

JAMES M. FISCHER, P.C.

ATTORNEY AT LAW
REGULATORY CONSULTANT

101 WEST McCARTY, SUITE 215
JEFFERSON CITY, MO 65101

TELEPHONE (573) 636-6758
FAX (573) 636-0383

September 16, 1998

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

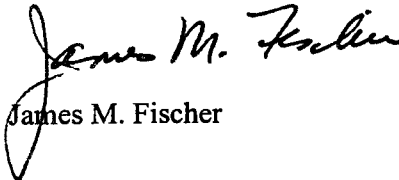
RE: Year 2000 Conversion
Case No. OO-99-43

Dear Mr. Roberts:

Enclosed are the original and fourteen (14) copies of the Year 2000 Survey of Southern Missouri Gas Company, L.P. for filing in the above-referenced matter.

Thank you for your attention to this matter.

Sincerely,


James M. Fischer

/jr
Enclosures

cc: Office of the Public Counsel

FILED

SEP 16 1998

Missouri Public
Service Commission

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SEP 16 1998

In Re the Matter of an Investigation Into)
Public Utility Preparedness for Year 2000)
Conversion.)

Missouri Public
Service Commission
CASE NO. 00-99-43

**Missouri Public Service Commission
Y2K Questionnaire**

**A Survey to determine the Scope of the Year 2000 (Y2K) Problem as it Relates to
Public Utilities in the State of Missouri.**

Utility Name Southern Missouri Gas Company, L.P. Utility #

Y2K Project Coordinator Michael N. Trusty
(Individual with primary responsibility for Y2K conversion and readiness)

Complete Address 8801 S. Yale - Suite 385, Tulsa, OK 74137

Telephone # 918-493-5995

E-Mail Address mintrus@prodigy.net

Fax # 918-493-7475

1. How many employees are specifically assigned to the Y2K problem?
One (M. N. Trusty, as a collateral duty)

2. Do you have a Y2K consultant? If so, please identify.
No

3. Do you (or does your parent company) have a Year 2000 Compliance statement? If so, please attach. If not, do you plan to have one in the future?

Yes, SMGC has a combined Year 2000 Statement and Assessment (copy attached).

4. Please identify and describe in detail your current status in the Year 2000 preparedness process:

- Have Not Started
 - Planning
 - Assessment
 - Remedying
 - Testing and Certifying
 - Finished
 - Not Following a Plan
- SMGC can best be described as remediating and monitoring. All in-house issues are being addressed now; monitoring continues for vendors and suppliers. See the attached Compliance Plan for details.

6. What is the date at which you expect to be fully Year 2000 compliant?

Describe what tests or standards your company uses to determine "Y2K compliant" status.

SMGC expects to be Year 2000 compliance by mid-1999. SMGC relies on software manufacturer statements and presence of 4-digit year date fields for compliance confirmation. SMGC does not expect to publish any "standard" or specific "test" to confirm compliance.

7. Does your particular industry have an organization that is providing Y2K guidance and information? If so, please identify the organization.

None

8. Have you taken or are you planning to take any actions that you know will prevent disruptions in both service and or billing systems?

SMGC's billing services are provided by Citizens Gas Fuel Company (a subsidiary of MCN Corporation, a General Partner in SMGC). Citizens' new ORCOM billing system is fully Year 2000 compliant. See attached Compliance Plan for further discussion.

FILED

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In Re the Matter of an Investigation Into
Public Utility Preparedness for Year 2000
Conversion.

)
)
) CASE NO. 00-99-43

ENTRY OF APPEARANCE

Comes now (name of attorney) and enters his/her appearance on behalf
of (name of utility/entity) in Case No. 00-99-43.

The Year 2000 coordinator for the above-named company, who has
primary responsibility for Year 2000 conversion and readiness, is

Name
Title
Address
Telephone #
Fax
E-mail

Attorney signature
MoBar number
Address
Telephone
Fax
E-mail

Attachment A: Entry of Appearance

(Please feel free to supplement this entry with the same data on
Disk in Word or Wordperfect format)

3. Do you (or does your parent company) have a Year 2000 Compliance statement? If so, please attach. If not, do you plan to have one in the future?
- Yes, SMGC has a combined Year 2000 Statement and Assessment (copy attached).

