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PROFESSIONAL CORPORATION

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July 14, 2000

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

FILED²
JUL 14 2000
Missouri Public
Service Commission
GR-2001-36

RE: *In the Matter of Greeley Gas Company's Tariff Revision Designed to Revise Its
Purchased Gas Adjustment Factor for the Missouri Service Area of the Company*

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are the original and eight (8) copies of Greeley Gas Company's Request for Variance from Tariff Provisions. A copy of the Request 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 K. Joyce

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²

JUL 14 2000

Missouri Public
Service Commission

In the Matter of Greeley Gas Company's)
Tariff Revision Designed to Revise Its)
Purchased Gas Adjustment Factor for)
the Missouri Service Area of the Company.)

Case No. GR-2001-36

Tariff File No. 200100046

REQUEST FOR VARIANCE FROM TARIFF PROVISIONS

COMES NOW Greeley Gas Company, a division of Atmos Energy Corporation, ("Greeley" 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 Greeley 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, Greeley states as follows:

1. On July 14, 2000, Greeley filed its revised PGA tariff (*i.e.*, 45th Revised Sheet No. 6 cancelling 44th Revised Sheet No. 6), which was designed to calculate the Total PGA amount to be recovered in the upcoming period. Greeley also filed its supporting workpapers which supported the calculations of the revised PGA factor to be recovered this period under the PGA/ACA process.

This filing represents an unscheduled Summer PGA filing.

2. Due to unforeseen and dramatic increases in natural gas prices, Greeley believes that it is reasonable and appropriate to file an unscheduled Summer PGA filing. If approved, this filing will: (1) give a more accurate price signal to consumers regarding the current cost of natural gas; (2) help keep the DCCB and the ACA balances from further undercollections which, if not

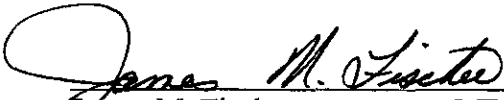
addressed, would add to the impact of the upcoming scheduled winter filing; and (3) help build consumer awareness of the possible increases in gas costs for the next winter season.

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

4. The Commission Staff has indicated to the undersigned counsel that it does not object to this request for variance from the provisions of the Company's tariffs.

WHEREFORE, Greeley Gas Company, a division of Atmos Energy Corporation, 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 Greeley at this time.

Respectfully submitted,


James M. Fischer MBN 27543
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Jefferson City, Missouri 65101
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Fax: (573) 636-0383
E-mail: jfischerpc@aol.com



ATTORNEYS FOR
GREELEY GAS COMPANY,
A DIVISION OF ATMOS ENERGY CORPORATION

CERTIFICATE OF SERVICE

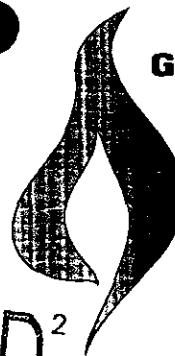
I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed by First Class, U.S. mail, postage prepaid, this 14th day of July, 2000, to:

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

**GREELEY
GAS
COMPANY**



July 13, 2000

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street
Jefferson City, Missouri 65101

FILED²

JUL 14 2000

GR-2000-36

Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed is the original and three copies of the filing for P.S.C. Mo. No. 1, Forty-fifth revised sheet No. 6, which cancels P.S.C. Mo. No. 1, Forty-fourth revised Sheet No. 6. Please indicate receipt of this filing by dating the enclosed duplicate of this letter and returning it in the enclosed, stamped envelope for our files. Also, if you have any questions, please do not hesitate to call me at (615) 595-7700 extension 233.

This filing is made to comply with Public Service Commission Rules and Greeley Gas Company tariffs. Included in this filing are Exhibits C, D, and E, detailing the computation of the Refund effective August 1, 2000 through November 30, 2000, and the steps used in calculating the new Regular Purchased Gas Adjustment (RPGA) for Greeley Gas Company's Missouri customers and the revenue effect thereof.

The expected purchased gas cost calculations on Exhibit D has the effect of increasing the RPGA. This increase is expected to result in an annual increase to the Missouri customers of \$73,889 or 22.06% on gross receipts.

Greeley Gas Company requests that this revised tariff P.S.C. Mo. No. 1, Forty-fifth revised sheet No. 6, become effective with all billings on or after August 1, 2000.

Sincerely,

Bob Cline
Manager, Rate Administration

Enclosures

Cc: Public Counsel (2)

200100046

GREELEY GAS COMPANY (A Division
of Atmos Energy Corporation)

Name of Issuing Corporation

For: RICH HILL, HUME, AND RURAL CUSTOMERS

Community, Town, or City

GENERAL GAS SERVICE SCHEDULE
PURCHASED GAS ADJUSTMENT CLAUSE (Cont.)ADJUSTMENT STATEMENT

As provided in sheets 3, 4, 5, and 5A of this Purchased Gas Adjustment Clause, the following adjustments in \$/CCF shall be made to the Customer's currently effective rate to reflect the Company's cost of gas.

