

**BEFORE THE
PUBLIC SERVICE COMMISSION OF KENTUCKY**

RECEIVED

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PUBLIC SERVICE
COMMISSION

In The Matter Of:

GENERAL ADJUSTMENT IN)	
ELECTRIC RATES OF)	CASE NO. 2005-00341
KENTUCKY POWER COMPANY)	

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 responses to KIUC Information Requests 22, 34, 38 and 42.

Pursuant to 807 KAR 5:001 an original of the responses for which confidential treatment is sought is filed as part of Kentucky Power's original filing in response to this data request. In addition, ten redacted copies of the subject Response are filed with Petition. Redacted copies are being served on all parties to this proceeding.

The Requests and Background.

Information Request 22 asks Kentucky Power to file and disclose:

Please provide a copy of the Company's daily cash flow model, including all inputs translating accrual amounts to cash flow amounts and any other input assumptions. If the Company does not have its own daily cash flow model, the please provide the AEP model.

Information Request 34 requests Kentucky Power to file and disclose:

Provide the Company's forward price curves (future market projections) for off-system sales as of June 30, 2004, September 30, 2004, December 31, 2004, March 31, 2005, June 30, 2005 and September 30, 2005. The forward price curves as of these dates should be provided for all projected periods for which they are developed or otherwise obtained.

Provide all assumptions underlying these forward price curves including, but not limited to natural gas prices.

Information Request 38 requests Kentucky Power to file and disclose:

Please provide the Company's budgeted/projected off-system sales revenues, off-system sales expenses and off-system sales margins for November 2005 through December, 2006, including the most recent revisions or expectations. Provide all assumptions underlying the budgeted amounts and/or the most recent revisions or expectations, data, computations, and work papers, including electronic spreadsheets with formulas intact in sufficient detail to understand the basis for and to replicate the Company's qualifications. Separately identify sales to other AEP utilities and to unaffiliated third parties and detail all allocations pursuant to the AEP Interconnection Agreement.

Information Request 42 asks Kentucky Power to file and disclose:

Refer to page 39 lines 8-21 of Mr. Wagner's Testimony. Please provide a copy of all planning documents that AEP relied on to determine its need for building or otherwise acquiring the specific unit additions indicated for CSP and APC.

Kentucky Power does not object to providing the information to the Commission, subject to an order according it confidential treatment. In addition, Kentucky Power will provide the information to KIUC and the other parties upon execution of an appropriate confidentiality agreement.

Basis for Confidential Treatment

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

"Records confidentially disclosed to an agency, generally recognized as confidential or proprietary, which if openly disclosed would present an unfair commercial advantage to competitors of the entity that disclosed the records, and which are compiled and maintained . . . in conjunction with the regulation of commercial enterprise . . ."

This exception applies to Kentucky Power's responses to KIUC Information Requests 22, 34, 38 and 42.

The Information Is Generally Recognized As Confidential and Proprietary.

First, the records to be filed with the Commission are "generally recognized as confidential or proprietary." Request Nos. 34, 38 and 42 include projections concerning prices at which AEP and Kentucky Power expects to buy and sell in the future. This price information is highly confidential, and confidentiality is critical to the proper functioning of the market. Request No. 22 presents information on a consolidated basis for all AEP companies that is not otherwise available to the public.

Dissemination of the requested information is restricted by American Electric Power and Kentucky Power and the companies take all reasonable measures to prevent its disclosure to the public as well as persons within the companies who do not have a need for the information.

Disclosure Of The Information Will Result In An Unfair Commercial Advantage.

Disclosure of the confidential information will result in an unfair commercial advantage to Kentucky Power's competitors and hence a detriment to Kentucky Power's rate payers. The price and quantity projections are especially sensitive and their disclosure would be of some advantage to competitive other utilities and suppliers; thus, disclosure would work a disadvantage to Kentucky Power and its ratepayers. For example, projections concerning AEP's projected off-system sales activities will enable the company's competitors to shape their pricing accordingly. Accordingly, Kentucky Power would be placed at a competitive disadvantage vis-à-vis other energy suppliers, especially in the off-system sales market. To the extent that competitors use the

information to capture sales that AEP otherwise would have made the Company and its rate payers (through the system sales clause) are injured.

