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November 1, 1999

FILED

NOV - 1 1999

Missouri Public  
Service Commission

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 3660  
Jefferson City, Missouri 65102

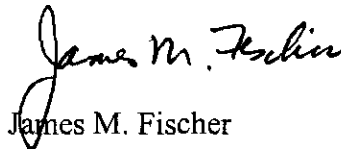
RE: Proposed Recission and Modification of 4 CSR 240-2.080  
Case No. AX-2000-116

Dear Mr. Roberts:

Enclosed are the original and fourteen (14) copies of Comments of Southern Missouri Gas Company for filing in the above-referenced matter. A copy of the foregoing document 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 Joyce

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED

NOV - 1 1999

Missouri Public  
Service Commission

In the Matter of the Proposed Recission and )  
Modification of 4 CSR 240-2.080. )

Case No. AX-2000-116

**COMMENTS OF SOUTHERN MISSOURI GAS COMPANY, L.P.**

Comes now Southern Missouri Gas Company, L.P. ("SMGC") and respectfully submits the following Comments regarding the proposed changes to 4 CSR 240-2.080 in this proceeding:

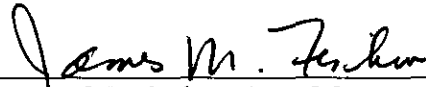
1. In the October 1, 1999, edition of the Missouri Register, the Missouri Public Service Commission ("Commission") proposed to rescind and modify 4 CSR 240-2.080. In Subsection 16 of the proposed rule, the Commission has proposed the following provision:

Parties shall be allowed seven (7) days from the date of filing in which to respond to any pleading unless otherwise ordered by the commission.

2. The effect of this proposed change is to reduce from ten (10) to seven (7) days the amount of time that parties would have to respond to any pleading filed by other parties in a Commission proceeding. SMGC is concerned that this proposed change will make it more difficult for parties to adequately respond to pleadings, especially when they are served by mail. Often, there are delays in mail service which effectively reduce the amount of time to prepare, circulate drafts for client approval, and file responses to pleadings. In addition, when pleadings are filed on Friday, the weekend period effectively shortens the time to file such responses by two or three days. Even under the existing 10-day rule, it is often necessary to requests extensions of time to respond. GTE believes the proposal to shorten the response time will only exacerbate the problem of responding in a timely manner. Therefore, SMGC respectfully opposes the proposed change discussed herein.

WHEREFORE, Southern Missouri Gas Company, L.P. respectfully requests that the Commission decline to adopt the proposed change, as discussed herein, to 4 CSR 240-2.080.

Respectfully submitted,



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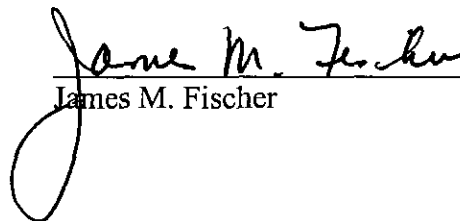
ATTORNEY FOR  
SOUTHERN MISSOURI GAS COMPANY, L.P.

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 1st day of November, 1999, to:

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

Dan Joyce  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102



James M. Fischer