<u>Regular PGA</u>	<u>Actual Cost</u>	<u>Refund</u>	<u>Net PGA</u>
<u>(\$/CCF)</u>	<u>Adjustment</u>	<u>(\$/CCF)</u>	<u>(\$/CCF)</u>
0.5087	(0.0331)	(0.0240)	0.4516

* Indicates new rate or test

+ Indicates change

DATE OF ISSUE: July 13, 2000DATE EFFECTIVE: August 1, 2000ISSUED BY: Mark G. Thessin Vice President, Regulatory Affairs

Geley Gas Company

Missouri Area - Eastern Kansas Division
Mcf Sales And Dollar Sales Comparison
Of New ACA To Become Effective 12/1/99

Exhibit C
Page 1 of 1

Month	Mcf Sales			
	Rich Hill	Hume	Rurals	Totals
Jun-98	2,226	133	39	2,397
Jul-98	2,547	133	27	2,707
Aug-98	1,310	225	19	1,554
Sep-98	715	103	23	841
Oct-98	1,144	145	30	1,319
Nov-98	2,080	306	71	2,457
Dec-98	1,934	1,140	139	3,213
Jan-99	11,347	1,600	352	13,300
Feb-99	5,846	890	181	6,917
Mar-99	6,068	868	178	7,114
Apr-99	3,954	632	325	4,911
May-99	2,170	335	180	2,685
Total	41,342	6,510	1,564	49,416

	Actual Sales	Percent	Cost Change
Rich Hill	41,342	83.66%	61,816
Hume	6,510	13.17%	9,734
Rurals	1,564	3.17%	2,339
Total	49,416	100.00%	73,889

	Projected Ccf/Sales	Rate/ Ccf	Revenue	Percentage Change
Old Rate (12/1/99)	530,430	0.6315	\$334,967	
New Rate (8/1/00)	530,430	0.7708	408,855	
			<u>\$73,889</u>	<u>22.06%</u>

Contact Person - Business License Tax

Rich Hill, Missouri: Rose Entrikin, City Clerk
120 North 7th Street
Rich Hill, Missouri 64779

Hume, Missouri: Pat Filpot, Town Clerk
P. O. Box 191
Hume, Missouri 64752

Regular PGA filing pursuant to change in Williams Natural Gas
Company tariffs (Sheet Nos.6 and 6A)
and purchases from Alternative Suppliers.

PGA Computation:	<u>Mcf</u>		<u>\$/Dth</u>	<u>Cost</u>
<u>Williams Natural Gas: TSS-M</u>				
No-Notice Fee	7,461	x	\$0.0154	\$115
Reservation: FSS - Deliverability	4,384	x	0.5083	2,228
Reservation: FSS - Capacity	71,209	x	0.0290	2,065
Reservation: FTS - P	3,146	x	5.6119	17,655
Reservation: FTS - M	7,461	x	2.6014	19,409
Reservation: GRI Demand (P & M)	10,607	x	0.2300	2,440
Injection - FSS	14,392	x	0.0122	176
Fuel Reimbursement - Injection	904	x	0.0000	0
Withdrawal - FSS	14,392	x	0.0122	176
Commodity: FTS - P	55,165	x	0.0124	684
Fuel Reimbursement	2,824	x	0.0000	0
Commodity: FTS - M	55,165	x	0.0061	337
Commodity: GRI funding	55,165	x	0.0075	414
Commodity: ACA funding	55,165	x	0.0022	121
Summary of FERC Order 636 Transition costs (See Exhibit D, page 2)				<u>5,770</u>
See Exhibit D, Page 2 of 2.				
Subtotal Williams Natural				51,590
Williams Energy Marketing	55,165	x	3.9560	218,233
Estimated Total Dollar Cost of Purchased Gas (" P ")				<u>\$269,823</u>
Divided by PGA Sales (CCF) (" V ")				<u>530,430</u>
Equals: Regular Purchased Gas Adjustment (RPGA)				<u>\$0.5087</u>

1) Assumed that an Mcf is equivalent to a Dth.

