

**BEFORE THE PUBLIC SERVICE COMMISSION OF  
THE STATE OF MISSOURI**

In the Matter of a Proposed Commission	)	
Rule 20 CSR 4240-10.035 Residential	)	File No. OX-2026-0045
Advanced Meter or Hub Meter Opt-Out	)	

**COMMENTS ON PROPOSED RULE**

**COMES NOW** Spire Missouri Inc. (“Spire Missouri” or the “Company”), by and through its undersigned counsel, and submits these written comments on the Missouri Public Service Commission’s (“Commission”) Proposed Rule 20 CSR 4240-10.035 (“Proposed Rule”), stating the following:

1. On August 25, 2025, the Commission opened a rulemaking docket to promulgate a rule governing the residential advanced meter and hub meter opt-out process in accordance with Section 386.820, RSMo.

2. The Proposed Rule was filed with the Missouri Secretary of State on August 29, 2025.

3. On September 5, 2025, the Commission directed written comments regarding the Proposed Rule be filed by November 5, 2025, and ordered a hearing be held on November 13, 2025.

4. Spire Missouri is in support of the objective of the Proposed Rule, which is to provide guidance to utilities in offering an opt-out option to customers who do not want a residential advanced meter. The Company appreciates the efforts of the Commission and its Staff to develop the Proposed Rule.

5. Spire Missouri does have concerns with the Proposed Rule’s language specific to customer-supplied meter reads. The statute and Proposed Rule both allow customers opting out of an advanced meter (“opt-out customers”) to elect to read their own meter each month and

supply those reads to their utilities. While the statute provides that when a customer “fails to report usage, inaccurately reports usage, or the utility does not receive” reads on time, “the utility may manually read the customer’s meter,”<sup>1</sup> the Proposed Rule does not contain similar language. The legislature clearly intended to allow opt-out customers to elect to read their own meters but also intended for utilities to have an available remedy if they did not receive accurate and timely reads. As such, Spire Missouri proposes the following addition to the Proposed Rule:

**20 CSR 4240-10.035 (5) (D): If a customer elects to supply meter readings and, for two consecutive billing cycles, fails to supply accurate and timely meter reads, a utility may manually read such customer’s meter each billing cycle.**

6. The Company’s amendment still allows opt-out customers to elect to read their own meter, while ensuring that utilities are able accurately bill customers and timely recover their allowed rates if customers fail to provide accurate and timely reads. Spire Missouri notes that the statute and Proposed Rule do require that utilities obtain annual reads of opt-out customers’ meters. The Company agrees that an annual read is useful to ensure customers are not being over- or under-charged, but if customer-supplied reads are non-existent, inaccurate, or late, there could be a significant amount accrued that must be returned to, or collected from, customers. The Company recommends the Commission incorporate this amendment.

**WHEREFORE,** Spire Missouri respectfully requests that the Commission accept these comments and incorporate the Company’s proposed amendment.

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<sup>1</sup> Section 386.829.3 RSMo.

Respectfully submitted,

*/s/ J. Antonio Arias*

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**ATTORNEY FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent either by mail or electronic mail to all parties of record on this 5th day of November, 2025.

*/s/ J. Antonio Arias*

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J. Antonio Arias