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MISSOURI PUBLIC SERVICE COMMISSION
FINANCIAL AND BUSINESS ANALYSIS DIVISION
CUSTOMER EXPERIENCE DEPARTMENT

DIRECT TESTIMONY
OF
SARAH FONTAINE

SPIRE MISSOURI INC.,
d/b/a Spire

CASE NO. GR-2025-0107

Jefferson City, Missouri
April 2025

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Q. Please state your name and business address.

A. My name is Sarah Fontaine. My business address is 200 Madison Street, Jefferson City, MO 65101.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission (“Commission”) as a Senior Research/Data Analyst in the Customer Experience Department (“CXD”), Financial and Business Analysis Division. My duties as a Senior Research/Data Analyst for the Commission include, but are not limited to, researching and managing formal complaints, preparing and reviewing investigative reports at the Commission, and participating in Commission Staff (“Staff”) recommendations.

Q. Please describe your background and relevant work experience.

A. My education and work experience are attached as Schedule SF-d1.

Q. What is the purpose of your direct testimony?

A. The purpose of my direct testimony is to address Staff concerns with Spire Missouri Inc., d/b/a Spire's ("Spire Missouri") disconnection processes and procedures. More specifically, I will address: Spire Missouri's previous policy of disconnecting customers for issues other than non-payment on days when the weather is forecasted to be under thirty-two degrees Fahrenheit (32°F); Spire Missouri's processes and procedures for

1 notification of customers prior to disconnection; Spire Missouri's practices surrounding
2 delayed transfers and/or vacant with consumption meters; and Spire Missouri's reconnection
3 policies and procedures.

4 This testimony was planned prior to the Commission's *Order Directing Spire to*
5 *Respond to Customer Allegations* filed on March 5, 2025; however, it can also serve as Staff's
6 comments regarding the customer allegations made in the order including: "disconnections of
7 accounts without proper notice, lack of knowledge or awareness of account ownership resulting
8 in disconnections, and delays in reconnections after arrearages have been paid."

9 Q. You mentioned that Staff already planned to write testimony on the
10 issues referenced in the Commission *Order Directing Spire to Respond to Customer*
11 *Allegations*. What is the history and reasoning behind Staff's decision to address these
12 concerns in testimony?

13 A. Commission Consumer Services Department ("CSD") and CXD Staff currently
14 have monthly meetings with Spire Missouri to discuss customer service updates and issues.
15 In an August 24, 2022, meeting, CSD shared that for almost three years it had received
16 complaints from customers and had voiced concern to Spire Missouri regarding its practice of
17 disconnecting customers due to the customer's failure to schedule a safety inspection on days
18 when disconnection is not allowed for non-pay under the Cold Weather Rule ("CWR").

19 In a January 20, 2023, meeting, Spire Missouri admitted process changes may be needed
20 and stated that it tries to avoid disconnections in the winter. There was discussion about
21 possible changes to the lettering process or changing the wording on letters, and based on
22 Staff's research it seems Spire Missouri did make some wording changes to the letters.
23 CXD Staff suggested that Spire Missouri start the process of notifying customers with inside

1 meters earlier in the year to try to avoid these types of disconnections for customers with inside
2 meters during the winter. Spire Missouri agreed that it would start early in 2023 but stated it
3 struggles to have the bandwidth to fit them all in. Staff continued to see these issues occurring
4 in the winter of 2024.

5 In a January 25, 2025, meeting, CSD voiced concern to Spire regarding incoming
6 complaints and inquiries regarding disconnections occurring on CWR days for a customer's
7 failure to schedule a meter exchange and for accounts that are considered "vacant with
8 consumption" (also known as "delayed transfer") accounts.

9 CXD Staff reviewed informal complaints, inquiries, public comments and quick hits in
10 the Commission's Electronic Filing and Information System ("EFIS") and found several
11 concerns leading Staff to make the decision to submit Data Requests ("DR" or "DRs") for more
12 information, investigate the issues further and, ultimately, make recommendations based on its
13 findings in direct testimony in this rate case. More details of Staff's concerns, findings and
14 recommendations follow.

15 **DISCONNECTIONS**

16 Q. What are the specific reasons for which Spire Missouri may disconnect a
17 customer?

18 A. In its response to Staff DR 0196, Spire Missouri states that customers may be
19 disconnected for the following reasons:

- 20 • Safety Non-Compliance – Atmospheric Corrosion Inspection ("ACI")
- 21 • Unauthorized Consumption – Diversion or locked meter
- 22 • Delayed Transfer or Vacant Meter showing consumption
- 23 • Customer request (demo/remodel, seasonal stop)
- 24 • Hazardous Condition (gas leak, flood)
- 25 • Meter Exchange
- 26 • Maintenance and Upgrades (relocating service line, main upgrade)
- 27 • Company Abandonment

1 Q. Are there certain types of service disconnections that Staff finds are leading to
2 the most areas of concern?

3 A. Yes. Staff specifically has concerns with disconnections for safety
4 non-compliance - ACI, delayed transfers/vacant with consumption meters, and meter exchanges.

5 Q. Please explain a disconnection for safety non-compliance.

6 A. From Staff's understanding, these are disconnections that occur when a
7 customer is scheduled to receive an ACI or a leak survey as required by 20 CSR 4240-40.030.¹
8 If the customer does not comply with Spire Missouri's requests to schedule the required
9 inspection, Spire Missouri disconnects service as a result.

10 Q. Please explain a disconnection for delayed transfer or vacant meter showing
11 consumption.

12 A. From Staff's understanding, these are disconnections that occur when a
13 customer has moved into a property but has failed to start service with Spire Missouri.

14 According to Spire Missouri's response to Staff DR 0203, a delayed transfer is a
15 "soft disconnect." The soft disconnect is typically used when a customer requests a stop service
16 at a property and Spire Missouri has no other information about another person moving in.²
17 During a soft disconnect, service is not physically stopped at the meter ("hard disconnect"),
18 but a stop service order is entered into Spire Missouri's system for the date requested for

¹ 20 CSR 4240-40.030 (9)(Q) Atmospheric Corrosion Control—Monitoring. (192.481) 1. Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion at least once every three (3) calendar years, but with intervals not exceeding thirty-nine (39) months.

20 CSR 4240-40.030(M) Distribution Systems—Leakage Surveys. (192.723) 1. Each operator of a distribution line or system shall conduct periodic instrument leakage surveys in accordance with this subsection B. Except as provided for in subparagraph (13)(M)2.C., instrument leak detection surveys must be conducted outside of business districts as frequently as necessary, but at intervals not exceeding— (I) Fifteen (15) months, but at least once each calendar year, for unprotected steel pipelines and unprotected steel yard lines; (II) Thirty-nine (39) months, but at least once each third calendar year, for all other pipelines and yard lines;

² Spire Missouri response to Staff DR 0203.

1 shut off. If Spire Missouri does not receive a request for new service at the property within
2 30 days and there has been no gas consumption, a field activity is created in its system to
3 disconnect at the meter. Spire Missouri's system also has thresholds in place for these situations,
4 which are triggered by either time or usage. If thirty (30) days have passed but the usage
5 threshold has not been triggered, a letter requesting the occupant to contact Spire Missouri about
6 establishing gas service is sent to the property. If thirty (30) days have not passed but the usage
7 threshold of 10 Ccf³ (summer) or 40 Ccf (winter) has been met⁴, the same letter goes out to the
8 occupant. If Spire Missouri does not receive an application for service at the property within
9 ten (10) days of the date the letter was sent, an order is created by the system for a hard
10 disconnect to occur.

11 Q. Please explain a disconnection for a meter exchange.

12 A. These disconnections occur when a customer has been notified of the need to
13 exchange the gas meter at their location and that an appointment is required to do so.
14 Spire Missouri's procedure is if the customer is not responsive to the notices to set up an
15 appointment for the exchange, Spire Missouri will go to the property to do the exchange.
16 If the customer is home, Spire Missouri will move forward with the exchange. If the customer
17 is not home, Spire Missouri will leave a door hanger, disconnect the service and will do the
18 meter exchange at the time of reconnection.⁵

19 Q. What are Staff's concerns regarding these particular disconnection types?

20 A. Staff has several concerns. Staff's first concern is Spire Missouri's practice of
21 disconnecting customers for these types of disconnections even on winter days that do not allow

³ 100 Cubic Feet of Natural Gas.

