

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

Structural Glass Systems, Inc.)	
)	
Complainant,)	
)	
v.)	File No. GC-2023-0143
)	
Spire Missouri, Inc. d/b/a Spire,)	
)	
Respondent)	

COMPLAINANT’S BRIEF

COMES NOW Complainant, by and through Counsel, and for its post hearing brief states the following. The evidentiary hearing on this case revealed the following facts.

1. Spire cannot identify what the gas meter reading was when Complainant began using gas.
2. Spire cannot identify whether the lost digit at issue was to the right (10x increase) or to the left (no increase) of the numbers which were read.
3. The only appliance using gas within the Complainant’s facility was a heater which was set to a low winter temperature. That heater could not have used the amount of gas which Spire alleges Complainant used.
4. The alleged discrepancy with the meter readings and billings was not appreciated for months. This prevented the Complainant from mitigating the situation by turning off the gas and/or the heater, which the Complainant would have done. The fault for this lies entirely with Spire.
5. Spire discovered the purported underbilling in January of 2022, but did not address it until May of 2022. The applicable tariff provides that billing for underbilled usage may only run through the date that it is “discovered.” In this case, Spire is attempting to bill for the entire sum.

6. The inequity of Spire's bill was made manifest at the hearing. Spire made a mistake when it installed new meters in Kansas City. It is now trying to bill its customer for that mistake, with no evidence that the gas at issue was, in fact, used. This is inequitable and should not be permitted.

7.

Respectfully Submitted,
/s/Mark E. Meyer

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A copy of this was served upon all persons receiving electronic notice in this matter.

/s/Mark E. Meyer
