

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 DATA REQUEST AND MOTION FOR INVESTIGATION

COMES NOW Complainant, Jonathan Miller, and submits this consolidated Data Request to Respondent, Spire Missouri Inc. This motion is based on a chronological timeline of systemic procedural failures, violations of consumer privacy, and alleged professional misconduct, all of which are substantiated by evidence previously filed with the Commission. The purpose of this request is to obtain all relevant data to address the full scope of these ongoing issues.

I. Chronological Timeline of Discrepancies and Violations

The following is a timeline of events demonstrating a pattern of alleged misconduct by Spire, its employees, and its legal counsel.

- **January 27, 2025:** Spire's customer service representative allegedly discusses the Complainant's account with a non-account holder and improperly enrolls the account in a budget billing plan.
 - **Factual Basis:** This event is detailed in the [Exhibit Transcript of Call with Spire Representative Violating Privacy by Discussing Account with Non Account Holder.pdf](#), which documents the conversation with the non-account holder. Spire's own admission of this "manual error" and "unauthorized budget plan enrollment" is cited in the [Email Chain Spire Settlement Offer & Complainants Rejection Case No GC 2026 0007.pdf](#).
- **June 30, 2025:** Spire's representatives allegedly continue to demonstrate systemic procedural failures by automatically enrolling the Complainant in a billing plan without consent and refusing to provide comprehensive written documentation of account changes.

- **Factual Basis:** This is outlined in the [Exhibit Summaries of Spire Calls with Video Links June 30th 2025.pdf](#), which references YouTube video recordings of the calls as evidence.
- **July 23, 2025:** Spire's legal counsel provides discovery materials to the Missouri Public Service Commission (PSC).
 - **Factual Basis:** The date of this action is documented in [2025-08-11 Supplemental Filing - Discovery Delay.pdf](#).
- **August 11, 2025:** Spire's legal counsel provides discovery to the Complainant via a private, unencrypted platform ([Kiteworks](#)), nearly three weeks after providing it to the PSC. This transmission includes a confidential case file belonging to another customer (File No. GC-2026-0021), containing 83 minutes of audio recordings and other sensitive information.
 - **Factual Basis:** This is a core claim in several filings, including [Complainant's Formal Letter to the Commission Regarding Confidentiality Breach in Discovery.pdf](#) and [2025-08-11 GC-2026-0007 Spire-Discovery-Confidentiality-Breach.pdf](#), which directly detail the breach. The delay is further documented in [2025-08-11 Supplemental Filing - Discovery Delay.pdf](#).
- **August 11-13, 2025:** Upon discovering the breach, Spire's counsel attempts to have the evidence "withdrawn" and "destroyed."
 - **Factual Basis:** This attempted spoliation of evidence is a central allegation in [COMPLAINANT'S CONSOLIDATED MOTION AND SUPPLEMENTAL EVIDENCE.pdf](#), [COMPLAINANT'S SUPPLEMENTAL SUBMISSION OF EVIDENCE.pdf](#), and [Exhibit A Evidence of Data Breach and Spoliation of Evidence.pdf](#).

II. Consolidated Data Requests

To address the comprehensive timeline of events, Complainant requests the following data:

1. **All Internal Records Related to January 27, 2025 Call:** Please produce all internal notes, representative records, and any audio or digital logs concerning the phone call on January 27, 2025, where a Spire representative discussed the Complainant's account with a non-account holder and improperly enrolled the account in a budget billing plan.
2. **All Internal Records Related to June 30, 2025 Calls:** Please produce all internal notes, memos, or communications regarding the phone calls on June 30, 2025, where the Complainant alleges automatic enrollment into a billing plan and a refusal to provide written documentation.
3. **Complete Discovery from File No. GC-2026-0021:** Please produce any and all files, documents, audio recordings, and data related to PSC Case No. GC-2026-0021 that were improperly transmitted to the Complainant on or about August 11, 2025.

4. **All Communications Regarding Attempted Spoliation:** Please produce any and all internal and external communications, including emails and memos, related to the attempted "withdrawal" or "destruction" of the discovery materials referenced in the above request.
5. **Evidence of Timely Discovery Provision:** Please produce all timestamped records, logs, and communications demonstrating that discovery materials were provided to the Complainant simultaneously with their provision to the PSC on July 23, 2025.
6. **Evidence of Notification to Affected Customer:** Please produce all records and communications demonstrating that Spire has formally notified the customer from Case No. GC-2026-0021 of the confidentiality breach.

WHEREFORE, Complainant respectfully requests the Commission:

- **A.** Compel Respondent to produce all requested documents and data to the Complainant within an expeditious and reasonable timeframe.
- **B.** Launch an immediate and comprehensive investigation into Respondent's systemic procedural failures, data security protocols, and alleged spoliation of evidence.

Respectfully submitted,

Jonathan Miller 812

[REDACTED]

[REDACTED]

[REDACTED]