⁴ Spire Missouri response to Staff DR 0199.1.

⁵ Spire Missouri response to Staff DR 0197.

1 disconnections for non-payment under the CWR. Second, Staff is concerned with
2 Spire Missouri's procedure and business practices relating to notification of customers prior to
3 these types of disconnections. Third, Staff is concerned with Spire Missouri's procedure and
4 business practices relating to the reconnection of customers after disconnections occur.

5 Q. You referenced disconnections occurring on a "Cold Weather Rule day".
6 What is a "Cold Weather Rule day"?

7 A. The CWR⁶ "protects the health and safety of residential customers
8 receiving heat-related utility service by placing restrictions on discontinuing and refusing to
9 provide heat-related utility service from November 1 through March 31 **due to delinquent**
10 **accounts** of those customers." [Emphasis added.]

11 It also states,

12 . . . discontinuance of gas and electric service to all residential users,
13 including all residential tenants of apartment buildings, **for**
14 **nonpayment of bills** where gas or electricity is used as the source of
15 space heating or to control or operate the only space heating equipment
16 at the residence is prohibited— (A) On any day when the National
17 Weather Service local forecast between 6:00 a.m. to 9:00 a.m., for the
18 following twenty-four (24) hours predicts that the temperature will
19 drop below thirty-two degrees Fahrenheit (32°F); or (B) On any day
20 when utility personnel will not be available to reconnect utility service
21 during the immediately succeeding day(s) (Period of Unavailability)
22 and the National Weather Service local forecast between 6:00 a.m. to
23 9:00 a.m. predicts that the temperature during the Period of
24 Unavailability will drop below thirty-two degrees Fahrenheit (32°F).⁷
25 [Emphasis added.]

26 It should be noted that, as of August 28, 2025, the Cold Weather Rule Section 393.109,
27 RSMo, will take effect with the passage of Senate Bill 4 signed on April 9, 2025. Under this
28 statute, the 24-hour time period referenced above will be changed to 72-hours. For the

⁶ 20 CSR 4240-13.055 Purpose.

⁷ 20 CSR 4240-13.055(5)(A)(B).

1 purpose of this testimony, CWR is specific for the implementation and compliance with
2 20 CSR 4240-13.055.

3 Q. Does the CWR apply to disconnections for purposes other than non-payment?

4 A. Staff's interpretation of the CWR is that it applies only to disconnections for
5 nonpayment/delinquency. Staff recognizes that Spire Missouri's decision to disconnect
6 customers for reasons other than nonpayment/delinquency on CWR days does not appear
7 to violate Commission rules, regulations or Spire Missouri's tariff. However, Staff notes that
8 Spire Missouri clearly touts its values on its website⁸, stating: "By honoring Spire's values of
9 safety, inclusion and integrity, we're creating a healthy workforce and taking good care of
10 each other, our customers and communities." More specifically, Spire Missouri refers to
11 safety and integrity: "we keep our people, company, customers and communities safe" and
12 "we do what's right, every time". Disconnecting on dates when it is prohibited under the CWR,
13 for any reason other than a safety concern such as a gas leak, results in a safety concern for the
14 occupant and, arguably, is not "what's right". To add to this safety concern, some customers
15 have had to wait several days for service to be reconnected. Staff will address this in more detail
16 later in testimony.

17 According to the LIHEAP⁹ Clearinghouse¹⁰, forty (40) states and the District of
18 Columbia have Cold Weather disconnection protection policies and twenty-one (21) states
19 and the District of Columbia have Hot Weather disconnection protection policies. An article
20 in the The Electricity Journal titled "Electric Utility Disconnection Policy and Vulnerable
21 Populations"¹¹ states, "Exposure to extreme cold, coupled with an underlying vulnerability
22 such as heart disease, social isolation or simply age, can lead to substantial numbers of deaths

⁸ [About Spire Natural Gas Utilities | Spire Inc. Accessed March 20, 2025.](#)

⁹ Low Income Home Energy Assistance Program.

¹⁰ [Disconnect Policies | The LIHEAP Clearinghouse. Accessed March 20, 2025.](#)

¹¹ <https://doi.org/10.1016/j.tej.2020.106859>; Electric utility disconnection policy and vulnerable populations, The Electricity Journal, Volume 33, Issue 10, 2020. Flaherty, Matthew; Carley, Sonya; Konisky, David. Accessed March 20, 2025.

1 during extreme weather.” The article also states, “A lack of access to energy can lead to serious
2 health and safety consequences. For instance, the use of candles for light, space heaters, or
3 generators cause many house fires and can lead to carbon monoxide poisoning (Franklin and
4 Kurtz, 2017).” A December 2024 study published in the Journal of the American Medical
5 Association found that the number of Americans who died from cold weather-related factors
6 more than doubled from 1999 to 2022, with the highest rate being detected in the Midwest.¹²
7 Disconnections during extreme weather should be taken very seriously. Missouri has
8 demonstrated its agreement with this statement by adopting rules and statutes relating to both
9 cold weather and hot weather disconnections.

10 Q. Would Staff agree it is the customer’s responsibility to address concerns
11 leading to disconnection so that a lapse of service does not occur on their account when it is
12 cold outside?

13 A. Absolutely, there should be customer responsibility. Where Staff’s concern lies
14 is that on several occasions Staff found that Spire Missouri’s notification processes prior to
15 disconnect¹³ were not always followed and reliable. There were instances where a customer
16 received no notice prior to disconnection; instances where a customer received months of
17 notices threatening disconnection but the notices were sporadic and did not always occur in a
18 timely manner prior to the actual disconnection; and instances where Spire Missouri had months
19 when the weather was not dangerously cold, proper notification was made, and it could have
20 disconnected but it waited until the winter to go through with the actual disconnection.

¹² Journal of American Medical Association, Cold Related Deaths in the US, December 19, 2024, Liu, Patel, Wahdera. Accessed April 3, 2025.

¹³ For disconnections other than non-payment/delinquency.

1 In a February 25, 2025, meeting with CXD and CSD, Spire Missouri made Staff aware
2 that as of the week of February 17, 2025, it would no longer disconnect customers on
3 Cold Weather Rule days with two exceptions – in cases of diversion and for ACI inspection.
4 Staff is supportive of this change and recommends that Spire Missouri's tariff be revised in
5 order to reflect this new policy.

6 **CUSTOMER NOTIFICATION PRIOR TO DISCONNECTION**

7 Q. Do Commission regulations require certain customer notifications to take place
8 prior to disconnection for reasons other than non-payment?

9 A. Yes. 20 CSR 4240-13.050(3) (Discontinuance of Service) states:

10 On the date specified on the notice of discontinuance or within
11 thirty (30) calendar days after that, and subject to the requirements of
12 these rules, a utility may discontinue service to a residential customer
13 between the hours of 8:00 a.m. and 4:00 p.m. Service shall not be
14 discontinued on a day when utility personnel are not available to
15 reconnect the customer's service, or on a day immediately preceding
16 such a day. After the thirty (30) day calendar effective period of the
17 notice, all notice procedures required by this rule shall again be followed
18 before the utility may discontinue service.

19 20 CSR 4240-13.050(8) (Discontinuance of Service) states:

20 At least twenty-four (24) hours preceding discontinuance, a
21 utility shall make reasonable efforts to contact the customer to advise the
22 customer of the proposed discontinuance, and what steps must be taken
23 to avoid it. Reasonable efforts shall include either a written notice
24 following the notice pursuant to section (4), a doorhanger, or at least two
25 (2) telephone call attempts reasonably calculated to reach the customer.

