

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

Life Center Church,	)	
	)	
Complainant,	)	
	)	
v.	)	<b><u>File No. GC-2024-0136</u></b>
	)	
Spire Missouri Inc. d/b/a Spire,	)	
	)	
Respondent.	)	

**NOTICE OF DEFICIENCY**

Issue Date: October 16, 2023

On October 16, 2023, Life Center Church filed a formal complaint pursuant to rule 20 CSR 4240-2.070 against Spire Missouri Inc. d/b/a Spire. The complaint is signed by Elijah H. Hankerson, III.

Commission Rule 20 CSR 4240-2.040(5), specifically addressing practice before the Commission, states:

A natural person may represent himself or herself. Such practice is strictly limited to the appearance of a natural person on his or her own behalf and shall not be made for any other person or entity.

The basis for these Commission Rules is found in Sections 484.010 and 484.020.<sup>1</sup> Section 484.010 defines the practice of law as “the appearance as an advocate in a representative capacity or the drawing of papers, pleadings or documents or the performance of any act in such capacity in connection with proceedings pending or prospective before any court of record, commissioner, referee or any body, board,

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<sup>1</sup> All statutory citations refer to RSMo 2016 unless otherwise noted.

committee or commission constituted by law or having authority to settle controversies.”  
Section 484.020 restricts the practice of law and engagement in law business to licensed attorneys.<sup>2</sup>

Life Center Church, not being a natural person representing only itself, must be represented by an attorney authorized to practice law in Missouri to appear before the Commission in this Complaint. The complaint is defective because of the lack of that representation as evidenced by the lack of a signature by an attorney authorized to practice law in Missouri. The complaint is deficient and the Commission shall take no further action in this matter until such time as the deficiency is corrected.



**BY THE COMMISSION**

A handwritten signature in black ink that reads "Nancy Dippell". The signature is written in a cursive, flowing style.

Nancy Dippell  
Secretary

Pridgin, Deputy Chief Regulatory Law Judge

Dated at Jefferson City, Missouri,  
on this 16<sup>th</sup> day of October, 2023.

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<sup>2</sup> “The law does not treat individuals and corporations equally. The law allows an individual to bear the risk that representation without an attorney may entail. Natural persons may represent themselves in situations which, if done for someone else, would constitute the practice of law. Unlike individuals, corporations are not natural persons, but are creatures of statute. Businesses operating in corporate form are entitled to certain benefits that are denied to others. In addition to benefits, however, corporations also have certain restrictions placed upon them. One such restriction in Missouri is that a corporation may not represent itself in legal matters, but must act solely through licensed attorneys.” (Internal citations omitted). *Reed v. Labor and Indus. Relations Com'n*, 789 S.W.2d 19, 21 (Mo. banc 1990).

**STATE OF MISSOURI**

**OFFICE OF THE PUBLIC SERVICE COMMISSION**

**I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.**

**WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 16<sup>th</sup> day of October, 2023.**



*Nancy Dippell*  
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**Nancy Dippell**  
**Secretary**

**MISSOURI PUBLIC SERVICE COMMISSION**

**October 16, 2023**

**File/Case No. GC-2024-0136**

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**Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).**

*Sincerely,*



**Nancy Dippell  
Secretary**

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Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.