

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

In the Matter of Greeley Gas Company's Purchased)
Gas Adjustment Factors to be Reviewed in its) **Case No. GR-2001-394**
2000-2001 Actual Cost Adjustment)

**GREELEY GAS COMPANY'S
MOTION FOR EXTENSION TO FILE RELIABILITY STUDY**

COMES NOW Greeley Gas Company, a division of Atmos Energy Corporation ("Greeley" or "Company"), and pursuant to 4 CSR 240-2.080, hereby requests a thirty (30) day extension of time to file its Reliability Study information with the Gas Procurement division of the Commission Staff:

1. On April 30, 2002, the Commission issued its Order Approving Stipulation & Agreement in this proceeding in which it directed Greeley Gas Company to provide the following information to the Gas Procurement division by October 1, 2002:

a. Submit a reserve margin estimate for the 2001/2002 ACA period and for three years beyond that. Explain the rationale for the reserve margin for each of these years. For any negative reserve margin shown, provide an explanation of the firm capacity that will be used to meet demand requirements beyond the firm contract maximum daily quantities. For any shortfall of capacity, provide details about the actions the Company will take with respect to firm residential, commercial, public authority, and industrial customers whose demand will not be met should a peak day recur.

b. Submit an updated summary of actual usage, actual heating degree days (HDD), and customer counts for five or more recent cold days from the 2000/2001 or 2001/2002 ACA period. Compare the usage on these actual cold days to the usage estimated by the Company's peak day forecasting model for those days. Include a calculation of the percent over (under) estimation by the forecasting model. List firm and interruptible volumes separately or show how the model treats these. Provide an explanation when the modeled usage does not reasonably agree with the actual usage. If the model is re-evaluated based on these findings, please provide details of the re-evaluation.

2. Due to the workload of the Greeley's Gas Supply personnel, the requested information is not available for filing at this time, and Greeley must therefore respectfully request an extension of time until October 31, 2002, to provide the requested information to the Commission Staff.

3. The undersigned counsel has contacted counsel for the Staff and Public Counsel regarding this motion, and neither the Staff nor Public Counsel has expressed any objections to this request for extension of time to file the information.

WHEREFORE, Greeley Gas Company respectfully requests the Commission grant a thirty (30) day extension until October 31, 2002, to file the Reliability Study information with the Commission Staff.

Respectfully submitted,

/s/ James M. Fischer

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of this document has been hand-delivered emailed or mailed, First Class, postage prepaid, this 1st day of October, 2002, to:

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/s/ James M. Fischer

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