26 20 CSR 4240-13.050(9) (Discontinuance of Service) states:

27 Immediately preceding the discontinuance of service, the
28 employee of the utility designated to perform this function, except where
29 the safety of the employee is endangered, shall make a reasonable effort
30 to contact and identify him/herself to the customer or a responsible
31 person then upon the premises and shall announce the purpose of his/her
32 presence. When service is discontinued, the employee shall leave a
33 notice upon the premises in a manner conspicuous to the customer that
34 service has been discontinued and the address and telephone number of
35 the utility where the customer may arrange to have service restored.

1 Q. Is Spire Missouri's customer notification process the same for all types of
2 disconnections?

3 A. No. According to Spire Missouri's response to Staff DR 0197, Spire Missouri
4 approaches customer notification differently for disconnections due to ACI inspection
5 non-compliance vs. meter exchanges vs. vacant with consumption.

6 For vacant with consumption, Spire Missouri's procedure is to send a letter to the
7 occupant when either the time or the usage threshold has been met. After ten (10) days have
8 passed with no establishment of a new account, a field activity is automatically generated for a
9 technician to do a hard disconnect. If no physical contact is made at the property, a door hanger
10 is left and service is disconnected at the curb box.¹⁴ An example of this letter is attached as
11 Schedule SF-d2.

12 For ACI inspection non-compliance, Spire Missouri's procedure is that a case is
13 automatically created in its billing system six months prior to the inspection due date.
14 However, the actual start to the notification process is manual and is based on the time of year.
15 On average, Spire Missouri begins the notification process two months prior to the due date;
16 however, for January dates it begins one month prior and for November and December dates it
17 begins three months prior. Notifications are sent via U.S. Postal Service letter, but if a customer
18 has selected a preferred contact method of email and/or text, Spire Missouri will also send
19 notifications via those methods.

20 There is a series of five events as part of the case. They are as follows: a letter is sent
21 letting the customer know they need to contact Spire Missouri to schedule the appointment,
22 a second letter to schedule is sent ten days later, a third letter is sent ten days after the second

¹⁴ Spire Missouri response to Staff DR 0201.1.

1 which now includes notice to disconnect, a fourth letter is sent ten days after the third letter,
2 now with a 96-hour notice to disconnect. Finally, if the customer has not scheduled the
3 appointment or completed the inspection, the customer will either be disconnected or the
4 communication process starts over.¹⁵ Samples of these letters are attached as Schedule SF-d3.

5 If the customer is home when Spire Missouri's field staff goes to the property to perform
6 the disconnection, the inspection will be performed at that time. If the customer is not home, a
7 door hanger is left and service is disconnected.

8 For customers requiring a meter exchange as part of Spire Missouri's advanced meter
9 upgrade project, it sent postcards on May 24, 2024, to all customers that required a meter
10 exchange including those with indoor or outdoor meters as well as those needing module
11 upgrades. After that initial notification via postcard, a case was created and the customer was
12 also notified via e-mail on May 28, 2024. ** [REDACTED]

13 [REDACTED]
14 [REDACTED] **¹⁶ If an exchange was
15 not scheduled, Spire Missouri would attempt another contact via phone or email. If still no
16 contact was made, the field tech would call the customer before reaching the property and would
17 knock on the door when arriving at the property. If no physical contact was made and the meter
18 was not accessible, a door tag was left and service disconnected at the curb box. An emergency
19 no gas field activity was added to the account so that when the customer calls to get reconnected,
20 it was treated as a priority order which is worked the same day. Staff has attached a
21 confidential handout from Spire Missouri sent to Staff on September 24, 2024 titled

¹⁵ Spire Missouri response to Staff DR 0201.1.

¹⁶ Confidential ** [REDACTED] **

1 “Advanced Meter Upgrades” as Confidential Schedule SF-d4. It is Staff’s understanding that
2 this meter exchange project is still ongoing as Spire Missouri is focused now on the no access
3 outside and inside meters.

4 Q. In its investigation, did Staff find violations of Commission rule, statute or Spire
5 Missouri’s tariff regarding customer notifications?

6 A. Staff has not found definitive instances in which Spire Missouri clearly violated
7 rule, statute or tariff. However, Staff still has concerns regarding some of Spire Missouri’s
8 practices and procedures, or lack thereof.

9 More specifically:

- 10 1. There were several informal complaints in which, according to Spire Missouri
11 customers, technicians did not knock on the door, or did it so softly that it could
12 not be heard. While this is difficult to verify, Staff is concerned that this
13 complaint has validity as it is reiterated by numerous customers.
- 14 2. When Spire Missouri fails to disconnect a customer within the timeframe
15 allowed by the notification requirements under 20 CSR 4240-13 rules or Spire
16 Missouri’s tariff, it starts the process over again and this continues for several
17 months. This leads to a potential for customer confusion and diminished
18 recognition by the customer of the urgency of the situation.
- 19 3. It is Staff’s perspective that disconnections related to vacant with consumption
20 meters would not fall under the notification requirements of 20 CSR 4240-13
21 rules or Spire Missouri’s tariff due to the fact that there is not technically a
22 customer at that point, Spire Missouri does have a responsibility to identify and
23 address these accounts in a timely manner. Staff’s investigation of these
24 disconnections showed that Spire Missouri failed to timely address this issue
25 for several years in some instances.

26 Q. Are there specific examples that Staff found in its research and investigation?

1 A. Yes. In its review of informal complaints, Staff found several instances in
2 which the above procedures were not followed for delayed transfer/vacant with usage meters.
3 Some examples include¹⁷:

- 4 • A complaint in which the customer was disconnected due to a vacant with
5 consumption meter. The customer received no notification prior to
6 disconnection and no door tag was left. This customer lived at the property for
7 a year before service was disconnected. According to Spire Missouri's response
8 to Staff DR 0205, the disconnect "order was created 11/08/2023 but due to the
9 backlog, was not worked until 5/28/2024."
- 10 • A complaint in which service was disconnected due to a vacant with
11 consumption meter. Notices were sent, but sent sporadically. In this instance,
12 the last known account had stopped service on May 24, 2022. Spire Missouri
13 sent notices July 1, 2022, and January 13, 2023. No other notices were sent prior
14 to disconnection on May 20, 2024.
- 15 • A complaint in which service was disconnected on November 25, 2024, due to
16 a vacant with consumption meter. The complainant moved to the property in
17 June of 2023. A letter was sent in July of 2023 and another not sent until
18 November of 2024. The occupant contacted Spire Missouri on November 21,
19 2024, to set up an account; however, the Spire Missouri Customer Service
20 Representative ("CSR") did not switch the account to the customer's name.
21 Since the account was not put in the customer's name, service was disconnected
22 even though the customer had already set up the new account. Also of note,
23 service was disconnected on a CWR day. The account was reconnected on
24 December 2, 2024.

25 A complaint in which service was disconnected due to a vacant with
26 consumption meter. The complainant moved to the property in July 2023.

¹⁷ Informal Complaint numbers for examples cited: CI202401319, CI202401401, CI202500781, CI202501060, CI202500837, CI202401369.

1 No letters were sent. An order to disconnect was placed in September of 2024
2 but due to technician workload, service was not disconnected until
3 December 30, 2024.

- 4 • A complaint in which service was disconnected due to a vacant with
5 consumption meter; however, the customer did not actually move from the
6 property, rather they just requested a stop service. The customer contacted Spire
7 Missouri to stop service in June of 2023. A soft disconnection occurred. A hard
8 disconnect occurred on December 10, 2024, and Spire Missouri attempted to bill
9 the customer for the 18 months in between. The customer felt they were not
10 responsible since Spire Missouri did not shut off gas as requested. Since Spire
11 Missouri did not disconnect the service as requested by the customer, it did not
12 back bill the customer for the usage.

- 13 • Finally, a complaint in which the customer was disconnected due to a vacant
14 with consumption meter. The previous tenant stopped service in September of
15 2020. Letters were sent in March 2022 and January 2023. Service was finally
16 disconnected in June of 2024.

