

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

In the Matter of the Establishment of a Working)
Case for the Writing of a New Rule on the Treatment)
of Customer Information by Commission Regulated) File No. AW-2018-0393
Electric, Gas, Steam Heating, Water, and Sewer)
Utilities and Their Affiliates and Nonaffiliates)

**SPIRE’S INITIAL RESPONSE TO DRAFT CUSTOMER
INFORMATION RULE**

COMES NOW Spire Missouri Inc. (“Spire” or “Company”) and submits *Spire’s Initial Response to Draft Customer Information Rule* (“Response”) to the Missouri Public Service Commission (“Commission”) in response to the Commission Staff’s September 16, 2019 filing, *Staff Draft Customer Information Rule*. In support of its Response, Spire states as follows:

1. On September 20, 2019, Ameren Missouri filed its Initial Response to Draft Rule, setting forth its position regarding the Staff’s proposed Customer Information Rule. Spire agrees with the concerns set forth in Ameren Missouri’s filing regarding areas of the draft rule that could benefit from additional input, including but not limited to: the aggregation and anonymization of customer information, privacy policy, and the provision of customer information to third parties by local statute, rule, subpoena or order without documented recorded or written customer consent.

2. Of the options set forth by Staff in its cover pleading, Spire supports the continuation of the working case in order to allow for further refinement of the draft rule. This option would allow for a more comprehensive and thought out draft rule for the Commission’s consideration that would result in a rule that enhances the protection of customer specific information in a manner that is practical for both the customer and the Company.

WHEREFORE, for the foregoing reasons, Spire asks that the Commission continue this working case and allow for additional comments and working sessions among interested stakeholders.

Respectfully submitted,

SPIRE MISSOURI INC.

/s/ Goldie T. Bockstruck _____

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Response was served on all parties of record on this 7th day of November 2019 by email.

Goldie T. Bockstruck

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