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

Joshua M. Kearney,	)	
	)	
Complainant,	)	
	)	File No. GC-2024-0172
v.	)	
	)	
Spire Missouri, Inc. d/b/a Spire,	)	
	)	
Respondent.	)	

## **LIST OF ISSUES**

**COMES NOW** Travis L. Noble, Jr. and respectfully submits the list of issues on behalf of Joshua Kearney,:

- 1. Spire has been charging natural gas consumers twice. Spire has done this by charging the "charge for gas used" and the purchase gas adjustment.
- 2. Spire claims to be a intrastate local distribution company within the State of Missouri, however Spire, Inc. engages in transaction with other natural gas entities outside of the State of Missouri.
- 3. Spire receives the purchased gas from other out of State natural gas entities and transports the gas into the State of Missouri. This done through other various pipelines and subsidiaries owned by Spire inc.
- 4. Spire STL pipeline engages in daily capacity releases with no replacement customer listed on website as required and no information can be requested via the website.
- 5. Spire Does not have retail gas marketer listed on their website as required by tariff sheets 9 though 9.12.
- 6. Spire Missouri, Inc. Is receiving the maximum contractual quantity under the precedent agreement using Spire STL Pipeline's FTS rate schedule and paying no cost for the commodity charge, however Spire Missouri, Inc. is charging the consumer for the commodity using the actually cost adjustment listed under the purchase gas adjustment.
- 7. Spire Missouri, Inc. does not have natural gas rates filed with the FERC as required.

Respectfully submitted, /s/ Travis L. Noble, Jr.

Travis L. Noble, #50389 Attorney for Complainant 8000 Maryland Ave., Ste. 910 Clayton, MO 63105 314-721-6040 314-721-8545 <u>Jfenske@travisnoble.com</u>

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been sent via EFIS and electronically mailed to all parties and/or counsel of record on this 11<sup>th</sup> day of June, 2024.

/s/ Travis L. Noble, Jr.