

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED³
NOV 08 2001

In the Matter of Southern Missouri Gas)
Company L.P.'s Purchased Gas Adjustment)
Factors to be reviewed in Its 2000-2001)
Actual Cost Adjustment)

Case No. GR-2001-388

Missouri Public
Service Commission

REQUEST FOR VARIANCE FROM TARIFF PROVISIONS

COMES NOW Southern Missouri Gas Company, L.P., ("SMGC" or "Company"), by and through its attorney, and requests the Missouri Public Service Commission ("Commission") to grant a variance from the provisions of its tariffs, for good cause shown, and permit SMGC to file a scheduled Winter Purchased Gas Adjustment change to be effective on December 1, 2001, rather than November 1, 2001, as specified in SGMC's tariffs. In support of its Request for Variance, SMGC states as follows:

1. Simultaneously with the filing of this Request For Variance, SMGC filed its revised PGA tariff (*i.e.*, 11th Revised Sheet No. 27 cancelling 10th Revised Sheet No. 27), which was designed to calculate the Total PGA amount to be recovered in the upcoming period. SMGC also filed its supporting workpapers which supported the calculations of the revised PGA factors to be recovered this period under the PGA/ACA process. This filing represents a scheduled Winter PGA filing.

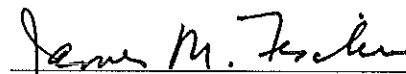
2. Due to recent reductions in natural gas prices, SMGC filed an unscheduled Summer PGA filing, reducing the cost of gas. This tariffs was approved by the Commission and became effective on October 1, 2001. In this October filing, SMGC stated that it anticipated that the revised Total PGA level would remain unchanged in for the period normally covered by a scheduled winter PGA filing. As a result of this recent filing in October, 2001, SMGC did not

believe it was necessary to file a scheduled winter PGA on November 1, 2001, as specified in its tariffs, since the revised Total PGA level was expected to remain unchanged. However, based upon conversations with the Commission Staff, SMGC now believes it is appropriate to have a scheduled winter PGA on file, even though there is no change in the overall Total PGA cost of gas.

3. In order to ensure that SMGC's procedure is not in conflict with its tariffs, SMGC would respectfully request the Commission to grant it a one-time variance from its tariffs to permit it to make a scheduled Winter PGA filing at this time, with an effective date of December 1, 2001.

WHEREFORE, Southern Missouri Gas Company, L.P., respectfully requests the Commission to grant it a variance from the provisions of its tariffs, as discussed herein, and permit the Company to make the scheduled Winter PGA factor change proposed by SMGC at this time.

Respectfully submitted,



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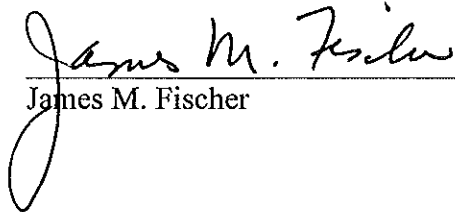
ATTORNEYS FOR
SOUTHERN MISSOURI GAS COMPANY, L.P.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed by First Class U.S. mail, postage prepaid, this 8th day of November, 2001, to:

Office of the Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102

Dana K. Joyce
General Counsel
Missouri Public Service Commission
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James M. Fischer