

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Jonathan Miller,

Complainant,

v.

Spire Missouri Inc. d/b/a Spire,

Respondent.

File No. GC-2026-0007

Related Case No. GC-2026-0021

Attorney General Complaint No. CC-2025-08-002680

COMPLAINANT'S SUPPLEMENTAL SUBMISSION OF EVIDENCE AND REQUEST FOR INVESTIGATION

COMES NOW Complainant, Jonathan Miller, and submits the following supplemental evidence in response to Respondent Spire Missouri Inc.'s continued silence on the matters raised in my filing of August 12, 2025. This submission provides irrefutable proof of Respondent's negligence and subsequent attempt to destroy evidence.

- 1. Exhibits 1-3 (Screenshots 4905, 4906, 4907):** These screenshots prove that on August 11, 2025, Spire's legal counsel formally attempted to "withdraw" the evidence of the data breach, effectively demanding its destruction. This action constitutes a clear and documented act of spoliation of evidence and attempted obstruction of an ongoing regulatory investigation.
- 2. Exhibits 4-5 (Screenshots 4903, 4911):** These screenshots are irrefutable proof that the evidence in question—a zipped folder containing eight audio recordings totaling 83 minutes and a PDF—was not improperly obtained, but was officially provided to Complainant by Spire's own legal counsel to Complainant's personal computer in an official filing related to PSC File No. GC-2026-0021.

Legal and Regulatory Violations

The evidence submitted demonstrates Spire's actions constitute serious violations of Missouri law and regulatory standards.

- **Breach of Security:** The disclosure of a customer's Social Security number and complete bank card information is a direct violation of RSMo § 407.1500

(Missouri's Personal Information Protection Act), which defines a "breach of security" and requires companies to protect this information.

- **Gross Negligence:** The use of an unencrypted zip file to transmit highly sensitive data to a personal computer proves a fundamental lack of security protocols, demonstrating gross negligence.
- **Spoliation of Evidence:** Spire's formal demand to "return, sequester, or destroy" the materials, as documented in this and prior filings, constitutes a documented attempt to obstruct an ongoing administrative proceeding. The fact that the evidence was successfully captured via screenshot *after* the access was purportedly shut down proves the inefficacy of Spire's security controls and their failure to secure the data.

Actionable Fines and Consequences

Due to these violations, Spire is now subject to a number of severe and actionable fines and consequences.

- **Regulatory Fines:** The Missouri Public Service Commission has the authority under RSMo § 386.250 to impose significant fines for these regulatory violations. These fines are intended to punish a utility's bad faith and negligence and can be far more substantial than any settlement offer.
- **Civil Lawsuits:** Spire's actions give rise to a potential civil lawsuit for damages, where a court could award significant punitive damages to punish their misconduct. Punitive awards are frequently a multiple of compensatory damages, with some cases upholding multipliers of 500x or more in cases of egregious misconduct.
- **Class-Action Risk:** The public record of the data breach and the documented cover-up creates a foundation for a class-action lawsuit, which could expose Spire to a level of financial liability exponentially larger than any individual claim.

Potential Damages to Other Affected Customers

The data breach directly exposes other customers to significant harm, which could be the basis for additional civil actions. These damages include, but are not limited to:

- **Risk of Identity Theft and Fraud:** The disclosure of Social Security numbers, bank card details, and residential addresses places the affected customers at a high and ongoing risk of financial fraud and identity theft.
- **Emotional Distress:** The affected customers and their families will likely suffer from emotional distress, anxiety, and the loss of peace of mind knowing their most sensitive information has been compromised.
- **Financial Costs:** Customers may incur financial costs for credit monitoring, legal fees, and other expenses directly related to protecting themselves from the fallout of this breach.

WHEREFORE, Complainant respectfully requests the Commission:

a) Consider this irrefutable proof of Respondent's negligence and attempt to destroy evidence in its ruling on August 31, 2025. b) Launch an immediate investigation into Spire's data security protocols, specifically addressing their use of unencrypted zip files for sensitive customer data. c) Demand to know why the affected customer has still not been notified. d) Issue any sanctions, penalties, or other relief as is just and reasonable.

Respectfully submitted,

/s/ Jonathan Miller Jonathan Miller

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all counsel of record, including Spire's Counsel's Name at Spire's Counsel's Email Address, on this 13th day of August, 2025.

/s/ Jonathan Miller Jonathan Miller