

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

In the Matter of:

Electronic Application And Request For Decision By)	
April 5, 2021 Of Kentucky Power Company For An)	
Order Approving Accounting Practices)	
To Establish A Regulatory Asset Related To)	Case No. 2021-00129
The Extraordinary Expenses Incurred By)	
Kentucky Power Company In Connection With)	
Three February 2021 Major Storm Events)	

**Kentucky Power Company’s Motion
For Confidential Treatment**

Kentucky Power Company (“Kentucky Power” or “Company”) moves the Public Service Commission of Kentucky (“Commission”) pursuant to 807 KAR 5:001, Section 13(2), and KRS 61.878(1)(a),(c),(k), and (l) for an Order granting confidential treatment to the entirety of Exhibit 4 to its Verified Application (“Confidential Exhibit 4”), which is comprised of confidential and proprietary information regarding the Company’s internal accounting procedures.

Pursuant to 807 KAR 5:001, Section 13, Kentucky Power is filing under seal the entirety of Confidential Exhibit 4. Kentucky Power will notify the Commission when it determines the information for which confidential treatment is sought is no longer confidential.

I. MOTION FOR CONFIDENTIAL TREATMENT

A. The Statutory Standard and Confidential Exhibit 4.

Kentucky Power requests that Confidential Exhibit 4 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.

Confidential Exhibit 4 includes information concerning the Company's internal accounting procedures. The Company's internal accounting procedures constitute proprietary and trade secret information. The procedures embody sensitive business operations procedures, which if made available, would potentially harm American Electric Power Company, Inc. ("AEP") and Kentucky Power. Public disclosure would provide competitors with insight into the internal operations of AEP, which they could then use and incorporate into their own business strategies, to the detriment of AEP and its customers.

Employees are instructed that the information is available only for internal use. The current version of the policies and procedures is published in summarized form only in external financial reports filed with the SEC and/or other required parties.

The Commission previously granted confidential treatment for a period of 20 years to the document comprising Confidential Exhibit 4 for the reasons set forth above.¹ For those reasons, and for the reasons stated herein, Confidential Exhibit 4 should remain confidential for 20 years, or until further Order of this Commission.

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.

Confidential Exhibit 4 is highly confidential. Dissemination of the information contained in Confidential Exhibit 4 is restricted by Kentucky Power, its parent, AEP, and its affiliates (including American Electric Power Service Corporation ("AEPSC")). The Company, AEP, and

¹ Order, *Electronic Application Of Kentucky Power Company For (1) A General Adjustment Of Its Rates For Electric Service; (2) Approval Of Tariffs And Riders; (3) Approval Of Accounting Practices To Establish Regulatory Assets And Liabilities; (4) Approval Of A Certificate Of Public Convenience And Necessity; And (5) All Other Required Approvals And Relief*, Case No. 2020-00174 (Ky. P.S.C. Oct. 26, 2020).

its affiliates take all reasonable measures to prevent its disclosure to the public as well as persons within the Company who do not have a need for the information. The information contained in Confidential Exhibit 4 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 information contained in Confidential Exhibit 4 supports the Company's Verified Application and, in order to be entered into the record of this case, is 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 entirety of Confidential Exhibit 4 for a period of 20 years or until further Order of this Commission; and

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

Respectfully submitted,



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