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February 29, 2000

Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 3660 Jefferson City, Missouri 65102

FILED²

RE: Southern Missouri Gas Company, L.P.

Case No. GR-2000-485

Dear Mr. Roberts:

Enclosed, for filing in the above-referenced matter, are the original and fourteen (14) copies of Southern Missouri Gas Company, L.P.'s Motion to Expedite Partial Reconsideration of the Suspension Order and Notice Issued on February 24, 2000. A copy of the foregoing Motion has been hand-delivered or mailed this date to parties of record.

Thank you for your attention to this matter.

Sincerely,

James M. Fischer

/jr

Enclosure(s)

cc:

Doug Micheel

Tim Schwarz/Robert Franson

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

| FILED |
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| FEB 2 9 2000 |

| In the Matter of Southern Missouri Gas Company, L.P. for Authority to File Tariffs |)) | Service Commission Case No. GR-2000-485 | | | |
|---|--------|--|-----------|----|------------|
| Increasing Rates for Gas Service |) | Case No. | GR-2000-4 | 85 | "" "Ission |
| Provided to Customers in the Company's |) | | | | |
| Missouri Service Area. |) | | | | |

SOUTHERN MISSOURI GAS COMPANY, L.P.'s MOTION TO EXPEDITED PARTIAL RECONSIDERATION OF THE SUSPENSION ORDER AND NOTICE ISSUED ON FEBRUARY 24, 2000

COMES NOW Southern Missouri Gas Company, L.P. ("SMGC") and respectfully requests that the Commission grant its motion for expedited partial reconsideration of the Suspension Order and Notice issued on February 24, 2000. In support, SMGC respectfully states:

- 1. On February 24, 2000, Deputy Chief Regulatory Law Judge Lewis Mills, by delegation of authority, issued a Suspension Order and Notice which, *inter alia*, suspended the tariffs filed herein for the full statutory suspension period, established an intervention date, ordered the Company to file its direct testimony by March 28, 2000, and scheduled evidentiary hearings in this matter.
- 2. Simultaneously with the filing of this motion, SMGC is filing its Motion to Adopt Procedures Similar to the Small Rate Case Procedures Authorized by 4 CSR 240-2.200. This motion proposes procedures similar to those used in small rate case proceedings. SMGC, the Commission Staff, and Public Counsel have been discussing these alternative procedures for several weeks, and SMGC had hoped to file its motion prior to the issuance of the standard suspension order. To date, however, the Commission Staff and Public Counsel have not reached a position regarding this motion.

3. In the event the Commission finds the alternative procedures to be acceptable, SMGC respectfully requests that the Commission partially reconsider its Suspension Order and Notice, to the extent that its Suspension Order and Notice is inconsistent with the small rate case procedures proposed by SMGC. More specifically, SMGC would request that the Commission reconsider all ordered paragraphs, except for Ordered Paragraph 1 which suspends the tariffs until January 4, 2001. The remaining orders are not consistent with the small rate case procedures as proposed in the accompanying motion.

4. Since SMGC was ordered to file its direct testimony by March 28, 2000, a requirement that would not be necessary under the alternative small rate case procedures, SMGC requests that the Commission consider this motion for reconsideration on an expedited basis to allow SMGC to be relieved of the requirement to file direct testimony as soon as possible.

WHEREFORE, Southern Missouri Gas Company, L.P. respectfully requests that the Commission partially reconsider, on an expedited basis, the Suspension Order and Notice issued on February 24, 2000, as discussed herein.

Respectfully submitted,

James M. Fischer

Mo. Bar No. 27543

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ATTORNEYS FOR SOUTHERN MISSOURI GAS COMPANY, L.P.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, First Class Mail, postage prepaid, this <u>29</u> day of February 2000, to:

Doug Micheel Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Tim Schwarz Robert Franson Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

James M. Fischer