

FILED³

Missouri Public
Service Commission

Tariff File No. 2001 00 459

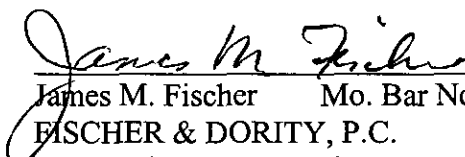
1. On October 18, 2000, SMGC filed its annual PGA tariff (*i.e.*, 8th Revised Sheet No. 27 canceling 7th Revised Sheet No. 27) which was designed to calculate the Total PGA amount to be recovered in the upcoming period. SMGC also filed its supporting workpapers which identified a current ACA balance 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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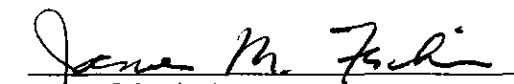
ATTORNEYS FOR
SOUTHERN MISSOURI GAS COMPANY, L.P.

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 18th 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
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James M. Fischer