17 Staff is concerned with these examples and others. Spire Missouri attributes these issues
18 to a backlog that was discovered in March of 2024.¹⁸

19 Q. Can you explain this backlog issue in more detail?

20 A. Yes. Spire Missouri more fully explained the circumstances surrounding this
21 backlog in response to Staff DR 0207.1, including a document titled “Delayed Transfer Clean
22 Up Effort”, which is attached as Schedule SF-d5. As previously stated, Spire Missouri
23 discovered a backlog of Delayed Transfer/Vacant with Consumption meters in March of 2024.
24 This backlog of no associated accounts with consumption consisted of approximately
25 9,700 premises across both East and West regions. Spire Missouri states that there were

¹⁸ Spire Missouri response to Staff DR 0207.1.

1 fewer actual field activities in the backlog; however, it is not currently aware of the exact
2 number of field activities that were completed/gas disconnected. Spire Missouri continues the
3 process of responding to Staff's DR with this information. It is also determining the amount of
4 lost revenue associated with these premises and the backlog. Staff will update on this
5 information in later testimony.

6 The backlog built up over several years. Staff has found in its research of informal
7 complaints that it may have gone as far back as 2020; however, Spire Missouri is also
8 working to provide this information to Staff and Staff will update this information in later
9 testimony as well.

10 Spire Missouri explained:

11 There was a misunderstanding about who was responsible for
12 working them in the field which ultimately resulted in not focusing on
13 them as a priority. This was due to a lack of understanding of the order
14 type in Field Operations. The Delayed Transfer Case generates a
15 Disconnect Service Point field activity. Workload Planning was under the
16 impression that these Disconnect Service Point field activities that were
17 being generated for vacant meters showing consumption were actually for
18 "locked meters showing consumption," or a theft of gas situation, which
19 is routed and handled by a different Field Ops team (a team called the
20 Diversion team). The Diversion team thought Workload Planning was
21 working them since they were Disconnect Service Point field activities.
22 One department was thinking the other was responsible for working them,
23 which resulted in a lack of prioritization for the work. Some of them did
24 get worked, but no department thought it was their ultimate responsibility.
25 The Customer Experience Billing team kept getting the cases and
26 reviewing the report, but they kept seeing the same accounts show up, so
27 over time, they thought it wasn't a priority since the field activities weren't
28 getting worked in the field. Ultimately, this should not have happened.
29 There's no excuse and it should have been caught sooner.¹⁹

30 Spire Missouri worked the backlog, as detailed in Schedule SF-d5, and ultimately has
31 changed its procedures for handling these situations as a result. The new procedures were

¹⁹ Spire Missouri response to Staff DR 0207.1.

1 outlined earlier in this testimony but they include changes to the manual process so that billing
2 representatives maintain follow-up actions so as to validate if/when a customer responds within
3 the ten (10) day time period required. When a delayed transfer case is started, there is a process
4 built in to allow a re-start of the cycle of notifications if disconnection does not occur within
5 the allotted timeframe. Spire Missouri found that function was not occurring during the time
6 period of the backlog. It states that this has been corrected. These cases were also previously
7 not considered as priority for Workload Planning and Field Operations; they were assigned to
8 technicians when there was extra capacity in the workload. The prioritization has now changed
9 to ensure that these situations are worked in a timely manner.

10 Q. You covered Staff's concern with customer notifications regarding delayed
11 transfer/vacant with usage meters. Does Staff have concerns related to notifications prior to
12 disconnections for ACI non-compliance?

13 A. Yes. Staff's concern in relation to disconnections for ACI non-compliance is
14 that it found instances in which notices were sent for several months leading up to the due date
15 of the inspection. While on its face, Staff does not consider this as a negative; however, when
16 this occurs for multiple months, it can lead to customer confusion or a customer who does not
17 believe that Spire Missouri will follow through with the disconnection.

18 The first notice is titled "Important safety inspection notice", the second notice says
19 "Second notice for safety inspection", and the next notice says "FINAL NOTICE – Safety
20 Inspection Notice". The final notice gives a date stating that if Spire Missouri does not hear
21 from the customer by given date, it will disconnect service.

22 In one occurrence, the customer received all three of these notices including a final
23 notice with a date of October 28, 2024, for disconnection. However, instead of disconnecting

1 the customer on October 28, Spire Missouri sent another letter on November 4, 2024, with the
2 title "Important safety inspection notice". The series of letters started over, with Spire Missouri
3 sending the first letter of the series again after the final notice was sent. This is confusing for
4 customers and takes away from the urgency of the final notice letter. For this occurrence Spire
5 Missouri finally disconnected gas on November 22, 2024. Examples of these letters are attached
6 as Schedule SF-d3.

7 Q. Has Spire Missouri offered a response to Staff about Staff's concerns relating to
8 customer notification processes and procedures?

9 A. Yes. In its response to Staff DR 0258, Spire Missouri explains that all of its
10 disconnection and reconnection processes are cross-functional and involve several departments.
11 With that, Spire Missouri states that it does not currently have written and documented
12 comprehensive cross-functional processes and procedures in place. However, it does have an
13 initiative started to develop these procedures in order to improve the overall customer
14 experience and ensure consistency for customers.

15 Q. Does Staff have related recommendations?

16 A. Yes. Staff recommends that Spire Missouri refine its vacant with consumption
17 meter procedures. It should ensure soft disconnects are closely monitored and hard disconnects
18 occur in a timely manner. Spire Missouri needs to ensure that customers are not using service
19 for years at a time without being billed and then are faced with large rebills. Spire Missouri
20 should provide a monthly report to CXD Staff showing the number of delayed transfer/vacant
21 with usage meters for the previous month.

22 Staff recommends that Spire Missouri examine its current practices and procedures for
23 these types of disconnections and reconnections. Staff believes that Spire Missouri's plan to

1 develop and implement cross-functional processes and procedures is a step in the right
2 direction. Staff believes that clear, cross-functional procedures will not only benefit the
3 Company in ensuring that no violations of Commission rule or Spire Missouri tariff occur,
4 but it will greatly benefit its customers ensuring that customer expectations are consistent.
5 Spire Missouri should share its updated cross-functional procedures with CXD Staff
6 upon completion. It should also include the date the procedure was implemented and to whom
7 it was disseminated.

8 Staff recommends that Spire Missouri make efforts to complete disconnections related
9 to ACI non-compliance in the timeframe referenced in its letters to customers. If at all possible,
10 another letter should not be sent after the “final” notice, as this is confusing to the customer.
11 Spire Missouri should report on these efforts including the number of inspections it has
12 completed per month for the prior quarter. CXD Staff currently meets with Spire Missouri
13 on a monthly basis to discuss customer service and billing matters. Staff recommends that,
14 moving forward, these meetings occur on a quarterly basis. The above information should be
15 shared at these quarterly meetings along with the existing items currently discussed in
16 scheduled monthly meetings.

17 **SERVICE RECONNECTION AFTER DISCONNECT**

18 Q. Did Staff look into Spire Missouri’s processes and procedures related to
19 reconnection after a customer is disconnected?

20 A. Yes. In Staff DR 0202, Staff requested Spire Missouri’s reconnection
21 procedures for disconnections related to non-payment, meter exchanges, ACI non-compliance,
22 vacant with consumption and locked meter showing consumption (typically diversion).

23 Q. Are the procedures different depending on the type of disconnection?

1 A. Yes, they can be. According to its DR 0202 response, for reconnection after
2 disconnection due to non-payment, once a customer has paid all fees and/or past due balances
3 or have entered into a payment agreement Spire Missouri will reconnect either the same day or
4 the next business day. The customer is subject to a reconnection fee of \$65.00 for non-payment.

5 For a disconnection due to failure to set an appointment for a meter exchange, Spire
6 Missouri states that it has “a goal to perform same day reconnections, treating it as a no-gas
7 priority order. If circumstances don’t allow for same day reconnection, we reconnect no later
8 than next day.”²⁰ According to Spire Missouri’s response to Staff DR 0202.1, no-gas priority
9 orders “are a reference to orders that have been disconnected due to system maintenance and
10 Spire prioritizes these customers for reconnection. This is done because customers were simply
11 left with “no-gas” as a result of system maintenance that is being performed by Spire.”

