

STATE OF MISSOURI

KYLAND LAMONT POWELL ESTATE, Complainant
GC-2025-0021

Case Number:

Vs.

Spire Missouri Inc. d/b/a Spire, Respondent

MOTION TO A HEARING AND REQUEST OF PUBLIC RECORDS

INTRODUCTION:

COMES NOW, Kyland-Lamont: POWELL a Living Breathing Free Spirit Man of Sound Mind and Good Faith, who is competent and is the Age of Majority with the capacity to Contract and handle legal affairs, I Reserve All Rights and Waive None. I am the **Guarantor / Attorney in Fact** for Persons, **KYLAND L POWELL**, As I am the Executor/ Beneficiary over the **KYLAND LAMONT POWELL ESTATE AND TRUST**. I hereby respectfully, request a motion to a Hearing as there is a matter within the Commission's Jurisdiction that can be redressed to the Estate as expressed in the earlier filings. As previously expressed, Spire and other Utility Companies (Evergy) have unjustly inflated utility rates and compromised service reliability. This activity not only harms consumers but also violates the fundamental principles of fair and reasonable utility regulation, which is central to the PSC's mandate. As a Social Security Number was Utilized to Open the Utility accounts on behalf of the Estate, which is Considered under **RSMO's Article 9-103 "Secured Transaction"** is an Asset to Secure an Obligation, and therefore satisfies an consumer's obligations to a utility company.

JURISDICTION OF THE PSC:

1. PSC Jurisdiction and Regulations:

- The Missouri Public Service Commission ("PSC") regulates public utilities in Missouri, including the Respondent, under Chapters 386, 392, and 393 of the Revised Statutes of Missouri (RSMo).
- The PSC has the authority to ensure that public utilities provide fair, just, and reasonable rates and services to customers

- Under this authority, the PSC can investigate utility practices, adjust rates, and take corrective action when misconduct or mismanagement impacts the costs passed on to consumers.
- If fraudulent activities—such as securities fraud or financial misrepresentation—have caused an increase in rates or compromised service delivery, the PSC is empowered to take several actions.
- The PSC has the authority to review the rates charged by utilities to determine if they are inflated due to improper conduct or financial mismanagement. If it is found that the fraudulent activities of **SPIRE** have led to unjust rate increases, the PSC can order adjustments to ensure that rates remain fair and reasonable.
- If the utility has incurred expenses due to fraud, those costs should not be borne by consumers. The PSC has the power to disallow the recovery of costs that were not prudently incurred, ensuring that fraudulent financial dealings do not unjustly burden ratepayers.
- Should the investigation reveal that consumers have been overcharged due to the utility's misconduct, the PSC can order refunds to rectify the harm caused to ratepayers.
- The Commission also has the ability to sanction utilities and require them to make operational changes when misconduct is uncovered. This is particularly important in maintaining the integrity of the service provided to consumers.

2. REQUEST FOR ACTION:

- Despite my status as an "Customer", the Respondent has improperly charged rates and interest as though the Estate is a typical consumer of their gas services. This practice is not only unfair but also constitutes a violation of PSC regulations which mandate that rates charged to customers must be just and reasonable.
- Respondent is Claiming Their "Utility Bill" is not a Form of Payment, When According to the Bill of Exchange Act Section 3 and 83, Any "Bill" that has a unconditional order in writing, addressed by one person to another, signed by the person giving it, requiring the person to whom it is addressed to pay on demand or at a fixed or determinable future time a sum certain in money, is in fact a bill of exchange which is also known as A "Draft".
- Respondent is dishonoring its duty to uphold its Oath to the regulations and Codes by Enforcing a Policy that is not in accordance with Missouri's Constitution.
- Under the law governing bills of exchange (such as the Uniform Commercial Code), the drawer (Spire) must honor the bill if it is presented in proper form and all conditions are met. A company policy cannot override these legal obligations.
- While the Missouri PSC does not have direct jurisdiction over securities fraud, the fraudulent activities of a utility company, when tied to its financial practices and resulting in harm to consumers through increased rates or diminished service quality, fall squarely

within the PSC's regulatory purview. Securities fraud may be handled by the **Missouri Secretary of State's Securities Division** or the **Securities and Exchange Commission (SEC)**, but the impact of such fraud on utility rates and services is a matter for the PSC to address.

- I respectfully request for PSC to Review all rate adjustments tied to any financial misconduct and disallow the recovery of any costs that were not prudently incurred.
- Take corrective action, including ordering refunds, imposing sanctions, and ensuring future compliance with PSC standards and regulations.
- **Pursuant to the Missouri Sunshine Law (RSMo Chapter 610)**, I am formally requesting the following public records from the PSC, Copies of the **bonding number and oath of office** for the **Secretary**, The **Administrative Law Judge (ALJ)** and **Attorneys** who is employed by the PSC and Spire that is taking part of this Complaint. Any and all documents related to the application, account information, and records associated with the utility account in Complaint.

