

FILED
July 14, 2025
Missouri Public
Service Commission

From: pscinfo@psc.mo.gov
pscinfo@psc.mo.gov

Subject: FW: FORMAL COMPLAINT – Unauthorized Spire Account Change & PSC Employee Conduct – Account: [REDACTED] – (Full Details Below & Attached)

Details:

Additional information for formal complaint Case # GC-2026-0007.

From: Mr. Jon Lee [REDACTED]

Sent: Friday, July 11, 2025 8:25 PM

To: Missouri Public Service Commission <pscinfo@psc.mo.gov>

Subject: Re: FORMAL COMPLAINT – Unauthorized Spire Account Change & PSC Employee Conduct – Account: [REDACTED] – (Full Details Below & Attached)

Dear Missouri Public Service Commission,

This email serves to supplement my formal complaint, Case # GC-2026-0007 (Case ID [REDACTED]), filed on July 2, 2025, regarding the unauthorized budget billing enrollment of my Spire account ([REDACTED]) and related issues.

Upon further review and understanding of Missouri's regulatory framework, I wish to emphasize the specific regulatory and legal violations that appear to be involved in Spire's actions and the initial responses received. My complaint asserts that these actions are not merely administrative errors but systemic failures with clear implications under state law and PSC regulations.

Specifically, the core issues involve potential violations of:

- **Violation of Just and Reasonable Practices (386.250 RSMo):** Spire's unilateral placement of my account onto a budget plan, coupled with deceptive 20-day terms, constitutes an unjust and unreasonable utility practice that removes customer autonomy and can create financial distress.
- **Violation of Approved Tariffs (386.260 RSMo):** Spire's actions likely contravene its own approved tariffs, which typically mandate customer consent for fundamental changes to billing arrangements and clearly defined terms for such plans.
- **Failure to Obtain Customer Consent (Implied and per 4 CSR 240-13):** My explicit non-authorization for this budget plan change, and the lack of proper consent procedures, is a direct breach of consumer protection principles requiring informed consent for significant account alterations.
- **Failure in Notification and Transparency:** Spire's failure to notify me prior to or upon enrollment, to disclose specific terms like the 20-day remainder, and the complete absence of any budget plan indication on my actual Spire bill, constitute multiple failures in transparent billing and communication practices.
- **Deceptive or Misleading Practices:** The presentation of a "budget plan" that includes an immediate, accelerated payment obligation (20-day remainder) appears to be a deceptive tactic to enforce collections under a misleading guise, rather than offering a genuine averaged payment solution.
- **Contradiction of Cold Weather Rule (CWR) Intent (20 CSR 4240-13.055):** The imposition of a sudden, short-term payment obligation under the banner of a budget

plan, allegedly "required for CWR," directly contradicts the CWR's purpose of providing lenient and manageable payment options to prevent service disconnection.

- **PSC Staff Misconduct:** The provision of inaccurate information by PSC representatives regarding the legality and nature of such "automatic" enrollments, and the unprofessional act of abruptly disconnecting my call, hinder the resolution process and undermine public trust in the Commission.

I urge the Commission's Staff assigned to my case ([REDACTED] the investigator) to thoroughly investigate these specific regulatory and legal implications. My objective is not only to rectify the issue with my account but also to ensure that Spire adheres to its legal and regulatory obligations to all customers, preventing such unauthorized and deceptive practices from occurring systematically.

I expect a comprehensive investigation into these points, leading to corrective actions on my account and broader policy changes as necessary.

Sincerely,

Jonathan Miller

On Wed, Jul 2, 2025 at 7:58 AM Missouri Public Service Commission <pscinfo@psc.mo.gov> wrote:

Dear Mr. Miller,

This email is in response to your email below regarding Spire. Please know that your request has been entered into our Electronic Filing and information System (EFIS) and will be assigned to a Lead Customer Service Representative who will be in touch with you.

Consumer Services Department

Missouri Public Service Commission

From: Mr. Jon Lee [REDACTED]

Sent: Tuesday, July 1, 2025 5:37 PM

To: Missouri Public Service Commission <pscinfo@psc.mo.gov>

Subject: Re: FORMAL COMPLAINT – Unauthorized Spire Account Change & PSC Employee Conduct – Account: [REDACTED] – (Full Details Below & Attached)

Dear Missouri Public Service Commission Customer Service Department,

Thank you for your response.

The city and zip code for my service address (Account Number: [REDACTED]) are:

City: [REDACTED] State: Missouri Zip Code: [REDACTED]

(address: [REDACTED])

Please note that the full details of my formal complaint, including all specific concerns regarding Spire's unauthorized account changes, the deceptive terms, and the conduct of a PSC representative, were provided in my original email dated June 27, 2025, along with the attached supporting documentation.

I trust this information allows you to proceed with the thorough investigation of my complaint.

Sincerely,

Mr. Jon Lee

On Tue, Jul 1, 2025 at 3:48 PM Missouri Public Service Commission <pscinfo@psc.mo.gov> wrote:

Thank you for contacting the Missouri Public Service Commission. In order for a complaint to be submitted, we must have the city and zip code of your service address. Please provide.