12 Following a disconnection for either failure to schedule ACI inspection or for a vacant
13 showing consumption meter, after the customer contacts Spire Missouri, the reconnection is
14 scheduled for the same or next available day, based on availability.

15 Finally, after disconnection due to a locked meter showing consumption, Spire Missouri
16 will reconnect on the next available day after the customer contacts Spire Missouri, pays and
17 sets up an account.

18 Q. In your investigation did you find instances in which these procedures were not
19 followed?

20 A. Yes. There are informal complaints²¹ showing instances where customers had
21 to wait for service to be turned back on while Spire Missouri did an investigation as to

²⁰ Spire Missouri response to Staff DR 0202.

²¹ CI202500647, CI202500475.

1 how much the customer owed – these were generally for disconnections due to vacant
2 showing consumption meters. Vacant with consumption meter cases are also treated as new
3 customer connection requests, so according to 20 CSR 4240-13.035 (3)²² Spire Missouri has
4 three (3) days to start service. Staff understands that certain situations occur requiring
5 investigation, but it encourages Spire Missouri to make every effort to connect as soon as
6 possible when temperatures are hazardous. Staff also found complaints where a customer was
7 disconnected on a Thursday, called in for reconnection on Friday and was told there were no
8 available times and the customer had to wait until Monday. This can lead to dangerous
9 situations in the winter so, again, Staff would encourage Spire Missouri to make every effort to
10 reconnect as soon as possible.

11 Q. Did Staff ask Spire Missouri about its policies for disconnections on Fridays and
12 days before holidays?

13 A. Yes. Staff notes that 20 CSR 4240-13.050(3) states:

14 3) On the date specified on the notice of discontinuance or within
15 thirty (30) calendar days after that, and subject to the requirements of
16 these rules, a utility may discontinue service to a residential customer
17 between the hours of 8:00 a.m. and 4:00 p.m. Service shall not be
18 discontinued on a day when utility personnel are not available to
19 reconnect the customer's service, or on a day immediately preceding
20 such a day. After the thirty (30) calendar day effective period of the
21 notice, all notice procedures required by this rule shall again be followed
22 before the utility may discontinue service.

²² 20 CSR 4240-13.035 (3) The utility shall commence service at an existing residential service location in accordance with this rule as close as reasonably possible to the day specified by the customer for service to commence, but no later than, three (3) business days following the day specified by the customer for service to commence provided that the applicant has complied with all requirements of this rule. When service to a new residential location is requested, the utility shall commence service in accordance with this rule as close as reasonably possible to the day specified by the applicant for service to commence, but normally no later than three (3) business days following the day that all required construction is completed and all inspections have been made.

1 Spire Missouri's tariff Sheet No. R-11.4 states:

2 At all times, a reasonable effort shall be made to restore service
3 upon the day restoration is requested, and in any event, restoration shall
4 be made not later than the next working day following the day requested
5 by the customer.

6 In response to Staff's DR 0200, Spire Missouri stated that its policy "for disconnections
7 for non-payment is to not disconnect on a Friday or the day before a holiday. Residential
8 disconnections for reasons other than non-payment like Delayed Transfers, meter exchanges,
9 etc. also follow this rule. Disconnections for ACI, theft of gas or safety reasons do not follow
10 this rule."

11 Q. Does it appear to Staff that Spire Missouri is following Commission rule, its
12 tariff and its policy for reconnections as outlined above?

13 A. At times it does. However, there are also times when a customer has been told
14 that the schedule is full for reconnection the next business day. In Staff DR 0194, Staff
15 requested a daily breakdown of the number of disconnections for each type of disconnection on
16 a per day basis from 2019-2024. Unfortunately, Spire Missouri was only able to provide that
17 data for disconnections due to non-payment. Additionally, Spire Missouri responded to Staff
18 DR 0194 by stating that it could not produce the level of detail needed to provide the
19 information for the other types of disconnections. This information would be helpful to
20 determine how many disconnections are occurring on each day and whether it is plausible,
21 based on workload management, for that many reconnections to occur on the next day. Staff
22 recommends, moving forward, that Spire Missouri track the number of disconnections for all
23 types and provide to Staff a report at the end of each month showing the number of
24 disconnections per day for each type of disconnection.

1 Looking at disconnections for non-payment only, it shows that on average
2 Spire Missouri performs a similar number of disconnections on Thursdays as it does other days
3 of the week. Spire Missouri performs fewer disconnections for non-pay on Mondays than on
4 Tuesday-Thursday. Rather than perform a larger number of disconnections on Thursday,
5 when more customers may be at risk of not having service over a weekend due to an
6 inability to schedule a reconnection, it could prioritize doing more disconnections on Monday
7 so that a larger number of customers have a higher likelihood of getting reconnected prior to
8 the weekend.

9 Spire Missouri states that it will do reconnects on weekends and holidays if there is an
10 extenuating circumstance, in which case someone in supervision may make an effort to work it
11 into the schedule. It states that examples would be if Spire Missouri disconnected a customer
12 in error or if the customer had a serious health condition.²³

13 Q. Did Staff come across any other concerns related to reconnections during its
14 investigation?

15 A. Yes. Staff also found several informal complaints, online complaints and public
16 comments regarding Spire Missouri's scheduling timeframes for reconnection. Customers
17 stated that they are given an entire day timeframe in which they are required to be home for the
18 reconnection to occur. Customers are being required to take off work for an entire day to
19 accommodate the reconnection and feedback is that customers are not happy about this.
20 There were also some instances in which a customer took off work, waited all day and the
21 technician did not show for the appointment or Spire Missouri sent the wrong type of

²³ Spire Missouri response to Staff DRs 0200 and 0200.1.

1 technician to do the job and it had to be rescheduled. This is not acceptable customer service
2 from Staff's perspective.

3 In Staff DR 0257, Staff asked Spire Missouri to provide its appointment windows that
4 are offered to customers. It responded that the time periods offered are 8:00 a.m. – 12:00 p.m.,
5 12:00 p.m. – 4:00 p.m. and 8:00 a.m. – 4:00 p.m. and that these time periods “are offered to all
6 customers for all field activity types that require an appointment.” Staff also asked if
7 Spire Missouri field technicians call customers prior to arrival and its policy shows that they
8 do call ahead for the appointment types referenced in this testimony. Staff is not aware of
9 whether these have always been the standard windows for scheduling or if the shorter windows
10 were added after Spire Missouri received complaints. See Schedule SF-d6 for an example of
11 related complaints.

12 Staff recommends that Spire Missouri look at its scheduling procedures to determine
13 how it can more efficiently handle these processes to better meet the needs of its customers.

14 **CONCLUSION**

15 Q. Does Staff have recommendations as a result of its findings while researching
16 for this testimony?

17 A. Yes. Staff made several recommendations throughout its testimony that it will
18 recap below:

- 19 • Staff recommends that Spire Missouri's tariff be revised in order to reflect the
20 new policy that was shared with Staff at its February 25, 2025, meeting changing
21 its policy to not disconnect service on Cold Weather Rule days for all
22 disconnections except ACI safety inspections and locked meters showing
23 consumption.

