

STATE OF MISSOURI

**KYLAND LAMONT POWELL ESTATE, Complainant**  
**GC-2025-0021**

**Case Number:**

**Vs.**

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

**RESPONSE TO RESPONDENT REQUEST FOR DENIAL**

**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 ALL CAPS Persons, **KYLAND L POWELL (legal Fiction)**, As I am the Executor/ Beneficiary over the **KYLAND LAMONT POWELL ESTATE AND TRUST**. I hereby respectfully, request this Commission to do it Fiduciary Duty and to thoroughly investigate all sectors of the Respondent Financial Practices when it comes to Utilizing Consumers Social Security Numbers to open accounts with Spire. As The Estate is the Legal Title Owner and Lien Holder over the Legal Fiction name, When the SSN was provided to Spire, which is the Estates Collateral Asset, The Application then became a Bond to Guarantee Payment for Future services or Obligations.

**FACTS OF THE MATTER**

1. When dealing with an Estate, the executor or administrator has the legal authority to manage the estate's assets to settle debts and pay for ongoing expenses, including utilities for properties still owned by the estate.
2. As Executor of the Estate, I am not here to have a "**ARGUMENT**" I am here to declare that there is Error on behalf of the Contract/Agreement with the Respondent and to point out the Fraud being committed against the Estate and I am demanding to have this matter corrected and to find a resolution for both parties to agree on in a fair and equitable manner.

3. As previously stated in the original complaint, the Respondent had accepted and honored the first original tender of payment which was a registered security instrument that was processed and credited to the account, which is the correct and lawful way to perform bills of exchange. I am demanding that the Respondent continues to honor my performance, which they have dishonored all other tender of payments made to them.
4. Under **Chapter 386** and **Chapter 393 of the Revised Statutes of Missouri (RSMo)**, which govern public utilities, the Respondent is required to maintain fair and reasonable practices concerning payment acceptance, billing, and customer service. The abrupt refusal of a previously accepted form of payment without prior notice or a valid reason is deemed as a violation of the consumer protections afforded under these statutes.
5. The Respondent most recent response has requested the Commission to "Deny" a rehearing, when there has not even been an official hearing, and ignores the multiple claims of fraud and violations that goes to show that the Respondent's counsel of record demonstrates a lack of gravitas and fail to recognize the full magnitude of the circumstances.
6. By accepting the tender of payment in one billing cycle and dishonoring the same payment method in the following cycle, the Respondent appears to be engaging in inconsistent billing practices. As a regulated public utility, Spire is required to follow transparent, fair, and consistent billing practices. Arbitrarily refusing a payment method that was previously accepted without giving adequate notice or rationale is a violation of the principles of good faith and fair dealing, which are embedded in utility law and the regulatory framework governing public utilities in Missouri.
7. The refusal of payment after it had been previously accepted may also constitute a violation under the **Uniform Commercial Code (UCC)**, which governs commercial transactions. Under **UCC Article 3**, a party that dishonors a negotiable instrument without proper cause may be subject to legal liabilities for breach of contract or improper rejection of payment.

#### **REQUEST FOR ACTION**

- 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.

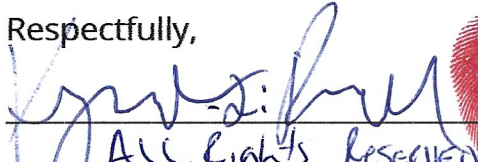

- I respectfully request for PSC to Review all rate adjustments tied to any financial misconduct and disallow the recovery of any costs that were not prudently incurred.
- Take corrective action, including ordering refunds, imposing sanctions, and ensuring future compliance with PSC standards and regulations.
- **Pursuant to the Missouri Sunshine Law (RSMo Chapter 610)**, I previously requested oath of offices and surety bonds by all public servants participating in this complaint. After receiving a response from the PSC Secretary, I was told that none of the employees are required to have a bond. As The PSC SHOULD be aware, **RSMo 107.010** outlines the obligation of public officials, including members of the Public Service Commission, to obtain surety bonds prior to assuming or continuing in their official duties. These bonds serve as a safeguard to ensure that public officials conduct their responsibilities with integrity and in full compliance with the law. The purpose of this statute is to provide financial protection to the public by holding officials accountable for their actions while in office.
- Failure to adhere to these requirements carries significant consequences. Under **RSMo 107.010**, the surety bond provides a mechanism for the public or relevant parties to seek compensation should any official act in a manner that results in negligence, misconduct, or other violations of their duties. The law ensures that public servants are held financially accountable for any potential wrongdoing.
- As officials of the Missouri Public Service Commission, you are entrusted with the responsibility of regulating industries that are vital to the welfare of Missouri residents. It is imperative that all PSC officials comply with the surety bond requirements, as failure to *do so could expose the Commission—and its individual members—to legal and financial liabilities*. Such liabilities could arise if it is found that an official's actions have not been in accordance with their legal responsibilities, resulting in harm to the public.
- I respectfully request that all necessary measures be taken to ensure compliance with RSMo 107.010 and that all current and future members of the Missouri Public Service Commission fully understand their obligations under this statute. In doing so, the PSC can continue to carry out its essential functions in a manner that is transparent, ethical, and in accordance with the law.

### 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 thoroughly 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. It is imperative that each employee participating in this complaint possesses a surety bond and a oath of office as the Estate will take complaint to a higher administrator or court system if the Commission decides to wrongfully denies the complaint.

Respectfully,

  
  
*All Rights Reserved*  
Kyland-L :POWELL (EXECUTOR)

**(GUARANTOR/ATTORNEY IN FACT)**

(COMPLAINANT/PLAINTIFF)

