BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

FILED³
OCT 1 8 2000

In the matter of Southern Missouri Gas)	Service Commission
Company, L.P.'s Tariff Revision Designed)	Tariff File No. 200100 459
to be Reviewed in Its 1999-2000 Actual Cost)	,
Adjustment for the Missouri Service Area)	Case No. GR-2001-39
of the Company.)	

REQUEST FOR VARIANCE FROM TARIFF PROVISIONS

COMES NOW Southern Missouri Gas Company, L.P. ("SMGC" or "Company"), by and through its attorneys, and requests that the Missouri Public Service Commission ("Commission") grant a variance from the provisions of its tariffs, for good cause shown, and permit the Company to recover the current ACA balance over a three (3) year period, rather than recovery of the total in a one year period, as reflected in the Company's tariff sheets (*i.e.*, 1st Revised Sheet No. 26, and Original Tariff Sheet Nos. 26.1 and 26.2.) In addition, the Company requests that it be permitted to make its Scheduled Winter PGA filing effective on November 2, 2000, rather than November 1, 2000, as mandated by its 1st Revised Tariff Sheet No. 21. In support of its Request for Variance, the SMGC states as follows:

1. On October 18, 2000, SMGC filed its annual PGA tariff (i.e., 8th Revised Sheet No. 27 canceling 7th 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 current ACA balance of \$1,653,148.75. In order to reduce the immediate impact upon customers of the recovery of this current ACA balance in a one-year period, SMGC is proposing to recover the current ACA balance over a three (3) year period. This would result in a recovery of

\$551,049.58 in the current period. In order to ensure that SMGC's proposed 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 recover the current ACA balance over a three (3) year period rather than a one (1) year period.

4. In addition, due to the need to discuss the Company's PGA/ACA process and the Company's pending general rate case with the Commission Staff, the Company was unable to file its Scheduled Winter PGA filing until today. In order to give the Commission Staff ten (10) business days to review its PGA filing, the Company's 8th revised tariff sheet No. 27 is being filed with an effective date of November 2, 2000, rather than on November 1 as mandated by its tariffs. Therefore, the Company hereby requests a waiver of its tariff provision on its 1st Revised Sheet No. 21 that states that its Winter PGA shall be effective on November 1.

WHEREFORE, Southern Missouri Gas Company, L.P. respectfully requests the Commission to grant it a variance from the provisions of its tariffs, as discussed herein, and permit the Company to recover its current ACA balance over a three (3) year period rather than a one (1) year period, and also permit the filing of the Company's Winter PGA to be effective on November 2, 2000.

Respectfully submitted,

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ATTORNEYS 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 _/8 day of October, 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