

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

In the matter of Southern Missouri Gas)	
Company, L.P. d/b/a Southern Missouri)	
Natural Gas' Purchased Gas Adjustment)	Case No. GR-2009-0287
(PGA) Factors to be Reviewed in its 2008-)	
2009 Actual Cost Adjustment.)	

REQUEST FOR VARIANCE FROM TARIFF PROVISIONS

COMES NOW Southern Missouri Gas Company, L.P. d/b/a Southern Missouri Natural Gas ("SMNG" or "Company"), pursuant to 4 CSR 240-3.015 and 4 CSR 240-2.060(2), by and through its attorneys, and requests that the Missouri Public Service Commission ("Commission") grant a variance from the provisions of its tariffs (i.e. 2nd Revised Sheet No. 20), for good cause shown, and permit SMNG to file a Purchased Gas Adjustment change on less than ten (10) business days notice.

In support of its Request for Variance, the SMNG states as follows:

1. Southern Missouri Gas Company, L.P. d/b/a Southern Missouri Natural Gas, a Missouri limited partnership, ("SMNG") owns and operates a natural gas transmission and distribution system located in southern Missouri which currently serves approximately 7,500 residential, commercial and industrial customers. SMGC is a "gas corporation" and "public utility" under the jurisdiction of the Missouri Public Service Commission, pursuant to Chapters 386 and 393, RSMo. 2000. The Company's street and mailing address is: 500 W. 19th Street, Mountain Grove, Missouri 65711. The Company's telephone number is: (417) 926-7533.

2. All correspondence, pleadings, orders, and documents in this proceeding should be addressed to:

James M. Fischer
Larry W. Dority
Fischer & Dority, P.C.
101 Madison Street--Suite 400
Jefferson City, Missouri 65101
Telephone: (573) 636-6758
Email: jfischerpc@aol.com
lwdority@sprintmail.com

Mike Lumby, General Manager
Southern Missouri Gas Company, L.P.
500 W. 19th Street
Mountain Grove, Missouri 65711
Telephone: (417) 926-7533
Email: mlumby@smng.biz

Randal T. Maffett, President & CEO
Sendero Asset Management, LLC
1001 Fannin--Suite 550
Houston, Texas 77022
Telephone: (713) 655-0523
Email: rmaffett@sendero.biz

3. A copy of SMNG's Certificate Of Good Standing In Missouri from the Missouri Secretary of State was submitted in Case No. GA-2007-0212 and is incorporated herein by reference.

SMNG has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates which has occurred within three (3) years of the date of this request for waiver. SMNG has no annual report or assessment fees that are overdue.

4. Simultaneously with the filing of this request, SMNG filed its revised PGA tariff (i.e. 27th Revised Sheet No. 27 canceling 26th Revised Sheet No. 27) which was designed to calculate the Total PGA amount to be recovered in the upcoming period. SMNG also filed its supporting workpapers which supported the calculations of the revised PGA factor to be recovered this period under the PGA/ACA process. The tariff has an issue date of January 19, 2010, and an effective date

of February 1, 2010. This provides twelve (12) calendar days' notice of the tariff filing. However, due to the occurrence of weekend days, the tariffs are proposed to be effective on eight (8) business days' notice.

5. SMNG's 2nd Revised Sheet No. 20 states in part: "Any PGA filing shall not be approved unless it has first been on file with the Commission for a period of ten (10) business days."

6. Due to rapidly rising natural gas prices and changes in the related basis differentials in the marketplace, it is necessary to change the PGA factor to avoid the need to adversely affect the ACA factor in a manner that would require future recoveries from customers. 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. Without the approval of this request, SMNG would need to delay the effective date of its tariffs until March 1, 2010 to coincide with its billing cycles.

WHEREFORE, Southern Missouri Gas Company, L.P. d/b/a Southern Missouri Natural Gas respectfully requests that the Commission grant it a variance from the provisions of its tariffs, as discussed herein, and permit the Company file its proposed PGA tariff change on less than ten (10) business days notice.

Respectfully submitted,

/s/ James M. Fischer

James M. Fischer Mo. Bar No. 27543
FISCHER & DORITY, P.C.
101 Madison—Suite 400
Jefferson City, Missouri 65101
Telephone: (573) 636-6758
Fax: (573) 636-0383
Email: jfischerpc@aol.com

ATTORNEYS FOR
SOUTHERN MISSOURI GAS COMPANY, L.P.
d/b/a SOUTHERN MISSOURI NATURAL GAS

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been
emailed, hand-delivered or mailed, postage prepaid, this 19th day of January, 2010, to:

Office of the Public Counsel
P.O. Box 2230
Jefferson City, Missouri 65102

General Counsel's Office
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

/s/ James M. Fischer

James M. Fischer