

April 7, 2012

VIA OVERNIGHT MAIL

Chairman, Tennessee Regulatory Authority  
c/o Ms. Sharla Dillon, Dockets and Records Manager  
460 James Robertson Parkway  
Nashville, TN 37243

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

Dear Ms. Dillon:

Demand Response Partners, Inc. and EnerNOC, Inc. hereby attach for filing a Joint Petition for Intervention in the above-captioned docket.

Please find an original and four (4) copies of the Joint Petition enclosed, as well a check in the amount of \$50.00 which represents the filing fee.

Thank you very much for your assistance and to the Authority for their consideration of this Petition.

Sincerely,



Andrew W. Dorn IV  
Demand Response Partners



Greg Geller  
EnerNOC, Inc.

cc: Ms. Jean A. Stone  
Mr. William C. Bovender  
Mr. David Foster  
Mr. William A. Bosta  
Mr. James R. Bacha  
Mr. Michael J. Quinan

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TN**

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

**JOINT PETITION TO INTERVENE**

Demand Response Partners, Inc. and EnerNOC, Inc. ("Joint Parties") petition the Tennessee Regulatory Authority ("TRA") to intervene in the above-captioned proceeding pursuant to T.C.A. § 4-5-310, 65-2-107, 65-4-104, 65-4-115, 65-4-117 (1) and (3), 65-5-101, and 65-5-103 and TRA Rules 1220-1-2-.02(4), 1220-1-2-.08, and 1220-1-2-.09.

The Joint Parties are Curtailment Service Providers ("CSPs") for thousands of customers in the Pennsylvania-Jersey-Maryland Interconnection Pool ("PJM"), including customers in the AEP subsidiary Kingsport Power Company ("KgPCo") footprint who are under contract for current and future years. EnerNOC, Inc. also currently provides demand response to hundreds of large commercial & industrial customers in Tennessee through a 10-year, 560 MW contract with the Tennessee Valley Authority ("TVA").

This proceeding will address KgPCo's request to prohibit customers from enrolling directly or through a CSP in PJM Demand Response programs. Such request would significantly impair the ability for customers to participate in demand response and for CSPs to have a presence in the KgPCo area and meet any PJM capacity obligations they have made as a result of existing contracts. Such request would also place customers and CSPs in the KgPCo territory at an unfair disadvantage relative to their counterparts in other PJM regions served by AEP or its

subsidiaries, including Virginia, West Virginia, and Ohio, who are allowed to enroll directly or through a CSP in PJM Demand Response programs.

Therefore, the legal rights, duties, privileges, immunities, or other legal interests of the CSPs may be affected or determined by the outcome of this proceeding. Granting this petition will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

The Joint Parties, therefore respectfully request, that this Petition to Intervene be granted.

All notices, correspondence, pleadings, copies of orders, communication, and other materials should be addressed to representatives for the Joint Parties as follows:

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CERTIFICATE OF SERVICE

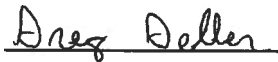
We hereby certify that, on April 7, 2012, the foregoing pleading was served by hand-delivery, facsimile, overnight delivery service, or first class mail, postage prepaid, to all parties of record at their addresses shown below.

William C. Bovender, Esq. HUNTER, SMITH & DAVIS, LLP 1212 North Eastman Road Kingsport, TN 37664	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
James R. Bacha, Esq. Hector Garcia, Esq. American Electric Power Service Corp. One Riverside Plaza, 29 <sup>th</sup> Floor Columbus, OH	Mr. David Foster Chief, Utilities Division Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505
Jean A. Stone General Counsel Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505	Mr. Michael J. Quinan, Esq. CHRISTIAN & BARTON, LLP 909 East Main St., Suite 1200 Richmond, VA 23219

This 7<sup>th</sup> day of April, 2012.



Andrew W. Dorn IV  
Demand Response Partners, Inc.



Greg Geller  
EnerNOC, Inc.