

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

THE APPLICATION OF KENTUCKY POWER COMPANY FOR: (1) THE APPROVAL OF THE TERMS AND CONDITIONS OF THE RENEWABLE ENERGY PURCHASE AGREEMENT FOR BIOMASS ENERGY RESOURCES BETWEEN THE COMPANY AND ECOPOWER GENERATION-HAZARD LLC; (2) AUTHORIZATION TO ENTER INTO THE AGREEMENT; (3) THE GRANT OF CERTAIN DECLARATORY RELIEF; AND (4) THE GRANT OF ALL OTHER REQUIRED APPROVALS AND RELIEF

CASE NO. 2013-00144

MOTION OF KENTUCKY POWER COMPANY
FOR LEAVE TO DEVIATE FROM
FILING REQUIREMENTS

Kentucky Power Company (“Kentucky Power” or the “Company”) moves the Public Service Commission of Kentucky pursuant to 807 KAR 5:001, Section 21, for leave to deviate from the filing requirements of the Commission’s April 26, 2013 Order and 807 KAR 5:001, Section 13(2)(b). Specifically, the Company requests that it be excused from filing a paper original or copies of the confidential portions¹ of its supplemental response to Data Request KIUC 1-6 because of the voluminous nature of the response.

¹ The portion of the supplemental response for which Kentucky Power is not seeking confidential treatment is not voluminous. That portion is being filed in accordance with the requirements of the Commission’s April 26, 2013 Order and the Commission’s regulations.

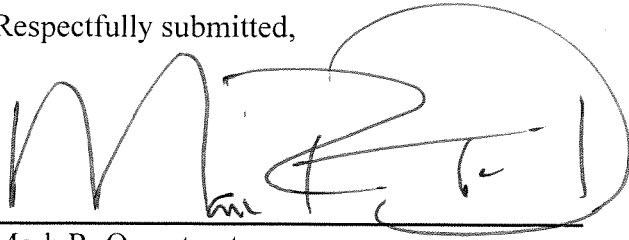
Pursuant to the Commission's April 26, 2013 Order, Kentucky Power is required to file an original and ten copies of all responses to data requests and attachments, along with service copies to all parties of record. The confidential portion of Kentucky Power's supplemental response to Data Request KIUC 1-6 is voluminous. It consists of 744 individual documents comprising more than 1,000 pages of confidential material. Additionally, many of the documents included in the confidential portion of the response to Data Request KIUC 1-6 are electronic format. Filing these electronically allows the other parties to the case full access to the documents.

With today's filings, the Company is filing and serving the original of the confidential portion of its supplemental response to Data Request KIUC 1-6 in electronic form. Through this motion the Company seeks the Commission's approval for this deviation from the standard filing requirements.

WHEREFORE, Kentucky Power Company respectfully requests the Commission to enter an Order:

1. Authorizing Kentucky Power to file and serve its supplemental response to Data Request KIUC 1-6 in the manner described above; and
2. Granting Kentucky Power all further relief to which it may be entitled.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark R. Overstreet', enclosed within a large, hand-drawn oval.

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COUNSEL FOR KENTUCKY POWER
COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served as indicated below upon:

Michael L. Kurtz
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202

By Overnight Delivery

Jennifer Black Hans
Dennis G. Howard II
Lawrence W. Cook
Kentucky Attorney General's Office
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204

By Overnight Delivery

on this the 16th day of August, 2013.

A handwritten signature in black ink, appearing to read 'M R O', with a horizontal line underneath it.

Mark R. Overstreet