

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

In the Matter of a Proposed Experimental Regulatory    )   Case No. EO-2005-0329  
Plan of Kansas City Power & Light Company            )

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Kansas City Power & Light Company ("KCPL") and, pursuant to 4 CSR 240-2.085, 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. On March 28, 2005, a Stipulation and Agreement among KCPL, Staff, Public Counsel, and other signatory parties was filed in this proceeding. The filed Stipulation and Agreement contains a Non-proprietary version of Appendix A related to KCPL's SO<sub>2</sub> Emission Allowance Management Policy. However, upon the issuance of a Protective Order, the signatory parties intend to file a Highly Confidential version of the Appendix A. In addition, KCPL intends to file testimony in support of the Stipulation and Agreement in the future. This testimony is expected to include proprietary and highly confidential information.

2. In accordance with 4 CSR 240-2.085, KCPL hereby requests the Commission issue a standard protective order in this proceeding. The issuance of the protective order will permit KCPL to file the Highly Confidential version of this SO<sub>2</sub> Emission Allowance Management Plan expeditiously. None of the requested information for which a claim of confidentiality is made can be found in any format in any other public document. KCPL respectfully requests the Commission to issue its standard protective order, in the same form as has been customary in previous cases.

3. 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,

/s/ James M. Fischer

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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 29<sup>th</sup> day of March, 2005, to counsel on the attached service list from Case No. EW-2004-0596.

/s / James M. Fischer

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