

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE 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.: 14-KCPE-~~272~~ **DEB-09** 2013

Received  
on  
by  
State Corporation Commission  
of Kansas

**MOTION FOR PROTECTIVE ORDER**

COMES NOW, Kansas City Power & Light Company (“KCP&L”) and requests that the State Corporation Commission of the State of Kansas (“Commission”) issue a Protective Order in this matter. In support of this Motion, KCP&L states:

1. Concurrently with the filing of this Motion, KCP&L is filing an abbreviated rate case Application and supporting testimony pursuant to K.S.A. 66-117 and K.A.R. 82-1-231(b)(3).
2. During the course of discovery and investigation of the Application, KCP&L anticipates that Commission Staff and intervenors may seek the production of documents and information from KCP&L that contains confidential, proprietary and/or commercially sensitive material, as defined in K.S.A. 66-1220a, K.S.A. 66-1233 and K.A.R. 82-1-221a.<sup>1</sup> The public disclosure of such information would adversely impact the financial interests of KCP&L and/or the security of KCP&L’s assets.
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

---

<sup>1</sup> The Application and supporting testimony and schedules filed with the Application in this case do not contain confidential information. However, they do reference and incorporate confidential information from Docket No. 12-KCPE-764-RTS (“764 Docket”). That information continues to be classified as confidential as marked in the 764 Docket.

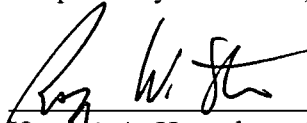
intervene in this docket from disclosure of sensitive, proprietary and confidential information, and to facilitate the investigation of this matter.

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,



---

Heather A. Humphrey (#17594)  
General Counsel and Vice President – Human Resources  
Roger W. Steiner (#26159)  
Corporate Counsel  
Kansas City Power & Light Company  
One Kansas City Place  
1200 Main, 16<sup>th</sup> Floor  
Kansas City, MO 64105  
Telephone: (816) 556-2785  
Facsimile: (816) 556-2787  
E-mail: [Heather.Humphrey@kcpl.com](mailto:Heather.Humphrey@kcpl.com)  
E-mail: [Roger.Steiner@kcpl.com](mailto:Roger.Steiner@kcpl.com)

Glenda Cafer (#13342)  
Cafer Law Office, L.L.C.  
3321 SW 6<sup>th</sup> St.  
Topeka, KS 66606  
Telephone: (785) 271-9991  
Facsimile: (785) 233-3040  
E-mail: [glenda@caferlaw.com](mailto:glenda@caferlaw.com)

ATTORNEYS FOR  
KANSAS CITY POWER & LIGHT COMPANY