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November 6, 2000

FILED<sup>3</sup>

NOV 06 2000

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**RE: Missouri Public Service - Case No. GR-2000-520**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of a Motion for Variance Concerning Recovery Period. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

*Dean Cooper*  
Dean L. Cooper *ly Rg*

DLC/rhg

Enclosures

cc: Office of the Public Counsel  
Ms. Lera Shemwell, PSC  
Mr. Doug Micheel, OPC

FILED<sup>3</sup>  
NOV 06 2000  
Missouri Public  
Service Commission

**MOTION FOR VARIANCE**  
**CONCERNING RECOVERY PERIOD**

## GENERAL BACKGROUND

2. All correspondence, communications, notices, order and decisions of the Commission

with respect to this matter should be sent to:

Karen Russell  
UtiliCorp United Inc.  
7101 Mercy Road  
Suite 400  
Omaha NE 68106  
(402) 926-5273  
(402) 996-9773 facsimile

Dean L. Cooper  
BRYDON, SWEARENGEN & ENGLAND P.C.  
312 E. Capitol Avenue  
P. O. Box 456  
Jefferson City, MO 65102  
(573) 635-7166  
(573) 635-0427 facsimile

#### **VARIANCE**

3. MPS's P.S.C. Mo. No. 5, 6<sup>th</sup> Revised Sheet No. 36, II.C calls for MPS to recover the ending ACA balance over a twelve month period.

4. On November 6, 2000, MPS filed its annual winter PGA tariff (i.e., P.S.C. Mo. No. 5, 14<sup>th</sup> Revised Sheet No.44.1) which is designed to calculate the Total PGA amount to be recovered in the upcoming period. MPS also provided supporting workpapers which identified a current ACA balance of \$872,698.98.

5. In order to reduce the immediate impact upon customers of the recovery of this current ACA balance in a twelve moth period (as would otherwise be required by P.S.C. Mo. No. 5, 6<sup>th</sup> Revised Sheet No. 36, II.C), MPS is proposing to recover the current ACA balance over a three (3) year period. This would result in a recovery of \$290,899.66 in the current period assuming annual sales of 379,065 Mcf. Attached hereto and incorporated by reference is Appendix A which details this information.

## GOOD CAUSE

6. Due to drastic increases in the price of natural gas and two years of warmer than normal weather, MPS believes this to be a reasonable request. A grant of this variance will reduce the immediate impact upon customers by making resulting increases more gradual.

7. The Commission Staff has worked with the Company to develop this solution to assist in rate stabilization for the MPS Eastern System customers.

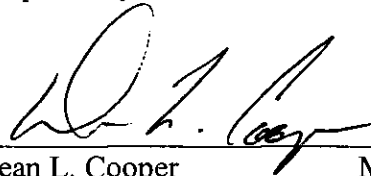
8. Accordingly, MPS respectfully requests the Commission grant it a variance from P.S.C. Mo. No. 5, 6<sup>th</sup> Revised Sheet No. 36 to permit MPS to recover the current ACA balance over a three year period, rather than a twelve month period.

WHEREFORE, MPS requests a Commission order:

a) granting MPS a variance from its P.S.C. Mo. No. 5, 6<sup>th</sup> Revised Sheet No. 36, as discussed herein, to permit the Company to recover its current ACA balance over a three (3) year period, rather than a twelve month period;

b) granting such further relief as may be necessary which is consistent with the relief requested herein.

Respectfully submitted,

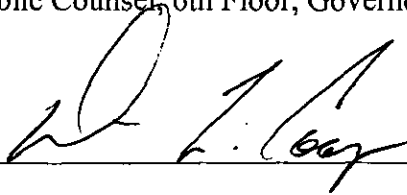


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ATTORNEYS FOR UTILICORP UNITED INC.  
D/B/A MISSOURI PUBLIC SERVICE

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was either hand-delivered or mailed, U.S. Mail, postage prepaid, on the 6th day of November, 2000, to: Lera Shemwell, Missouri Public Service Commission, Governor Office Building, Jefferson City, Mo 65101; and, Douglas Micheel, Office of the Public Counsel, 6th Floor, Governor Office Building, Jefferson City, Mo 65101.



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**MISSOURI PUBLIC SERVICE  
EASTERN SYSTEM  
PROPOSED THREE YEAR RECOVERY**

ACA Balance @8/99	\$	526,969.90
99-00 Recovery	\$	332,399.91
Previous year carryover	\$	194,569.99
99-00 underrecovery	\$	678,128.99
Total Underrecovery @ 8-00	\$	872,698.98
33.3% 3 yr installments	\$	290,899.66
Volumes		379,065.6
Recovery/ccf	\$	0.07674

APPENDIX A