- 1 • Staff recommends that Spire Missouri refine its vacant with consumption meter
2 procedures. It should ensure soft disconnects are closely monitored and hard
3 disconnects occur in a timely manner. Spire Missouri needs to ensure that
4 customers are not using service for years at a time without being billed and then
5 are faced with large rebills. Spire Missouri should provide a monthly report to
6 CXD Staff showing the number of delayed transfer/vacant with usage meters for
7 the previous month.
- 8 • Staff recommends that Spire Missouri examine its current practices and
9 procedures for all types of disconnections and reconnections. Staff believes that
10 Spire Missouri's plan to develop and implement cross-functional processes
11 and procedures is a step in the right direction. Staff believes that clear,
12 cross-functional procedures will not only benefit the Company in ensuring that
13 no violations of Commission rule or Company tariff occur, but it will greatly
14 benefit its customers ensuring that customer expectations are consistent.
15 Spire Missouri should share its updated cross-functional procedures with
16 CXD Staff upon completion. It should also include the date the procedure was
17 implemented and to whom it was disseminated.
- 18 • Staff recommends that Spire Missouri make efforts to complete disconnections
19 related to ACI non-compliance in the timeframe referenced in its letters to the
20 customer. Another letter should not be sent after the final notice, as this is
21 confusing to the customer. Spire Missouri should report these efforts and the
22 results to Staff on a quarterly basis.
- 23 • Staff recommends that Spire Missouri track the number of disconnections made
24 for each reason and then provide to Staff monthly the number of disconnections
25 for each reason broken down daily for the previous month.
- 26 • CXD Staff currently meets with Spire Missouri on a monthly basis to discuss
27 customer service and billing matters. Staff recommends that, moving forward,
28 these meetings occur on a quarterly basis; however, Spire Missouri should meet

Direct Testimony of
Sarah Fontaine

1 with and/or inform CXD Staff of any customer service or billing issues as they
2 occur. Staff also reserves the right to schedule a meeting with Spire Missouri at
3 any point that it determines there are customer service or billing concerns that
4 need to be discussed outside of the scheduled quarterly meetings.

- 5 • Staff recommends that Spire Missouri look at its scheduling procedures to
6 determine how it can more efficiently handle these processes to better meet the
7 needs of its customers awaiting reconnection.

8 Q. Does this conclude your direct testimony?

9 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Spire Missouri Inc. d/b/a Spire's)	
Request for Authority to Implement a General)	Case No. GR-2025-0107
Rate Increase for Natural Gas Service Provided)	
in the Company's Missouri Service Areas)	

AFFIDAVIT OF SARAH FONTAINE

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

COMES NOW SARAH FONTAINE and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Direct Testimony of Sarah Fontaine*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

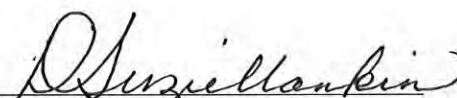


SARAH FONTAINE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16th day of April 2025.





Notary Public

Sarah Fontaine

Educational and Employment Background and Credentials

I am currently employed as a Senior Research/Data Analyst for the Missouri Public Service Commission (“Commission”). I previously worked for the Commission from 2004-2008 in the General Counsel’s Office. I earned a Bachelor of Science degree in Human Services with a minor in Education from Columbia College in May 2013.

Prior to my current position at the Commission, I worked for the State of Missouri at the Secretary of State’s Office and with the Department of Revenue. I have also worked in regulatory affairs for a natural gas company and in the real estate field.

The following is a list of cases before the Commission in which I have provided Testimony, Staff Recommendation or Staff Report:

Case Number	Company Name/Type of Case	Contribution
AW-2020-0356	Working Case to Consider Best Practices for Recovery of Past-Due Utility Customer Payments After the Covid-19 Pandemic Emergency	Staff Report
AO-2021-0264	Cause of the February 2021 Cold Weather Event and its Impact on Investor Owned Utilities	Staff Report
GR-2021-0108	In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas	Direct Testimony
WC-2021-0075	Louis DeFeo v. Missouri-American Water Company – Formal Complaint	Staff Report
WC-2021-0251	William B. Rilenge v. Missouri-American Water Company – Formal Complaint	Staff Report

Case Number	Company Name/Type of Case	Contribution
WA-2023-0071	In the Matter of Missouri-American Water Company's Application for a Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain a Water System and Sewer System in and around the City of Smithton, Missouri	Staff Report
WA-2023-0092	In the Matter of the Application of Confluence Rivers Utility Operating Company, Inc., for Certificates of Convenience and Necessity to Provide Water and Sewer Service in an Area of St. Charles County, Missouri (Stone Ridge Meadows)	Staff Report
WC-2023-0106	Charles Harter, Complainant v. Missouri-American Water Company, Respondent	Staff Report
WM-2023-0065	In the Matter of the Joint Application of 188 North Summit, LLC, and Seges Utility Company, LLC For Authority to Sell the Water System and Wastewater System Assets of Seges Mobile Home Park, LLC, to Seges Utility Company, LLC, and For a Certificate of Convenience and Necessity To Provide Water and Sewer Services	Staff Report
ER-2022-0337	In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service	Direct Testimony Surrebuttal Testimony
EC-2023-0395	Brett Felber, Complainant v. Union Electric Company d/b/a Ameren Missouri, Respondent	Staff Report

Case Number	Company Name/Type of Case	Contribution
WA-2023-0345	In the Matter of Missouri-American Water Company for a Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain a Water System and Sewer System in and around the City of Wood Heights, Missouri	Staff Recommendation
WA-2023-0284	In the Matter of the Application of Confluence Rivers Utility Operating Company, Inc., for Certificates of Convenience and Necessity to Provide Water and Sewer Service in an Area of Johnson County, Missouri	Staff Recommendation
WA-2023-0071	In the Matter of Missouri-American Water Company's Application for a Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain a Water System and Sewer System in and around the City of Smithton, Missouri	Staff Recommendation
EC-2024-0092	The Staff of the Missouri Public Service Commission vs. Evergy Metro, Inc d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc d/b/a Evergy Missouri West	Direct Testimony Surrebuttal Testimony
EC-2024-0111	Dranel Clark and Aquilla Canada, Complainants v. Union Electric Company d/b/a Ameren Missouri, Respondent	Staff Report
EC-2024-0313	Merlon Jonee Ragland, Complainant, v. Evergy Metro, Inc. d/b/a Evergy Missouri Metro, Respondent	Staff Report
ER-2024-0319	In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service	Direct Testimony Rebuttal Testimony

Case Number	Company Name/Type of Case	Contribution
GR-2024-0106	In the Matter of the Request of Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty to Implement a General Rate Increase for Natural Gas Service in the Missouri Service Areas of the Company	Case Coordination
GC-2024-0314	Merlon Jonee Ragland, Complainant, v. Spire Missouri Inc. d/b/a Spire, Respondent	Staff Report
GR-2025-0107	In the Matter of Spire Missouri Inc. d/b/a Spire's Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas	Direct Testimony
EC-2025-0007	Kevin Kojeski, Complainant v. Evergy Missouri West, Inc. d/b/a Evergy Missouri West, Respondent	Staff Report



February 27, 2025

02422229-SPML302280-CN CNF-000017
CIRCULARITY



Account Number
Service Address



RE: Important notice concerning natural gas use at this address

Hello,

We noticed natural gas is being used at this address without an active Spire account.

If you'd like to keep your service on, we're happy to set up an account in your name. Otherwise, we'll have to turn off natural gas service to your residence.

Either way, to keep your natural gas service and set up a new account, please visit us online at MyAccount.SpireEnergy.com or call us right away at 800-582-1234. We're available from 7 a.m. to 7 p.m. Monday through Friday.

Thanks for working with us.

Customer Service Team
Spire



02422229-SPML302280-CN CNF-000017

Customer service or gas emergencies: 800-582-1234 | www.SpireEnergy.com/ContactUs | www.SpireEnergy.com



September 09, 2024



T:2



Account Number: [REDACTED]
ServiceAddress: [REDACTED]

Important safety inspection notice

Hello, [REDACTED]

Your safety is our top priority, and regular safety inspections help us make sure our indoor natural gas pipes and meters are working just as they should. We need your help to make it happen.

It's time for us to inspect your natural gas meter and piping– but we haven't yet heard from you to schedule your appointment.

You can schedule a time that works best for you by:

- Visiting MyAccount.SpireEnergy.com and signing into your account
- Calling us at 800-887-4173

The inspection is easy and is provided at no cost to you. And if we find that we need to upgrade your meter, we'll do the work at that time. The appointment should take no longer than an hour to complete.

Your time is important, so we're happy to work around your schedule. That's why we also partner with a contractor and offer morning and afternoon appointments Monday through Friday, and limited evening and Saturday appointments on a first-come, first-served basis.

Either a Spire or contractor technician will arrive in uniform and in a branded vehicle. Feel free to ask for a contractor badge before letting them in your home. They'll be happy to show you.

