

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

<b>In the Matter of the Application of Kansas</b>	)	
<b>City Power and Light Company for</b>	)	
<b>Approval to Make Certain Changes in its</b>	)	<b>Case No.</b> _____
<b>Charges for Electric Service to Begin the</b>	)	
<b>Implementation of Its Regulatory Plan.</b>	)	

**MOTION FOR PROTECTIVE ORDER**

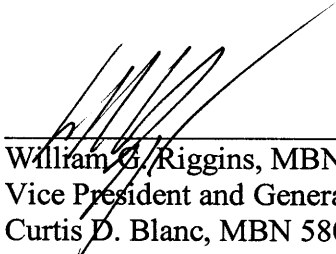
COMES NOW Kansas City Power & Light Company ("KCPL"), pursuant to 4 CSR 240-2.085, and hereby requests the Missouri Public Service Commission ("Commission") to issue a protective order in the above-captioned case. In support thereof, KCPL states as follows:

1. Simultaneously with the filing of this motion, KCPL has submitted an Application and supporting testimony that contains certain proprietary and highly confidential information. In accordance with 4 CSR 240-2.085, KCPL hereby requests that the Commission issue a protective order in this proceeding in order to protect its proprietary and highly confidential information from public disclosure. Disclosure of such information would harm the financial and competitive interests of the Company. None of the information for which a claim of confidentiality is made can be found in any format in any other public document. KCPL requests the Commission to issue its standard protective order in the same form as has been customary in previous cases.

2. KCPL notes that the Commission has issued this 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 the Commission to issue a protective order in this proceeding, in the same form as has been customary in previous cases.

Respectfully submitted,



---

William G. Riggins, MBN 42501  
Vice President and General Counsel  
Curtis D. Blanc, MBN 58052  
Senior Attorney  
Kansas City Power & Light Company  
Telephone: (816) 556-2785  
Facsimile: (816) 556-2787  
email: bill.riggins@kcpl.com

James M. Fischer, MBN 27543  
email: jfischer@aol.com  
Larry W. Dority, MBN 25617  
email: lwdority@sprintmail.com  
Fischer & Dority, P.C.  
101 Madison Street, Suite 400  
Jefferson City, MO 65101  
Telephone: (573) 636-6758  
Facsimile: (573) 636-0383

Karl Zobrist, MBN 28325  
Sonnenschein Nath & Rosenthal LLP  
4520 Main Street, Suite 1100  
Kansas City, MO 64111  
Telephone: (816) 460-2545  
Facsimile: (816) 531-7545  
email: kzobrist@sonnenschein.com

**Attorneys for  
Kansas City Power & Light Company**

### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing Application has been hand delivered, emailed or mailed, First Class mail, postage prepaid, this 1st day of February, 2006, to the signatories to the Stipulation and Agreement in Case No. EO-2005-0329, pursuant to the terms of that agreement.

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

Curtis D. Blanc