

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

Latrell S. Germany,)	
)	
Complainant,)	
)	
v.)	File No. GC-2026-0278
)	
Spire Missouri Inc. d/b/a Spire,)	
)	
Respondent.)	

**MOTION FOR CLARIFICATION AND
MORE DEFINITIVE STATEMENT OF FACTS**

COMES NOW Respondent, Spire Missouri Inc., and, moves for clarification of the Missouri Public Service Commission’s (“Commission”) April 24, 2026 *Order Giving Notice of Complaint, Directing an Answer, and Staying a Staff Investigation and Report* and moves for a more definitive statement of facts, stating the following:

1. On April 17, 2026, Complainant filed a formal complaint.
2. On April 17, 2026, the Commission issued a Notice of Deficiency as it was unclear if Complainant was filing in her individual capacity or on behalf of a trust and gave Complainant an opportunity to cure the deficiency.
3. On April 23, 2026, the Commission issued its *Order Directing a Statement of Facts Forming the Basis for the Complaints and Denying Request for Restoration of Service*, directing Complainant to clarify the nature of her complaint with sufficient information for Respondent to answer.
4. On April 23, 2026, Complainant filed her *Response to Order*. On April 24, 2026, Complainant filed her *Amended Response to Order* and additional documents.
5. On April 24, 2026, the Commission issued its *Order Giving Notice of Complaint, Directing an Answer, and Staying a Staff Investigation and Report*, setting a date for an answer to

the complaint to be filed. However, the order references a docket number pertaining to Complainant's complaint against Missouri American Water Company ("MAWC"), as well as orders MAWC to answer the complaint. Therefore, Respondent moves for clarification of whether the order was intended to be filed in the docket pertaining to Complainant's complaint against Respondent Spire Missouri.

6. Additionally, if the Commission intended to issue an order directing Spire Missouri to file an answer, Respondent also moves for a more definitive statement of facts. Respondent has reviewed Complainant's *Amended Response to Order*, and Respondent is unable to discern which of Complainant's allegations apply to Respondent and which, if any, would represent violations of any law subject to the Commission's authority, or rule, tariff, order, or decision of the Commission. It is also apparent from the *Amended Response to Order* that some of the allegations, which reference the Uniform Commercial Code, federal statutes, and the United States Constitution, are not within the Commission's jurisdiction. For these reasons, Respondent moves for a more definitive statement of facts so it may answer the complaint and make any other filings as necessary.

WHEREFORE, Respondent respectfully requests that the Commission grant this motion for clarification and motion for a more definitive statement of facts 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 either by mail or electronic mail to all parties of record on this 27th day of April, 2026.

/s/ J. Antonio Arias

J. Antonio Arias