

## **MOTION TO AMEND AND SUPPLEMENT DISCOVERY FINDINGS**

### **I. Introduction**

Jonathan Miller respectfully submits this motion to the Missouri Public Service Commission (the "Commission") to amend and supplement the record in Case No. GC-2026-0007. This is a complaint brought not only by a pro se party, but by a customer of Spire who seeks to demonstrate that the issues raised are systemic and impact the Commission's fundamental duty to protect the public from unfair utility practices. The purpose of this filing is to present newly discovered evidence of a systemic failure in the electronic notification system that has created a significant procedural barrier and prejudiced my ability to participate fully in this case.

### **II. Background**

As a customer and a pro se party in this proceeding, Jonathan Miller has consistently sought to follow all procedural requirements, including subscribing to the electronic filing system (EFIS) for case notifications. As documented in my

**Formal Response Addressing Discrepancies and Motion to Compel Discovery**, a discrepancy exists in the discovery process that has compromised the fairness and legitimacy of this proceeding. In that filing, I requested the Commission's intervention regarding Spire's practices and the unequal access to discovery. On August 8, 2025, I filed a

**Motion for Continuance** to extend all deadlines, including the finding date of August 31, 2025, to allow time to review crucial evidence from Spire. On the same day, I formally requested access to all discovery materials from Spire, including the call recordings on the Kiteworks platform, via email.

### **III. Argument and Supporting Evidence**

1. **Failure of the Notification System:** The EFIS notification system, despite my active subscription, has failed to consistently notify me of all case filings. My email subscription settings, submitted as **Exhibit A**, show that I am properly subscribed to receive notifications for "Filing Created on Existing Case" with a frequency of "Quickly as Possible". However, a review of my email records, submitted as **Exhibit B**, clearly demonstrates that while I received notifications for Data Requests (DRs) filed in this case, I did not receive any notifications for the responses to those requests.
2. **Prejudice and Unequal Access:** This procedural flaw places an unreasonable and unfair burden on me as a pro se party to manually police the case docket, which compromises my due process rights and the Commission's requirement for equal access to information. My experience highlights that the systemic issues with the utility are compounded by a regulatory process that, through failures such as inconsistent notifications, fails to provide a fair and transparent path for a customer to seek recourse. The only reason I discovered the existence of these responses was by chance after a separate notification for nine new DRs prompted me to manually check the docket. The

lack of timely access to this critical, time-sensitive evidence severely prejudices my ability to prepare a response and address the findings before the final decision deadline of August 31, 2025.

#### **IV. Prayer for Relief**

Wherefore, Jonathan Miller respectfully requests that the Commission:

- **A. Formally acknowledge** the procedural failure of the EFIS notification system to send me alerts for filed discovery responses.
- **B. Admit into the record** the provided email subscription screenshot and the screenshots of my email search as official exhibits.
- **C. Take appropriate action** to ensure I have full and fair access to all discovery materials and receive proper notifications for all future filings.
- **D. Grant my Motion for Continuance** to extend all deadlines, including the finding on August 31, 2025, to ensure a fair and just process.