

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

The Application of Kentucky Power Company for:)
(1) A General Adjustment of Its Rates for Electric)
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 Order)
Granting All Other Required Approvals and Relief)

**MOTION OF KENTUCKY POWER COMPANY FOR LEAVE TO DEVIATE FROM
FILING REQUIREMENTS**

Kentucky Power Company (“Kentucky Power”) moves the Commission pursuant to 807 KAR 5:001, Section 22, for leave to deviate from the filing requirements of 807 KAR 5:001, Section 13(2)(e) and 807 KAR 5:001, Section 8 as described below.

Kentucky Power requests that it be excused from filing a paper original of its confidential response and attachments to data request AG 1-85. Kentucky Power is filing a petition for confidential treatment in which it requested that certain information produced in response to data requests from the Commission Staff and the intervening parties be withheld from public disclosure. Pursuant to 807 KAR 5:001, Section 13(2)(e), Kentucky Power is filing a paper copy of the majority of its confidential responses. The one exception lies with the Company’s response to AG 1-85, which is voluminous. Filing the response in paper form will require Kentucky Power to produce, and the Commission to print 3,665 pages of confidential material and file them in eight separate binders. The Company requests a deviation from 807 KAR 5:001, Section 13(2)(e) to file the confidential version of AG 1-85 on CD instead of on paper.

Because of the competitively sensitive nature of the material contained in AG 1-85 (salary surveys and other material subject to a non-disclosure agreement between AEP and the vendor) the Company requests leave to work with the intervening parties that sign nondisclosure

agreements to make the Company's response to AG 1-85 available for inspection onsite at the offices of Kentucky Power.

Kentucky Power also requests that it be excused from filing its responses to the following data requests: AG 1-62, AG 1-121, AG 1-143, AG 1-170, and AG 1-280. All of these responses are extraordinarily voluminous and production as required under the applicable regulations will be unduly burdensome for Kentucky Power and of little benefit to the Commission Staff or other parties. It will be impossible or impracticable for the Company to produce the information in electronic or paper form. Specifically, the Company asks for the Commission's approval to make its responses to the following data requests available for inspection where they are presently located at the offices of Kentucky Power in Frankfort, Kentucky or AEP in Columbus, Ohio:

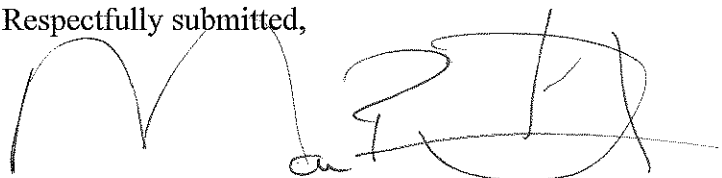
- AG 1-62, AG 1-121, and AG 1-170 – These are schedules and workpapers for tax returns from 2008 through 2013, which comprise an entire file room and at least tens of thousands of pages of documents.
- AG 1-143 – Kentucky Power's response comprises five entire filing cabinets and thousands of pages of documents.
- AG 1-280 – The requested support for Kentucky Power's response is extremely voluminous and cannot be produced electronically or on paper.

Additionally, to the extent deviation is required, Kentucky Power requests that it be permitted to file "live" Excel spreadsheets on disks instead of filing paper copies of the spreadsheets.

Finally, the Company seeks deviation from the Commission's electronic filing requirements to permit it to file on CD in lieu of uploading Attachments 40 and 44 to the Company's response to KIUC 1-17. Each attachment, which is an Excel spreadsheet, is over 100 MB and cannot be uploaded to the Commission's site. Because of the references within the spreadsheet, breaking the sheets into smaller sizes will render the spreadsheets inoperable.

Wherefore, Kentucky Power respectfully requests the Commission authorize Kentucky Power to file and serve its responses to the data requests in the manner described above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark R. Overstreet', written over a horizontal line.

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
Facsimile: (502) 223-4124
moverstreet@stites.com
bcrittenden@stites.com

Kenneth J. Gish, Jr.
STITES & HARBISON PLLC
250 West Main Street, Suite 2300
Lexington, Kentucky 40507
Telephone: (859) 226-2300
Facsimile: (859) 253-9144
kgish@stites.com

COUNSEL FOR
KENTUCKY POWER COMPANY

Certificate of Service

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
Kurt J. Boehm
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
mkurtz@bkllawfirm.com
kBoehm@bkllawfirm.com
jkylercohn@bkllawfirm.com

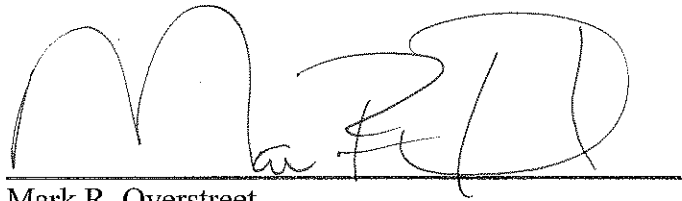
Jennifer Black Hans
Angela Goad
Lawrence W. Cook
Kentucky Attorney General's Office
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204
jennifer.hans@ag.ky.gov
angela.goad@ag.ky.gov
larry.cook@ag.ky.gov

Don C. A. Parker
Spilman Thomas & Battle, PLLC
300 Kanawha Blvd., East
Charleston, WV 25301
dparker@spilmanlaw.com

Derrick Price Williamson
Carrie M. Harris
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
charris@spilmanlaw.com

Matthew R. Malone
William H. May, III
Hurt, Crosbie & May PLLC
127 West Main Street
Lexington, Kentucky 40507
mmalone@hcm-law.com
bmay@hcm-law.com

this the 11th day of February, 2015.

A handwritten signature in black ink, appearing to read 'Mark R. Overstreet', written over a horizontal line.

Mark R. Overstreet