

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

PUBLIC SERVICE
COMMISSION

APPLICATION OF KENTUCKY POWER COMPANY)
FOR APPROVAL OF AN AMENDED COMPLIANCE)
PLAN FOR PURPOSES OF RECOVERING)
ADDITIONAL COSTS OF POLLUTION CONTROL)
FACILITIES AND TO AMEND ITS ENVIRONMENTAL)
COST RECOVERY SURCHARGE TARIFF)

CASE NO.
2005-00068

**KENTUCKY POWER COMPANY'S
PETITION FOR CONFIDENTIAL TREATMENT
AND REQUEST FOR DEVIATION FROM THE RULES**

Kentucky Power Company moves the Commission pursuant to 807 KAR 5:001, Section 7 and KRS 61.878(1)(c) for an Order granting confidential treatment to the attached February 28, 2003 document re the AEP Unregulated Generation NO_x SIP Call Compliance Plan. In support Kentucky Power states:

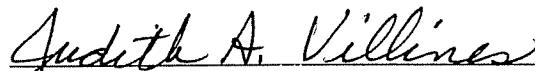
At the public hearing held on July 28, 2005 in this matter, the Hearing Officer directed Kentucky Power Company to search for further written documents that may relate to the decisions of the AEP companies subject to the AEP Interconnection Agreement regarding the installation of the NO_x control equipment at issue in this case. That search was conducted and the attached document was determined to meet the criteria established by the Hearing Officer for producing additional documents. This document relates to the "unregulated" facilities of Kentucky Power Company's sister companies located in Ohio. (These facilities are "unregulated" only in the sense that they are not regulated under Ohio law by the Ohio Public Utility Commission; they are regulated in the sense that they remain part of the facilities covered by the AEP Interconnection Agreement that has been approved by FERC.) This document is

considered proprietary and confidential by the American Electric Power Company and its subsidiaries because it is a strategy document discussing the market impacts of the matters discussed in the document. Accordingly, this document is exempt from the Kentucky Open Records Law and entitled to confidential treatment by the requesting agency, the Kentucky Public Service Commission, pursuant to KRS 61.878(c)(1).

The statute provides protection from disclosure by an agency if a record is “confidentially disclosed to an agency or required by an agency to be disclosed to it,” and is “generally recognized as confidential or proprietary,” and “if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records.” The attached document is being disclosed to the Commission at its direction and is generally recognized as confidential or proprietary and has been treated as such by the AEP companies. Additionally, because this document is an internal policy and strategy document, if openly disclosed, the competitors of the Ohio companies would have an unfair commercial advantage because of the information contained in this document. Accordingly, the document is entitled to confidential treatment.

Wherefore, Kentucky Power respectfully requests Public Service Commission of Kentucky to issue an Order protecting the attached document (described above) from public disclosure.

Respectfully submitted,



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COUNSEL FOR:
KENTUCKY POWER COMPANY

CERTIFICATE OF SERVICE

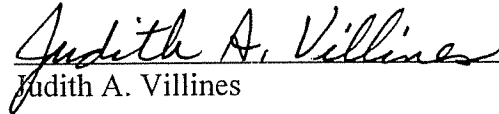
I hereby certify that a true and accurate copy of the foregoing Petition for Confidential Treatment and Request for Deviation from the Rules of Kentucky Power Company was served via United States Postal Service, First Class Mail, postage prepaid, upon:

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

Elizabeth E. Blackford
Kentucky Attorney General's Office
Suite 800
1024 Capital Center Drive
Frankfort, Kentucky 40601-8204

Richard G. Raff
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615

on this the 5th day of August, 2005.