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6. What is the date at which you expect to be fully Year 2000 compliant?
- Describe what tests or standards your company uses to determine "Y2K compliant" status.

SMGC expects to be Year 2000 compliance by mid-1999. SMGC relies on software manufacturer statements and presence of 4-digit year date fields for compliance confirmation. SMGC does not expect to publish any "standard" or specific "test" to confirm compliance.

7. Does your particular industry have an organization that is providing Y2K guidance and information? If so, please identify the organization.

None

8. Have you taken or are you planning to take any actions that you know will prevent disruptions in both service and or billing systems?
- SMGC's billing services are provided by Citizens Gas Fuel Company (a subsidiary of MCN Corporation, a General Partner in SMGC). Citizens' new ORCOM billing system is fully Year 2000 compliant. See attached Compliance Plan for further discussion.

9. In assessing potential Y2K problems, which of the following best describes the anticipated impact for your utility operations? (circle one) please add additional information where appropriate:

- We will identify and correct all Y2K problems before Jan. 1, 2000.
- We will be 100% compliant sometime after Jan. 1, 2000 with no significant disruptions to service or billing.
- We will be 100% compliant sometime after Jan. 1, 2000 with some significant disruptions to service or billing.
- We will be 100% compliant sometime after Jan. 1, 2000 but our assessment is not accurate enough to identify all problems that may significantly affect service or billing.
- We are not following a compliance plan that calls for prior assessment of potential Y2K problems.

SMGC plans to identify and correct or mitigate to the point of insignificance all Year 2000 problems before 1-1-2000. Due to the simplicity of SMGC's system, SMGC can deliver any gas that enters its system regardless of Year 2000 problems. SMGC will stay in close touch with its gas supplier and gas transporter to better ensure uninterrupted supply. Other than any supply vulnerability, SMGC's normal ops plans and contingency procedures will cover any Year 2000 related issue.

10. Please provide a copy of your contingency plan.

SMGC does not have any contingency plan other than those which are part of its normal Operations, Maintenance and Emergency manuals plus the actions intended as part of the attached Compliance Plan.

11. What is your estimated cost for investigating Y2K conversion and ensuring Y2K readiness and compliance?

SMGC's total Year 2000 related costs will be less than \$5,000. This amount will be expended for off-the-shelf software packages and NT Server upgrades. Other hardware/software replacement is dictated by age or vendor supply of upgrades.

12. Do you anticipate any impact on rates as a result of the Y2K conversion process? If so, please explain.

None

13. Have you addressed Y2K compliance with external suppliers, contractors, and other business partners or vendors? If so, please explain.

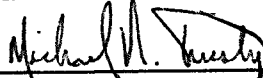
Yes, see attached Compliance Plan.

14. What is your plan for monitoring for potential problems after January 1, 2000?

SMGC plans to be alert for any on-going Year 2000 risks, especially after each of the critical dates (e.g., 9-9-99, 1-1-00, etc.).

Secretary of the Commission, 00-99-43
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

I, Michael N. Trusty, of lawful age, state upon my oath that I participated in the preparation of this survey to be filed in Case No. 00-99-43 and that the information contained herein is true and correct to my best knowledge and belief.



Michael N. Trusty, RE
Title: Vice President
Southern Missouri Gas Company, L.P.

Subscribed and sworn to before me this 15th day of September, 1998.



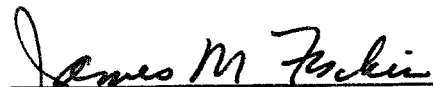
Notary Public

My Commission Expires:

June 11, 2001

Pursuant to the Code of State Regulations and Missouri Supreme Court Rules, pleadings filed with the Public Service Commission on behalf of another must be filed by an attorney licensed to practice law in the State of Missouri.

Signature:



Attorney James M. Fischer
MO Bar # 27543
Address 101 West McCarty Street, Suite 215
City Jefferson City State MO 65101
Phone # (573) 636-6758
Fax # (573) 636-0383
E-Mail: HCJN85A@prodigy.com



SOUTHERN MISSOURI GAS COMPANY, L.P.

