

**FISCHER & DORITY**  
PROFESSIONAL CORPORATION

James M. Fischer  
Larry W. DORITY

Attorneys at Law  
Regulatory & Governmental Consultants

101 West McCarty, Suite 215  
Jefferson City, MO 65101  
Telephone: (573) 636-6758  
Fax: (573) 636-0383

July 14, 2000

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

**FILED<sup>2</sup>**  
JUL 17 2000  
Missouri Public  
Service Commission  
*filed separate  
from tariffs  
nd*

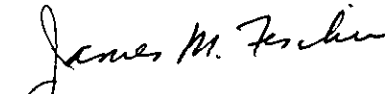
RE: *In the Matter of United Cities Gas Company, L.P.'s Purchased Gas Adjustment Factors to be reviewed in the 1999-2000 Actual Cost Adjustment, Case No. GR-2000-392.*

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are the original and eight (8) copies of United Cities Gas Company, L.P.'s Request for Variance from Tariff Provisions. A copy of the Request has been hand-delivered or mailed this date to parties of record.

Thank you for your attention to this matter.

Sincerely,

  
James M. Fischer

/jr  
Enclosures

cc: Office of the Public Counsel  
Dana K. Joyce

**BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI**

In the Matter of United Cities Gas	)	
Company, L.P.'s Purchased Gas Adjustment	)	Case No. GR-2000-392
Factors to be reviewed in the 1999-2000	)	
Actual Cost Adjustment	)	

**REQUEST FOR VARIANCE FROM TARIFF PROVISIONS**

COMES NOW United Cities Gas Company, a division of Atmos Energy Corporation, ("UCG" 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 UCG to file an unscheduled Summer Purchased Gas Adjustment change, rather than delaying its next change in the PGA factor until its next scheduled Winter filing. In support of its Request for Variance, UCG states as follows:

1. On July 14, 2000, UCG filed its revised PGA tariff (*i.e.*, 7<sup>th</sup> Revised Sheet No. 58 cancelling 6<sup>th</sup> Revised Sheet No. 58), which was designed to calculate the Total PGA amount to be recovered in the upcoming period, and UCG filed ANG's revised PGA tariff (*i.e.*, 20<sup>th</sup> Revised Sheet No. 16T canceling 19<sup>th</sup> Revised Sheet No. 16T). UCG 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 an unscheduled Summer PGA filing.

2. Due to unforeseen and dramatic increases in natural gas prices, UCG believes that it is reasonable and appropriate to file an unscheduled Summer PGA filing. If approved, this filing will: (1) give a more accurate price signal to consumers regarding the current cost of natural gas; (2) help keep the DCCB and the ACA balances from further undercollections which, if not

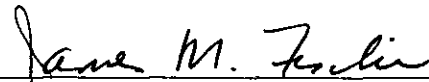
addressed, would add to the impact of the upcoming scheduled winter filing; and (3) help build consumer awareness of the possible increases in gas costs for the next winter season.

3. In order to ensure that UCG's procedure is not in conflict with its tariffs, UCG would respectfully request the Commission to grant it a variance from its tariffs to permit it to make a one-time unscheduled Summer PGA filing.

4. The Commission Staff has indicated to the undersigned counsel that it does not object to this request for variance from the provisions of the Company's tariffs.

**WHEREFORE**, United Cities Gas Company, a division of Atmos Energy Corporation, 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 unscheduled Summer PGA factor change proposed by UCG at this time.

Respectfully submitted,



James M. Fischer MBN 27543  
FISCHER & DORITY, P.C.  
101 West McCarty Street, Suite 215  
Jefferson City, Missouri 65101  
Telephone: (573) 636-6758  
Fax: (573) 636-0383  
E-mail: jfischerpc@aol.com

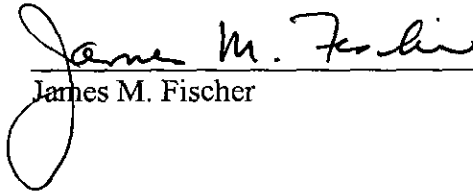
ATTORNEYS FOR  
UNITED CITIES GAS COMPANY,  
A DIVISION OF ATMOS ENERGY CORPORATION

**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 14<sup>th</sup> day of July, 2000, to:

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

Dana K. Joyce  
General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

  
James M. Fischer