

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

In the Matter of:

Electronic Application Of Kentucky Power	)	
Company For (1) A General Adjustment Of Its	)	
Rates For Electric Service; (2) An Order	)	
Approving Its 2017 Environmental Compliance	)	
Plan; (3) An Order Approving Its Tariffs And	)	Case No. 2017-00179
Riders; (4) An Order Approving Accounting	)	
Practices To Establish Regulatory Assets Or	)	
Liabilities; And (5) An Order Granting All Other	)	
Required Approvals And Relief	)	

Kentucky Power Company's Motion For Confidential Treatment

Kentucky Power Company the Public Service Commission of Kentucky pursuant to 807 KAR 5:001, Section 13(2), for an order granting confidential treatment to the identified portions of the analysis for the PJM 2022/2023 planning year of the FRR/RPM election made by the Company in conjunction with American Electric Power Company, Inc. and its eastern operating companies.

Pursuant to 807 KAR 5:001, Section 13, Kentucky Power is filing under seal the portion of the analysis containing confidential information with the confidential portions highlighted in yellow. Kentucky Power is also filing redacted versions of the analysis. Kentucky Power will notify the Commission when it determines the information for which confidential treatment is sought is no longer confidential.

A. The FRR/RPM Election and Analysis and the Statutory Standard.

Kentucky Power does not object to filing the identified information for which it is seeking confidential treatment, but requests that the identified portion of the analysis and election be excluded from the public record and public disclosure.

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

(c)(1) 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;

This exception applies to the analysis.

The analysis provides both the analyses and the FRR/RPM elections made by Kentucky Power and the other AEP PJM-member operating companies in the PJM Interconnection LLC Base Residual Auction of the PJM 2022/2023 year. The PJM Base Residual Auction is conducted to allow for the procurement of resource commitments to satisfy the PJM region's unforced capacity obligation for the delivery year and allocates the cost of those commitments to Load Serving Entities through a Locational Reliability Charge. The auction is highly competitive and includes large entities such as Pennsylvania Power and Light, First Energy Corporation, and Alleghany Power in addition to AEP and its member operating companies. Premature disclosure of the election and analysis would unfairly prejudice Kentucky Power and its customers, AEP, and its other member operating companies, and their customers, by permitting their competitors to change their bidding strategy in response to the elections and analyses Kentucky Power seeks to protect. Public disclosure also would disclose the analyses and elections of those AEP operating companies not subject to this Commission's jurisdiction.

The confidential elections and analyses should be kept confidential until June 1, 2021. At that date the information will become publicly available or otherwise discernible and the need for confidential protection by this Commission will no longer exist.

B. The Identified Information is Generally Recognized as Confidential and Proprietary and Public Disclosure of it Will Result in an Unfair Commercial Advantage for Kentucky Power's Competitors.

The analyses and elections are highly confidential. Dissemination of the information for which confidential treatment is being requested is restricted by Kentucky Power, its parent, AEP, and its affiliates (including American Electric Power Service Corporation). The Company, AEP, and its affiliates take all reasonable measures to prevent its disclosure to the public as well as persons within the Company and third-party vendors who do not have a need for the information. The information is not disclosed to persons outside Kentucky Power, AEP, or its affiliates. Within those organizations, the information is available only upon a confidential need-to-know basis that does not extend beyond those employees with a legitimate business need to know and act upon the identified information.

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

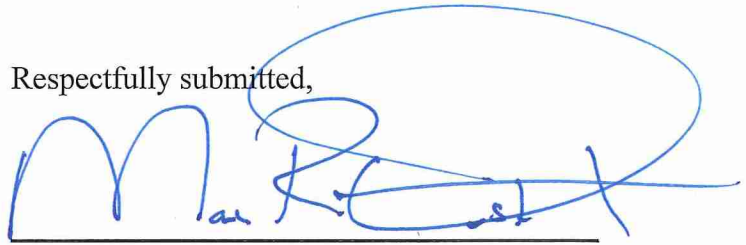
The identified information is, by the terms of the Commission's January 18, 2018 Order, required to be disclosed to the Commission. The Commission is a "public agency" as that term is defined in KRS 61.870(1). Any filing should be subject to a confidentiality order and any party requesting such information should be required to enter into an appropriate confidentiality agreement.

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

1. According confidential status to and withholding from public inspection the identified information for the indicated periods; and

2. Granting Kentucky Power all further relief to which it may be entitled.

Respectfully submitted,



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Mark R. Overstreet  
Katie M. Glass  
STITES & HARBISON PLLC  
421 West Main Street  
P. O. Box 634  
Frankfort, Kentucky 40602-0634  
Telephone: (502) 223-3477  
Facsimile: (502) 779-8349  
[moverstreet@stites.com](mailto:moverstreet@stites.com)  
[kglass@stites.com](mailto:kglass@stites.com)

COUNSEL FOR KENTUCKY POWER  
COMPANY