And as a reminder, these safety inspections are required which means that even during the months when the Cold Weather Rule is in effect, your service can still be disconnected if your inspection is not completed by the due date established by the Missouri Public Service Commission.

Thanks for working with us.

Safety Inspection Team
Spire



Case No. GR-2025-0107
Schedule SF-d3, Page 1 of 5

:Customer service or gas emergencies: 800-887-4173

:www.SpireEnergy.com/ContactUs

:www.SpireEnergy.com

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ACU/ACT



September 25, 2024



T:4



Account Number: [REDACTED]
ServiceAddress: [REDACTED]

Important safety inspection notice

Hello, [REDACTED]

Your safety is our top priority, and regular safety inspections help us make sure our indoor natural gas pipes and meters are working just as they should. We need your help to make it happen.

It's time for us to inspect your natural gas meter and piping– but we haven't yet heard from you to schedule your appointment.

You can schedule a time that works best for you by:

- Visiting MyAccount.SpireEnergy.com and signing into your account
- Calling us at 800-887-4173

The inspection is easy and is provided at no cost to you. And if we find that we need to upgrade your meter, we'll do the work at that time. The appointment should take no longer than an hour to complete.

Your time is important, so we're happy to work around your schedule. That's why we also partner with a contractor and offer morning and afternoon appointments Monday through Friday, and limited evening and Saturday appointments on a first-come, first-served basis.

Either a Spire or contractor technician will arrive in uniform and in a branded vehicle. Feel free to ask for a contractor badge before letting them in your home. They'll be happy to show you.

And as a reminder, these safety inspections are required which means that even during the months when the Cold Weather Rule is in effect, your service can still be disconnected if your inspection is not completed by the due date established by the Missouri Public Service Commission.

Thanks for working with us.

Safety Inspection Team
Spire



Case No. GR-2025-0107
Schedule SF-d3, Page 2 of 5

Customer service or gas emergencies: 800-887-4173

www.SpireEnergy.com/ContactUs

www.SpireEnergy.com

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ACI1/ACI1



October 07, 2024



T:4



Account Number: [REDACTED]
Service Address: [REDACTED]

Second notice for a safety inspection

Hello [REDACTED]

Keeping our communities safe is our top priority. And regular safety inspections and meter upgrades help us make sure our indoor natural gas pipes and meters are working just as they should.

Ways to schedule your inspection

It's important that you schedule your inspection appointment by October 15, 2024 to avoid any service disruption. To schedule your safety inspection, you can:

- Go to MyAccount.SpireEnergy.com and sign into your account
- Call us at 800-887-4173 before October 15, 2024.

The inspection is easy and is provided at no cost to you. And if we find that we need to upgrade your meter, we'll do the work right then. The appointment should take no longer than an hour to complete.

Unfortunately, if we don't hear from you by October 15, 2024, we'll have to disconnect your natural gas service until we can complete the safety inspection in your home.

Because we always want to avoid service disconnections, we also partner with a contractor to offer appointments in the morning and afternoon Monday through Friday, as well as in the evenings and Saturdays on a limited first-come, first-served basis.

Either a Spire or contractor technician will arrive in uniform and in a branded vehicle. Feel free to ask for a contractor badge before letting them in your home. They'll be happy to show you.

And as a reminder, these safety inspections are required which means that even during the months when the Cold Weather Rules is in effect, your service can still be disconnected if your inspection is not completed by the due date established by the Missouri Public Service Commission.

Thanks for working with us.

Safety Inspection Team
Spire

Case No. GR-2025-0107
Schedule SF-d3, Page 3 of 5

☎ :Customer service or gas emergencies: 800-887-4173

🌐 :www.SpireEnergy.com/ContactUs

🌐 :www.SpireEnergy.com

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ACICUT/ACICUT



October 18, 2024



T:1



Account Number: [REDACTED]

Service Address: [REDACTED]

FINAL NOTICE - Safety Inspection Due

Hello, [REDACTED]

We're having trouble getting in touch with you. And, unfortunately, if we don't hear from you by October 28, 2024, we'll need to disconnect your natural gas service so we can perform a required safety inspection. If this happens, there will be a \$65 reconnection fee to have your service restored.

Let's work together to avoid that. You can schedule a time that works best for you two ways:

- Go to MyAccount.SpireEnergy.com and sign into your account
- Call us at 800-887-4173 before October 28, 2024

We offer morning and afternoon appointments from 7:30 a.m. to 4 p.m. on weekdays, and a limited number of evening and Saturday appointments on a first-come, first-served basis.

And as a reminder, these safety inspections are required which means that even during the months when the Cold Weather Rule is in effect, your service can still be disconnected if your inspection is not completed by the due date established by the Missouri Public Service Commission.

Please contact us right away. We'll work with your schedule to get the required safety inspection completed.

Thanks for working with us.

Safety Inspection Team
Spire



Case No. GR-2025-0107
Schedule SF-d3, Page 4 of 5

:Customer service or gas emergencies: 800-887-4173

:www.SpireEnergy.com/ContactUs

:www.SpireEnergy.com

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ACINOT/ACINOT



November 04, 2024



T:2



Account Number: [REDACTED]
ServiceAddress: [REDACTED]

Important safety inspection notice

Hello, MORRY COLE.

Your safety is our top priority, and regular safety inspections help us make sure our indoor natural gas pipes and meters are working just as they should. We need your help to make it happen.

It's time for us to inspect your natural gas meter and piping– but we haven't yet heard from you to schedule your appointment.

You can schedule a time that works best for you by:

- Visiting MyAccount.SpireEnergy.com and signing into your account
- Calling us at 800-887-4173

The inspection is easy and is provided at no cost to you. And if we find that we need to upgrade your meter, we'll do the work at that time. The appointment should take no longer than an hour to complete.

Your time is important, so we're happy to work around your schedule. That's why we also partner with a contractor and offer morning and afternoon appointments Monday through Friday, and limited evening and Saturday appointments on a first-come, first-served basis.

Either a Spire or contractor technician will arrive in uniform and in a branded vehicle. Feel free to ask for a contractor badge before letting them in your home. They'll be happy to show you.

And as a reminder, these safety inspections are required which means that even during the months when the Cold Weather Rule is in effect, your service can still be disconnected if your inspection is not completed by the due date established by the Missouri Public Service Commission.

Thanks for working with us.

Safety Inspection Team
Spire



Case No. GR-2025-0107
Schedule SF-d3, Page 5 of 5

:Customer service or gas emergencies: 800-887-4173

:www.SpireEnergy.com/ContactUs

:www.SpireEnergy.com

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ACI/ACII

Case No. GR-2025-0107

SCHEDULE SF-d4

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY

Delayed Transfer Clean Up Effort

Background

The situation where someone is using gas at a premises without an active account was traditionally worked differently in our two major regions—Missouri East and Missouri West. In Missouri East, we automated the process in February 2022. In Missouri West, these were worked from a report called the “Closed and Tagged” report. We transitioned from the Closed and Tagged report to the Delayed Transfer Case automated process in Missouri West in January 2025.

The process, today, is handled automatically by the Delayed Transfer Case and exceptions are reviewed manually by Spire employees. Spire’s CX Billing team also works the Closed and Tagged report as there are times when there will be a reason other than a move out and move in that can cause this situation. However, the vast majority of these situations come through as Delayed Transfers.

Why did the backlog happen?

The backlog of cases and field activities was discovered by CX leadership in March 2024. The backlog that occurred on Delayed Transfers/Vacant Meters Showing Consumption built up over several years through lack of experiential knowledge of the process, both in Field Operations and in Customer Experience.

