

APR 20 2012

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

by
State Corporation Commission
of Kansas

In the Matter of the Application of)
Kansas City Power & Light Company)
to Make Certain Changes in)
Its Charges for Electric Service)

Docket No. 12-KCPE- 764 -RTS

2012.04.20 16:46:29
Kansas Corporation Commission
/S/ Patrice Petersen-Klein

MOTION FOR PROTECTIVE ORDER

COMES NOW, Kansas City Power & Light Company ("KCP&L" or "Company"), and hereby moves the State Corporation Commission of the State of Kansas ("Commission" or "KCC") to issue a Protective Order in this docket. In support of its Motion, KCP&L states:

1. Concurrently with the filing of this Motion, KCP&L is filing a rate case Application and supporting testimony that contains certain confidential and proprietary information, as defined in K.S.A. 66-1220a, K.S.A. 66-1233 and K.A.R. 82-1-221a. The public disclosure of such information would adversely impact the financial interests of KCP&L and/or the security of KCP&L's assets.

2. Additionally, during the course of discovery and investigation of the rate Application, KCP&L anticipates that Commission Staff and interveners may seek the production of documents and information from KCP&L that contains confidential, proprietary and/or commercially sensitive material.

3. KCP&L requests that the Commission issue its standard Protective Order to govern this proceeding, in order to protect KCP&L and parties who might be granted leave to intervene in this docket from disclosure of sensitive, proprietary, and confidential information, and to facilitate the investigation of this matter.

4. KCP&L submits that the interest in maintaining the confidential status of qualifying material and avoiding the substantial competitive harm that otherwise would result to the parties outweighs any interest in disclosing the material to unauthorized parties or in

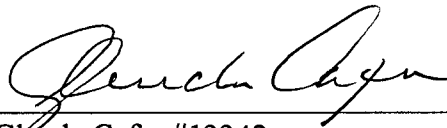
proceedings unrelated to the Application. For these reasons, KCP&L requests that the Commission issue its standard Protective Order in this proceeding.

5. The Commission has substantial latitude in deciding when a Protective Order is appropriate and the degree of protection that is required. A Protective Order will enable the Commission to manage the discovery process in a manner that furthers the goal of full disclosure of relevant, non-sensitive information, while at the same time protecting participants from harm that could result from the disclosure of commercially sensitive information.

WHEREFORE, KCP&L respectfully requests that the Commission issue the requested Protective Order and that said Protective Order apply to all parties to this proceeding.

Respectfully submitted,

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