Judith A. Villines

KE057:KE113:12877:1:FRANKFORT

Unregulated Generation 2003 NOx SIP Plan													Unreg Generation 2003				Unreg Generation 2003			Teating Results				'04 NOx Target			Test Results				Modelling Results				Final Configuration Template Range			
Unit	Capacity (MW)	Load				Title IV Controls NOx Emission				'03 NOx Target				'03 ERC Target		ERC Qualifying Rate	ERC Applied	ERC Expected	Minimum Load	Minimum Load	Intermediate Load	Full Load	Full Load	Minimum Load	Full Load	Minimum Load	Full Load	Best	Conservative	Best	Conservative							
		Min Load	Max Load	Min Load	Max Load	Min Load	Max Load	Min Load	Max Load	Min Load	Max Load	ERC	ERC	ERC	ERC																	ERC	ERC	ERC	ERC	ERC	ERC	
Amos	3	500	1,300	0.60	0.80	0.080	0.080	0.55	0.65	0.080	0.080	0.10	0.25	1945	1197																							
Cardinal	1	320	600	0.55	0.65	0.065	0.065	0.065	0.065	0.065	0.065	0.08																										
Cardinal	2	320	600	0.55	0.65	0.065	0.065	0.065	0.065	0.065	0.065	0.08																										
Cardinal	3	330	630	0.50	0.55	0.055	0.055	0.055	0.055	0.055	0.07																											
Conesville	1	70	125	0.60	1.25	0.60	1.25	0.60	1.25	0.60	1.25	0.31																										
Conesville	2	70	125	0.60	1.25	0.60	1.25	0.60	1.25	0.60	1.25	0.31																										
Conesville	3	70	165	0.45	0.60	0.45	0.60	0.45	0.60	0.45	0.60	0.31																										
Conesville	4	152	339	0.45	0.52	0.45	0.52	0.45	0.52	0.45	0.52	0.31																										
Conesville*	5	160	400	0.42	0.45	0.27	0.32	0.42	0.45	0.27	0.32	0.31																										
Conesville*	6	160	400	0.42	0.45	0.42	0.45	0.42	0.45	0.42	0.45	0.33																										
Garwin	1	1,000	1,275	0.45	0.60	0.45	0.60	0.45	0.60	0.45	0.60	0.08																										
Garwin	2	1,000	1,275	0.45	0.60	0.45	0.60	0.45	0.60	0.45	0.60	0.08																										
Kammer*	1	70	210	0.77	0.82	0.77	0.82	0.77	0.82	0.77	0.82	0.08																										
Kammer*	2	70	210	0.77	0.82	0.77	0.82	0.77	0.82	0.77	0.82	0.08																										
Kammer*	3	70	210	0.77	0.82	0.77	0.82	0.77	0.82	0.77	0.82	0.08																										
Michell	1	300	800	0.50	0.70	0.40	0.40	0.50	0.70	0.40	0.40	0.45																										
Michell	2	300	800	0.50	0.70	0.40	0.40	0.50	0.70	0.40	0.40	0.45																										
Muskingum River*	1	80	205	0.60	0.85	0.40	0.40	0.60	0.85	0.40	0.40	0.45																										
Muskingum River*	2	80	205	0.60	0.85	0.40	0.40	0.60	0.85	0.40	0.40	0.45																										
Muskingum River*	3	115	215	0.77	0.82	0.35	0.40	0.77	0.82	0.35	0.40	0.38																										
Muskingum River*	4	115	215	0.77	0.82	0.35	0.40	0.77	0.82	0.35	0.40	0.38																										
Muskingum River*	5	245	585	0.58	0.75	0.58	0.75	0.58	0.75	0.58	0.75	0.38																										
Sporn	1	30	100	0.35	0.65	0.28	0.55	0.35	0.65	0.28	0.55	0.38																										
Sporn	2	60	150	0.60	0.70	0.30	0.35	0.60	0.70	0.30	0.35	0.38																										
Sporn	4	50	150	0.60	0.70	0.30	0.35	0.60	0.70	0.30	0.35	0.38																										
Sporn	5	270	450	0.35	0.45	0.35	0.45	0.35	0.45	0.35	0.45	0.38																										
													12169			3723																						

* CV 588 and MR1-4 qualify for ERCs if stack CEM < 80% of v2k NOx. The stack must average below 0.03 lb/MMBtu for CV 5/6 and 0.54 lb/MMBTU for MR 1-4 during the May 1-Sept 30 ozone season to qualify.

** MR 0 can operate with BOQS, but fuel savings depend on firing high sulfur coal offsets ERC value, overlay to be installed in Fall '03 outage.

Neither Cardinal 1 nor Garwin 1 will operate for ERC's in '03.

2003 Dilution OH 0.25 WV 0.6

Note that Best/Mitchell part load operation assumes BOQS