

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 CONSOLIDATED MOTION FOR JUDICIAL REVIEW AND
RECONSIDERATION OF STAFF'S CHARACTERIZATION OF DATA BREACH**

COMES NOW Complainant, Jonathan Miller, and submits this consolidated motion for judicial review and reconsideration of the Public Service Commission Staff's assessment of the data breach that occurred on or about August 11, 2025. This motion addresses the Staff's assertion that since the confidential data was only sent to the Complainant, it was not a "real threat." This characterization is fundamentally flawed, irresponsible, and demonstrates a severe misunderstanding of the gravity of the situation.

1. **Staff's Characterization is an Admission of a Confirmed Breach** The Staff's statement that the confidential data "only went to me" (the Complainant) is a direct admission that the improper transmission of confidential data to an unauthorized party did, in fact, occur. This confirms the factual basis of the complaint: Spire's legal counsel transmitted highly sensitive information from an unrelated case (File No. GC-2026-0021) to the Complainant. The privacy of the affected customer in File No. GC-2026-0021 was undeniably violated.
2. **A Breach is Not Defined by the Number of Recipients** The integrity of a data security system is compromised the moment a breach occurs, regardless of the number of unauthorized recipients. The Staff's attempt to minimize the event based on the recipient count is irrelevant to the core issue. The incident proves a catastrophic systemic failure in Spire's discovery process and data security protocols. This failure makes it plausible that similar breaches could occur with different recipients in the future, with potentially malicious outcomes.
3. **Spire's Procedural Failures are a Systemic Problem** This incident is not an "isolated" event. It is a symptom of a larger pattern of procedural failures by Spire, as documented in previous filings, including:
 - **Improper Budget Billing Enrollment:** Spire's admission of "erroneously enrolled" status of the Complainant on a budget billing plan.

- **Systemic Refusal to Provide Documentation:** Spire's consistent refusal to provide written documentation of account changes and agreements, as detailed in my filings of August 5, 2025, and July 15, 2025.
 - **Spoilation of Evidence:** The attempted "withdrawal" of the evidence by Spire's counsel upon discovering the breach, as documented in my supplemental filings.
4. **A Regulatory Body's Duty to Protect Consumers** For the Public Service Commission to characterize a confirmed breach of confidentiality by a regulated public utility as "not a real threat" is a grave dereliction of its duty to protect consumers. This position fails to recognize the high risk of financial fraud and identity theft faced by the affected customer and, more broadly, signals to Spire that such security failures will not be held to account.

WHEREFORE, Complainant respectfully requests the Honorable Judge Walker:

- a) Formally reconsider and reject the Public Service Commission Staff's characterization of the data breach as "not a real threat."
- b) Acknowledge that a data breach, as a matter of fact and law, occurred.
- c) Initiate a formal investigation into Spire's data security protocols and their legal counsel's professional conduct as previously requested.
- d) Grant any other relief as is just and reasonable.

Respectfully submitted,

/s/ Jonathan Miller Jonathan Miller

[REDACTED]

[REDACTED]

[REDACTED]