



CHRISTIAN & BARTON, LLP
ATTORNEYS AT LAW

MICHAEL J. QUINAN
Direct Dial: 804.697.4149
Direct Fax: 804.697.6149
E-mail: mquinan@cblaw.com

June 15, 2012

BY HAND DELIVERY

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

filed electronically in docket office on 06/15/12

Re: Petition of Kingsport Power Company for Approval of Demand Response Programs and
Associated Demand Response Tariffs
Docket No. 12-00012

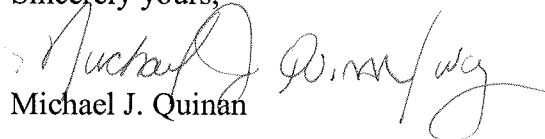
Petition of Eastman Chemical Company and Air Products and Chemicals, Inc., for
Expedited Review to Allow Certain End Use Customers of Kingsport Power Company to
Participate in PJM Interconnection Demand Response Programs
Docket No. 12-00026

Dear Mr. Bosta:

Enclosed please find the Industrial Customers Discovery Requests to Kingsport Power
Company (First Set) in the above-referenced matters.

Best regards.

Sincerely yours,


Michael J. Quinan

MJQ/wcy
Enclosures

cc: Ms. Sharla Dillon
Ms. Cynthia Kinser
Ms. Jean A. Stone
Mr. James R. Bacha
Mr. William C. Bovender
Mr. Andrew W. Dorn, IV
Mr. David Foster
Mr. Greg Geller

**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

**INDUSTRIAL CUSTOMERS DISCOVERY REQUESTS
TO KINGSPORT POWER COMPANY (First Set)**

Come Eastman Chemical Company ("Eastman") and Air Products and Chemicals, Inc. ("Air Products"; collectively with Eastman, "Industrial Customers") and propound the following discovery requests to Kingsport Power Company d/b/a AEP Appalachian Power ("KgPCo") pursuant to Rule 1220-1-2-.11 of the Rules of Practice and Procedure of the Tennessee Regulatory Authority ("T.R.A.") and Rules 26, 33 and 34 of the Tennessee Rules of Civil Procedure. Responses are requested no later than Monday, July 16, 2012.

Discovery Requests

IC-1. Please provide the following information for each AEP-East Operating Company, by jurisdiction (e.g., APCo VA, APCo WV):

a. Do retail customers of the company have the right to participate directly or through a curtailment service provider ("CSP") in PJM Interconnection LLC ("PJM") demand response programs ("DR programs")?

b. If retail customers are permitted to participate directly or through a CSP in PJM DR programs, did the retail regulator issue an order or ruling approving or otherwise addressing such participation? If so, please provide a copy of the order or ruling.

c. If retail customers are permitted to participate directly or through a CSP in PJM DR programs, did the AEP Operating Company ever seek to limit or deny such retail customer participation? If so, how were the company's efforts resolved (e.g., denied, withdrawn)? Provide a copy of every petition, motion or other pleading evidencing such company efforts, and all resulting orders, rulings or other documents evidencing such resolutions.

d. If retail customers are permitted to participate directly or through a CSP in PJM DR programs, are there any retail regulator imposed restrictions on such participation? If so, please provide a complete description of any such restrictions. Also, please provide a copy of any retail regulator order or ruling that addresses this issue.

e. If retail customers are not permitted to participate directly (or through a CSP) in PJM DR programs in any retail jurisdiction, please provide a copy of the retail

regulator order, ruling or decision denying the right of customers to directly participate.

IC-2. For each AEP-East Operating Company, by jurisdiction (e.g., APCo VA, APCo WV) in which retail customers are permitted to directly participate or through a CSP in PJM DR programs, please provide the mW level of participation by such company's customers, by PJM DR program, for the most recent two PJM program years.

IC-3. Provide copies of all analysis, studies, work papers and all other documents related to the development of KgPCo's proposed DR programs and tariffs, including the effects of such programs and tariffs on KgPCo's customers.

IC-4. Provide copies of all analysis, studies, work papers and all other documents related to the development of DR programs and tariffs of other AEP-East Operating Companies, including the effects of such programs and tariffs on customers.

IC-5. Provide copies of all analysis, studies, work papers and all other documents related to the participation of KgPCo customers in PJM DR programs, the effect of such participation on KgPCo (including impacts on system operations, planning and revenues), and the effect of such participation on KgPCo's proposed DR programs and tariffs.

IC-6. Provide copies of all analysis, studies, work papers and all other documents related to the participation in PJM DR programs of customers of other AEP-East Operating Companies, the effect of such participation on AEP and its operating companies (including impacts on system operations, planning and revenues), and the effect of such participation on those companies' DR programs and tariffs (as planned and as implemented).

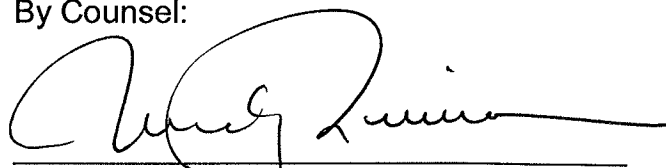
IC-7. Identify any and all KgPCo customers who, at this time, are expected to participate in KgPCo's proposed DR programs, and state the mW level of their anticipated participation.

IC-8. Provide copies of all analysis, studies, work papers and all other documents related to the effect of any planned or anticipated restructuring of the AEP-East System Pool (i.e., the AEP Interconnection Agreement) on the participation of customers in either company DR programs or PJM DR programs.

Respectfully submitted this 15th day of June, 2012.

Eastman Chemical Company, and
Air Products and Chemicals, Inc.

By Counsel:

A handwritten signature in black ink, appearing to read "Michael J. Quinan", is written over a horizontal line.

Michael J. Quinan, Esq.
(Tenn. Sup. Ct. No. 11104)
CHRISTIAN & BARTON, LLP
909 East Main St., Suite 1200
Richmond, VA 23219
(804) 697-4149 (Telephone)
(804) 697-6149 (Fax)

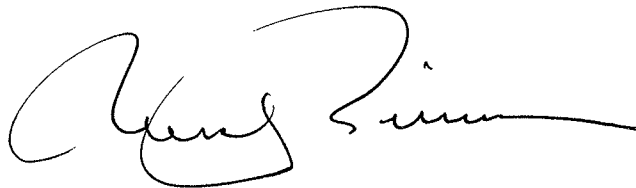
Counsel for Eastman Chemical Company,
and Air Products and Chemicals, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on June 15, 2012, the foregoing pleading was served by hand to Mr. Bosta, by overnight delivery service to all others (for delivery on Monday, June 18, 2012), and by 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 |
| Jean A. Stone General Counsel Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505 | 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 |
| William C. Bovender, Esq. HUNTER, SMITH & DAVIS, LLP P. O. Box 3740 Kingsport, TN 37664 | James R. Bacha, Esq. Hector Garcia, Esq. American Electric Power Service Corp. 1 Riverside Plaza Columbus, OH 43215 |
| Andrew W. Dorn IV Demand Response Partners, Inc. 360 Delaware Ave., Suite 406 Buffalo, NY 14202 | Greg Geller EnerNOC, Inc. 101 Federal Street, Suite 1100 Boston, MA 02110 |

This 15th day of June, 2012.



Michael J. Quinan, Esq.

#1281884