

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

Charles A. Harter)	
)	
Complainant,)	
)	
v.)	File No. GC-2023-0333
)	
Spire Missouri Inc. d/b/a Spire,)	
)	
Respondent)	

ANSWER

COME NOWS Spire Missouri Inc. (“Spire” or “Company”) and submits its Answer to the Complaint pursuant to Missouri Public Service Commission (“Commission”) Rule 20 CSR 4240-2.070 and in support thereof states the following:

1. Spire admits the allegations set forth in paragraph 1 of the Complaint.
2. Spire admits the allegations set forth in paragraph 2 of the Complaint.
3. Spire admits the allegations set forth in paragraph 3 of the Complaint.
4. Spire admits the allegations set forth in paragraph 4 of the Complaint.
5. Spire admits that this was the amount at issue when the first disconnection notice was sent on February 27, 2023.
6. Spire denies that the relief requested in paragraph 6 is appropriate for the reasons set forth below.
7. Spire denies the allegation that Spire violated Commission Rule 20 CSR 4240-13.050(5) as set forth in paragraph 7 of the Complaint. Commission Rule 20 CSR 4240-13.050(5) requires that written notice is sent, not received, at least ten (10) days prior to the date of the proposed discontinuance, a requirement with which Spire complied. For the remaining allegations in paragraph 7, Spire is without

information to form a belief as to the truth of the allegations, and therefore denies the same.

8. Spire admits that Complainant spoke with Spire's call center on March 20, 2023, and that Complainant was advised that the disconnection that was scheduled for March 13, 2023 had been canceled. Spire admits that the call center representative advised Complainant that the disconnection had been cancelled on February 27, 2023. This was incorrect; the disconnection was cancelled on March 10, 2023.
9. Spire denies each and every allegation contained in the Complaint which was not specifically admitted herein.

FURTHER ANSWER

10. Spire would note that the disconnection notices were not the first contact Spire made regarding the termination of the Cold Weather Rule Payment Arrangement ("CWR Arrangement"). On November 7, 2022, Complainant enrolled in this CWR Arrangement. Since enrolling, Complainant has only made one payment on January 18, 2023. Due to having a past due balance, Complainant was sent a notice on February 1, 2023, advising that the CWR Arrangement had been cancelled and recommending Complainant contact Spire. This notice preceded the disconnection notices.

WHEREFORE, Spire Missouri respectfully requests the Commission accept this Answer and direct the parties to file a joint procedural schedule.

Respectfully submitted,

/s/ J. Antonio Arias

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all counsel of record on this 3rd day of May, 2023.

/s/ Lew Keathley