

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

|                                       |   |                |
|---------------------------------------|---|----------------|
| In the Matter of the Resource Plan of | ) |                |
| Kansas City Power & Light Company     | ) | Case No. _____ |
| Pursuant to 4 CSR 240-22              | ) |                |

**MOTION FOR PROTECTIVE ORDER**

Pursuant to 4 CSR 240-2.085, Kansas City Power & Light Company ("KCPL") hereby respectfully requests that the Missouri Public Service Commission ("Commission") issue a protective order in the above-captioned case. In support thereof, KCPL states as follows:

1. Concurrently herewith KCPL is submitting in the above captioned proceeding (i) its Integrated Resource Plan ("IRP") reporting requirements and (ii) an Application for Extensions of Time and Waivers Concerning Certain of The Commission's IRP Reporting Requirements. Both documents contain "Highly Confidential" information as that term is defined and used in the Commission's standard protective order. Such Highly Confidential information has been removed from the versions of those documents that KCPL submits concurrently herewith. However, upon the issuance of a Protective Order in this proceeding, KCPL will file the Highly Confidential version of the documents.

2. In accordance with 4 CSR 240-2.085, KCPL hereby requests the Commission issue a standard protective order in this proceeding. The issuance of a protective order will permit KCPL to file expeditiously the Highly Confidential versions of its IRP reporting requirements and Application for Extensions of Time and Waivers Concerning Certain of The Commission's IRP Reporting Requirements.

3. None of the information for which a claim of confidentiality is made can be found in any format in any other public document. KCPL respectfully requests that the Commission

issue its standard protective order in this proceeding, in the same form as has been customary in previous cases before the Commission.

4. KCPL notes that the Commission has issued its standard protective order in numerous other dockets where it has recognized a genuine need to protect confidential information from disclosure. The issuance of protective orders in prior proceedings has helped to minimize disputes, and has provided a sound method for parties to submit confidential information.

WHEREFORE, for the reasons set forth herein, KCPL respectfully requests that the Commission issue a protective order in the above-captioned proceeding, in the same form as has been customary in previous cases before the Commission.

Respectfully submitted,



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**COUNSEL FOR  
KANSAS CITY POWER & LIGHT COMPANY**

Dated: July 5, 2006

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Application was served either by electronic mail or by first class mail, postage prepaid, on this 5<sup>th</sup> day of July 2006, upon:

Kevin Thompson  
Missouri Public Service Commission  
P.O. Box 360  
200 Madison St., Suite 800  
Jefferson City, MO 65102

Lewis Mills  
Office of the Public Counsel  
P.O. Box 2230  
200 Madison St., Suite 650  
Jefferson City, MO 65102

A handwritten signature in black ink, appearing to read "C.D. Blanc", written over a horizontal line.

Curtis D. Blanc