

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

APPLICATION FOR REHEARING

COMES NOW the Complainant, Jonathan Miller, Pro Se, and pursuant to Section 386.500, RSMo, and Commission Rule 4 CSR 240-2.060, respectfully submits this Application for Rehearing of the Commission's **Report and Order Granting Summary Determination and Dismissing Complaint** (hereinafter, the "Dismissal Order," Filing 72), issued on or about December 11, 2025.

The Complainant asserts that the Dismissal Order is **unlawful and unreasonable** and should be vacated because the Commission failed to consider and incorporate findings essential to its statutory duties, which were present in the official record.

I. GROUNDS FOR REHEARING

The Dismissal Order is unlawful and unreasonable because it ignores evidence of systemic violations of the Missouri Public Service Commission's core statutory mandate to ensure safe and adequate utility service.

A. The Order is Unlawful as it Violates Statutory Mandate

The Commission has a clear statutory responsibility under **Section 393.130(1), RSMo**, to ensure that every utility corporation shall furnish and provide such service instrumentalities and facilities as shall be **"safe and adequate"**.

The Dismissal Order is unlawful because it focuses solely on the resolved, individual billing matter, thereby failing in its mandate to address the fundamental adequacy and safety of the Respondent's systems, despite undisputed evidence in the record demonstrating a failure of safe service. By dismissing the case, the Commission implicitly found the service adequate, a finding directly contradicted by the Staff Investigation.

B. The Order is Unreasonable and Not Supported by the Entire Record

A Commission Order is unreasonable if it is not supported by substantial, competent evidence on the **whole record**. The Dismissal Order is unreasonable for deliberately omitting and ignoring the findings of the Commission Staff's own investigation, which is a material part of the record:

1. **Staff's Confidential Report (Filing 64):** This report confirmed that the Complainant's confidential customer data (Personally Identifiable Information, or PII) was disclosed without authorization, and identified a systemic vulnerability in the Respondent's processes and employee conduct that led to the disclosure.
2. **Omission of Material Fact:** The Dismissal Order makes no mention of the Staff Report's findings, the unauthorized PII disclosure, the systemic security vulnerability, or the Staff's subsequent recommendations for systemic corrective action.
3. **Conflict with Public Interest:** By ignoring the Staff's conclusion that Respondent's service was inadequate due to a confirmed, easily exploitable security vulnerability, the Commission acted contrary to the public interest. The Order effectively insulates the Respondent from necessary regulatory oversight regarding data security and employee training, jeopardizing the confidential data of all Missouri ratepayers.

C. Error in Law Regarding the Scope of the Case

The Commission committed an error of law by concluding that the correction of the Complainant's January 2025 budget billing issue rendered the entire complaint moot. The underlying cause of the Formal Complaint (unauthorized PII change and improper employee conduct) escalated the matter beyond a simple billing dispute

to a contested case concerning utility fitness and safety, which remains unresolved on the merits.

II. RELIEF REQUESTED

WHEREFORE, Complainant Jonathan Miller respectfully requests that the Missouri Public Service Commission:

1. **GRANT** this Application for Rehearing.
2. **VACATE** the Report and Order Granting Summary Determination and Dismissing Complaint (Filing 72).
3. **RE-OPEN** the docket to specifically address the findings and recommendations of the Staff Confidential Report (Filing 64) and to issue a new Order resolving the material issues of fact and law regarding the safety and adequacy of Spire Missouri, Inc.'s service and security protocols as mandated by Section 393.130(1), RSMo.

Respectfully submitted,

Jonathan Miller, Complainant Pro Se

Email:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Application for Rehearing has been served via electronic mail to all Counsel of Record listed on the official Docket Sheet this **13th day of December 2025**.

Party	Representative	Email Address
MO PSC Staff	Department, Staff Counsel	

Office of the Public
Counsel (OPC)

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Jonathan Miller Complainant Pro Se