

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

In the Matter of:

Electronic Application Of Kentucky Power Company	)	
For 1) A Certificate Of Public Convenience And	)	
Necessity To Construct A Mechanical Draft Cooling	)	
Tower At The Mitchell Plant 2) Approval Of Certain	)	Case No. 2026-00001
Regulatory And Accounting Treatments, And 3) All	)	
Other Required Approvals And Relief	)	

Kentucky Power Company's Motion For Confidential Treatment

Kentucky Power Company ("Kentucky Power" or the "Company") moves the Public Service Commission of Kentucky (the "Commission") pursuant to 807 KAR 5:001, Section 13(2), and KRS 61.878(1)(c) for an Order granting confidential treatment to the identified portions of Attachment 1 to its response to Commission Staff Post-Hearing Data Request 2 ("KPSC PHDR-2"), Attachment 1 to its response to Commission Staff Post-Hearing Data Request 16 ("KPSC PHDR-16"), and Attachment 2 to KPSC PHDR-16.

Pursuant to 807 KAR 5:001, Section 13(2)(a)(3), Kentucky Power is filing a redacted version of these documents.

A. 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 portions of these documents be excluded from the public record and public disclosure.

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

(c)(1) 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 identified information.

1. The Identified Portions of Attachment 1 to KPSC PHDR-2 and Attachments 1 and 2 to KPSC PHDR-16.

Attachment 1 to KPSC PHDR-2 is a copy of the federal grant application seeking funds to offset the costs of addressing the structural needs of the Mitchell Unit 2 Cooling Tower and includes estimated costs and construction schedules associated with the selected option. Attachments 1 and 2 to KPSC PHDR-16 include estimated costs for the new mechanical draft cooling tower. The disclosure of the identified information in Attachment 1 to KPSC PHDR-2 and in Attachments 1 and 2 to KPSC PHDR-16 would unfairly prejudice Kentucky Power and its customers by permitting an unfair commercial advantage to Kentucky Power's competitors and suppliers. Public disclosure of such project cost data and schedule information could prove damaging to the Company in both current and future competitive marketplaces, and would place Kentucky Power at a significant disadvantage. If Kentucky Power's costs and operating schedules are publicly known, competitors and suppliers can formulate competitive bidding strategies that will hamper the Company's ability to compete against them, cause Kentucky Power's units to operate/sell less, and ultimately cost more to operate, thereby resulting in higher costs for the Company's customers.

Moreover, disclosure of the cost estimates in Attachment 1 to KPSC PHDR-2 and Attachments 1 and 2 to KPSC PHDR-16 would create a "price floor" for contractors and equipment suppliers bidding in response to requests for proposals to implement a chosen alternative. This could make the implementation project more expensive to the detriment of Kentucky Power's customers.

The identified portions of Attachment 1 to KPSC PHDR-2 and Attachments 1 and 2 to KPSC PHDR-16 should remain confidential indefinitely.

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 identified information requested to be disclosed by Kentucky Power in response to KPSC PHDR-2 and KPSC PHDR-16 is 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 Orders 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 indefinitely the identified portions of Attachment 1 to KPSC PHDR-2 and Attachments 1 and 2 to KPSC PHDR-16; and

2. Granting such further relief to which the Company may be entitled.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be "K. J. Gish, Jr.", written over a horizontal line.

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