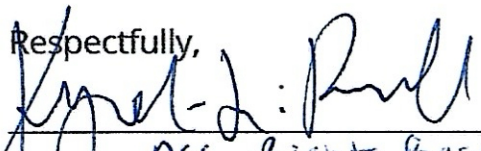
LEGAL IMPLICATIONS OF NON COMPLIANCE FROM PSC:

- **Violation of the Missouri Sunshine Law (RSMo Chapter 610):** A failure to disclose the requested information would breach the PSC's legal obligations under Missouri's public records laws.
- **Denial of Access to Public Records (RSMo § 610.027):** If the PSC unlawfully refuses or delays access to these records without a valid exemption, this would constitute a violation, and penalties may apply. This could result in fines and legal consequences for those involved in withholding public records.
- **Potential Litigation:** Non-compliance could force the Estate to seek relief in the courts under RSMo § 610.027, which authorizes judicial intervention, including injunctive relief to compel disclosure of the requested records and the awarding of fees and court costs.
- **RSMo § 610.010 and § 610.023** specifically outline the public's right to access such records, including the oaths of office taken by public officials and employees, as well as financial or administrative documentation pertaining to governmental activities and interactions with public services' such as utility companies.

The law provides that the public entity must respond to this request no later than **Three business days** after receiving it, either by providing the records or offering a reasonable explanation for any delay, along with an estimated time for when the records will be made available. Failure to comply with the Sunshine Law can result in penalties, including fines, court costs, and attorney fees as prescribed under **RSMo § 610.027**.

Conclusion:

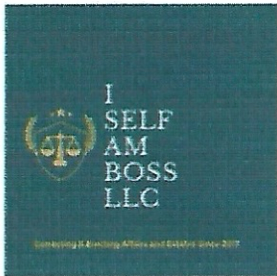
In light of these request, and after providing enough significant evidence based on this matter, I believe if the PSC does its Fiduciary Duty by upholding its oath to Missouri 's Constitution by going over and throughly reviewing all of the evidence and information provided along with understanding the importance of Spire truly complying with all of its Regulations and Codes they are to adhere to, and by violating one of them indirectly affects all of its regulations, PSC will see that this matter is within their jurisdiction to Regulate a Fair and Just remedy to settle the matter.

Respectfully,


ALL Rights RESERVED
Kyland-L :POWELL (EXECUTOR)

(GUARANTOR/ATTORNEY IN FACT)

(COMPLAINANT/PLAINTIFF)





MISSOURI PUBLIC SERVICE COMMISSION

RECORDS REQUEST FORM

REQUESTOR'S INFORMATION	
REQUESTOR'S NAME: KYLAND-L: POWELL	
COMPANY NAME: K.L.P ESTATE & TRUST	
MAILING ADDRESS: (MUST PROVIDE STREET ADDRESS IF REQUESTING PRIORITY OR OVERNIGHT DELIVERY) C/O [REDACTED]	
CITY/STATE/ZIP: [REDACTED]	
PHONE: [REDACTED]	
EMAIL: [REDACTED]	
BILLING INFORMATION <input checked="" type="checkbox"/> CHECK HERE IF SAME AS ABOVE	
BILLING CONTACT NAME:	
COMPANY NAME:	
BILLING ADDRESS:	
CITY/STATE/ZIP:	
PHONE:	
EMAIL:	
DOCUMENT & DELIVERY INFORMATION	
DESCRIPTION OF DOCUMENT(S) BEING REQUESTED: (ATTACH ADDITIONAL SHEETS IF NECESSARY) - BONDING NUMBER, OATH OF OFFICE FROM Nancy Dippell, Karoline S. WALKER, PAUL GRAHAM, SCOTT STACEY - ALL DOCUMENTS INCLUDING APPLICATION ON BEHALF OF SPIRE GAS ACCOUNT # [REDACTED]	
CASE NUMBER OR TRACKING NUMBER: GL-2025-0021	
DOCUMENT FORMAT: <input checked="" type="checkbox"/> PAPER <input checked="" type="checkbox"/> ELECTRONIC (AVAILABILITY VARIES BY DOCUMENT TYPE AND YEAR)	
CERTIFIED COPY: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
PREFERRED DELIVERY METHOD: <input checked="" type="checkbox"/> REGULAR MAIL <input checked="" type="checkbox"/> EMAIL <input type="checkbox"/> PICK-UP <input type="checkbox"/> PRIORITY/OVERNIGHT MAIL*	
*RECIPIENT WILL BE BILLED FOR PRIORITY OR OVERNIGHT DELIVERY. PLEASE PROVIDE THE FOLLOWING. ACCOUNT NUMBER:	
ACCOUNT TYPE: <input type="checkbox"/> UPS <input type="checkbox"/> FEDEX <input type="checkbox"/> USPS <input type="checkbox"/> OTHER (SPECIFY)	
SEND REQUESTS TO: MISSOURI PUBLIC SERVICE COMMISSION DATA CENTER P.O. BOX 360 JEFFERSON CITY, MO 65101 EMAIL: RECORDSREQUEST@PSC.MO.GOV	CHARGES: AN ACTUAL-COST FEE FORMULA IS APPLIED FOR COPIES. CHARGES WILL NOT EXCEED 10 CENTS PER PAGE. FOR CERTIFIED COPIES, AN ADDITIONAL \$1 PER CERTIFIED SHEET WILL BE APPLIED. AN INVOICE FOR FEES WILL BE ISSUED TO THE BILLING CONTACT LISTED ABOVE.
QUESTIONS: PLEASE CALL THE DATA CENTER AT 573-751-7496	