BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI



In the Matter of Southern Missouri Gas Company L.P.'s Purchased Gas Adjustment Factors to be reviewed in Its 2000-2001)	Case No.	GR-2001-388
Actual Cost Adjustment)		

REQUEST FOR VARIANCE FROM TARIFF PROVISIONS

COMES NOW Southern Missouri Gas Company, L.P., ("SMGC" or "Company"), by and through its attorney, and requests the Missouri Public Service Commission ("Commission") to grant a variance from the provisions of its tariffs, for good cause shown, and permit SMGC to file an unscheduled Summer Purchased Gas Adjustment change, rather than delaying its next change in the PGA factor until its next scheduled Winter filing. In support of its Request for Variance, SMGC states as follows:

- 1. Simultaneously with the filing of this Request For Variance, SMGC filed its revised PGA tariff (*i.e.*, 10th Revised Sheet No. 27 cancelling 9th 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 supported the calculations of the revised PGA factors to be recovered this period under the PGA/ACA process. This filing represents an unscheduled Summer PGA filing.
- 2. Due to recent reductions in natural gas prices, SMGC believes that it is reasonable and appropriate to file an unscheduled Summer PGA filing, reducing the cost of gas. If approved, this filing will: (1) give a more accurate price signal to consumers regarding the current cost of natural gas; and (2) help keep the DCCB and the ACA balances at appropriate levels and not create significant over-collections or under-collections that would need to be

reflected in future periods. SMGC also anticipates that the revised Total PGA level will remain unchanged in its upcoming scheduled winter PGA filing in October, 2001.

3. In order to ensure that SMGC's procedure is not in conflict with its tariffs, SMGC would respectfully request the Commission to grant it a one-time variance from its tariffs to permit it to make an unscheduled Summer PGA filing at this time.

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 make the unscheduled Summer PGA factor change proposed by SMGC at this time.

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 by First Class U.S. mail, postage prepaid, this 177 day of September, 2001, 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