LAW OFFICES

BRYDON, SWEARENGEN & ENGLAND

PROFESSIONAL CORPORATION
312 EAST CAPITOL AVENUE

P.O. BOX 456

UEFFERSON CITY, MISSOURI 65 I O2-0456

TELEPHONE (573) 635-7166

FACSIMILE (573) 635-3847

E-Mail: DCOOPER@8RYDONLAW.COM

DEAN L. COOPER
MARK G. ANDERSON
TIMOTHY T. STEWART
GREGORY C. MITCHELL
BRIAN T. MCCARTNEY
DALE T. SMITH

OF COUNSEL RICHARD T. CIOTTONE

November 6, 2000

FILED³

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

Missouri Public Service Commission

NOV 0 6 2000

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

Dear Mr. Roberts:

DAVID V.G. BRYDON

GARY W. DUFFY

PAUL A. BOUDREAU

SONDRA B. MORGAN CHARLES E. SMARR

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND, III

JOHNNY K. RICHARDSON

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:

Wlan Cooper by Rg

DLC/rhg Enclosures

cc:

Office of the Public Counsel

Ms. Lera Shemwell, PSC

Mr. Doug Micheel, OPC

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Missouri Public Service's
Purchased Gas Adjustment factors to be reviewed
in its 1999-2000 Actual Cost Adjustment.

Case No. GR-2000-520

MOTION FOR VARIANCE CONCERNING RECOVERY PERIOD

Comes now UtiliCorp United Inc. ("UtiliCorp") d/b/a Missouri Public Service ("MPS" of "Company"), in accordance with Commission Rule 4 CSR 240-2.060(11), and as its motion for variance from a provision of MPS's P.S.C. No. 5, 6th Revised Sheet No. 36, states to the Missouri Public Service Commission ("Commission") as follows:

GENERAL BACKGROUND

- 1. UtiliCorp is a Delaware corporation, in good standing in all respects, with its principal office and place of business at 911 Main Street, Suite 3000, Kansas City, Missouri 64105. UtiliCorp is authorized to conduct business in Missouri through its MPS operating division and as such is engaged in providing electrical and natural gas utility service in its service areas subject to the jurisdiction of the Commission. A certified copy of MPS's Certificate of Corporate Good Standing-Foreign Corporation and fictitious name registration as issued by the Secretary of State of the State of Missouri was previously filed with the Commission in Case No. EM-2000-292 and is hereby incorporated by reference in accordance with 4 CSR 240-2.060(1)(G). MPS has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates. MPS has no annual report or assessment fees which are overdue.
 - 2. All correspondence, communications, notices, order and decisions of the Commission

with respect to this matter should be sent to:

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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, 6th 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, 14th 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, 6th 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, 6th 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, 6th 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,

Dean L. Cooper

MBE #36592

BRYDON, SWEARENGEN & ENGLAND P.C.

312 E. Capitol Avenue

P. O. Box 456

Jefferson City, MO 65102

(573) 635-7166

(573) 635-0427 facsimile

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.

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