There was a misunderstanding about who was responsible for working them in the field which ultimately resulted in not focusing on them as a priority. This was due to a lack of understanding of the order type in Field Operations. The Delayed Transfer Case generates a Disconnect Service Point field activity. Workload Planning was under the impression that these Disconnect Service Point field activities that were being generated for vacant meters showing consumption were actually for “locked meters showing consumption,” or a theft of gas situation, which is routed and handled by a different Field Ops team (a team called the Diversion team). The Diversion team thought Workload Planning was working them since they were Disconnect Service Point field activities. One department was thinking the other was responsible for working them, which resulted in a lack of prioritization for the work. Some of them did get worked, but no department thought it was their ultimate responsibility. The Customer Experience Billing team kept getting the cases and reviewing the report, but they kept seeing the same accounts show up, so over time, they thought it wasn’t a priority since the field activities weren’t getting worked in the field.

Ultimately, this should not have happened. There’s no excuse and it should have been caught sooner.

The process for working the backlog

Spire began working the backlog in March 2024. The backlog was worked by reviewing both the Delayed Transfer cases and the Closed and Tagged report. Field activities to disconnect began to be worked in March 2024, as well. Also, we cleared up the misunderstanding between Workload Planning and Diversion, by reviewing the process and ensuring that Workload Planning knew that they were ultimately responsible for making sure the field activities were completed on a timely basis.

All of the premises that were in the backlog were not in need of a disconnection field activity. Many of them had customers who had applied for service, already. On some of them, the meter had been removed, but they were still showing up on the report, so we had to make some changes to the report.

We handled working the report and cases manually. CX investigated the accounts to generate the number of field activities per day that could be worked by Field Ops. We initially worked the Delayed Transfer Cases, then we started working the Closed and Tagged report.

CX reviewed 200 accounts a day to create a batch of field activities that could be worked by Field Ops. Field Ops worked about 100-200 a day until the backlog was cleared. The clean-up process took about 8 months.

Were notifications sent during the clean up?

For the Closed and Tagged report, initially we began sending a notification to the customer. For the Delayed Transfers, the letters were automatically being sent, but many of those were sent several months prior, so the lettering was not always current.

Comments on Yelp:

[SPIRE ENERGY - Updated April 2025 - 143 Reviews - 700 Market St, St. Louis, Missouri - Professional Services - Phone Number - Yelp](#)

Mar 27, 2025

Obviously, there is a huge disconnect between your call center, and the meter men. I feel sorry for them at the call center who have to explain why the meter men never show up. Don't you think it would be a better idea to have the meter man respond directly to customers, instead of involving people who can't control them? There are complaints all over Nextdoor in Lee's Summit about meter men who don't show up. Why do they still have jobs when they consistently don't keep appointments?

Feb 12, 2025

They left message saying I must have meter changed and then threatened they will shut off service if you don't do it. Not very tactful! Then I have to stay home for 12 hours the day of service! What kind of company is this?

Jul 17, 2024

The service is horrible. They make you wait all day, get your appointments wrong, and don't respond to emails. And the callers have attitude when you ask for a specific appointment time because some of us have jobs and cant just take off full days to wait for them

Jun 26, 2024

Spire requires a mandatory safety inspection when moving into a new house. So I set one up. Estimated time for technician to show up is between 7am-8pm. I worked from home on the couch to make sure I wouldn't miss them. My dog howls if anybody knocks on the door or comes up to it. Nothing happened.

I call in to customer service and after fighting with their automated voice system for a good 10 minutes I finally got through to a customer service employee. Spire just cancelled the appointment without informing me after I waited all day.

Apr 17, 2024

I found a note hanging on my door when I got home from work. on the front reads 'sorry we missed you'd. on the opposite side of the note, It said my meter needs to be changed and to call the one 800 number. after finally making it through all the props, I finally get a human. She says I have to schedule a day for them to come out. I gave her the days and times I'm available and she gave me the days and times they could come out. however, I never got an email to schedule. I never got a phone call to schedule. They just popped up today. now I have to rearrange my life between 7 AM and 8 PM just so they could come change a meter. then I get threatened that if I did not schedule an appointment, my spire will be cut off. Where do they do that at? It wasn't like the representative didn't have a nice calm voice , but it was very nice and nasty and unconcerned. i've been living in my house for 30 years and never had an issue before..do better Spire

Jan 11, 2024

We had set up an appointment and had to reschedule for the next day due to inclement weather. They said they'd be there to set up gas and turn it on for us between 730am and 530pm. They never show up. Appointment shows on the website. Call after the window and they say that they'll be there before 730. No one shows up. Wait on hold for supervisor, get hung up on and no call back. I really wish they weren't the only company in our area because they're horrible so far. Not a great way to start with a new client. Horrible service.

Jun 19, 2023

Awful. They turned off my gas on Thursday because I had not allowed an inspection that I had no idea I needed to allow. Cool. So now I'm expected to be able to wait around for 12 hour windows for someone to come do the inspection like I don't have a job.

So on Monday the guy comes out to do the inspection, it's done in two minutes, but then I have to call to get it turned back on.

Apparently the inspector can't turn it back on. It can be shut down remotely but can't be turned back on remotely. So now they want to set up another 12 hour window for me to be home.

But I still have that job, you know. Does Spire think that people can just stay home entire working days waiting for them? Is that something Spire allows its employees to do?

Somehow I imagine not .

So now I'm waiting for manager to call me back, but I bet they won't. After all, why would they? It's not like I can not do business with Spire. At least not now.

And all I'm trying to do is set up a time, a scheduled time, for someone to come to my house. A mutually agreed on, scheduled time.

Like what you can do with an oil change place, a haircut, your doctor visit, any decent restaurant, I bet you set up meetings at your job all the time.

But not Spire. Spire can't do that. It's the 21st century but Spire can't set up an appointment.

What an awful company.

Apr 3, 2023

One star. Do not recommend. If Spire is going to be forced upon you, I recommend refitting your home/business to move away from gas. This is a tale of disconnecting service. To make sure it is easy for the customer, upon disconnection, they will give you a window of 8 am to 8 pm (always a sign of a well organized and customer minded company) for them to get into the building. When you ask why they need to physically gain access, you don't really get an answer. The next phase of customer

service is what really separates Spire away from the pack of mediocre to bad to utility companies is that even though they give you a 12 hour window for you to wait, they don't even show up or call! They are so unorganized and care so little for their customers that they will just not show up after demanding the only way to disconnect service is for them to be physically present! Good stuff. Really above and beyond in the customer service department. I have never written a bad review but after sitting in a vacant location for 12 hours waiting for a no show service call, I was angry enough to write this. So, in summary, if you can avoid it, do not do business with this company. Buy a grill, live off of a campfire, use solar to heat your water, do whatever but do not give these these people you money.

PSC Informal Complaint:

CI202401426 Customer wants it documented in the complaint that he feels it is ridiculous that Spire does not supply a time window for service calls, being they are serving the public.

PSC Public Comments:

10/25/2024 [Spire \(Gas\) \(Investor\)](#) Gas [GR-2025-0107](#)

Consumer is opposed to Spire procedures for inspecting gas meters. He set up an inspection but was unable to make the appointment. When he called to change the inspection, the company was inflexible, claiming the inspection was overdue. As a result, the consumer had to take off a day of work to allow access to his meter or face disconnection, including a new appointment and charge to reconnect service.

[202500930](#) 11/8/2024 [Spire \(Gas\) \(Investor\)](#) Gas [GR-2025-0107](#)

"Spire is scheduled to be at my home, 6601 Waterman Avenue, 63130, to do a safety inspection of their meter. I appreciate they will be doing this. However, the "Window for Service" they gave me is "7:30 AM till 4:30 PM." This is beyond unreasonable as I, and I'm sure most of their customers, cannot stay at home all day waiting for this kind of service." *See attached for full comment.

[202400779](#) 6/27/2024 [Spire \(Gas\) \(Investor\)](#) Gas

Spire contacted me to replace my meter. They acted like it was urgent and needed to be done right away. So I scheduled a day for them to come out. Spire then gives me a time frame that I am expected to be home and available for 12 1/2 hours. Scheduled for a whole day. 7:30 am to 7 PM. window is not reasonable. A 4 hour window is more acceptable but 12 1/2 hours is unacceptable and unreasonable to put on consumers. This should be regulated as to not cause unnecessary financial burdens on consumers. They are not paying me for this time and I am losing money by not being able to work at all for this day.