Motion to Amend Complaint and Demand for Full Procedural Parity

TO: The Missouri Public Service Commission

FROM: Jonathan Miller

CASE NO.: GC-2026-0007

DATE: August 18, 2025

SUBJECT: Motion to Amend Complaint and Demand for Full Procedural Parity

I. **Introduction** Jonathan Miller respectfully amends his previous motion to demand full procedural parity in this proceeding, as required by both state and federal law. This amended filing broadens my challenge to the prejudicial and unequal process provided by the Commission's Electronic Filing and Information System (EFIS).

II. **Argument** My original filing correctly identified a specific due process violation: the inconsistent and unreliable notification system for my Personal Account. This procedural failure, which deprived me of timely notice for data request responses, is not an isolated incident but a symptom of a larger, systemic flaw.

Upon further investigation, it has become apparent that the PSC's EFIS system is designed to provide different levels of access and different tools to different parties. As a pro se litigant, I am being held to the same legal standards as a professional attorney but am not being given the same tools to meet those standards. The defendant, Spire, and the PSC staff have access to a Professional Account that provides numerous benefits not available to me. These benefits include, but are not limited to:

- **Reliable and Consistent Notifications:** A complete and automated notification system that guarantees timely notice for all legal filings, including data responses and other key documents.
- **Advanced Search and Filing:** The ability to perform advanced searches, filter case documents, and manage filings in a way that is not available to me.
- **Batch Filing and Management:** The capability to upload, download, and manage multiple documents at once, which is a significant advantage in a case with a high volume of filings.

The Due Process Clauses of the **U.S. Constitution (14th Amendment)** and the **Missouri Constitution (Article I, Section 10)** require that a legal process be fair and impartial. This is not possible when the Commission provides a prejudicial system that gives one party a clear informational and procedural advantage.

I am operating under the reasonable assumption that a pro se litigant who is held to the same standards as a legal professional should be given the same tools as a legal professional. Anything less is a violation of due process.

III. **Prayer for Relief** Wherefore, Jonathan Miller respectfully demands that the Commission:

1. **Grant me immediate and full access** to the same type of Professional Account provided to my defendant, Spire, including all its features and benefits.
2. **Formally acknowledge** that the use of different account types for professional and pro se parties creates a prejudicial process that violates a complainant's right to due process and procedural parity.

I thank the Commission for its immediate attention to this matter.

Sincerely,

Jonathan Miller

Complainant,

Case No. GC-2026-0007

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