GREY GAS COMPANY
MISSOURI AREA - SUPPLIER REFUND

Exhibit E
Page 1 of 1

Interest rate: 9.00%

Item No.	Description	Ccf	Principal	Interest before refund period	Total	Factor \$/Ccf
1	Refund Balance @ 5/31/99		(\$9,314.00)	\$0.00	(\$9,314.00)	
2	adjustment		(5,248.02)	(616.41)	(5,864.43)	
					0.00	
	Total with pre-refund interest	530,430	(\$14,562.02)	(\$616.41)	(\$15,178.43)	\$0.0286
3	Interest during refund period				(387.91)	(0.0240)
4	1998-1999 ACA Staff adjustment		2,828.00		2,828.00	
	Total	530,430	(\$11,734.02)	(\$616.41)	(\$12,738.34)	\$0.0240

Item No.	Refund Holding Period	Days per Month	Refund Factor	Beginning Balance	Refund Amount	Interest	Ending Balance
2	Apr-98	30	0	(\$11.00)	0	(\$0.08)	(\$11.08)
	May-98	31	0	(11.08)	0	(\$0.08)	(11.17)
	Jun-98	30	0	(11.17)	0	(\$0.08)	(11.25)
	Jul-98	31	0	(11.25)	0	(\$0.09)	(11.33)
	Aug-98	31	0	(11.33)	0	(\$0.09)	(11.42)
	Sep-98	30	0	(11.42)	0	(\$0.08)	(11.51)
	Oct-98	31	0	(11.51)	0	(\$0.09)	(11.59)
	Nov-98	30	0	(11.59)	0	(\$0.09)	(11.68)
	Dec-98	31	0	(11.68)	0	(\$0.09)	(11.77)
	Jan-99	31	0	(11.77)	0	(\$0.09)	(11.86)
	Feb-99	28	0	(11.86)	0	(\$0.08)	(11.94)
	Mar-99	31	0	(11.94)	0	(\$0.09)	(12.03)
	Apr-99	30	0	(12.03)	0	(\$0.09)	(12.12)
	May-99	31	0	(12.12)	0	(\$0.09)	(12.21)
	Jun-99	30	0	(11.59)	0	(\$0.09)	(11.68)
	Total	456				(\$1.30)	

Item No.	Refund Holding Period	Days per Month	Refund Factor	Beginning Balance	Refund Amount	Interest	Ending Balance
2	Apr-98	30	0	(\$5,237.02)	0	(\$38.74)	(\$5,275.76)
	May-98	31	0	(5,275.76)	0	(\$40.33)	(5,316.09)
	Jun-98	30	0	(5,316.09)	0	(\$39.32)	(5,355.41)
	Jul-98	31	0	(5,355.41)	0	(\$40.94)	(5,396.35)
	Aug-98	31	0	(5,396.35)	0	(\$41.25)	(5,437.60)
	Sep-98	30	0	(5,437.60)	0	(\$40.22)	(5,477.82)
	Oct-98	31	0	(5,477.82)	0	(\$41.87)	(5,519.69)
	Nov-98	30	0	(5,519.69)	0	(\$40.83)	(5,560.52)
	Dec-98	31	0	(5,560.52)	0	(\$42.50)	(5,603.02)
	Jan-99	31	0	(5,603.02)	0	(\$42.83)	(5,645.85)
	Feb-99	28	0	(5,645.85)	0	(\$38.98)	(5,684.83)
	Mar-99	31	0	(5,684.83)	0	(\$43.45)	(5,728.29)
	Apr-99	30	0	(5,728.29)	0	(\$42.37)	(5,770.66)
	May-99	31	0	(5,396.35)	0	(\$41.25)	(5,437.60)
	Jun-99	30	0	(5,437.60)	0	(\$40.22)	(5,477.82)
	Total	456				(\$615.11)	

Item No.	Refund Period	Estimated Sales Ccf	Refund Factor	Beginning Balance	Refund Amount	Interest	Ending Balance
2,3	Dec-99	80,455	0.0293	15,178.43	2,357.33	96.16	12,917.26
	Jan-00	103,030	0.0293	12,917.26	3,018.78	74.24	9,972.72
	Feb-00	102,454	0.0293	9,972.72	3,001.90	52.28	7,023.10
	Mar-00	69,784	0.0293	7,023.10	2,044.67	37.34	5,015.77
	Apr-00	50,726	0.0293	5,015.77	1,486.27	26.47	3,555.96
	May-00	26,073	0.0293	3,555.96	763.94	20.94	2,812.97
	Jun-00	10,429	0.0293	2,812.97	305.57	18.81	2,526.21
	Jul-00	9,056	0.0293	2,526.21	265.34	16.96	2,277.82
	Aug-00	7,581	0.0240	2,277.82	181.94	15.72	2,111.60
	Sep-00	8,926	0.0240	2,111.60	214.22	14.23	1,911.61
	Oct-00	15,866	0.0240	1,911.61	380.78	11.48	1,542.30
	Nov-00	46,050	0.0240	1,542.30	1,105.20	3.28	440.38
	Total	530,430			\$15,125.96	\$387.91	

