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Post Office Box 634  
Frankfort, KY 40602-0634  
[502] 223-3477  
[502] 223-4124 Fax  
www.stites.com

April 5, 2011

**HAND DELIVERED**

Jeff R. Derouen  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602-0615

RECEIVED

APR 05 2011

PUBLIC SERVICE  
COMMISSION

Mark R. Overstreet  
(502) 209-1219  
(502) 223-4387 FAX  
moverstreet@stites.com

**RE: Case No. 2010-00490**

Dear Mr. Derouen:

Enclosed please find and accept for filing the redacted original and ten redacted copies of Kentucky Power Company's responses to the hearing data requests in the above matter.

Also enclosed is a motion for confidential treatment of a portion of the Company's response to hearing data request number 1, along with a sealed copy of the response, with the confidential information highlighted.

Please do not hesitate to contact me if you have any questions.

Very truly yours,



Mark R. Overstreet

MRO

cc: Dennis G. Howard II  
Michael L. Kurtz

COMMONWEALTH OF KENTUCKY  
BEFORE THE  
PUBLIC SERVICE COMMISSION OF KENTUCKY

RECEIVED

APR 05 2011

PUBLIC SERVICE  
COMMISSION

IN THE MATTER OF

AN EXAMINATION OF THE APPLICATION )  
OF THE FUEL ADJUSTMENT CLAUSE OF )  
KENTUCKY POWER COMPANY ) CASE NO. 2010-00490  
FROM NOVEMBER 1, 2008 THRU OCTOBER 31, )  
2010 )

KENTUCKY POWER COMPANY RESPONSES TO COMMISSION STAFF'S  
MARCH 22, 2011 HEARING DATA REQUESTS

April 5, 2011

**AFFIDAVIT**

Kimberly K. Chilcote, upon being first duly sworn, hereby makes oath that if the foregoing questions were propounded to her at a hearing before the Public Service Commission of Kentucky, she would give the answers recorded following each of said questions and that said answers are true.

*Kimberly K Chilcote*

\_\_\_\_\_  
Kimberly K. Chilcote

State of Ohio

)

) Case No. 2010-00490

County of Franklin

)

Sworn to before me and subscribed in my presence by Kimberly K. Chilcote, this the 30 day of March, 2011.

*Gina L. Beyer*

\_\_\_\_\_  
Notary Public

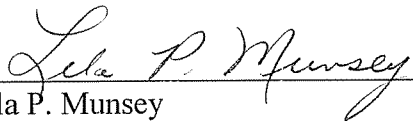


**GINA L. BEYER**  
Notary Public, State of Ohio  
My Commission Expires 07-01-2011

My Commission Expires: 7-1-2011

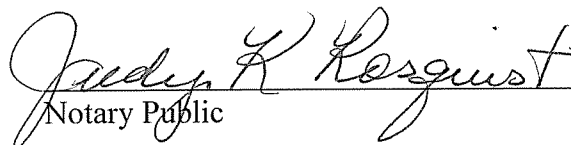
**AFFIDAVIT**

Lila P. Munsey, upon being first duly sworn, hereby makes oath that if the foregoing questions were propounded to her at a hearing before the Public Service Commission of Kentucky, she would give the answers recorded following each of said questions and that said answers are true.

  
\_\_\_\_\_  
Lila P. Munsey

Commonwealth of Kentucky          )  
  ) Case No. 2010-00490  
County of Franklin                    )

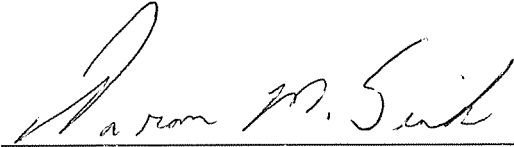
31<sup>st</sup> Sworn before me and subscribed in my presence by Lila P. Munsey, this the  
day of March, 2011.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: January 23, 2013

**AFFIDAVIT**

Aaron M. Sink, upon being first duly sworn, hereby makes oath that if the foregoing questions were propounded to him at a hearing before the Public Service Commission of Kentucky, he would give the answers recorded following each of said questions and that said answers are true.



\_\_\_\_\_  
Aaron M. Sink

Commonwealth of Kentucky

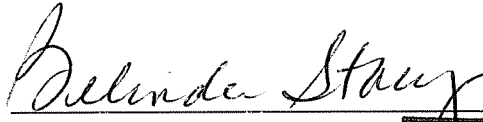
)

) Case No. 2010-00490

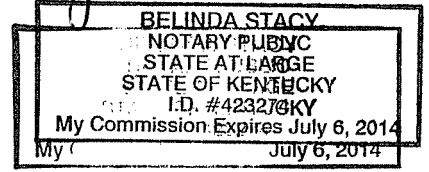
County of Boyd

)

Sworn to before me and subscribed in my presence by Aaron Sink, this the 28th day of March, 2011.



