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October 27, 1999

FILED

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Dale Hardy Roberts  
Secretary  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Missouri Public  
Service Commission

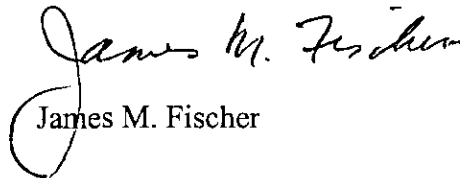
RE: *In the matter of Southern Missouri Gas Company, L.P.'s Tariff Revision Designed to be Reviewed in Its 1998-99 Actual Cost Adjustment for the Missouri Service Areas of the Company. Tariff File No. 200000373; Case No. GR-2000-288.*

Dear Mr. Roberts:

Enclosed are the original and fourteen (14) copies of the Request for Variance in the above-referenced matter. A copy of the Request for Variance 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

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BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

Missouri Public  
Service Commission

In the matter of Southern Missouri Gas       )  
Company, L.P.'s Tariff Revision Designed    )  
to be Reviewed in Its 1998-99 Actual Cost   )  
Adjustment for the Missouri Service Area    )  
of the Company.                                )

Tariff File No. 200000373  
Case No. GR-2000-288

**REQUEST FOR VARIANCE FROM TARIFF PROVISIONS**

COMES NOW Southern Missouri Gas Company, L.P. ("SMGC" or "Company"), by and through its attorney, and requests that the Missouri Public Service Commission ("Commission") grant a variance from the provisions of its tariffs, for good cause shown, and permit SMGC to use certain refunds from Williams Natural Gas Pipeline (WNG) as an immediate offset to the total amount to be recovered in the ACA period, rather than identifying the amount separately on Sheet No. 27. In support of its Request for Variance, the SMGC states as follows:

1. On October 15, 1999, SMGC filed its annual PGA tariff (i.e. 6<sup>th</sup> Revised Sheet No. 27 canceling 5<sup>th</sup> 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 identified a refund of \$133,409 from WNG which was used to reduce the total amount to be recovered this period under the PGA/ACA process. This procedure gave customers the benefit of the WNG refund, but it did not separately identify the refund on a Ccf basis as may be contemplated by the format of Tariff Sheet No. 27. The Commission Staff recently contacted the Company and indicated that this procedure may be technically inconsistent with the Company's tariffs since there is a column identified as "refunds" on Tariff Sheet No. 27 and these refunds are described on Sheets 26.1 and 26.2. In order to ensure that SMGC's procedure is not in conflict with its tariffs, SMGC would

respectfully request that the Commission grant it a variance from its tariffs to permit it to use the WNG refund as an immediate offset to the total amount to be recovered this period under the PGA/ACA process, rather than separately identifying a "refund" factor on Sheet No. 27.

4. By approving this Request for Variance, it will avoid any substantial delay in changing the Company's PGA factor, and the submission of revised tariffs and workpapers.

5. 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.

6. In order to give the Commission additional time to review this request, SMGC hereby extends the effective date of its 6<sup>th</sup> Revised Sheet No. 27 from November 1, 1999, to November 4, 1999. This date is the latest date that will permit the revised PGA factor to be reflected on the bills in the November billing cycle. Since the tariff will not be effective until November 4, 1999, the Company also requests that the tariff requirement on Revised Sheet No. 21 that the winter PGA tariff filing should be effective on November 1, be waived.

**WHEREFORE**, Southern Missouri Gas Company, L.P. respectfully requests that the Commission grant it a variance from the provisions of its tariffs, as discussed herein, and permit the Company to use the WNG refund as an immediate offset to the total amount to be recovered this period under the PGA/ACA process, rather than separately identifying a "refund" factor on Sheet No. 27.

Respectfully submitted,



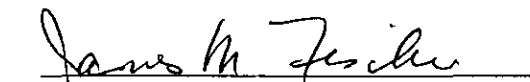
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ATTORNEY FOR  
SOUTHERN MISSOURI GAS COMPANY, L.P.

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, postage prepaid, this 27th day of October, 1999, to:

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

  
James M. Fischer