

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

MAR 01 2007

**In the Matter of the Application of)
Kansas City Power & Light Company)
To Modify Its Tariffs to Continue)
The Implementation of Its Regulatory Plan.)**

Susan K. Duffe Docket
Room

Docket No. 07-KCPE-905-RTS

MOTION FOR PROTECTIVE ORDER

COMES NOW, Kansas City Power & Light Company ("KCPL"), by its attorneys, 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, KCPL states:

1. Simultaneously with the filing of this Motion, KCPL has filed 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. Additionally, during the course of discovery and investigation of the rate Application, KCPL anticipates that the parties, Commission Staff, CURB and interveners could seek the production of documents and information from KCPL that may contain confidential, proprietary and/or commercially sensitive material.

2. The confidential information included in the rate Application falls into five broad categories: (i) information concerning KCPL's activities in wholesale power markets; (ii) information concerning KCPL's activities in SO₂ emission allowance markets; (iii) highly sensitive financial information; (iv) information concerning litigation strategy and litigation costs related to the Surface Transportation Board litigation; and (v) information about homeland security measures. The public disclosure of such information would adversely impact the financial interests of KCPL and/or the security of KCPL's assets.

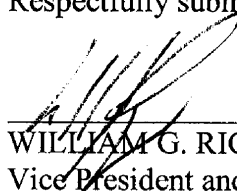
3. KCPL requests that the Commission issue its standard protective order to govern this proceeding, in order to protect KCPL and parties who might be granted leave to intervene in this docket from disclosure of sensitive, proprietary, and highly confidential information, and to facilitate the investigation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

4. KCPL 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, KCPL 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 unregulated disclosure of commercially-sensitive information.

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

Respectfully submitted,



WILLIAM G. RIGGINS (#12080)
Vice President and General Counsel
Kansas City Power & Light Company
1201 Walnut
Kansas City, MO 64141
(816) 556-2785
(816) 556-2787 Fax
Bill.Riggins@KCPL.com

FRANK A. CARO, JR. (#11678)
ANNE E. CALLENBACH (#18488)
Polsinelli Shalton Flanigan Suelthaus, P.C.
6201 College Boulevard, Suite 500
Overland Park, Kansas 66211
(913) 451-8788
(913) 451-6205 Fax
fcaro@polsinelli.com
acallenbach@polsinelli.com

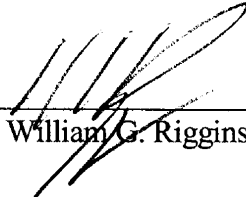
**ATTORNEYS FOR
KANSAS CITY POWER & LIGHT COMPANY**

VERIFICATION

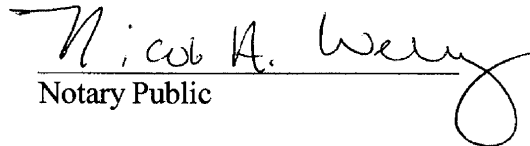
STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

I, William G. Riggins, being duly sworn, on oath state that I am counsel for Kansas City Power & Light Company, that I have read the foregoing Motion for Protective Order, and know the contents thereof, and that the facts set forth therein are true and correct to the best of my knowledge and belief.

KANSAS CITY POWER & LIGHT COMPANY

By:  _____
 William G. Riggins

The foregoing Motion for Protective Order was subscribed and sworn to before me this February 28, 2007.



Notary Public

My Commission Expires:
Feb. 4, 2011

