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March 20, 2002

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ROBERT SCHALLENBERG
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Director, Administration
DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
General Counsel

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

FILED³
MAR 20 2002

RE: Case No. GR-2001-39/GR-2001-388

Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **STAFF MOTION TO MODIFY PROCEDURAL SCHEDULE**.

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,

Robert V. Franson
Associate General Counsel
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RVF:ccl
Enclosure
cc: Counsel of Record

FILED³

MAR 20 2002

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of Southern Missouri Gas)
Company, L.P.'s Purchased Gas)
Adjustment factors to be reviewed in its)
1999-2000 Actual Cost Adjustment.)

Case No. GR-2001-39

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

STAFF MOTION TO MODIFY PROCEDURAL SCHEDULE

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and respectfully states as follows:

1. On April 12, 2001, the Commission issued its Order Consolidating these cases and establishing a Procedural Schedule.
2. All parties have complied with the Procedural Schedule prior to the March 20, 2002 filing date of this motion.
3. Staff believes that the parties are in substantial agreement regarding the issues in GR-2001-39 and believes that that case could potentially be closed without a hearing.
4. Substantial changes have occurred which affect Staff's ability to timely comply with the Procedural Schedule.
5. These changes include: departure of experienced Staff who were involved in these and other Actual Cost Adjustment cases; necessary training time for new Staff; a delay in the contract with a consultant on hedging and providing information to that consultant; Staff time for multiple priorities including working on and with EFIS preparation, rate cases, testimony and

hearings for previous ACA cases, meetings and hearings on incentive plans, responding to Company Data Requests, as well as participation in Commission Task Forces.

6. All of these factors have combined to make it extremely difficult for Staff to complete audits within the existing Procedural Schedule and for this reason Staff is requesting a revised Procedural Schedule.

7. Staff proposes the following modifications to the existing Procedural Schedule:

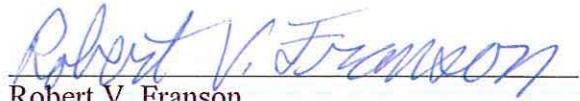
Staff Recommendation (GR-2001-388)	September 13, 2002
Company Response (GR-2001-388)	October 14, 2002
Direct Testimony (both cases/all parties)	November 15, 2002
Rebuttal Testimony (both cases/all parties)	December 13, 2002
Issues List	December 20, 2002
Position Statement	December 30, 2002
Surrebuttal Testimony	January 10, 2003
Hearing	January 17, 2003 (commencing at 8 a.m.)

8. Staff has consulted with Counsel for Southern Missouri Gas L.P. and with the Office of Public Counsel. Neither party has any objection to this request.

WHEREFORE, Staff recommends that the Commission issue its order in this case modifying the Procedural Schedule consistent with Staff's recommendations.

Respectfully submitted,

DANA K. JOYCE
General Counsel



Robert V. Franson
Associate General Counsel
Missouri Bar No. 34643

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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 20th day of March, 2002.



Service List for
Case No. GR-2001-388/GR-2001-39
Verified: March 20, 2002 (ccl)

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