

# BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

JONATHAN L. MILLER, Complainant,

V.

Spire Missouri Inc. d/b/a Spire, Respondent.

Case No. GC-2026-0007

## URGENT SUPPLEMENTAL FILING AND ADDITIONAL EVIDENCE REVEALING SYSTEMIC PSC/SPIRE DATA HANDLING FAILURES AND AMPLIFYING CONSTITUTIONAL CLAIMS IN SUPPORT OF MOTION FOR DECLARATORY RULING AND SYSTEMIC REMEDIATION REGARDING EFIS ACCESS

COMES NOW Complainant, Jonathan L. Miller, and respectfully submits this Supplemental Filing and Notice of Additional Evidence, providing critical new information directly relevant to and further substantiating the pending Motion for Declaratory Ruling and Systemic Remediation Regarding EFIS Access.

### I. Introduction of New Evidence

Attached hereto as **Exhibit 1** is a letter from Spire Missouri Inc., dated August 12, 2025, addressed to [REDACTED], titled "RE: Inadvertent Disclosure of Recorded Phone Calls with Spire Missouri Inc."

Attached hereto as **Exhibit 2** is a "MOTION TO WITHDRAW" filed by Senior Staff Counsel [REDACTED] in Case No. GC-2026-0021, dated August 18, 2025.

### II. The Egregious Revelation and Its Implications

The letter from Spire (Exhibit 1) unequivocally reveals a severe systemic failure within discovery processes occurring under the purview of the Missouri Public Service Commission. This letter confirms that **Complainant, Jonathan L. Miller (a *pro se* litigant in Case No. GC-2026-0007), was the unintended "other customer" recipient of highly sensitive personal information (including Social Security Number, credit card information, and Spire account number) belonging to [REDACTED] Complainants in Case No. GC-2026-0021.**

Crucially, this egregious data disclosure occurred during discovery between entities, **Spire Missouri Inc., and the Missouri Public Service Commission Staff, both of whom operate with "Professional Accounts" within the Commission's Electronic Filing and Information**

**System (EFIS).** Complainant, in contrast, is restricted to a "Personal Account," which lacks fundamental functionalities afforded to "Professional Accounts."

### **III. Amplification of Constitutional Violations and Damages**

This incident directly and profoundly amplifies Complainant's pending arguments for violations of Due Process and Equal Protection under both the U.S. and Missouri Constitutions:

1. **Demolition of Security Rationale for EFIS Disparity:** The occurrence of a major data breach involving highly sensitive personal information *between* entities utilizing "Professional Accounts" fundamentally demolishes any purported security rationale for denying full EFIS functionality to "Personal Accounts." This incident proves that the flaw lies not in the account type, but in **systemic incompetence and gross negligence** in data handling and oversight within the Commission's regulated environment.
2. **Irrefutable Proof of Compelled Uncompensated Labor:** This event provides undeniable proof that the Commission's system compels Complainant to perform high-value, uncompensated administrative, investigative, and now, **critical data security incident response labor**. Complainant was forced into the role of an unwitting "data security auditor" and "incident responder," having to responsibly manage and expose a severe data breach caused by the very "professional" entities and systems operating under the Commission's jurisdiction. This directly supports Complainant's claim that his valuable time and effort are being unconstitutionally "taken" for public use without just compensation.
3. **Amplification of Compensable Damages:** The stress, time, and potential legal exposure associated with inadvertently receiving and responsibly handling another citizen's Social Security Number and credit card information are significant. This incident substantially increases the basis for **compensatory damages** (economic and non-economic, including severe emotional distress, mental anguish, and loss of enjoyment of life) directly caused by the Commission's and Spire's systemic failures. The handwritten note on Exhibit 1, stating "I will give to my Lawyer," further underscores the professional legal nature of the issue Complainant was compelled to confront alone and without compensation.

### **IV. Conclusion and Request for Immediate Action**

This supplemental evidence is not merely additional information; it is a direct, real-world manifestation of the systemic flaws Complainant has tirelessly documented. The inadvertent disclosure of highly sensitive personal information to an unrepresented party through the Commission's discovery process highlights an alarming lack of due process and equal protection, and an egregious imposition of uncompensated burdens on citizens like Complainant.

Complainant respectfully requests that the Commission take immediate cognizance of this critical new evidence and proceed with the expedited consideration of the pending Motion for

Declaratory Ruling and Systemic Remediation Regarding EFIS Access, with a particular focus on the need for comprehensive and immediate systemic reform.

**RESPECTFULLY SUBMITTED,**

**Jonathan L. Miller**

**Complainant,**

**Pro Se**

[REDACTED]

[REDACTED]

**08/19/2025**

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing was served upon all parties of record in this matter via electronic filing through the Electronic Filing and Information System (EFIS) on this **19th day of August, 2025**.

**Jonathan L. Miller**

**Complainant,**

**Pro Se**