Although Response to Request No. 22 provides historical information, the information is on a consolidated AEP-wide basis and at a level of detail that otherwise is not available to the public. By disclosing the timing and amount of power trading and gas trading settlements, competitors may be able to discern a pattern that will enable them to unfairly compete with AEP. More fundamentally, information is presented concerning SO₂ allowance purchases by AEP. This information (as opposed to information about purchases and sales by Kentucky Power) is not publicly available, is sought after in the market place and can be used to better discern AEP's SO₂ allowance position. Such information can affect the price at which AEP and Kentucky Power buy and sell such allowances.

The Information Is Compiled And Maintained In Conjunction With The Commission's Regulation of Kentucky Power.

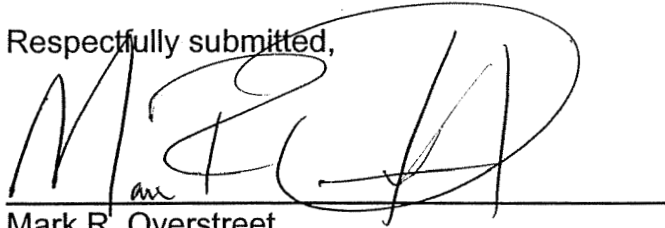
Finally, the records requested in Information Requests 22, 34, 38 and 42 are compiled and maintained "in conjunction with the regulation of a commercial enterprise." Any filing, however, should be subject to a confidentiality Order and any party requesting such information should enter into a confidentiality 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 responses to Data Requests 22, 34, 38 and 42; 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 'M. Overstreet', written over a horizontal line. The signature is stylized and somewhat cursive.

Mark R. Overstreet
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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 29th day of November, 2005.


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Mark R. Overstreet

KE057:KE180:13300:1:FRANKFORT

REDACTED

KPSC CASE NO. 2005-00341
KIUC 1ST SET DATA REQUESTS
ITEM NO. 22

AEP Consolidated Cash (\$000)

Investment Beginning Balance
Prior Day Cash in Bank

Funds Available

CP Maturities
CP Issued
Net CP Activity

Operations:

Daily Operation Position w/o Credit
Current Day Cash in Bank
Net from Operations

Financing & Other Act.: IC Bor.

AEP Credit Factoring & Conduit
VEBA Medical Ins. Premiums
Equity Funding
SO2 purchases
Dividends paid
Lease payment
Taxes
LTD Redemptions/Interest
Misc (e.g. Pension Funding, ICP)
LTD Issuances
Asset Sales / (Acquisition)
Legal Settlements
Total Financing Activity

Net Daily Position (Ops.+Fin.)

Investment Ending Balance
Current Day Cash in Bank

Total Funds Available (Gross Cash)
Two-week Change
Verification check no's (actual invest
IAA CBP Balance
Unexplained
IAA CBP Balance Var

Operations Forecasted for the Day
Actuals for Operations
Variance

Forecasted for AEP Credit
Actuals for AEP Credit
Variance

Forecasted for Finance & Other
Actuals for Finance & Other
Variance

Forecasted Cash Balance
Forecasted Cash Balance

Variance

LTD Issuances not happen
Cumulative
Stress Case - No LTD Issuances
1,195,400
Monthly Forecast

AEP Consolidated Cash (\$000)

Investment Beginning Balance
Prior Day Cash in Bank

Funds Available

CP Maturities
CP Issued
Net CP Activity

Operations:

Daily Operation Position w/o Credit
Current Day Cash in Bank
Net from Operations

Financing & Other Act.: IC Bor.

AEP Credit Factoring & Conduit
VEBA Medical Ins. Premiums
Equity Funding
SO2 purchases
Dividends paid
Lease payment
Taxes
LTD Redemptions/Interest
Misc (e.g. Pension Funding, ICP)
LTD Issuances
Asset Sales / (Acquisition)
Legal Settlements
Total Financing Activity

Net Daily Position (Ops.+Fin.)

