

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

In the Matter of:

Terri Maxine Hurley	)	
	)	
Complainant	)	
v.	)	Case No. 2025-00058
	)	
Kentucky Power Company	)	
	)	
Defendant	)	

**MOTION FOR CONFIDENTIAL TREATMENT**

Kentucky Power Company (“Kentucky Power” or the “Company”) moves the Public Service Commission of Kentucky (“Commission”) pursuant to 807 KAR 5:001, Section 13(2), and KRS 61.878(1) for an Order granting confidential treatment to:

1. the identified portions of Attachment 1 to the Company’s response to Commission Staff Data Request 1-1 (“KPSC 1-1”);
2. the identified portions of Attachment 2 to KPSC 1-1;
3. the entirety of Attachment 1 to the Company’s response Commission Staff Data Request 1-4 (“KPSC 1-4”); and
4. the entirety of Attachment 2 to KPSC 1-4.

Kentucky Power seeks confidential treatment of information relating to specific customer billing statements. Pursuant to 807 KAR 5:001, Section 13, Kentucky Power is filing under seal those attachments containing confidential information.

## I. MOTION FOR CONFIDENTIAL TREATMENT

### A. The Request and the Statutory Standard

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

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

(a) Public records containing information of a personal nature where the public disclosure thereof would constitute a clearly unwarranted invasion of personal privacy;

This exception applies to the following information for which Kentucky Power is seeking confidential treatment:

#### 1. **Attachments 1 and 2 to KPSC 1-1, Attachments 1 and 2 to KPSC 1-4**

Attachments 1 and 2 to KPSC 1-1 and Attachments 1 and 2 to KPSC 1-4 include detailed information regarding specific customer billing statements including information about customer usage and payments due. Kentucky Power does not publicly disclose the details of specific customer bills and the public disclosure of such information, including a customer's payment history or lack thereof, would constitute a clearly unwarranted invasion of personal privacy.

Kentucky Power seeks confidential treatment of the identified portions of Attachments 1 and 2 to KPSC 1-1 and the entirety of Attachments 1 and 2 to KPSC 1-4 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 and Violate Federal Law.

The identified information in Attachments 1 and 2 to KPSC 1-1 and in Attachments 1 and 2 to KPSC 1-4 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). Kentucky Power, AEP, and its affiliates

(and third-party vendors where applicable) take all reasonable measures to prevent its disclosure to the public as well as persons within Kentucky Power 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 on 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 in Attachments 1 and 2 to KPSC 1-1 and in Attachments 1 and 2 to KPSC 1-4 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 Attachments 1 and 2 to KPSC 1-1 and the entirety of Attachments 1 and 2 to KPSC 1-4; and

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

Respectfully submitted,



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