

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

In the matter of the application of Trigen-)
Kansas City Energy Corporation for a)
Certificate of Public Convenience and)
Necessity authorizing it to construct, install,) Case No. HA-2006-0294
own, operate, control, manage and maintain)
a steam heat distribution system to provide)
steam heat service in Kansas City, Missouri,)
as an expansion of its existing certified area.)

**MOTION FOR ISSUANCE OF PROTECTIVE ORDER
AND FOR ORDER ESTABLISHING INTERVENTION DEADLINE
AND PREHEARING CONFERENCE**

COMES NOW Trigen-Kansas City Energy Corporation (“Trigen”), by and through its counsel, pursuant to 4 CSR 240-2.085, and for its Motion for Issuance of Protective Order and for Order Establishing Intervention Deadline and Prehearing Conference respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. Trigen has caused to be filed with the Commission an Application which is the subject of the captioned matter. Appendix C to said Application is a feasibility study which contains Highly Confidential information and is deemed Highly Confidential in its entirety; this Appendix will be late-filed as Appendix C to the Application when the Commission issues its standard protective order in this case.

2. In addition, Trigen anticipates that the Staff of the Commission, the Office of the Public Counsel and perhaps other parties, if any, may submit data requests in this proceeding seeking information, including information of a proprietary or highly confidential nature such as financial information which has not yet been disclosed to the public, financial analyses, customer specific information, and other information which

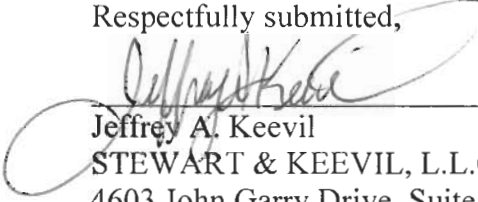
Trigen considers to be confidential business information or information about which Trigen has given assurances of confidentiality to others.

3. In view of the foregoing, Trigen requests that the Commission issue in this case what has become known generally as its "standard form" Protective Order which contains both highly confidential and proprietary categories so that Trigen may thereafter late-file with the Commission Appendix C and may also respond to data requests in a confidential manner, if necessary, and thereby facilitate the timely exchange of information relevant to the issues presented by the Application.

4. In addition, Trigen desires that the subject Application be processed as expeditiously as possible. To this end, Trigen requests that the Commission provide notice of the Application to the public as soon as possible, establish an intervention deadline in this proceeding and schedule an early prehearing or settlement conference to take place as soon as practical after the close of the intervention period.

WHEREFORE, good cause having been shown, Trigen respectfully moves the Commission to issue a Protective Order in this case, to provide its customary notice of the subject Application to the public, to establish an intervention deadline and to schedule an early prehearing/settlement conference.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing was sent to the following counsel by depositing same in the U.S. Mail first class postage paid, by hand-delivery, or by electronic transmission, this 10th day of January, 2006:

Office of the General Counsel
Missouri Public Service Commission
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0360

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

