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December 7, 2000

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Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. GR-99-392

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **STAFF REPLY TO ATMOS' RESPONSE**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Thomas R. Schwarz, Jr.

Thomas R. Schwarz, Jr.
Deputy General Counsel
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TRS:sw
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
DEC 7 2000

Missouri Public
Service Commission

In the Matter of Associated Natural Gas)
Company's Purchased Gas Adjustment)
Factors to be reviewed in its 1998-1999)
Actual Cost Adjustment.)

Case No. GR-99-392

Staff Reply to Atmos' Response

COMES NOW the Staff ("Staff") of the Public Service Commission of Missouri ("Commission") and for its reply to the Response filed by Atmos Energy Corporation ("Atmos") on November 27, 2000, in this docket states as follows:

1. The Staff's August 1, 2000, recommendation in this case included the recommendation that Associated Natural Gas Company ("ANG") compile and file a peak day study for its various Missouri operating districts.

2. Atmos has intervened in this case as a consequence of its acquisition of the Missouri properties of ANG. It filed its response to Staff's August recommendation on November 27, 2000. In its response, Atmos indicated, among other things, that it would file a peak day analysis and related information requested by Staff with its next filing in this case. Staff is concerned that Atmos will not have a filing due until perhaps fall of 2001. A filing at such a late date would be of little help in preparing Staff's recommendation for Case No GR-2000-573, which is due November 1, 2001.

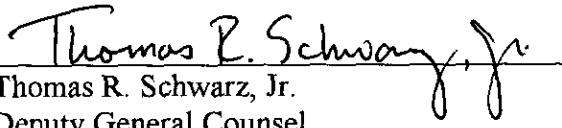
3. Staff notes that Atmos, in the Stipulation and Agreement in Case No GM-2000-312, has promised to file a peak day analysis for its operating districts by December 31, 2000. Staff hereby suggests that if the December 31 filing contains sufficient detail, that no further peak day

study need be done to satisfy the requirements of the Staff reliability recommendation in Case No GR-99-392.

4. If the December 31, 2000, peak day study does not have sufficient detail for purposes of analyzing the reliability information for Case No GR-2000-573, Staff suggests that the Commission order Atmos to submit such a study not later than May 1, 2001. Not later than January 31, 2001, Staff will advise the Commission of its opinion as to the sufficiency of the December 31 study.

Respectfully submitted,

DANA K. JOYCE
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Missouri Bar No. 29645

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 7th day of December, 2000.

Thomas R. Schwarz, Jr.

**Service List for
Case No. GR-99-392
Revised: December 7, 2000 (SW)**

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