To: Southern Missouri Gas Company, L.P. Partners

From: Michael N. Trusty, PE

Subj: Year 2000 Compliance Plan for SMGC

Date: 30 June 1998 (with update through 14 September 1998)

SMGC has potential vulnerability to Year 2000 Compliance problems from relatively few sources. These are itemized by Tartan Management Company of Missouri, L.C. ("TMC"), as Operator and one of two General Partners of SMGC, with brief discussion as follows:

Software: Windows NT Server - Version 3.51 @ Mt. Grove office - This software package, which forms the basis of the local network in the Mt. Grove office, will be updated with a then-current (and Year 2000 compliant) version in early 1999, immediately preceding SMGC's changeover to the new ORCOM billing system recently placed in service at Citizens Gas Fuel Company (MCN). [9-14-98 Update: This NT Server package will be essentially identical with the NT Server package to be installed in the Tulsa office (see below). Citizens presently provides SMGC's billing/account history service, with SMGC's data entry made via AT&T leased lines from the SMGC offices in Mt. Grove, West Plains and Marshfield; as discussed further below the new ORCOM billing system now in use at Citizens is fully Year 2000 compliant. With update of the Mt. Grove office's Windows NT Server software package, all SMGC billing related processes will be Year 2000 compliant.]

Reynolds GM (Version 3.24) and GMHost - Versions 4.33 and 4.36 and LVCHost - Version 1.22 - These packages are proprietary software provided by Reynolds Equipment Company, Inc. to communicate between the Mt. Grove office and the various volume correctors and chartless data recorders located along the SMGC system. This software is essentially an electronic version of a roundtable file; when the most recent day's data is added to the queue, the most distant day's data is erased. Reynolds has advised SMGC that the software has no specific date sensitivity that will be impacted by any Year 2000 issue; from SMGC's understanding of the software and how it functions, this statement by Reynolds appears valid and no Year 2000 problems are expected with either the software or the Reynolds volume correctors and/or chartless data recorders in service at SMGC.

Novell 3.12 Network Server @ Tulsa office - This software package, which forms the basis of the local network in the Tulsa office, will be replaced with Year 2000 compliant Windows NT in late 1998. [9-14-98 Update: A 9-1-98 quote is in-hand from Strategies In Technology, the local support firm for TMC's Novell 3.12 Network in the Tulsa office, to install a Year 2000 compatible Windows NT for Small Business Server; this installation is tentatively set for November 1998.]

Platinum for Windows 95 - Version 4.5A – This software package provides the overall accounting system used by TMC for SMGC accounting. A Year 2000 compliant upgrade revision has been received at the Tulsa office, but has not been placed in service on the recommendation of Crouch, Sellers & Slavin, the local Platinum support company. The current upgrade revision has been found to have several minor glitches which will be corrected in a forthcoming revision *that will be placed in service* in Tulsa. Counting the known forthcoming revision, Platinum is expected to have at least two revisions between now and the end of 1999, thus any significant Year 2000 problem is thought unlikely. TMC purchases an annual support agreement for SMGC's Platinum package and will receive upgrades as issued.

Microsoft Word, Excel, Access + Lotus 1-2-3 + WordPerfect Suite 8 in Mt. Grove and Tulsa offices – These packages are being upgraded on an on-going basis. All packages in active use will be upgraded before mid-1999.

Itron Meter Reader Hand-Held Data Entry Units - SMGC's meter readers use Itron Model FS/2 hand-held data entry units to record gas meter readings system wide. These readings are then downloaded directly into SMGC's Mt. Grove Windows NT Network for transmission to the Citizens Gas Fuel Company billing/account history system. *[9-14-98 Update: The primary software for these units, including that which provides the capability for direct download to SMGC's billing system, is being upgraded within the next 30 days to Enterprise E5000 Year 2000 version # 4.0, which is fully Year 2000 compliant.]*

Services: The primary service which could impact SMGC due to any Year 2000 compliance issue is the billing system/account history service provided by Citizens Gas Fuel Company (a subsidiary of MCN, the second SMGC General Partner). Current plans are for SMGC to switch in the first half of 1999 to the new ORCOM billing system recently installed and now in service at Citizens. It is SMGC's understanding that this new ORCOM system has fully addressed Year 2000 compliance issues.

