

AFFIDAVIT OF RANIE K. WOHNHAS

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COMMISSION

Ranie K. Wohnhas, after first being sworn, upon his oath, deposes and states:

1. I am employed by Kentucky Power Company (Kentucky Power). American Electric Power Company, Inc. (AEP) is the parent company of Kentucky Power. I am Managing Director of Regulatory & Finance. I supervise and direct the regulatory matters affecting Kentucky Power. I am of the age of majority and competent to make the statements contained in this affidavit.

2. I have personal knowledge of the confidential, proprietary, competitively sensitive and critical energy infrastructure confidential information addressed herein and in the accompanying Motion through direct contact with this information and through my investigation with other AEP employees who work directly with the Confidential Information. I have personal knowledge of efforts taken by AEP and Kentucky Power to maintain the integrity of the Confidential Information through direct contact with these efforts and through my investigation of these efforts with other employees who work directly with these procedures.

**Description of the Confidential Information for
Which Protection is Sought**

3. KENTUCKY POWER is requesting that certain confidential information to be included in KENTUCKY POWER's Integrated Resource Plan be exempted from public disclosure as confidential, proprietary, competitively sensitive and critical energy infrastructure information (the "Confidential Information").

4. More specifically, Kentucky Power seeks confidential treatment of six items.

Item No.	Exhibit Number or Type of Document	Description of Confidential and Proprietary Information	Statutory Basis for According Confidential Treatment
1	Chapter 2 Confidential Appendix	Sensitive Customer Account Data and forecast electricity prices	KRS 61.878(1)(c)(2)(c)
2	Exhibit 4-4	Projected Average Fuel Costs through 2028 Projected Variable Production Costs through 2028 Projected Non-fuel O&M through 2028	KRS 61.878(1)(c)(2)(c)
3	Exhibit 4-6	Projected Capacity Factors (steam) through 2028 Projected Availability Factors (steam) through 2028 Projected Average heat Rates through 2028	KRS 61.878(1)(c)(2)(c)
4	Exhibit 4-9	Key Supply Side Resource Option Assumptions (new generation technologies)	KRS 61.878(1)(c)(2)(c)
5	Exhibit 4-16	American Electric Power System (generation and transmission detail)	KRS 61.878(1)(m)(1)(g) KRS 61.878(1)(k)
6	Exhibit 4-17	Kentucky Power Transmission Line Network	KRS 61.878(1)(m)(1)(g) KRS 61.878(1)(k)

5. The confidential information in Item 1 includes data related to specific customers. The data details different customers' specific usage at different times over a number of years. This data is specific to individual customers and provides insight into individual customers' usage. In addition, forecast electricity prices are confidential as the disclosure of such would allow third parties to determine the future costs of competitive products and provide insights regarding the operational needs of Kentucky Power's customers.

6. Items 2 through 4 include confidential and proprietary information, the disclosure of which is likely to provide an unfair competitive advantage. Item 2 includes the projected fuel costs, variable production costs, and non-fuel O&M of generation through the year 2028.

Information substantially similar to that contained in Item 2 (Exhibit 4-4) was accorded confidential treatment by the Commission by letters dated December 11, 2009, December 2, 2002 and November 9, 1999 in Case Nos. 2009-00339, 2002-00377 and 99-437, respectively. Item 3 (Exhibit 4-6) includes the projected value of each of those factors through 2028. Item 4 (Exhibit 4-9) contains forecasted capability, installed cost, heat rate, fuel, variable O&M, and fixed O&M costs, and emission rates for new generation technologies. Similar information was provided confidential treatment by the Commission in Case No. 2007-00477 by letter dated January 18, 2008.

7. Items 5 and 6 are maps detailing the generation and transmission system of the American Electric Power System, and a Kentucky-specific subset of that information. The information contained in these maps is considered by the Federal Energy Regulatory Commission (FERC) as Critical Energy Infrastructure Information (CEII) and as such exempts the maps from public disclosure in accordance with FERC rules. FERC Rule 18 C.F.R. § 388.113(c) defines CEII as “information about proposed or existing infrastructure that relates to the production, generation, transportation, transmission of energy and that could be useful to a person planning an attack on critical infrastructure.” In addition, 18 C.F.R. § 388.112 exempts such information from disclosure under the Freedom of Information Act. However, FERC does provide access to CEII documents to those with a legitimate need for the information following an execution of a non-disclosure agreement with FERC.

**The Information Contained in Confidential Information
Derives Independent Economic Value By
Reason of the Fact that it is Not Publicly Available**

8. The Confidential Information is not readily available in the public domain and Kentucky Power takes steps to protect this information from public disclosure.

9. The information contained in Items 1 through 4 is competitively sensitive and a trade secret because competitors may use such data to determine Kentucky Power's current and projected resource costs, information about the operations of Kentucky Power's facilities and the price at which Kentucky Power projects to secure fuel for its plants. The disclosure of such costs would adversely impact Kentucky Power because it would permit competitors to better determine how to price their services and products. Further, the disclosure of the Company's costs would negatively effect the negotiation or competitive bidding process by allowing potential suppliers or vendors to know what the Company's expectations are with respect to its resource needs and costs. Thus, these suppliers or vendors would have the advantage of knowing how to price their bids or negotiate to provide resources in order to maximize their prices to the disadvantage of Kentucky Power and its customers.

**The Information Contained in Confidential Information is
Critical Energy Infrastructure Information (CEII) and is Not
Publicly Available**

10. Items 5 and 6 are CEII. Item 5 is a map included in Form 715 that AEPSC files with FERC, who has granted confidential treatment of this map as CEII. The information includes a detailed description of critical energy sector infrastructure. Item 6 details the Kentucky portion of the protected data from Item 5.

**The Information is Not Generally Known, Readily Ascertainable
by Proper Means by Other Persons Who Can
Obtain Economic Value from its Disclosure or Use**

11. The Confidential Information is not available or ascertainable by other parties through normal or proper means. No reasonable amount of independent research could yield this information to other parties.

**The Information is the Subject of Efforts Reasonable
Under The Circumstances to Maintain Its Secrecy**

12. The Confidential Information has been the subject of efforts that are reasonable under the circumstances to maintain its secrecy. Kentucky Power and American Electric Power Service Corporation (“AEPSC”) restrict the access of information to only those employees, officers and representatives of Kentucky Power and AEPSC who have a need to know about such information due to their job and management responsibilities. Kentucky Power and AEPSC limit public access to buildings housing the Confidential Information by use of security guards. Persons not employed by Kentucky Power and AEPSC who are allowed past security guards at buildings where Confidential Information is kept are not permitted to walk within such buildings without an escort. Kentucky Power’s and AEPSC’s files containing the Confidential Information are maintained separately from Kentucky Power’s and AEPSC’s general records and access to those files is restricted. Within Kentucky Power and AEPSC, access to this information has been and will continue to be disclosed only to those employees, officers and representatives of Kentucky Power and AEPSC who have a need to know about such information due to their job and management responsibilities. Outside Kentucky Power and AEPSC, this information is only provided to certain persons who have a legitimate need to review the information to participate in this filing and who sign a confidentiality agreement.