Thank you,
Customer Service Department
Missouri Public Service Commission

From: Mr. Jon Lee [REDACTED]
Sent: Friday, June 27, 2025 6:58 PM
To: Consumer Services <consumerservices@psc.mo.gov>; Missouri Public Service Commission <pscinfo@psc.mo.gov>
Subject: FORMAL COMPLAINT – Unauthorized Spire Account Change & PSC Employee Conduct – Account: [REDACTED] – (Full Details Below & Attached)

Dear Missouri Public Service Commission,

I am writing to file a formal complaint regarding an unauthorized change to my natural gas service account with Spire, **Account Number:** [REDACTED], and to express severe dissatisfaction with the Missouri Public Service Commission's (PSC) handling of my attempts to resolve this issue, including unprofessional conduct by a PSC representative.

On or about **June 27, 2025** (the date I was made aware via phone conversation with a Spire representative), my Spire account was unilaterally placed on a budget payment plan. This change was initiated due to a pledge made by a third party, specifically a church group. I wish to make it clear that **I, the account holder, never authorized Spire or this third party to alter my billing arrangements or enroll me in any budget plan.** A financial pledge is a payment, not a delegation of authority to change service terms.

My attempts to resolve this directly with Spire on **June 27, 2025** were unsuccessful. Spire representatives claimed this is "what they does" and that the "third party had a right to do it without my knowledge." Furthermore, Spire informed me that when my account was allegedly placed on this 'budget plan' because of the payment pledge, it came with terms requiring me to pay an *additional remainder* within **20 days**, or my account would be 'booted off the budget plan' and all charges would reappear. This is particularly concerning because:

1. I never consented to or was made aware of these specific terms or this 'budget plan' at the time the pledge was made. My wife and I believed the church group was paying the total bill.
2. My wife will contact the third-party church group responsible for the pledge,
3. A 20-day repayment term for a 'remainder' is inconsistent with a true budget billing plan, which is designed for averaged, predictable payments over typically 12 months. This arrangement appears to be a deceptive means of imposing immediate payment obligations under the guise of a 'budget plan' or leveraging a third-party pledge to force collections under terms I never agreed to. This directly contradicts the protective intent of the Cold Weather Rule, which aims to provide lenient payment options, not create hidden deadlines.

During my calls to the Missouri Public Service Commission on **June 27, 2025**, my attempts to seek resolution were met with unsatisfactory responses. PSC representatives repeatedly asserted that:

- This is "how pledges work."
- This action was "required for the Cold Weather Rule."
- "It's not illegal" for this to occur without my consent.
- Most notably, the PSC stated that placing me on a budget plan was 'automatic for pledges during CWR months.'

I respectfully maintain that these interpretations are incorrect and contrary to the spirit and letter of Missouri PSC regulations (e.g., 4 CSR 240-13, which requires customer consent for significant changes to billing and service agreements). The Cold Weather Rule provides options for customers to *enter into* payment agreements; it does not permit utilities or third parties to unilaterally impose them or to automatically enroll an account holder in a budget plan simply because a third-party pledge was made.

Most alarmingly, during my last call to the PSC on **June 27, 2025** at approximately **4:28 PM CDT**, while I was attempting to seek clarification on the specific regulation that permits such an unauthorized action, **the PSC representative abruptly hung up on me**. This conduct is unprofessional and makes it impossible to resolve consumer complaints through the standard channels.

Upon reviewing my most recent Spire bill (Statement Date 06/04/25) and my online billing and payment history, there is **no visible indication or line item whatsoever** that my account (Account Number: [REDACTED]) is currently or has been placed on a 'budget plan,' 'level pay,' or any similar type of averaged payment arrangement. My monthly bill amounts, as shown in the online history, continue to fluctuate significantly (e.g., \$[REDACTED] in February, \$[REDACTED] in April, \$[REDACTED] in June), which is inconsistent with a budget plan. Moreover, my current bill clearly states a past due amount of \$[REDACTED] and warns of disconnection if payment is not made, which directly contradicts the purpose of a valid budget or Cold Weather Rule payment plan designed

to manage arrears and prevent disconnections. This documentary evidence from Spire's own records directly refutes their claim of an authorized budget plan being in effect, as well as the PSC's assertion that it was 'automatic for pledges during CWR months.'

I request a thorough investigation into:

1. Spire's policy and practice of implementing unauthorized billing changes based on third-party pledges, especially with such deceptive 20-day terms.
2. The PSC's stated position that such unauthorized changes are permissible or required by the Cold Weather Rule.
3. The conduct of PSC staff, specifically the incident where a representative disconnected our call while I was attempting to seek a resolution.

I demand that my Spire account be immediately removed from the unauthorized budget plan. My billing should be adjusted retrospectively to reflect the charges as if this unauthorized budget plan had never been put into effect. I also expect a formal, written response from the Missouri Public Service Commission regarding the findings of your investigation and the corrective actions taken.

Sincerely,

Mr. & Mrs. Jonathan & Mandy Miller [REDACTED] & [REDACTED]
[REDACTED]