BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of the Application of Kansas City)	
Power & Light Company, a Missouri corporation,)	
for authority to guarantee Environmental Improvement)	
and Energy Resources Authority)	Case No. EF-2004-0512
Revenue Refunding Bonds, previously authorized by the)	
Commission in Case No. EF-93-13, with a municipal)	
bond insurance policy and to add an auction rate interest)	
rate mode.)	

MOTION FOR PROTECTIVE ORDER

Comes now Kansas City Power & Light Company (KCPL) and pursuant to 4 CSR 240-2.085, applies for a Protective Order in the above-entitled matter. In support of its motion, KCPL alleges and states:

- 1. This case involves an application by KCPL for authority to guarantee outstanding and previously issued Environmental Improvement Revenue Refunding Bonds in the aggregated principal amount of \$31 million with a municipal bond insurance policy and to add an Auction Rate interest rate mode.
- 2. Certain information may be provided to the Staff of the Missouri Public Service Commission (Staff), or may otherwise be provided in this case should not be made public, although it is relevant to the proceeding, because it is either (a) "proprietary" in that the information contains trade secrets, as well as confidential or private technical, financial, and business information; or (b) "highly confidential" in that it concerns (1) material or documents that contain information relating directly to specific customers; or (2) market-specific information relating to services offered in competition with other parties or non parties. Among other things, this information may contain: customer specific information, competitive pricing

information, trade secrets, confidential technical financial and business information or other material of a confidential proprietary nature.

- 3. The information may become a part of testimony and pleadings filed with the Commission and would therefore become publicly available through that filing, as well as through subsequent proceedings in this case, without a Protective Order in place. Disclosure of such information may harm KCPL's business interests.
- 4. Information subject to the Protective Order will not be found in any publicly available document.
- 5. KCPL seeks approval of this motion to facilitate the ongoing investigation in this case and the resolution of KCPL's application herein.

WHEREFORE, for the reasons stated herein, KCPL requests that the Commission issue a Protective Order in this case.

Respectfully submitted,

Michael A. Rump

Senior Attorney

Great Plains Energy Services

1201 Walnut

Kansas City, Missouri 64106-2124

Telephone:

(816) 556-2483

Fax:

(816) 556-2787

Email:

mike.rump@kcpl.com

Attorney for Kansas City Power & Light Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Protective Order has been hand-delivered or mailed, First Class mail, postage prepaid, this 10 TH day of May 2004, to:

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Dana K. Joyce General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Michael A. Rump