNOC respectfully moves that an Order be entered admitting Gregory J. Poulos, Esq. *pro hac vice* to practice before the Tennessee Regulatory Authority in this matter.

Respectfully submitted,

WATKINS & MCNEILLY, PLLC

A handwritten signature in cursive script, appearing to read "Frank J. Scanlon", is written over a horizontal line.

Frank J. Scanlon, BPR #3588
214 Second Avenue North, Suite 300
Nashville, Tennessee 37201
(615) 255-2191


ATTORNEYS FOR EnerNOC, INC.

CERTIFICATE OF SERVICE

I certify that the foregoing Motion for Admission *Pro Hac Vice* of Greg Poulos has been e-mailed to:

Mr. David Foster Chief, Utilities Division Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505 Email: david.foster@tn.gov	Mr. William A. Bosta Director, Regulatory Services VA/TN Appalachian Power Company Three James Center Suite 1100, 1051 E. Cary Street Richmond, VA 23219-4029 Email: wabosta@aep.com
Jean A. Stone General Counsel Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505 Email: jean.a.stone@tn.gov	Cynthia Kinser Consumer Advocate Division Office of the Attorney General P.O. Box 30207 425 5 th Avenue North, 2 nd Floor Nashville, TN 37243-0500 Email: cynthia.kinser@ag.tn.gov
Greg Gellar EnerNOC, Inc. 101 Federal Street, Suite 1100 Boston, MA 02110 Email: ggeller@enernoc.com	Andrew Dorn Demand Response Partners, Inc. 360 Delaware Avenue, Suite 406 Buffalo, NY 14202 Email: adorn@demandresponsepartners.com
Michael J. Quinan, Esq. CHRISTIAN & BARTON, LLP 909 East Main St., Suite 1200 Richmond, VA 23219 Email: mquinan@cblaw.com	William C. Bovender, Esq. HUNTER, SMITH & DAVIS, LLP P.O. Box 3740 Kingsport, TN 37664 Email: bovender@hstdlaw.com
James R. Bacha, Esq. Hector Garcia, Esq. American Electric Power Service Corp. One Riverside Plaza, 29 th Floor Columbus, OH 43215 Email: jrbacha@aep.com hgarcia1@aep.com	

This 25th day of July, 2012.



Frank J. Scanlon

AFFIDAVIT of Gregory J. Poulos

STATE OF OHIO

COUNTY OF FRANKLIN

Before me, the undersigned, personally appeared Gregory J. Poulos, who after being duly sworn makes oath and states as follows:

- (1) My full name is: Gregory John Poulos
- My residence address is: 5093 Heath Gate Dr, New Albany, Ohio 43054
- My Company name is: EnerNOC, Inc.
- My office address is: 471 East Broad Street, Suite 1520, Columbus, Ohio 43215
- My email address is: gpoulos@enernoc.com

Other jurisdictions licensed & registrations/indentifying numbers are:

1. United States District Court -- Southern District of Ohio
2. United States Bankruptcy Court -- Eastern District of Michigan

Full name or style of case in which I seek to appear:

Petition of Kingsport Power Company's d/b/a AEP Appalachian Power for
Approval of Demand Response Programs and Associated Demand Response
Tariffs
TRA Docket No. 12-00012

Name of the client or clients I seek to represent:

I seek to represent EnerNOC, Inc. in the above stated matter.

- (2) Tennessee lawyer with whom the applicant lawyer is associated:

Name: Frank J. Scanlon

Address: Watkins & McNeilly, PLLC, 214 2nd Avenue, Nashville TN 37201

Telephone No.: 615-255-2191

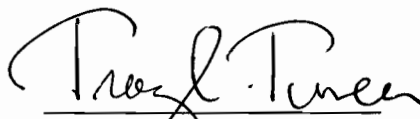
TN BPR No.: 3588

- (3) A certificate attesting to my good standing with the Supreme Court of the State of Ohio is attached hereto and incorporated herein by reference.

I declare under the penalty of perjury that the foregoing is true and correct.


Pro Hac Vice Applicant

Sworn to and subscribed before me this 16th day of July, 2012.


Notary Public

My Commission expires: never



TRACY TURNER, ATTORNEY AT LAW
NOTARY PUBLIC, STATE OF OHIO
My commission has no expiration date.
Section 147.03 R.C.

The Supreme Court of Ohio

C E R T I F I C A T E

I, SUSAN B. CHRISTOFF, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

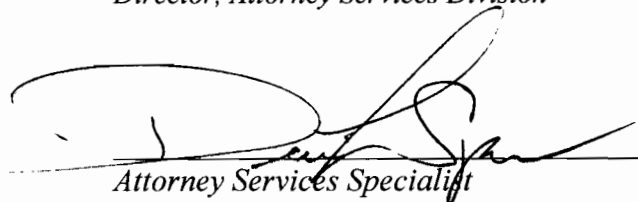
Gregory John Poulos

was admitted to the practice of law in Ohio on May 17, 1999; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 18th day of July, 2012.

SUSAN B. CHRISTOFF

Director, Attorney Services Division



Attorney Services Specialist