

**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

**RESPONSE TO STAFF’S MOTION TO OPEN INVESTIGATION**

COMES NOW Spire Missouri Inc. (“Spire Missouri”), and files this Response to Staff’s Motion to Open Investigation filed on December 20, 2019, stating as follows:

1. Since the Commission has already issued an Order Opening an Investigation into certain aspects of Spire Missouri’s operation, which order was issued earlier today, Spire Missouri will not respond in detail to the allegations in Staff’s Motion. As a general matter, Spire Missouri does not agree with many of the legal and factual assertions in Staff’s Motion. Nevertheless, Spire Missouri intends to cooperate with Staff in its investigation.

WHEREFORE, Spire Missouri Inc. respectfully requests that the Commission accept this response to Staff’s Motion.

Respectfully submitted,

SPIRE MISSOURI INC.

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing pleading was served on Staff and the Office of the Public Counsel, on this 30th day of December, 2019 by hand-delivery, fax, electronic mail or by regular mail, postage prepaid.

**/s/ Rick Zucker**