

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

In the Matter of the Commission’s Proposed)
Rule 20 CSR 4240-10.175 Relating to)
Customer Information of Electrical Corporations,)
Gas Corporations, Heating Companies, Certain)
Water Corporations and Certain Sewer Corporations)

File No. OX-2025-0106

COMMENTS OF SPIRE MISSOURI

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”), and for its Comments on the Proposed Rule 20 CSR 4240-10.175 related to customer information published by the Missouri Public Service Commission Staff (“Commission”), states as follows:

1. On September 20, 2024, a *Notice Opening File* was issued opening this case. On September 25, 2024, the Missouri Public Service Commission (“Commission”) issued its *Finding of Necessity and Order Directing that the Proposed Rule Be Filed for Publication*. A draft of the rule was filed with the Missouri Secretary of State’s Office the same day and filed on the Commission’s Electronic Filing and Information System (“EFIS”).
2. On November 1, 2024, the draft rule was published in the Missouri Register with a date for submission of written comments to the Commission of December 1, 2024.
3. On November 15, 2024, the Commission issued an order modifying the schedule for public hearings but kept the due date for submission of written comments as December 1, 2024.
4. As written, proposed rule 20 CSR 4240-10.175(2)(A) states:

Specific customer information shall be made available to affiliated or unaffiliated entities only upon consent of the customer or as otherwise provided by law or commission rules or orders.

The proposed rule also extends the customer consent requirement to the sharing of “general or aggregated customer information.” The Company has concerns that this language is unnecessarily restrictive given how many public utilities operate today.

5. This proposed rule follows a working docket on a new customer information rule, Case No. AW-2018-0393. In the final draft of a proposed rule filed by Staff of the Commission (“Staff”) in that docket, Staff had included language defining “utility related services” and allowing utilities to share customer information without customer consent for those services, provided that appropriate protections are in place. This rule recognized that utilities utilize both affiliated service companies and outside vendors to perform necessary services for customers, often to the benefit of customers in the form of lower costs for such services. However, this language was not included in proposed rule 20 CSR 4240-10.175, which requires customer consent whether the entity receiving the information is affiliated or unaffiliated, and regardless of the purpose for which the information is being shared.

6. Spire Missouri understands the importance of protecting customer information. For many years, the Company has maintained a comprehensive Privacy Policy to inform customers of the protections in place regarding their information. A copy of the current Privacy Policy can be found at <https://spireenergy.com/privacy-policy>.

7. The Company utilizes both its shared services affiliate and unaffiliated third-party vendors to provide many services for our customers, which requires sharing of customer information. These services include, but are not limited to, bill printing and mailing, infrastructure installation, utility line locating, and meter replacement. Utilizing both its affiliated shared services company and outside vendors allows the Company to reduce the costs of these services and lower the impact to its customers. However, requiring the Company to obtain customer consent when specific or general or aggregated customer information is to be shared, regardless of the purpose, adds a burdensome and costly step to a process intended to improve efficiency for our customers.

Moreover, Spire Missouri takes the necessary measures to ensure customer information is not shared with affiliated or unaffiliated entities without the appropriate protections in place. In addition to contractual language protecting customer information, all Company affiliates and unaffiliated vendors must comply with the terms of the Privacy Policy.

8. The final filed proposed rule in Case No. AW-2018-0393 defined utility related services and allowed utilities to send customer information to contracted vendors, without customer consent for those services provided that appropriate protections are in place. Staff's proposal struck the appropriate balance between protecting customer information and allowing for efficient provision of utility service to customers. Spire Missouri would suggest that the language filed by Staff in Case No. AW-2018-0393 be added to proposed rule 20 CSR 4240-10.175 for the reasons set forth herein.

9. A suitable place for the definition of utility related services, and the exception to customer consent for providing those services, would be in proposed rule 20 CSR 4240-10.175, with the following suggested language in bold and underlined:

(2) Standards.

* * *

(D) This rule shall not apply, and customer consent shall not be required, in the furtherance of utility related services.

* * *

(4) Utility related services include those services provided by a utility in furtherance of the provision of regulated utility service pursuant to Chapters 386 and 393, RSMo., as well as actions taken by the utility to support customer use of those services, and pursuant to a utility's commission approved tariff.

WHEREFORE, for the foregoing reasons, the undersigned respectfully requests that the Commission accept these comments for consideration in determining the next steps regarding the proposed rule revisions.

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 the record on this 1st day of December, 2024.

/s/ Sreenivasa Rao Dandamudi
Sreenivasa Rao Dandamudi