Vendors: Two vendors provide SMGC's most important third party services:

Gas Supply Transportation via Williams Natural Gas Company – WNG has a relatively huge and very complex natural gas transmission system. WNG has in-house task groups focused on the undoubtedly complex WNG Year 2000 issues. Privately, WNG field employees will assure customers that gas can and will physically flow on January 1, 2000 and the other associated critical dates, although gas accounting may or may not be impacted in some unknown way. SMGC will continue to monitor WNG's Year 2000 compliance progress.

Gas Supply Originating from Amoco Energy Trading Corporation – SMGC is contracted with Amoco as the SMGC gas supplier through October 1999. Amoco's situation is similar to WNG's regrading the Year 2000 compliance issues. Additionally, Amoco may or may not be the follow-on gas supplier beyond October, 1999. SMGC will continue to monitor Amoco's Year 2000 compliance progress and will rapidly assess the compliance situation for any other gas supplier that might be selected shortly before the year 2000.

Hardware: Pipeline System -- The SMGC system is relatively simple when compared to most gas distribution systems. SMGC has no prime movers (e.g., compressors) installed on its system and can continue normal deliveries to residential, commercial and industrial customers during times of power outage, communication failure, etc. All residential and commercial metering is mechanical and only non-year 2000 sensitive electronics are installed on SMGC's industrial meter settings. *No impact on SMGC's operations is foreseen relative to Year 2000 problems with in-house operations-related hardware.*

Administrative -- SMGC now has in place new Gateway pc's, known to be Year 2000 compliant, at each field office (Mt. Grove, Marshfield & West Plains). Replacements or upgrades of the remaining pc's in Mt. Grove are being made as software and/or tasking necessitates. It is possible that some not-routinely-used software on some SMGC pc may not operate properly due to Year 2000/critical date issues. If and when this situation arises, either the machine or the software will be replaced as soon as the problem is identified. TMC, as operator of SMGC, now has new Year 2000 compliant Gateway pc's available for SMGC accounting activity. *No significant impact is foreseen to SMGC arising from Year 2000 problems with in-house computer equipment or software.*


Customer Payment Receiving Agents -- SMGC customers can make payments in communities where there is no SMGC office by dropping off payments, deposits, etc. at third party business locations which act as SMGC Receiving Agents. SMGC uses an *entirely manual* process at the seven receiving agent locations to record all cash receipts and/or dropped off applications (an average 90 transactions per month per receiving agent). No direct Year 2000 compliance problem is likely to arise and affect the SMGC receiving agent process; the receiving agent locations, which vary in sophistication from no computer in the office to routine use of pc's and accounting software, may be vulnerable to some Year 2000 problem, but any impact to SMGC should be incidental and minimal. SMGC will continue to monitor the receiving agents as the Year 2000 timeframe approaches.

Utilities: SMGC is served at various business locations by numerous different, unaffiliated utilities (electric, water, and sewer co-ops/municipal systems, telephone, radio repeater, etc.). While SMGC can operate (receive, transport, measure and deliver gas) without any of these services, their absence ultimately would be disruptive. SMGC expects no significant or long term problems with larger electric utilities and providers such as AT&T, GTE and Southwestern Bell, but small cooperatives, water districts, municipal electric systems, etc., which often have minimal oversight, may have Year 2000 problems arise that will inconvenience SMGC for some period of time. [9-14-98 Update: SMGC will be alert for these potential problems as each potentially troublesome anniversary (e.g., 9-9-99 date, January 01, 2000, etc.) approaches, but plans no specific remedial or preparatory actions due to the relatively minor impact that problems experienced by these utilities might cause. It should be noted that SMGC has triple redundant communications capability covering it's entire system (telephone, cellular, & radio (with both simplex direct and trunked duplex capability using 12 VDC and 120 VAC power supplies, with backup generators pre-positioned at each of SMGC's three Missouri offices))].

Banking:

SMGC uses Nation's Bank for its routine, sweep and payroll accounts in Missouri. Nation's has an active Year 2000 compliance effort underway for all its locations. In Tulsa, SMGC uses Bank One which also has an active Year 2000 effort. Although SMGC will be alert for bank related Year 2000 issues, present bank plans are expected to avert any significant upheaval.

Y2kcom.wpd

A handwritten signature in black ink, appearing to be "M. N. Trusty", located in the lower right quadrant of the page.