

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

Jonathan Miller,)	
)	
Complainant,)	
)	
v.)	File No. GC-2026-0007
)	
Spire Missouri Inc. d/b/a Spire,)	
)	
Respondent.)	

RESPONSE TO APPLICATION FOR REHEARING

COMES NOW Respondent, Spire Missouri Inc., and submits this response to Complainant's Application for Rehearing and requests that the Missouri Public Service Commission ("Commission") deny Complainant's Application, stating as follows:

Procedural History

On October 30, 2025, Respondent filed its Motion for Summary Determination. On the same date, Complainant filed his response opposing Respondent's Motion for Summary Determination. On November 15, 2025, Staff of the Commission filed its response to Respondent's Motion for Summary Determination, stating that it did not object to the Motion and that it agreed there were no material facts in dispute remaining. No other responses were filed. On December 2, 2025, the Commission issued an order granting Respondent's Motion for Summary Determination. On December 13, 2025, Complainant filed his Application for Rehearing in regards to this order.

Response

Under Section 386.500, RSMo, after an order or decision has been made by the Commission, a request for rehearing may be granted if, in the Commission's judgment, there is sufficient reason to do so. Under 20 CSR 4240-2.117, the Commission may grant a motion for summary determination if there is no genuine dispute as to any material fact, and the moving party

is entitled to relief as a matter of law. It follows that sufficient reasons to grant rehearing of a Commission order granting a motion for summary determination would be to show that there is a genuine issue as to any material fact or that the moving party is not entitled to judgment as a matter of law.

The Commission order on which rehearing is requested is its December 12, 2025 Order Granting Motion for Summary Determination. Respondent moved for summary determination on the Formal Complaint, which only included allegations regarding the inadvertent enrollment of Complainant in budget billing. In its Order, the Commission determined that there is no genuine issue as to any material fact related to the Formal Complaint to be decided by the Commission. The Commission also determined that Respondent has not violated any law, rule, or order or decision of the Commission and, therefore, Respondent is entitled to relief as a matter of law. As noted above, sufficient reasons to grant rehearing would either be by showing that there is a genuine issue as to any material fact or that Respondent is not entitled to relief as a matter of law. However, in both his response to Respondent's Motion for Summary Determination and the Application for Rehearing, Complainant provides no argument against either Commission determination. Complainant also agreed that there was no material fact related to the Formal Complaint in dispute. Instead, Complainant bases his request for rehearing on points that are not relevant to the Formal Complaint and are not properly before the Commission on rehearing. Thus, Complainant has not provided sufficient reasons for the Commission to grant rehearing on its order granting Respondent's motion for summary determination, and his Application for Rehearing should be denied.

WHEREFORE, Respondent respectfully requests that the Commission deny Complainant's Application for Rehearing and order any other relief as is just and reasonable.

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 by electronic mail to all counsel of record on this 19th day of December, 2025.

/s/ J. Antonio Arias

J. Antonio Arias