

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of a Staff Investigation into the)
Customer Service, Billing, and Recordkeeping)
Practices of Spire Missouri, Inc. d/b/a Spire)

File No. GO-2020-0182

STAFF INVESTIGATION REPORT AND RECOMMENDATIONS

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its *Staff Investigation Report and Recommendations*, states as follows:

Introduction

1. On December 20, 2019, Staff filed its *Motion to Open Investigation*, in which it requested the Commission open an investigatory docket and order Staff to undertake an investigation of Spire’s recordkeeping, business practices, business operations, and responsiveness to the Commission, and further direct Staff to identify and recommend improvements where such are warranted.

2. On December 30, 2019, the Commission issued its *Order Opening an Investigation*, in which the Commission noted that this is a fact-finding investigation and not a contested case. The Commission directed Staff to undertake the investigation of Spire’s recordkeeping, business practices, business operations, and responsiveness to the Commission, and further directed Staff to file a progress report regarding its investigation no later than June 30, 2020.

3. Staff filed its *Progress Report* on June 30, 2020, and informed the Commission that Staff anticipated being able to report to the Commission its findings and recommendations in this investigation, in the form of a Staff Report filed in this investigatory docket, no later than October 30, 2020.

Staff Investigation

4. In the course of its investigation, Staff has conducted discovery by submitting several rounds of data requests to Spire. Staff's initial data requests were submitted to Spire on January 22, 2020, and January 31, 2020. Staff reviewed Spire's responses to those initial sets of data requests and submitted additional data requests to Spire on March 6, 2020 and June 29, 2020.

5. Due to the COVID-19 pandemic, Staff has been unable to complete in-person interviews, travel on-site to observe actual operations, or witness Spire employees conducting their job activities. However, this was not a material impediment to Staff's investigation. In addition to the several rounds of data requests Staff has submitted to Spire, Staff has also conducted numerous conference calls with various Spire employees.

Staff Report and Recommendations

6. Staff analyzed Spire's call center operations, quality assurance and employee training practices, metering operations, and responsiveness to the Commission and Staff. Staff determined that Spire's performance in several of the areas examined have potential for improvement and Staff has provided specific recommendations contained in the attached Staff Investigation Report, and incorporated herein, for evaluation and potential implementation by Spire.

7. In order for the Commission and Staff to remain informed of Spire's progress in evaluating and possibly implementing Staff's recommendations, Staff requests the Commission issue an Order that directs Spire to provide Staff, within 30 days of the filing of this report, a formal implementation plan that addresses each

recommendation contained in the attached report. Further, Staff requests the Commission order Spire to file such plan and a bi-annual status report on Spire's progress in this case docket until such time that Staff has verified the intent of each of Staff's recommendations has been fulfilled and at which point Staff will file a motion in this case docket to discontinue reporting.

WHEREFORE, Staff respectfully submits this *Staff Investigation Report and Recommendations* and requests the Commission issue an Order that is consistent with Staff's recommendations herein, and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Jamie S. Myers

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 30th day of October, 2020.

/s/ Jamie S. Myers