

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

**AN EXAMINATION OF THE
APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF KENTUCKY
POWER COMPANY FROM
NOVEMBER 1, 2013 THROUGH APRIL
30, 2014**

CASE NO. 2014-00225

**MOTION OF KENTUCKY POWER COMPANY
FOR LIMITED EXTENSION OF TIME TO RESPOND TO DATA REQUESTS**

Kentucky Power Company moves the Public Service Commission of Kentucky pursuant to 807 KAR 5:001, Section 22 for a limited extension of time to file its responses to Commission Staff Data Requests 2-1(b)(2) and 2-2(a)(2). The Company is timely filing its responses to the other Commission Staff and KIUC data requests, but Kentucky Power requires an additional day to complete the gathering of the information and making the calculations required to respond to the two indicated subparts.

Kentucky Power was required to answer a large number of data requests in a short period of time. KIUC's data requests included 71 requests for information (inclusive of subparts) in its first set of data requests. Most, if not all, of these requests required the Company to compile, organize, and review data from multiple sources within the Company and its affiliate, American Electric Power Service Corporation. Kentucky Power is providing approximately 500 attachments, many of which were comprised of large spreadsheets, in response to KIUC's data requests.

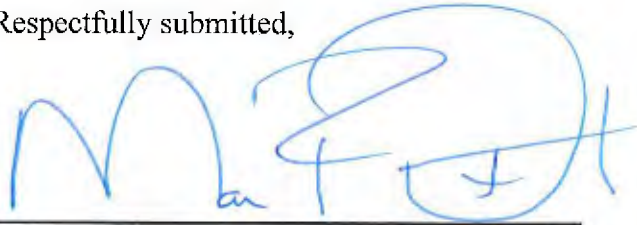
Although Commission Staff's requests were more abbreviated, Commission Staff Data Requests 2-1(b)(2) and 2-2(a)(2) required that the Company review and make calculations relating to two types of power purchases included in its calculation of the FAC. Properly responding to these requests required assembling and reviewing data from multiple sources within the Company. The individuals capable of providing the necessary data to respond to Commission Staff Data Requests 2-1(b)(2) and 2-2(a)(2) were the same individuals responsible for compiling and reviewing the data to respond to the voluminous discovery received on September 5, 2014. Despite its best efforts to do so, including working both the weekend of September 6-7, 2014 and the weekend of September 12-13, 2014, the Company will be unable to provide the information requested in Commission Staff Data Requests 2-1(b)(2) and 2-2(a)(2) by today's filing deadline.

Considering the volume of information requested on September 5, 2014 for filing today, the short time period in which the Company had to respond, and the Company's good faith efforts to respond in a full and timely fashion, the Company requests an extension of time to respond to Commission Staff Data Requests 2-1(b)(2) and 2-2(a)(2). The Company will file its responses to these data requests as soon as they are complete and no later than close of business Tuesday, September 16, 2014.

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

1. Authorizing Kentucky Power to file its responses to Commission Staff Data Requests 2-1(b)(2) and 2-2(a)(2) no later than close of business on Tuesday, September 16, 2014; and
2. Granting Kentucky Power all further relief to which it may be entitled.

Respectfully submitted,



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

Kenneth J. Gish, Jr.
STITES & HARBISON PLLC
250 West Main Street, Suite 2300
Lexington, Kentucky 40507
Telephone: (859) 226-2300

COUNSEL FOR KENTUCKY POWER
COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed using the Public Service Commission of Kentucky's electronic filing service, which will send an e-mail message to

Michael L. Kurtz
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
mkurtz@bkllawfirm.com
KBoehm@bkllawfirm.com
jkylercohn@bkllawfirm.com

Jennifer Black Hans
Gregory T. Dutton
Lawrence W. Cook
Kentucky Attorney General's Office
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204
jennifer.hans@ag.ky.gov
larry.cook@ag.ky.gov
Gregory.Dutton@ag.ky.gov

this 15th day of September 2014.

Mark R. Overstreet