**Greeley Gas Company,
A Division of Atmos Energy Corporation
Cap Calculation
Missouri**

FOR AN UNSCHEDULED SUMMER PGA FILING

1996-1997 Summer Season

	June 1996	July	August	September	October	April 1997	May	Total	Average \$/ Ccf
Purchase Volumes	1,453	960	1,095	2,242	2,907	4,319	1,865	14,841	
Commodity Cost	\$0.6903	\$7.1635	\$5.9954	\$3.9059	\$3.4919	\$3.2711	\$5.1839		
Total Commodity Costs	\$1,003.00	\$6,877.00	\$6,565.00	\$8,757.00	\$10,151.00	\$14,128.00	\$9,668.00	\$57,149.00	\$3.8508

1997-1998 Summer Season

	June 1997	July	August	September	October	April 1998	May	Total	Average \$/ Ccf
Purchase Volumes	841	1,775	2,989	(788)	2,793	3,459	1,248	12,317	
Commodity Cost	\$8.2818	\$6.0180	\$3.5661	-\$5.1459	\$4.3326	\$3.6843	\$6.2612		
Total Commodity Costs	\$6,965.00	\$10,682.00	\$10,659.00	\$4,055.00	\$12,101.00	\$12,744.00	\$7,814.00	\$65,020.00	\$5.2789

1998-1999 Summer Season

	June 1998	July	August	September	October	April 1999	May	Total	Average \$/ Ccf
Purchase Volumes	1,885	1,886	857	868	1,845	6,738	1,006	15,085	
Commodity Cost	\$3.8849	\$4.9836	\$7.3547	\$7.0945	\$4.4699	\$2.5877	\$6.0229		
Total Commodity Costs	\$7,323.00	\$9,399.00	\$6,303.00	\$6,158.00	\$8,247.00	\$17,436.00	\$6,059.00	\$60,925.00	\$4.0388

Single highest average commodity gas cost per Ccf
{ ie, the maximum \$ / Ccf of the 3 summer periods}
[Item No. (a) (2) (i) on Tariff Sheet No. 5B] \$5.2789

Average of the three most recent ACA summer periods
[Item No. (a) (2) (ii) on Tariff Sheet No. 5B] \$4.3895

Average of the single highest average commodity gas cost per Ccf & the average of the three summer periods
[Item No. (a) (2) on Tariff Sheet No. 5B] \$4.8342

Gas Commodity Costs per Ccf in the month the PGA filing is made (e.g., July 2000)
[Item No. (a) (1) on Tariff Sheet No. 5B] \$3.9560

The higher of Item No. (a) (1) & Item No. (a) (2)
[Item No. (a) shown on Tariff Sheet No. 5A]

CAP == > \$4.8342

GREELEY GAS COMPANY
MISSOURI GAS COST ADJUSTMENT
ESTIMATE OF EXPECTED COMMODITY PRICES
AUGUST FILING

Month	7/7/00 NYMEX	Basis Differential ¹	Expected WNG Index	Supplier	Expected Purchases MMBtu	Expected Purchases Amount
Aug-00	\$ 4.262	\$ (0.13)	\$ 4.132	Williams Energy Mktg	62,400	\$ 257,837
Sep-00	\$ 4.248	\$ (0.13)	\$ 4.118	Williams Energy Mktg	55,000	\$ 226,490
Oct-00	\$ 4.230	\$ (0.13)	\$ 4.100	Williams Energy Mktg	90,900	\$ 372,690
Nov-00	\$ 4.302	\$ (0.10)	\$ 4.202	Williams Energy Mktg	130,600	\$ 548,781
Dec-00	\$ 4.390	\$ (0.10)	\$ 4.290	Williams Energy Mktg	217,100	\$ 931,359
Jan-01	\$ 4.380	\$ (0.10)	\$ 4.280	Williams Energy Mktg	288,900	\$ 1,236,492
Feb-01	\$ 4.145	\$ (0.10)	\$ 4.045	Williams Energy Mktg	222,400	\$ 899,608
Mar-01	\$ 3.905	\$ (0.10)	\$ 3.805	Williams Energy Mktg	211,000	\$ 802,855
Apr-01	\$ 3.641	\$ (0.13)	\$ 3.511	Williams Energy Mktg	156,700	\$ 550,174
May-01	\$ 3.530	\$ (0.13)	\$ 3.400	Williams Energy Mktg	88,100	\$ 299,540
Jun-01	\$ 3.483	\$ (0.13)	\$ 3.353	Williams Energy Mktg	70,200	\$ 235,381
Jul-01	\$ 3.463	\$ (0.13)	\$ 3.333	Williams Energy Mktg	93,200	\$ 310,636
Total					1,686,500	\$ 6,671,842
12 Month Weighted Average						\$ 3.956

1. 3 year average seasonal differential between Inside F.E.R.C. Henry Hub and Williams Gas Pipelines Central, Inc., monthly indexes