Investment Ending Balance
Current Day Cash in Bank

Total Funds Available (Gross Cash)
Two-week Change
Verification check no's (actual Invest)
IAA CBP Balance
Unexplained
IAA CBP Balance Var

Operations Forecasted for the Day
Actuals for Operations
Variance

Forecasted for AEP Credit
Actuals for AEP Credit
Variance

Forecasted for Finance & Other
Actuals for Finance & Other
Variance

Forecasted Cash Balance
Forecasted Cash Balance

Variance

LTD Issuances not happen
Cumulative
Stess Case - No LTD Issuances
Monthly Forecast 1,195,400

AEP Consolidated Cash (\$000)

Investment Beginning Balance
Prior Day Cash in Bank

Funds Available

CP Maturities
CP Issued
Net CP Activity

Operations:

Daily Operation Position w/o Credit
Current Day Cash in Bank
Net from Operations

Financing & Other Act.: IC Bor.

AEP Credit Factoring & Conduit
VEBA Medical Ins. Premiums
Equity Funding
SO2 purchases
Dividends paid
Lease payment
Taxes
LTD Redemptions/Interest
Misc (e.g. Pension Funding, ICP)
LTD Issuances
Asset Sales / (Acquisition)
Legal Settlements
Total Financing Activity

Net Daily Position (Ops.+Fin.)

Investment Ending Balance
Current Day Cash in Bank

Total Funds Available (Gross Cash)
Two-week Change)
Verification check no's (actual invest)
IAA CBP Balance
Unexplained
IAA CBP Balance Var

Operations Forecasted for the Day
Actuals for Operations
Variance

Forecasted for AEP Credit
Actuals for AEP Credit
Variance

Forecasted for Finance & Other
Actuals for Finance & Other
Variance

Forecasted Cash Balance
Forecasted Cash Balance

Variance

LTD Issuances not happen
Cumulative
Stress Case - No LTD Issuances
1,195,400
Monthly Forecast

AEP Consolidated Cash (\$000)

Investment Beginning Balance
 Prior Day Cash in Bank

Funds Available

CP Maturities
 CP Issued
Net CP Activity

Operations:

Daily Operation Position w/o Credit
 Current Day Cash in Bank
 Net from Operations

Financing & Other Act.: IC Bor.

AEP Credit Factoring & Conduit
 VEBA Medical Ins. Premiums
 Equity Funding
 SO2 purchases
 Dividends paid
 Lease payment
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 LTD Redemptions/Interest
 Misc (e.g. Pension Funding, ICP)
 LTD Issuances
 Asset Sales / (Acquisition)
 Legal Settlements
 Total Financing Activity

Net Daily Position (Ops.+Fin.)

Investment Ending Balance
Current Day Cash in Bank

Total Funds Available (Gross Cash)
 Two-week Change
 Verification check no's (actual invest
 IAA CBP Balance
 Unexplained
 IAA CBP Balance Var

Operations Forecasted for the Day
 Actuals for Operations
 Variance

Forecasted for AEP Credit
 Actuals for AEP Credit
 Variance

Forecasted for Finance & Other
 Actuals for Finance & Other
 Variance

Forecasted Cash Balance
 Forecasted Cash Balance

Variance

LTD Issuances not happen
 Cumulative
 Stress Case - No LTD Issuances
 1,195,400
 Monthly Forecast

REDACTED

KPSC CASE NO. 2005-00341
KIUC 1ST SET DATA REQUESTS
ITEM NO. 34

	PJM - AEP GEN HUB		ERCOT South		SPP	
	On-Peak	Off-Peak	On-Peak	Off-Peak	On-Peak	Off-Peak
Jan-05						
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	PJM - AEP GEN HUB		ERCOT South		SPP	
	On-Peak	Off-Peak	On-Peak	Off-Peak	On-Peak	Off-Peak
Oct-07						
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	PJM - AEP GEN HUB		ERCOT South		SPP	
	On-Peak	Off-Peak	On-Peak	Off-Peak	On-Peak	Off-Peak
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Coal

	CAPP	CSX-Rail	CSX-Comp	NYMEX	NAPP High Sulfur	NAPP Med Sulfur	I-Basin	PRB 8800	PRB 8400	COLOWYO
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Coal

CAPP CSX-Rail CSX-Comp NYMEX NAPP High Sulfur NAPP Med Sulfur I-Basin PRB 8800 PRB 8400 COLOWYO

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CAPP CSX-Rail CSX-Comp NYMEX Coal NAPP High Sulfur NAPP Med Sulfur I-Basin PRB 8800 PRB 8400 COLOWYO

