COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| The Application of Kentucky Power Company for | or:) | |
|---|-------|---------------------|
| (1) A General Adjustment of Its Rates for Electri | ic) | |
| Service; (2) An Order Approving Its 2014 |) | Case No. 2014-00396 |
| Environmental Compliance Plan; (3) An Order |) | |
| Approving Its Tariffs and Riders; and (4) An Ord | der) | |
| Granting All Other Required Approvals and Reli | ef) | |

PETITION FOR CONFIDENTIAL TREATMENT

Kentucky Power Company ("Kentucky Power" or "Company") moves the Commission pursuant to 807 KAR 5:001, Section 13, for an Order granting confidential treatment for the identified portions of the Company's March 10, 2015 supplemental response to KIUC 1-67. Kentucky Power is complying with its obligations under 807 KAR 5:001, Section 13(2)(e) with respect to the filing of redacted and unredacted responses to these requests.

A. The Request and the Statutory Standard.

Kentucky Power does not object to producing the identified information for which it is seeking confidential treatment, but requests that the identified portions of the response be excluded from the public record and public disclosure. The Company does not object to making the identified information available to those parties to this proceeding that execute an appropriate confidentiality agreement.

The confidential information at issue in this proceeding is protected from public disclosure under the Kentucky Open Records Act ("Act"). KRS 61.878(c)(1) excludes from the 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.

Kentucky Power seeks confidential treatment of response because public disclosure will result in an unfair competitive advantage for the Company's competitors.

Kentucky Power seeks confidential treatment of its projected generation from each of the Company's units for 2015 and 2016 provided in its supplemental response to KIUC 1-67. The release of this information will place Kentucky Power at a competitive disadvantage. Competitors in the energy and capacity marketplace will be able to use the information to determine Kentucky Power's projected energy and capacity positions and likely market strategies. Armed with this information, Kentucky Power's competitors will be able to set artificial thresholds for market prices by adjusting the manner in which they bid their generating units into the market. Accordingly, Kentucky Power requests that this information be afforded confidential treatment through 2016. The original February 11, 2015 response to KIUC 1-67 is the subject of a pending motion for confidential treatment.

B. The Identified Information is Generally Recognized as Confidential and Proprietary and is Protected from Public Disclosure by Kentucky Power.

The identified information required to be disclosed by Kentucky Power in response to the data requests at issue is highly confidential. Dissemination of the information for which confidential treatment is being requested is restricted by Kentucky Power, AEP, and AEPSC. The Company, AEP, and AEPSC take all reasonable measures to prevent its disclosure to the public and the information is not disclosed to third parties. Within Kentucky Power, AEP, and AEPSC, the information is available only upon a confidential need-to-know basis that does not extend beyond employees with a legitimate business need to access and act upon the

information. The information is not otherwise accessible to employees of Kentucky Power, AEP, or AEPSC.

C. The Identified Information is Required to be Disclosed to an Agency.

The identified information is required to be disclosed to the Commission and the Commission is a "public agency" as that term is defined at KRS 61.870(1). Any filing should be subject to a confidentiality order and any party requesting the information should be required to enter into an appropriate confidentiality agreement.

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

- 1. Affording confidential status to and withholding from public inspection the identified information; and
 - 2. Granting Kentucky Power all further relief to which it may be entitled.

Respectfully submitted,

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Certificate of Service

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this the 10th day of March, 2015.

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