

**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

MOTION TO MODIFY PROCEDURAL SCHEDULE

Comes Petitioner, Kingsport Power Company d/b/a AEP Appalachian Power ("KgPCo"),
and moves to modify the Procedural Schedule as discussed herein:

1. Under the current Procedural Schedule, discovery cutoff is August 17, 2012, and KgPCo's rebuttal testimony is due August 31, 2012.
2. In the course of conducting written discovery of EnerNOC, Inc., and Demand Response Partners, Inc., KgPCo has encountered discovery responses which have prompted KgPCo's counsel to initiate informal discussions in an attempt to resolve the deficiencies without recourse to formal Motions to Compel and/or For Sanctions.
3. There has been notable progress relative to EnerNOC, Inc.'s responses.
4. Notwithstanding, KgPCo requests that the discovery cut-off be extended two (2)

weeks to August 31, 2012, so as to have additional time to resolve all discovery issues.

5. In addition, because of said discovery issues, it is not feasible or even possible for KgPCo to properly prepare and file its rebuttal testimony on the current due date of August 31, 2012. As such, KgPCo respectfully requests said filing deadline be extended two (2) weeks to September 14, 2012.

6. Due to the fact no hearing is currently scheduled on this combined Petition, it is submitted no party would be prejudiced by these requests.

7. KgPCo would also submit that this Motion should be granted because it is engaged in discussions with certain of the parties in an attempt to resolve outstanding issues. These extensions would serve as an aid to those discussions.

PREMISES CONSIDERED, KgPCo requests the discovery cutoff be extended to August 31, 2012, and the deadline for the filing of KgPCo's rebuttal testimony be extended to September 14, 2012, for good cause shown.

Respectfully submitted,
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.

William C. Bovender, Esq.

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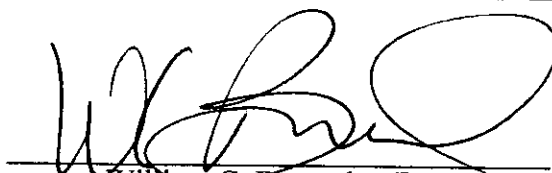
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Counsel for Kingsport Power Company

CERTIFICATE OF SERVICE

I hereby certify that, on August 15th, 2012, the foregoing **MOTION TO MODIFY PROCEDURAL SCHEDULE** was served via e-mail to all parties of record at their addresses shown below.

Mr. David Foster Chief, Utilities Division Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505	Mr. William A. Bosta Director, Regulatory Services VA/TN Appalachian Power Company Three James Center Suite 1100, 1051 E. Cary St. Richmond, VA 23219-4029
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