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Coal

CAPP CSX-Rail CSX-Comp NYMEX NAPP High Sulfur NAPP Med Sulfur I-Basin PRB 8800 PRB 8400

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Coal

	CAPP	CSX-Rail	CSX-Comp	NYMEX	NAPP High Sulfur	NAPP Med Sulfur	I-Basin	PRB 8800	PRB 8400	COLOWYO
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Coal

	CAPP	CSX-Rail	CSX-Comp	NYMEX	NAPP High Sulfur	NAPP Med Sulfur	I-Basin	PRB 8800	PRB 8400	COLOWYO
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	Natural Gas					
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Henry AD Hub PJM Class HSC Natural Gas Swing Service Adder

SO2 NOX

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	Henry	AD Hub	PJM Class	Natural Gas HSC	Swing Service Adder	SO2	NOX
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Henry	AD Hub	PJM Class	Natural Gas HSC	Swing Service Adder	SO2	NOX
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	Henry	AD Hub	PJM Class	Natural Gas HSC	Swing Service Adder	SO2	NOX
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	Henry	AD Hub	PJM Class	Natural Gas HSC	Swing Service Adder	SO2	NOX
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	AEP GEN HUB - HR	ERCOT - HR	SPP - HR	AD Hub Cap.	SPP Cap.
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Jul-05					
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AEP GEN HUB - HR ERCOT - HR SPP - HR AD Hub Cap. SPP Cap.

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AEP GEN HUB - HR ERCOT - HR SPP - HR AD Hub Cap. SPP Cap.

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AEP GEN HUB - HR ERCOT - HR SPP - HR AD Hub Cap. SPP Cap.

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	AEP GEN HUB - HR	ERCOT - HR	SPP - HR	AD Hub Cap.	SPP Cap.
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	AEP GEN HUB - HR	ERCOT - HR	SPP - HR	AD Hub Cap.	SPP Cap.
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Nov-20					
Dec-20					

	PJM - AEP GEN HUB		ERCOT South		SPP	
	On-Peak	Off-Peak	On-Peak	Off-Peak	On-Peak	Off-Peak
Oct-05						
Nov-05	2005	2005				
Dec-05	2006	2006				
Jan-06	2007	2007				
Feb-06	2008	2008				
Mar-06						
Apr-06						
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Feb-08						
Mar-08						

	CAPP	CAPP	CSX-Rail	CSX-Comp	NYMEX	NYMEX
Oct-05		2005		62.41		2005
Nov-05		2006		61.73		2006
Dec-05		2007		59.86		2007
Jan-06		2008		58.19		2008
Feb-06						
Mar-06						
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Mar-08						

Coal	NAPP High Sulfur	NAPP High Sulfur	NAPP Med Sulfur	I-Basin	PRB 8800	PRB 8400	COLOWYO
Oct-05							
Nov-05		2005					
Dec-05		2006					
Jan-06		2007					
Feb-06		2008					
Mar-06							
Apr-06							
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	Henry AD Hub	PJM Classic	HSC	Natural Gas	Swing Service Adder	SO2	NOX	AEP GEN HUB - HR	ERCOT - HR	SPP - HR	AD Hub Cap	SPP Cap
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Mar-08												

