BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of	
Kansas City Power & Light Company)	
for Authority to Transfer Functional Control)	Case No. EO-2006-0142
of Certain Transmission Assets to the)	
Southwest Power Pool, Inc.	

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 its standard-form protective order in the above-captioned case. In support hereof, KCPL states as follows:

- 1. KCPL anticipates that it may seek in testimony, or may be asked through Commission Staff data requests, to provide competitive pricing information and technical, financial and business information of a confidential or proprietary nature. Additionally, KCPL anticipates that other information that may be requested or utilized in testimony by the Staff, as well as the Office of Public Counsel or other intervenors, may contain customer-specific information, competitive pricing information, trade secrets and confidential, technical, financial and business information, or other material of a confidential or proprietary nature. The public disclosure of such information is likely to harm the interests of KCPL, its employees and its customers. KCPL will not seek the confidential treatment of any information that is already publicly available.
- 2. Consequently, because the potential exists for the public disclosure of confidential or proprietary information without a protective order in place, KCPL respectfully requests that

the Commission issue its standard-form protective order in this case, containing classifications of "highly confidential" and "proprietary."

For the reasons set forth above, KCPL respectfully requests that the Commission: (i) issue the Commission's standard-form protective order containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case; and (ii) grant such further relief as the Commission deems appropriate.

Respectfully submitted.

By:

Curtis D. Blanc

Kansas City Power & Light Company

1201 Walnut – 20th Floor

Kansas City, Missouri 64106

Phone: (816) 556-2483

Facsimile: (816) 556-2787 E-mail: Curtis.Blanc@kcpl.com

Counsel for Kansas City Power & Light Company

Dated: November 22, 2005

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was delivered by electronic mail, first-class mail or hand delivery, on this 22nd day of November 2005 to the following:

Steve Dottheim Office of the General Counsel Missouri Public Service Commission 200 Madison St., Suite 800 Jefferson City, Missouri 65102 Steve.Dottheim@psc.mo.gov

Dennis Frey Missouri Public Service Commission P.O. Box 360 200 Madison Street, Suite 800 Jefferson City, MO 65102

The Empire District Electric Company

Lewis Mills Office of the Public Counsel 200 Madison St., Suite 650 opcservice@ded.mo.gov

Jefferson City, Missouri 65102

Les Dillahunty Vice President, Regulatory Policy Southwest Power Pool, Inc. 415 North McKinley, Suite 140 Little Rock, Arkansas 72205 ldillahunty@spp.org

Paul A. Boudreau Aquila, Inc. 312 East Capitol Avenue P.O. Box 456 Jefferson City, MO 65102 David C. Linton, L.L.C. 424 Summer Top Lane Fenton, Missouri 63026 djlinton@earthlink.net

Jefferson City, MO 65102

Dean L. Cooper

312 East Capitol

David C. Linton

P.O. Box 456

Karl Zobrist Midwest Independent Transmission System Operator, Inc. 4520 Main Steet **Suite 1100** Kansas City, MO 64111

Carl Huslig Aquila, Inc. 10700 East 350 Hwy Kansas City, Missouri 64138 Carl.Huslig@aquila.com

Curtis D. Blanc

Kansas City Power & Light Company 1201 Walnut – 20th Floor

Kansas City, Missouri 64106

Phone: (816) 556-2483 Facsimile: (816) 556-2787

E-mail: Curtis.Blanc@kcpl.com