\_\_\_\_\_  
Notary Public



My Commission Expires: \_\_\_\_\_



## Kentucky Power Company

### REQUEST

Refer to Item 9 of the Commission Staff's First Set of Data Requests and to Item 1 of the Commission Staff's Second Set of Data Requests. Please provide an updated Planned Maintenance Schedule.

### RESPONSE

#### Kentucky Power Planned Outage Schedule

##### 2011

Big Sandy Unit 1, [REDACTED]  
Big Sandy Unit 2, [REDACTED]

##### 2012

Big Sandy Unit 1, [REDACTED]  
Big Sandy Unit 2, [REDACTED]

WITNESS: Aaron M Sink





Kentucky Power Company

REQUEST

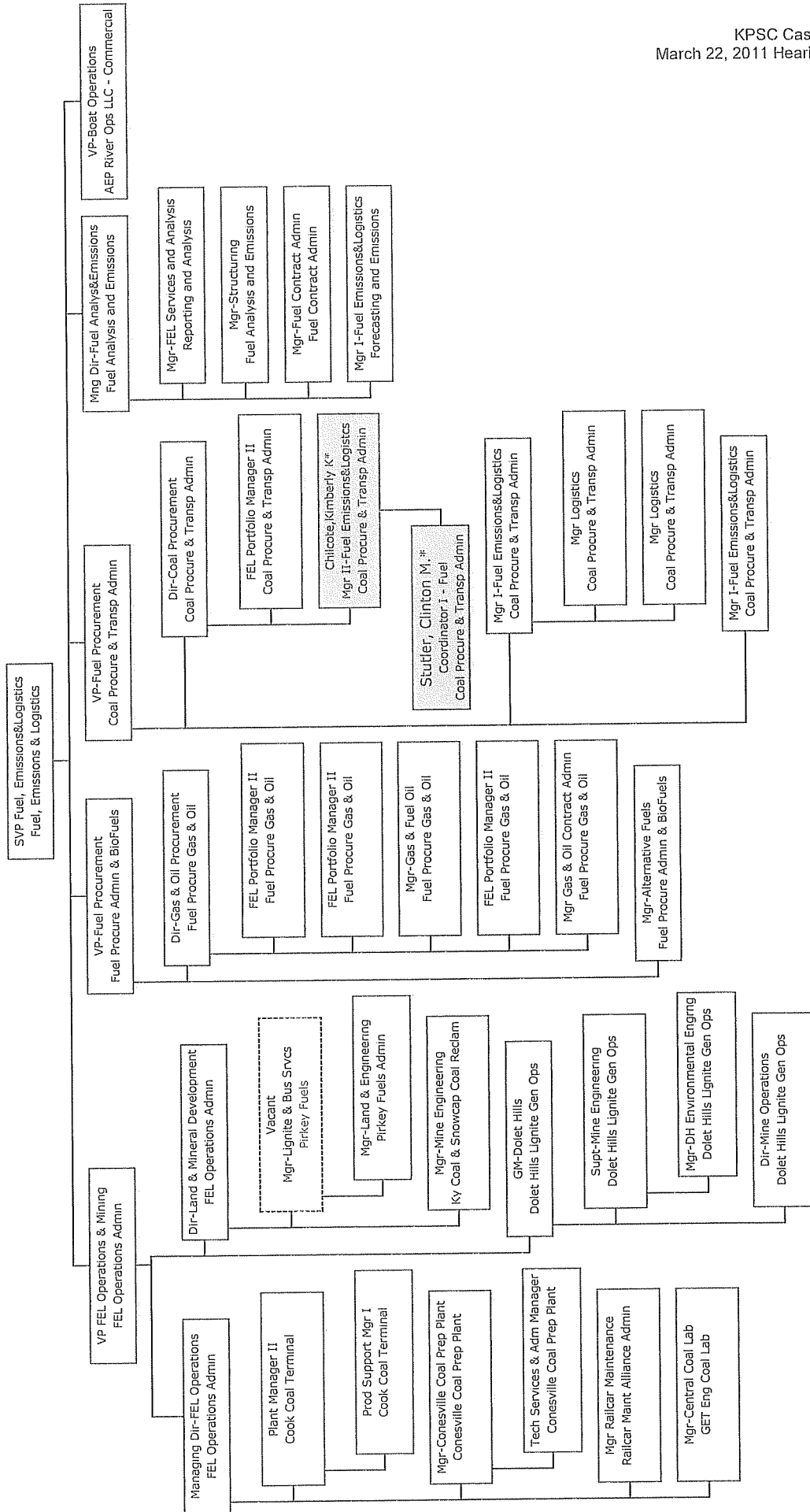
Refer to the Company's response to Item 31 of the Commission Staff's First Set of Data Requests. Please provide an organizational chart that identifies the position and the name of the person responsible for procuring coal for Kentucky Power. Also identify any positions that are specific to Kentucky Power.

