

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

FILED³

MAY 15 2000

Missouri Public
Service Commission

In the Matter of the Application of Kansas City)
Power & Light Company for an Order Authorizing)
The Transfer of Certain Electric Generation Assets)
Used to Provide Electric Service to Customers)
in Missouri and Other Relief Associated with)
Kansas City Power & Light Company's Plan to)
Restructure Itself into a Holding Company,)
Competitive Generation Company, Regulated)
Utility Company, and Unregulated Subsidiary.)

Case No. EM-2000-753

**KANSAS CITY POWER & LIGHT COMPANY'S MOTION TO SCHEDULE
AN EARLY PREHEARING CONFERENCE AND
MOTION FOR PROTECTIVE ORDER**

COMES NOW Kansas City Power & Light Company ("KCPL"), by and through counsel, and pursuant to 4 CSR 240-2.085 and 4 CSR 240-2.090(3), respectfully requests that the Commission issue an Order Scheduling Early Prehearing Conference And Establishing Protective Order. In support of its Motion, KCPL states, as follows:

1. Simultaneously with the filing of this Motion, KCPL is filing its Application which requests, *inter alia*, authority to restructure itself into a holding company, competitive generation company, regulated utility company, and an unregulated subsidiary. KCPL proposes that workshops and technical conferences be convened to address, and hopefully resolve, the issues raised by the Application. The Application also proposes a phased process for filing testimony and related exhibits over several months to address these issues.

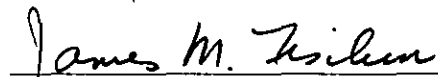
2. In order to discuss the proposed procedures with the Commission Staff, Office of the Public Counsel, and Intervenors in the proceeding, KCPL respectfully requests that the Commission immediately schedule an Early Prehearing Conference as soon as possible

following the expiration of the intervention deadline. The Early Prehearing Conference will permit KCPL and all parties to discuss a procedural schedule and the related procedures that will be used in this case.

3. KCPL also anticipates that there will be a need to exchange Highly Confidential and Proprietary information in the discovery process. KCPL therefore respectfully requests that the Commission issue it standard Protective Order in this proceeding.

WHEREFORE, for the foregoing reasons, Kansas City Power & Light Company prays that the Commission issue an Order Scheduling Early Prehearing Conference as soon as possible following the expiration of the intervention deadline, and issuing the Commission's standard Protective Order in this matter, and for such other and further relief as is just and proper.

Respectfully submitted,



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ATTORNEYS FOR
KANSAS CITY POWER & LIGHT COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed, via U. S. Mail, postage prepaid, or hand-delivered to the following counsel of record on this 5 day of May, 2000:

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