

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

In the Matter of an Investigation of the Cost to )  
Missouri's Electric Utilities Resulting from ) **File No. EW-2012-0065**  
Compliance with Federal Environmental Regulations )

**MOTION FOR PROTECTIVE ORDER**  
**AND MOTION TO EXPEDITED TREATMENT**

COME NOW Kansas City Power & Light Company (“KCP&L) and KCP&L Greater Missouri Operations Company (“GMO”)(collectively, “Company”), pursuant to 4 CSR 240-2.135(2) and 4 CSR 240.080(14) , and hereby move the Commission to issue a protective order on the following grounds:

1. The Commission has established this working case to consider the potential impacts of current and future Environmental Protection Agency (EPA) rules on the reliability and cost of the electric generation plant operated by Missouri's electric utilities. In preparation for the workshop meeting scheduled for August 18, 2014, the Commission has issued two orders directing responses to specific questions posed by the Commission and directed that the interested stakeholders "be prepared to discuss, or present on, these questions at the August 18, 2014 workshop. In addition, they shall file written responses to these questions no later than August 25, 2014." (July 30 and August 6, 2014 Orders)("Orders")

2. The Company believes that some of its responses to the questions contained in the Orders will contain proprietary and/or highly confidential information that needs to be protected from public disclosure. The Commission has recognized in

numerous cases that there is a genuine need to protect confidential information from disclosure.

3. Such information is not publicly available in other documents and Company would suffer significant negative business consequences if it were to be made public.

4. The Commission should establish a protective order authorizing the continued confidentiality of the information that will be filed by the Company in this workshop file, and similar information that may be provided by other stakeholders in this case. Such information should be maintained as proprietary or highly confidential, pursuant to the procedures set forth in 4 CSR 240-2.135.

5. Since written answers which are expected to contain proprietary and/or highly confidential information are due to be filed by August 25, 2014, the Company would request that the Commission grant this motion on an expedited basis prior to August 25. There will be no negative effect on the Company's customers or the general public if the Commission acts by August 25. This pleading is being filed as soon as possible after it was determined that there is a need to protect proprietary and highly confidential answers to the Commission's questions.

**WHEREFORE**, KCP&L and GMO respectfully request the Commission to issue a protective order on an expedited basis as described herein.

Respectfully submitted,

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**ATTORNEYS FOR  
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COMPANY AND KCP&L GREATER  
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## **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a copy of the foregoing has been served upon all parties of record by forwarding the same by electronic mail and/or first class mail, postage prepaid this 15<sup>th</sup> day of August, 2014 to the following:

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/s/ James M. Fischer  
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