RESPONSE

Attached is a current organizational chart for the Fuel Emissions & Logistics (FEL) organization within the American Electric Power Service Corporation. In the hierarchy under the VP-Fuel Procurement is Kimberly Chilcote's position of Mgr II-Coal Procurement. Although there are no positions within the FEL organization that are specific to Kentucky Power, Ms. Chilcote and one fuel buyer, Clinton Stutler, who reports to her, are responsible for purchasing coal for KPCo.

WITNESS: Kimberly K. Chilcote

# AEP Fuel, Emissions & Logistics



\*These positions are responsible for purchasing fuel for Kentucky Power Company. However, neither of these roles is Kentucky Power Company-specific, as both roles encompass other responsibilities as well.



Kentucky Power Company

REQUEST

Refer to the Company's response to Item 13 of the Commission Staff's First Set of Data Requests. It appears that line losses were trending downward in 2009 and slightly upward in 2010. Please explain the reason for the upward trend in line losses in 2010.

RESPONSE

During 2010, residential sales grew more rapidly than industrial sales. As line losses are greater for residential customers than industrial customers, the higher residential load would have caused line losses to increase.

WITNESS: Lila P Munsey



Kentucky Power Company

REQUEST

Refer to Item 18 (b) of the Commission Staff's First Set of Data Requests. The response states that Kentucky Power uses information compiled from FERC Form 423. It is the Staff's understanding that FERC Form 423 is no longer used. Did the Company intend to reference EIA Form 923?

RESPONSE

Yes. The Company obtained data from Velocity Suites; a Company that provides publicly filed data. The data from Velocity Suites cites both the FERC 423 and the EIA 923, and does mention that the FERC 423 is no longer used. The Company will update this reference in future cases to reflect the currently-used EIA 923 form as the source of the data.

WITNESS: Kimberly K Chilcote



Kentucky Power Company

REQUEST

Please describe what has happened to the demand since the end of the review period.

RESPONSE

KPCo's peak demand since October, 2010 occurred in December, 2010, at 1,596 MW. The Company has not experienced an all-time peak since the end of the review period.

WITNESS: Lila P Munsey



COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

AN EXAMINATION OF THE APPLICATION OF )  
THE FUEL ADJUSTMENT CLAUSE OF )  
KENTUCKY POWER COMPANY FROM ) CASE NO. 2010-00490  
NOVEMBER 1, 2008 THROUGH OCTOBER 31, )  
2010 )

\* \* \* \* \*

**PETITION FOR CONFIDENTIAL TREATMENT**

Kentucky Power Company ("Kentucky Power") moves the Commission pursuant to 807 KAR 5:001, Section 7, for an Order granting confidential treatment to Kentucky Power's response to Data Request No. 1 in the Commission Staff's third set of data requests. Pursuant to 807 KAR 5:001, Kentucky Power is filing an unredacted response along with ten redacted copies.

A. The Request And The Statutory Standard.

Staff Data Request No. 1 requires Kentucky Power to file and disclose:

Refer to Item 9 of the Commission Staff's First Set of Data Requests and to Item 1 of the Commission Staff's Second Set o Data Requests. Please provide an updated Planned Maintenance Schedule.

Kentucky Power does not object to responding to Data Request 1 and providing the Commission with the information about the Company's planned maintenance schedule.

However, the information should be afforded confidential treatment.

KRS 61.878(1)(c)(1) excludes from the Open Records Act:

Upon and after July 15, 1992, records confidentially disclosed to an agency or required to be disclosed to it, generally recognized as confidential or proprietary, which if openly disclosed would permit an unfair

commercial advantage to competitors of the entity that disclosed the records.

This exception applies to Kentucky Power's updated response to Staff Data Request 1.

B. The Information Provided by Kentucky Power in its Response to Staff Data Request No. 1 is Generally Recognized as Confidential and Proprietary.

The request calls for Kentucky Power's planned maintenance schedule, which includes the starting and ending dates for outages for 2011 and 2012. This information is highly confidential. Dissemination of the information for which confidential treatment is being requested is restricted by Kentucky Power and AEPSC, and the Company and AEPSC take all reasonable measures to prevent its disclosure to the public as well as persons within the Company who do not have a need for the information. Kentucky Power sought confidential treatment of its original response to Staff Data Request No. 1 and that request was granted by the Commission on March 16, 2011. Similarly, the Commission should find that confidential treatment is appropriate for Kentucky Power's response to this request from Commission Staff.

