BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas.

File No. GR-2022-0179

NOTICE OF LETTERS RECOMMENDING IN-PERSON LOCAL PUBLIC HEARINGS

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COMES NOW the Consumers Council of Missouri ("Consumers Council" or "CCM"), and provides the attached letters in support of in-person local public hearings to allow consumers to participate on the record in this Spire Missouri, Inc. ("Spire" or "Company") rate case, as well as in favor of at least one virtual hearing for the public.

Consumers Council believes that it is imperative that the Commission provide the opportunity for both in-person and virtual hearings for the convenience of the public. As the attached letters show, there is a significant "digital divide" which creates barriers for consumers who wish to put their comments *on the record* of this case, even if they lack a computer or computer-related acumen. Consumers deserve some opportunities to comment in-person in this rate case, as many of them are simply not be able to participate virtually.

Consumers Council urges the Commission to approve the three in-person hearings and the one virtual public hearing, negotiated between Spire, the Commission's Staff, the Office of the Public Counsel, and detailed in Consumers Council's June 29, 2022 Motion Regarding Local Public Hearings.

Respectfully submitted,

Dated: July 20, 2022

/s/ John B. Coffman

John B. Coffman MBE #36591 John B. Coffman, LLC 871 Tuxedo Blvd. St. Louis, MO 63119-2044 Ph: (573) 424-6779 E-mail: john@johncoffman.net

Attorney for the Consumers Council of Missouri

Attached Letters: Metropolitan St. Louis Equal Housing and Opportunity Council Tower Grove Community Development Corporation Epiphany United Church of Christ Sierra Club, Missouri Chapter

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or handdelivered to all parties listed on the official service list on this 29th day of June 2022.

/s/ John B. Coffman



1027 SVandeventer Ave 6th Floor St. Louis, MO 63110 PH) 314,534,5800 FX) 314,534,5800 FX) 314,534,2551 Tall Free: 800,555,3951 MO tty) 800,735,2966 IL tty) 800,526,0844

METROPOLITAN ST. LOUIS EQUAL HOUSING AND OPPORTUNITY COUNCIL Working to ensure equal access to housing and places of public accommodation for all people

Missouri Public Service Commission 200 Madison St. P.O. Box 360 Jefferson City, Missouri, 65101.

Dear Missouri Public Service Commission,

I am writing to you to express my concern that the Public Service Commission (PSC) may forgo holding public hearings about Spire's upcoming rate case. The Metropolitan St. Louis Equal Housing and Opportunity Council (EHOC) is the HUD's Fair Housing Initiative Program partner for the St. Louis region and Missouri. In that role we provide Fair Housing counseling, investigation and enforcement assistance to our clients and the federal, state and local levels of government. In addition to this, we provide assistance and advice to tenants facing a number of issues that relate to housing and evictions.

While housing affordability isn't directly related to Fair Housing, affordability is a closely related issue that impacts many of our clients, especially those who are calling about eviction-related issues. As you are probably aware, rents and housing costs have been ballooning at a rate that exceed wage gains. While most media attention has been focused on rapidly rising rents, utility costs are another important factor. If rates continue to rise, they will exacerbate the existing housing affordability crisis facing many Missourians. As such, EHOC strongly believes that the PSC should schedule in-person hearings regarding Spire's upcoming rate case. Low and moderate income families face significant hurdles in accessing the technology needed to participate in virtual hearings. Additionally, many older Missourians also face difficulties in using virtual means to participate in governmental and regulatory input. Many of these older Missourians are also on fixed incomes, making increasing utility costs a significant concern.

Considering all of the above, we are writing to implore the PSC to hold public hearings around Spire's proposed rate increases. Residents should absolutely have a fair chance to make their voices heard on such an important issue. Without in-person hearings to allow EHOC's clients the chance to advocate for their interests, we feel that the commission will be failing to truly offer proper public input. It certainly will fail to offer low income and older St. Louisans the opportunity to make their voices heard.

On behalf of EHOC and our clients, I am requesting that at least one in-person public hearing be scheduled in the St. Louis metropolitan area and that it be held in a location that is conducive to the attendance of low and moderate income residents who rely on-public transportation. Thank you for your time and consideration.

Sincerel

Willie J. Jordan Executive Director

From: "Dana Gray" <info@danagray.com> Sent: 7/6/22 10:56 AM To: <info@moconsumers.org> Subject: PSC - Spire rate case Public hearing

To the MO Public Service Commission

It has come to our attention that on June 30, Spire submitted a filing to the PSC, suggesting that they would hold three community meetings for the public, in place of the official public hearing, to allow consumers to express their concerns about their bills. These public meetings would NOT have commissioners, court reporters, or be officially entered into the case as evidence.

We appreciate Spire has agreed to three (3) in-person meetings, however we suggest these be an 'official public hearing'.

According to various sources between 6 – 25% of Americans do NOT have internet. In many cases, those folks who lack internet are Tower Grove CDC's clients. We do not want our clients denied due process in the current Spire rate case. The same folks who lack internet are those who will be most negatively impacted by Spire's proposed rate increase. Our clients should be granted an "official public hearing" with the Public Service Commission audience, and court reporters recording public testimony as evidence for the rate case.

