

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

Rovonne L. Ginger, Complainant )  
 )  
v. ) **File No. GC-2026-0250**  
 )  
Spire Missouri, Inc. d/b/a Spire, Respondent )

**STAFF RECOMMENDATION**

**COMES NOW**, the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Staff Recommendation*, states as follows:

1. On March 25, 2026, Rovonne Ginger (“Complainant”) filed a complaint with the Commission against Spire Missouri, Inc., d/b/a Spire (“Spire”). Rovonne Ginger alleges overbilling by Spire. This is a contested case pursuant to Section 386.390, of the Revised Statutes of Missouri (“RSMo”).

2. On March 31, 2026, the Commission entered an *Order* directing Staff to file a pleading no later than April 15, 2026, informing the Commission when it can file a recommendation or status report regarding this complaint.

3. On April 03, 2026, Staff filed a motion for extension of time to conduct further discovery and file its status report or recommendation.

4. On April 03, 2026, the Commission entered an *Order* for Staff to file a recommendation or status report by May 11, 2026.

5. On April 22, 2026, Spire filed its Answer to the complaint.

6. Staff conducted an investigation and reviewed information provided through discovery. Staff found no evidence of inaccurate meter readings or billing by Spire Missouri,

and therefore, no violation of commission rules or Spire’s Tariff Sheets. Staff states the Complainant’s bill appears to be accurate for the periods identified in the complaint. Staff’s investigation is set forth more fully in the Staff Recommendation Memorandum, which is attached as Appendix A and is incorporated by reference herein.

7. Staff acknowledges that the billing line item of Natural Gas Subtotal can cause confusion, as it can appear to customers that they are being charged twice for gas usage. Additionally, 20 CSR 4240-13.020(9)(I) requires, “Every bill for residential utility service shall clearly state—Purchased gas adjustment cost in total or cents per unit basis.” Therefore, Staff recommends that the Commission require Spire Missouri to revise monthly billing to show this billing line item as Purchase Gas Cost Adjustment (“PGA”) and PGA Total volumetric charge and that the revision is completed by Spire Missouri by August 1, 2026.

**WHEREFORE**, Staff respectfully submits this *Staff Recommendation* and hereby prays the Commission accept the recommendation and grant such other and further relief as the Commission considers just and reasonable under the circumstances.

Respectfully submitted,

**/s/ Ray Cunneen**

**Ray Cunneen**  
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**Attorney for Staff of the  
Missouri Public Service Commission**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First-Class United States Postal Mail, postage prepaid, on this 11<sup>th</sup> day of May, 2026, to all counsel of record.

**/s/ Ray Cunneen**

## REPORT OF THE STAFF

TO: Missouri Public Service Commission Official Case File  
Case No. GC-2026-0250, Rovonne Ginger Complainant, v.  
Spire Missouri, Inc. d/b/a Spire, Respondent

FROM: Michael Abbott, Senior Project Manager

/s/ Michael Abbott    May 11, 2026  
Case Manager            Date

SUBJECT: Staff Investigation and Report

DATE: May 11, 2026

### EXECUTIVE SUMMARY

This report presents Staff's investigation, findings, and recommendations regarding the formal complaint filed by Mrs. Rovonne Ginger ("Complainant") against Spire Missouri, Inc. d/b/a Spire ("Spire Missouri"). In her complaint, Mrs. Ginger alleges: (1) the December 2025 bill is incorrect; (2) the gas meter was malfunctioning; and (3) she was charged duplicate taxes on the October 2025 bill.

Based on its investigation of Mrs. Ginger's complaint, Staff finds that Spire Missouri has not violated any applicable Missouri statutes, regulations, or tariff provisions with respect to allegations under formal complaint GC-2026-0250. Staff finds that Spire Missouri's billing calculations are accurate and that the meter is operating correctly. However, Staff recommends Spire Missouri revise its customer bills to address the billing line item that contributed to confusion exposed during the investigation.

### INTRODUCTION AND BACKGROUND

On January 9, 2026, Mrs. Ginger filed an informal complaint with the Consumer Services Department ("CSD") regarding her higher-than-expected monthly bills. In response, CSD staff reviewed the matter and contacted Spire Missouri to obtain additional account information. On February 11, 2026, CSD sent Mrs. Ginger a letter explaining that the charges were based on actual usage, the meter readings matched the billing statements, and the

meter had been tested and passed at 100%. The letter also informed Mrs. Ginger of her right to file a formal complaint.<sup>1</sup>

On March 25, 2026, the Complainant, Mrs. Ginger, filed a formal complaint with the Missouri Public Service Commission (“Commission”) against Spire Missouri. In her filing, Mrs. Ginger requested that Staff investigate why her December 2025 monthly bill was three times higher than her November bill, which she also believed to be unusually high. Mrs. Ginger further asserted that the average temperatures in November and December were approximately 70 degrees Fahrenheit, adding to her confusion regarding the elevated billing amounts.

