

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Jonathan Miller, Complainant, v. Spire Missouri Inc., Respondent. Case No. GC-2026-0236

FIRST AMENDED STATEMENT OF FACTS

- Violation of Itemization Standards:** Pursuant to **20 CSR 4240-13.020(9)**, every residential bill must "clearly state" all charges. Respondent is in violation of this rule by bundling late payment penalties into the "Subtotal of Current Charges" on Page 1 (Account # [REDACTED]).
 - Evidence of Deceptive Formatting:** In March 2026, Respondent listed a subtotal of \$ [REDACTED] on Page 1, while itemized usage charges totaled only \$ [REDACTED]. This \$ [REDACTED] discrepancy was not designated as a penalty on the summary page.
 - Judicial Notice of Systemic Software Failure:** Complainant requests that the Commission take judicial notice of its findings in **Case No. OO-2025-0233** regarding the **"Customer First" (C1)** billing platform. Complainant alleges that the itemization errors and "pre-delinquent" penalties documented here are consistent with the software deficiencies identified in the recent Liberty Utilities investigation.
 - The "Floating Cycle" Trap:** Respondent utilizes a "floating" billing period (varying from 26 to 35 days). This fluctuation, combined with a 21-day payment window (**20 CSR 4240-13.020(7)**), creates a "drifting due date" that manufactured Complainant's technical delinquency.
 - Premature Assessment:** Respondent assessed late charges prior to the expiration of the legal 21-day grace period, a "pre-delinquent" error identical to the software "mis-mapping" found in the Liberty investigation.
 - Connection to Case No. GC-2026-0210:** These facts provide specific, documented proof of the "billing and customer service deficiencies" alleged by PSC Staff in their March 2, 2026, complaint against Spire.
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AMENDED RELIEF REQUESTED

Complainant respectfully requests the following:

- Statewide Forensic Audit:** A comprehensive audit of Spire's C1 billing platform for **all Missouri customers** to identify unitemized fees and "Clock Clash" revenue.
- Mandatory Formatting Correction:** An order requiring Respondent to clearly designate all penalties as standalone line items on **Page 1**.

3. **Refunds:** A return of all funds collected via "pre-delinquent" assessments or unitemized "Ghost Fees" statewide.
 4. **Integration:** That this case be consolidated with, or noticed in, **Case No. GC-2026-0210.**
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Respectfully Submitted,

Jonathan Miller [REDACTED]

Dated: March 16, 2026