	PJM - AEP GEN HUB		ERCOT South		SPP		CAPP	CAPP	CSX-Rail	CSX-Comp
	\$/MWh	\$/MWh	\$/MWh	\$/MWh	\$/MWh	\$/MWh				
	On-Peak	Off-Peak	On-Peak	Off-Peak	On-Peak	Off-Peak				
Jan-05							Jan-05	2005		
Feb-05							Feb-05	2006		
Mar-05							Mar-05	2007		
Apr-05							Apr-05	2008		
May-05							May-05	2009		
Jun-05							Jun-05	2010		
Jul-05							Jul-05	2011		
Aug-05							Aug-05	2012		
Sep-05							Sep-05	2013		
Oct-05							Oct-05	2014		
Nov-05							Nov-05	2015		
Dec-05							Dec-05	2016		
Jan-06							Jan-06	2017		
Feb-06							Feb-06	2018		
Mar-06							Mar-06	2019		
Apr-06							Apr-06	2020		
May-06							May-06			
Jun-06							Jun-06			
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Jan-07							Jan-07			
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Apr-14	52.29	41.34	53.10	33.31	54.16	37.24	Apr-14
May-14	45.32	32.26	53.33	31.67	50.73	33.98	May-14
Jun-14	49.72	32.39	55.54	34.71	55.40	35.52	Jun-14
Jul-14	56.44	36.48	59.45	39.35	61.54	39.90	Jul-14
Aug-14	57.50	36.90	61.23	39.59	61.93	40.21	Aug-14
Sep-14	55.10	37.62	54.89	33.78	58.74	39.00	Sep-14
Oct-14	52.94	38.47	54.27	32.61	55.11	37.31	Oct-14
Nov-14	53.28	40.84	56.72	37.81	57.31	39.63	Nov-14
Dec-14	53.57	41.95	55.07	36.98	54.55	39.17	Dec-14
Jan-15	57.17	45.08	55.09	37.86	57.82	41.43	Jan-15
Feb-15	57.92	46.83	56.41	41.10	57.86	41.91	Feb-15
Mar-15	58.78	46.04	55.22	36.85	57.43	40.31	Mar-15
Apr-15	53.96	42.89	53.84	33.74	55.48	38.02	Apr-15
May-15	46.84	33.17	54.08	32.07	51.64	34.42	May-15
Jun-15	51.08	33.30	56.33	35.17	56.47	36.05	Jun-15
Jul-15	57.90	37.52	60.28	39.87	62.75	40.40	Jul-15
Aug-15	58.98	38.13	62.10	40.12	63.19	40.89	Aug-15
Sep-15	56.27	38.60	55.65	34.21	59.86	39.62	Sep-15
Oct-15	54.16	39.44	55.02	33.01	56.33	38.09	Oct-15
Nov-15	54.35	41.97	57.50	38.29	58.37	40.26	Nov-15
Dec-15	54.88	43.22	55.81	37.45	55.40	39.81	Dec-15
Jan-16	58.99	46.74	55.82	38.34	59.45	42.63	Jan-16
Feb-16	59.67	48.66	57.17	41.65	59.45	43.13	Feb-16
Mar-16	60.28	47.71	55.97	37.33	58.90	41.45	Mar-16
Apr-16	55.22	44.12	54.59	34.17	56.99	39.21	Apr-16
May-16	47.83	34.22	54.84	32.47	52.89	35.62	May-16
Jun-16	52.62	34.75	57.12	35.63	58.01	37.32	Jun-16
Jul-16	59.54	39.01	61.11	40.39	64.47	41.70	Jul-16
Aug-16	60.63	39.76	62.97	40.65	64.94	42.18	Aug-16
Sep-16	57.76	40.15	56.42	34.64	61.42	40.68	Sep-16
Oct-16	55.40	40.92	55.77	33.41	57.45	39.06	Oct-16
Nov-16	55.91	43.65	58.28	38.79	59.86	41.48	Nov-16
Dec-16	56.45	44.95	56.56	37.93	57.07	41.12	Dec-16
Jan-17	60.81	48.39	56.56	38.83	61.08	43.83	Jan-17
Feb-17	61.42	50.49	57.94	42.20	61.04	44.36	Feb-17
Mar-17	61.78	49.38	56.73	37.81	60.38	42.60	Mar-17
Apr-17	56.47	45.35	55.34	34.60	58.50	40.39	Apr-17
May-17	48.82	35.27	55.61	32.88	54.13	36.81	May-17

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Coal Delivered Prices \$/Ton

	NYMEX	NYMEX	NAPP High Sulfur	NAPP High Sulfur	NAPP Med I-Basin	PRB 8800	PRB 8400	COLOWYC
Jan-05		2005		2005				
Feb-05		2006		2006				
Mar-05		2007		2007				
Apr-05		2008		2008				
May-05		2009		2009				
Jun-05		2010		2010				
Jul-05		2011		2011				
Aug-05		2012		2012				
Sep-05		2013		2013				
Oct-05		2014		2014				
Nov-05		2015		2015				
Dec-05		2016		2016				
Jan-06		2017		2017				
Feb-06		2018		2018				
Mar-06		2019		2019				
Apr-06		2020		2020				
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