In further support of this Request for Confidential Treatment for the data sought by Data Request No. 1, Kentucky Power notes that it sought and received confidential treatment for information pertaining to planned future outages in Case No. 2007-00477. Kentucky Power is aware of no instances in which the Commission has denied confidential treatment to similar information in other proceedings. To the contrary, specific information about planned outages is generally recognized as confidential and proprietary in the energy industry, and other utilities have sought and obtained confidential treatment for the information in other Commission proceedings. See, e.g.,

Administrative Case No. 387 (Petition of Duke Energy Kentucky, Inc. for Confidential Treatment of Certain Information Filed for Calendar Year 2009).

C. Disclosure Of The Information Included in Kentucky Power's Response to Staff Data Request No. 1 Will Result In An Unfair Commercial Advantage.

The rise of competitive markets such as PJM has placed a premium on generating unit data. Competitive Energy Market Intelligence, especially in regard to Real-Time Generation and unit availability, has developed into a cottage industry. Public disclosure of information about unit availability could adversely impact ratepayers and shareholders of Kentucky Power by providing a competitive advantage to Kentucky Power's direct competitors, thereby affecting Kentucky Power's ability to minimize costs for its rate paying customers.

Unit availability information is especially useful for competition as savvy marketers can estimate AEP's generation position and raise generation offers if they believe AEP will be energy short, resulting in Kentucky Power paying higher prices to procure energy to serve its customers. This type of data is highly valued by competing energy marketers and traders who speculate in forward energy transactions. Using forecasted unit availability data, other parties could improve their forecast accuracy of future AEP operations and utilize the resulting intelligence to influence negatively Kentucky Power's costs of providing electricity to its customers. Such actions would ultimately raise the cost to Kentucky Power's customers.

D. The Information Included in Kentucky Power's Response to Staff Data Request No. 1 Is Required To Be Disclosed To An Agency.

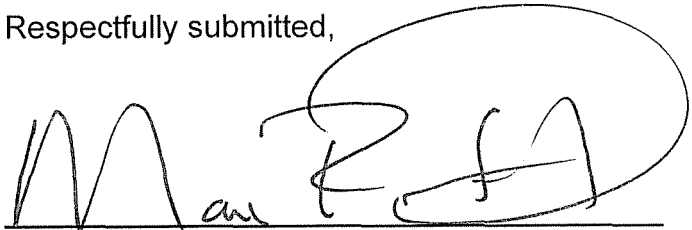
Finally, the information requested in Staff Data Request No. 1 is by the terms of the Data Request required to be disclosed to the Commission, a "public agency" as that

term is defined at KRS 61.870(1). Kentucky Power acknowledges its maintenance schedule and planned outages are within the scope of the Commission's review, and that parties to this fuel clause proceeding should have access to the information sought through Staff Data Request No. 1. Any filing, however, should be subject to a confidentiality order and any party requesting such information should enter into a confidentiality agreement. If such an agreement cannot be reached, the information should be subject to a protective order issued pursuant to 807 KAR 5:001, Section 7(5)(b).

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

1. According confidential status to and withholding from public inspection Kentucky Power's response to Staff Data Request 1; 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', is written over a horizontal line. The signature is stylized and includes a large, circular flourish on the right side.

Mark R. Overstreet  
R. Benjamin Crittenden  
STITES & HARBISON PLLC  
421 West Main Street  
P. O. Box 634  
Frankfort, Kentucky 40602-0634  
Telephone: (502) 223-3477

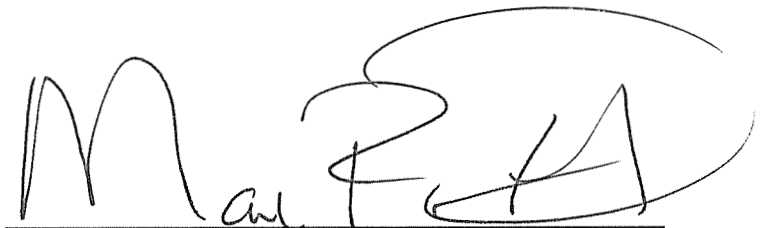
COUNSEL FOR KENTUCKY POWER  
COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing (along with redacted copies of the information for which confidential treatment is sought) was served by first class mail, postage prepaid, upon the following parties of record, this 5th day of April, 2011.

Michael L. Kurtz  
Boehm, Kurtz & Lowry  
2110 CBLD Center  
36 East Seventh Street  
Cincinnati, OH 45202

Dennis Howard II  
Assistant Attorney General  
Office for Rate Intervention  
P. O. Box 2000  
Frankfort, KY 40602-2000



Mark R. Overstreet