

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

In the Matter of Proposed Rulemaking to)
Promulgate a New Rule Regarding a) File No. AX-2023-0175
Residential Customer Disconnection Data)
Reporting Rule)

COMMENTS OF SPIRE MISSOURI

COMES NOW Spire Missouri, Inc. (“Spire”), and for its Comments on the new rule regarding Residential Customer Disconnection Data Reporting, which is the subject of this proceeding, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On November 30, 2022, The Office of the Public Counsel (“OPC”) and the Staff of the Missouri Public Service Commission (“Staff”) issued a *Motion for Rulemaking* in this proceeding. On March 29, 2023, the Missouri Public Service Commission (“Commission”) issued its *Finding of Necessity and Order Directing Proposed Rule 20 CSR 4240-13.075 be Filed for Publication*. Draft of the rule was filed on May 18, 2023.
2. On June 16, 2023, the Commission issued its *Notice of Rulemaking Hearing*, establishing a hearing on July 20, 2023, regarding the proposed adoption of a rule regarding service disconnection for electric, gas, sewer, and water utilities, 20 CSR 4240-13.075.
3. On May 18, 2023, draft of the rule was published in the Missouri Register, with a date for submission of comments to the Commission of July 15, 2023.

4. Spire appreciates the opportunity to participate in this rulemaking and provide comments regarding possible changes to the Commission's rules, and Spire appreciates the substantial efforts that have been taken by the Commission, its Staff and Office of Public Counsel to establish a working group to help standardize the data reported on by utilities.
5. Spire participated in the workshops and the voluntary one-month case study, providing input on definitions, reporting requirements and ability to report data from its billing system.
6. Spire favors the simplification of the reporting requirements and has no additional comments beyond what other utilities have provided.

WHEREFORE, Spire respectfully submits these Comments and requests that the Commission take them into consideration.

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 17th day of July, 2023.

/s/ Julie Johnson

Julie Johnson