Sincerely,

Dana Gray, Community Outreach Coordinator Tower Grove Community Development Corp 2337 South Kingshighway St. Louis, MO 63110 314-865-5530 / 314-776-3472 direct <u>www.towergrovecdc.org</u> <u>HomeScreen Tenant screening</u> service is available across the USA Please take a moment to read our <u>2021 annual report</u>



Epiphany United Church of Christ

2911 McNair Avenue, Saint Louis, Missouri 63118 Rev. Kristofer Avise-Rouse, Pastor

Phone: 314-772-0263 Cell: 618-540-7439 Email: pastorkris@epiphanyucc.org Web: www.eppiphanyucc.org



July 7, 2022

Sandra Padgett, Executive Director Consumers Council of Missouri 3407 S. Jefferson Avenue St. Louis, MO 63118

Dear Ms. Padgett,

Thank you for letting us know that, on June 30, Spire submitted a filing to the Public Service Commission (PSC) suggesting that they hold "community meetings" for the public instead of official public hearings. That is unacceptable. Consumers deserve the opportunity to share their concerns in a meeting presided over by commissioners with court reporters and the opportunity to officially register their comments as evidence.

As pastor at Epiphany United Church of Christ, I am well aware of the lack of affordable housing and utilities that is impacting our community. Some members of our congregation with disabilities have been able to secure Section 8 housing. Staying current in utility bills is part of the lease for some of these members. As utility costs rise, their shelter is at risk, not just utility connection.

Other members of our congregation as well as many neighbors in Benton Park and surrounding neighborhoods cannot find housing with rent and utility bills that they can afford. Often low rent equals very high utility bills because of substandard housing without tight window seals, insulation, and other energy efficiency features.

Web-based communication with the Public Service Commission is not an option for many of our neighbors. They have no computers or WiFi in their homes, and the struggle to survive makes it difficult for them to undertake problem solving about how to gain access to a virtual hearing. Local hearings in the community, accessible by public transportation, give them greater opportunity to share their voices, and Epiphany would be glad to host the PSC, Spire, and others so that area residents can offer testimony about the impact to their household when gas rate hikes occur. We also would furnish transportation to impacted persons so that they can attend a hearing in the local community.

Please keep us informed about Spire's response and how we can be of service.

Sincerely,

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Rev. Kristofer K. Avise-Rouse Pastor, Epiphany United Church of Christ

A Just Peace, Open and Affirming and Whole Earth Church

Enjoy. Explore. Protect.

July 15, 2022

SIERRA CLUB

MISSOURI CHAPTER

Missouri Public Service Commission 200 Madison Street P.O. Box 360 Jefferson City, Missouri 65101

Re: Letter Asking Missouri PSC to hold in-person and virtual on the record public hearings to allow testimony from Spire customers and public in Spire Rate Case, #GR-2022-0179

Chair Silvey and Members of the Commission:

On behalf of the Sierra Club Missouri Chapter and its more than 20,000 members and supporters, many of whom reside in the St. Louis and Kansas City metropolitan areas, I respectfully request the Public Service Commission hold in-person meetings in addition to virtual meetings, with at least two in-person meetings in both Kansas City and St. Louis.

On June 30th, Spire, Inc. filed a request in its rate case, #GR-2022-0179, that it be allowed to hold "community meetings" in lieu of public meetings hosted by the PSC. These proposed meetings would be off the record and would not be conducted with PSC commissioners or staff present. This proposal does not align with public policy and is inconsistent with the PSC's own practices, and therefore it should be rejected. Instead, to ensure Spire's customers and the public are able to be heard and that Missourians can participate in important matters before the PSC impacting them, the PSC should hold public meetings on the record, in the presence of commissioners and staff, and allow for both virtual and in-person testimony.

The Sierra Club Missouri Chapter has staff and volunteer leaders throughout the Kansas City and St. Louis metropolitan areas. Our staff works closely with members and supporters who are residents and community organizations, many of whom have limited access to the internet, computers, or suitable devices to participate in virtual meetings. For these residents, virtual meetings are not an option, and making virtual meetings the only way for the public to engage is insufficient as it will deny many Spire customers the opportunity to be heard. By having local, in-person meetings, preferably multiple at different times of the day to help residents avoid conflict with work, the PSC can ensure the public can participate. The Chapter and its community partners can assist in finding space, notifying residents, and helping them attend.

Hosting meetings on the record is also important to ensure that Missourians unable to attend any meeting are informed of public processes and can refer to them later. This allows for the sharing of information that is in the public interest. The PSC recognizes this and has a regular practice of hosting meetings about utility rates on the record. Just today, the PSC announced on the record public meetings for an Ameren case, and it will host public meetings on the record in an Evergy rate case in August 2022. Missourians deserve an opportunity to have their voices heard on the record and weigh in on important matters before the PSC, such as this one. Spire is proposing a rate increase of up to over 10% for some customers at a time when many are struggling to pay utility bills during a pandemic. Much is at stake for them. Sierra Club and other community partners are ready to work with the PSC to ensure Missourians are able to participate. Please reject Spire's proposal to host its own meetings off the record and schedule public, in-person meetings before the PSC.

Thank you for your time and your service.

Sincerely,

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Gretchen Waddell Barwick, MSW Chapter Director Sierra Club Missouri Chapter 2818 Sutton Blvd. St. Louis, MO 63143 O: (314) 644-1011 C: (314) 954-7108 gretchen.waddellbarwick@sierraclub.org