

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

Adhol W. Deng,	)	
	)	
Complainant,	)	
	)	
v.	)	File No. GC-2024-0374
	)	
Spire Missouri Inc. d/b/a Spire,	)	
	)	
Respondent.	)	

**SPIRE MISSOURI’S REQUEST FOR ADDITIONAL TIME  
TO RESPOND TO STAFF’S REPORT AND RECOMMENDATION**

COMES NOW Respondent, Spire Missouri Inc. (“Spire” or “Company”), and submits its *Request for Additional Time to Respond* to the Missouri Public Service Commission (“Commission”), stating the following:

1. On June 24, 2024, Complainant filed her complaint requesting removal of an outstanding balance to her account in the amount of \$1,239.69 and payment of damages for alleged burst pipes in the amount of \$3,000.
2. On August 1, 2024, Spire filed its Answer and Motion for Partial Dismissal.
3. On September 19, 2024, Staff of the Missouri Public Service Commission (“Staff”) filed its Report, which included confidential Attachment A.
4. In Attachment A, Staff concluded that this Commission does not have jurisdiction to award damages. Staff further concluded that Complainant did benefit from the gas that led to the outstanding balance in question. However, Staff noted that Spire has already removed this outstanding balance so that Complainant’s account currently has a zero balance.
5. Staff further concluded that when Complainant called to initiate gas service in her name, Spire should have notified Complainant of the decision to deny her gas service under

20 CSR 4240-13.035(1). Staff recommended that Spire implement a process to ensure that when an applicant is denied service for any reason, that proper notifications are sent, as required by 20 CSR 4240-13.035.

6. Spire has reviewed Staff's recommendation but requires additional time to file its response. Therefore, Spire requests an additional 30 days, beyond the 10 days allowed by regulation,<sup>1</sup> to file a response to Staff's Report and Recommendation.

7. Staff does not object to this request for additional time.

**WHEREFORE**, Spire respectfully requests that the Commission allow Spire an additional 30 days, until October 30, 2024, to file a response to Staff's Report and Recommendation.

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<sup>1</sup> 20 CSR 4240-2.080(13).

Respectfully submitted,

*/s/ Sreenivasa Rao Dandamudi*

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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 to all individuals on the service list of record on this 30th day of September, 2024.

*/s/ Julie Johnson*

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Julie Johnson