

## **Formal Response to OPC Email in Case No. GC-2026-0007**

**To:** The Missouri Public Service Commission (PSC) **From:** Jonathan Miller **Case No.:** GC-2026-0007 **Date:** August 6, 2025

**Subject:** Response to August 6, 2025 Email from [REDACTED] of the Office of the Public Counsel (OPC)

Dear Commissioners,

This letter is in response to an email I received today, August 6, 2025, from [REDACTED] of the Office of the Public Counsel (OPC). A copy of this email is attached to this filing as Exhibit A.

In his email, Mr. [REDACTED] states that the OPC has concluded its investigation and has determined that my case with Spire was an "isolated incident." The OPC has therefore concluded its active involvement in my complaint.

While I appreciate the OPC's initial assistance, I must respectfully disagree with their conclusion. As documented in my previous filings, including the testimony from the Missouri Valley Community Action Agency (MCVAA) representative, I believe my case highlights a systemic issue, not an isolated incident.

I intend to continue representing my own interests in this matter and am committed to seeing this complaint through to a comprehensive resolution. I respectfully request that the Commission continue to preside over this complaint and consider all evidence filed by myself and Spire.

Thank you for your time and consideration.

Sincerely,

Jonathan Miller Case No. GC-2026-0007


**Subject: URGENT: Update on Spire Case No. GC-2026-0007 -**

**Direct Communication from Spire's Counsel - Possible Rule**

**4-4.2 Violation**Inbox



**Mr. Jon Lee**  
[REDACTED]

  
Tue, Aug 5, 11:48 PM  
(10 hours ago)

to John, bcc:  
Mandy, bcc:  
boldstandardco



Dear Director Clizer,

I am writing to provide an urgent update regarding my complaint in Case No. GC-2026-0007, as there has been a significant new development.

Earlier today, **August 5, 2025**, I received a direct email communication from J. Antonio Arias, Director, Associate General Counsel for Spire. In this email, Mr. Arias presented what he termed a "settlement offer." However, this offer, while admitting to an "inadvertent" enrollment and proposing a corrected billing history and a \$[REDACTED] credit, **did not include any form of financial compensation** for the substantial time, effort, and emotional distress I have incurred due to Spire's actions.

I formally responded to Mr. Arias via email on **August 5, 2025**, rejecting this offer as unacceptable. My rejection reiterated that the offer failed to adequately address the full scope of the issues, including the significant personal investment I have made to rectify Spire's procedural failures and misrepresentations.

For your immediate review, I have compiled both Mr. Arias's offer and my response into a PDF document and have already **filed it through the Electronic Filing and Information System (EFIS)** for Case No. GC-2026-0007.

I want to emphasize that this direct communication from Spire's counsel occurred **without the prior knowledge or consent of the Office of Public Counsel (OPC)**, my legal representative in this matter. As you know, Missouri Supreme Court Rule 4-4.2 generally prohibits a lawyer from communicating about the subject of the representation with a person the lawyer knows to be represented by another lawyer in the matter, unless the lawyer has the consent of the other lawyer or is authorized to do so by law or court order. I believe this is a critical detail for your assessment of Spire's approach to this case and highlights a possible violation of professional conduct.

I am available to discuss this matter further at your earliest convenience and appreciate your continued guidance.

Sincerely,

Jonathan Miller Case No. GC-2026-0007

**One attachment** • Scanned by Gmail



9:44 AM (46  
minutes ago)

to me 

Mr. Miller,

With regard to your last email, I believe it is necessary to rectify a point of confusion. Neither the Office of the Public Counsel nor I represent you as an individual in your complaint filed before the Public Service Commission. We also do not represent you as an individual in any other

manner or matter. Our interpretation of the enabling statute for the Office of the Public Counsel permits that we are allowed to represent the general interests of the public in proceedings before the Public Service Commission, but this does mean that we represent individual members of the public.

When an individual member of the public contacts our office with a complaint regarding their regulated utility service, we will often do what we can to facilitate communication with the offending utility so as to foster resolution. We may also open our own investigation into the utility's practices if we believe that the customer's complaint presents a possible problem that would impact a larger number of the utility's customers and thereby effect the public in general. This is what occurred following our initial conversation via phone. We began reaching out to Spire to determine whether the problem you had been confronted with was occurring on a larger, more systemic basis. We have reached the conclusion that we do not believe this to be the case. We believe that the incident wherein you were auto-enrolled in a budget billing program without your consent was an isolated incident and that Spire is already taking steps to prevent it from occurring again.

Our office will continue to monitor your complaint case in the event new information is brought to light. As I stated initially, however, we are not able to represent you as an individual in this case. This does not preclude you from representing your own interests in the matter, as you so far have done. We wish you the best of luck in resolving your dispute with Spire.

Thanks,

[REDACTED]

*Senior Counsel, Missouri Office of the Public Counsel*

P: [REDACTED] | F: [REDACTED] | E: [REDACTED]

