

FORMAL COMPLAINT FORM

Attach extra pages as necessary.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Joshua Michael Kearney  
(Your name here)

Complainant,

v.

Spire Inc

(Utility's name here)

Respondent,

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

File No.

(PSC fills this in)

Amendment 2 FORMAL COMPLAINT

1. Complainant resides at:

[Redacted]

(Address of complainant)

[Redacted]

(City)

[Redacted]

(State)

[Redacted]

(Zip Code)

2. The utility service complained of was received at:

a. Complainant's address listed in paragraph 1.

b. A different address:

(Address where service is provided, if different from Complainant's address)

(City)

(State)

(Zip Code)

3. Respondent's address is:

700 Market St.

(Address of complainant)

Saint Louis

MO

63101

(City)

(State)

(Zip Code)

4. Respondent is a public utility under the jurisdiction of the Missouri Public Service Commission.

5. The amount at issue is: \$

(If your complaint is about money state how much is in dispute here.)

6. Complainant now requests the following relief:

(Explain what you want the Commission to do: the specific results you are seeking in this complaint.)

Order Spire Inc to cease and desist and return any and all over charges back to the respective remitter as well as fix the current issued tariff to more strictly and clearly state the charges that are allowed to be included on a customer's monthly bill.
Amendment 2: The complainant also requests the maximum civil penalty in accordance with USC Title 15 Chapter 15B section 717t-1 The complainant is requesting relief totaling ██████████ USD for which the complainant can provide the Burden of Proof for 50 violations of failure to charge a just and reasonable rate. The complainant also requests the maximum civil penalty in accordance with USC Title 15 Chapter 15B section 717t (a) and (b) the complainant is requesting ██████████ USD and ██████████ USD respectively. The respondent solemnly admits its knowledge of the presence of the precedent agreement in docket item number 14 located in line item number 3.

7. The relief requested is appropriate because Respondent has violated a statute, tariff, or Commission regulation or order, as follows:

(Explain why the Commission should grant the relief you seek: the facts that constitute a violation of a statute, tariff, or Commission regulation or order.)

Spire Inc. has engaged in unjust enrichment and avoiding regulatory compliance. By charging customers a charge for gas used and also charging the adjusted charge for gas used amount known as the PGA or Purchased Gas Adjustment.
Amendment 2: Pursuant to United States Code Title 15 Chapter 15B section 717 (b) Spire Mo Inc. is to be held accountable under federal regulation for its participation in interstate transportation and commerce outlined in the Precedent Agreement between Spire STL Pipeline LLC and Spire MO Inc. Therefor the only just and reasonable rate would be a rate that is filed with and approved by the Federal Energy Regulatory Commission.

