

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

Ronald E. Taylor,)
)
 Complainant,)
)
 v.) File No. GC-2022-0137
)
 Spire Missouri Inc., d/b/a Spire)
)
 Respondent.)

ANSWER

COMES NOW Spire Missouri Inc. (“Spire” or “Company”) and submits its Answer to the Complaint pursuant to Commission Rule 20 CSR 4240-2.070 and in support thereof states the following:

1. Spire is without information sufficient to form a belief as to the truth of the allegations set forth in paragraph 1 of the Complaint, and therefore denies the same.
2. Spire admits the allegations set forth in paragraph 2 of the Complaint.
3. Spire admits the allegations set forth in paragraph 3 of the Complaint.
4. Spire admits the allegations set forth in paragraph 4 of the Complaint.
5. Spire denies the allegations set forth in paragraph 5 of the Complaint.
6. Spire denies the allegations set forth in paragraph 6 of the Complaint.
7. Spire denies the allegations set forth in paragraph 7 of the Complaint
8. Spire does not have sufficient information to admit or deny the allegations set forth in paragraph 8 of the Complaint and therefore denies the same.
9. Spire denies the allegations set forth in paragraph 9 of the Complaint

FURTHER ANSWER

10. Any allegation not specifically admitted herein should be considered denied.
11. Mr. Taylor has maintained an outstanding balance on his natural gas utility bill for the address included in his complaint, ** [REDACTED] ** from Spire since at least December 2019.
12. Mr. Taylor's current outstanding balance is **\$ [REDACTED] **.
13. Spire communicated with Mr. Taylor through mail and phone correspondence regarding the status of the bill and threat of disconnect on multiple occasions each month.
14. Mr. Taylor failed to respond to Spire's repeated communication.
15. Mr. Taylor's service was disconnected for nonpayment of bill on December 10, 2020 and the forecasted temperature that day was above 32 degrees.
16. Mr. Taylor's disconnection for nonpayment of a bill was done in accordance with the requirements of Commission Rule 20 CSR 4240-13.050.
17. On October 28, 2021, Mr. Taylor made a call to Spire inquiring about getting his service reinstated at that time. Spire provided accurate information to Mr. Taylor at the time regarding the requirements to have service reinstated at the time he placed this call.
18. Mr. Taylor initiated this proceeding against the Company on November 17, 2021, eleven months after the December 2020 disconnection of service.

WHEREFORE, Spire Missouri respectfully requests the Commission issue an order dismissing the Complaint, or in the alternative setting the matter for hearing.

Respectfully submitted,

/s/ Rachel L. Niemeier

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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 this 23rd day of December 2021. The Complainant has been served via mail pursuant to Commission Rule 20 CSR 4240-2.080(16)(B) and email.

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/s/ Rachel L. Niemeier