On March 31, 2026, the Commission filed an *Order Giving Notice of Contested Case and Directing Answer* (“Order”). The Order required Staff to file a pleading no later than April 15, 2026, and Spire Missouri to file a response to the complaint no later than April 30, 2026. On April 3, 2026, Staff filed a *Motion for Extension of Time* requesting to file the recommendation no later than May 11, 2026, which the Commission approved on April 3, 2026, with its *Order Direction Staff to File a Recommendation or Status Report*.

### **STAFF’S INVESTIGATION**

Staff initiated the investigation by reviewing Mrs. Ginger’s formal complaint, followed by a meeting with Spire Missouri on March 30, 2026. Staff issued data request (“DRs”) to Spire Missouri on April 2 and 3, 2026. Staff also conducted a phone interview with Mrs. Ginger on April 6, 2026, and subsequently submitted additional DRs to Spire Missouri on April 7, 2026. Staff conducted an additional phone interview with Mrs. Ginger on May 1, 2026. Spire Missouri provided responses to all of Staff’s DRs on April 22 and 27, 2026.

Staff’s investigation included a review of the monthly bills for October, November, and December 2025, as well as January, February, and March 2026. Staff notes that during this period (October 2025 through March 2026), Spire Missouri implemented several Commission-authorized changes to Spire Missouri’s rates and charges, which would have affected the total amount due each month.

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<sup>1</sup> February 11, 2026, Commission’s Consumer Service Department letter to Ms. Rovonne Ginger.

On October 24, 2025, new customer charge and volumetric delivery and distribution charge were applied to users as a part of the Commission approved general rate proceeding, Case No. GR-2025-0107. As a part of this rate proceeding, the Commission approved the increase to the customer charge from \$20.00 to \$22.00 and the increase to the volumetric delivery and distribution charge, for winter, from \$0.37404 per Ccf<sup>2</sup> to \$0.60966 per Ccf. Mrs. Ginger's December bill, with usage of 453 Ccf at \$0.37404 per Ccf would have been calculated to \$169.44; however, at the new rate of \$0.60966 per Ccf, Spire Missouri correctly calculated Mrs. Ginger's bill in the amount of \$276.18, which is a \$106.74 difference.

Additionally, the Purchase Gas Cost Adjustment ("PGA") charge, which is labeled as natural gas subtotal on Spire Missouri's monthly bills, was modified on November 26, 2025, as a part of GR-2026-0127. The PGA, which is also a volumetric charge based on Ccf usage, increased from \$0.62139 per Ccf to \$0.67976 per Ccf. Mrs. Ginger's December bill, with usage of 453 Ccf, would have been \$281.49; however, at the new PGA rate it was correctly calculated by Spire Missouri to the value of \$307.94, which is a \$26.45 difference.

Mrs. Ginger also reported that her October bill, which covers the period from September 30, 2026, through October 29, 2026, reflected double tax charges. Staff reviewed this concern and determined that the two tax line items resulted from a rate modification that took effect on October 24, 2026. Charges for usage from September 30, 2026, through October 24, 2026, were calculated using the previous volumetric delivery and distribution rate of \$0.37404 per Ccf. The additional tax charge covering October 25, 2026, to October 29, 2026, reflects the new volumetric delivery and distribution rate of \$0.60966 per Ccf, applied to usage after the rate change. Staff finds that the application of the two tax charges and the resulting calculations on the October 2025 monthly bill are accurate and appropriate.

As part of Staff's investigation, Staff requested a copy of the meter test results for the meter serving Mrs. Ginger's residence. Spire Missouri provided the testing report, which indicates that the meter was in good condition, the index was properly sealed, and operating as designed. The test results document that Spire Missouri conducted two tests on the meter, which are: (1) open flow rate, and (2) check flow rate.

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<sup>2</sup> Ccf means hundred-cubic feet.

The open flow rate, which is a capacity test used to confirm that the meter can deliver sufficient gas volume, was tested and received a 100-percent passing result. The check flow rate, which is an accuracy test used to verify that the meter is measuring gas correctly, was also tested and produced a 99.8 percent result. This value falls within acceptable amount in accordance with 20 CSR 4240-10.030(18).

Staff also wanted to confirm Mrs. Ginger’s claim that the months of November and December 2025, were on average 70-degrees Fahrenheit (“°F”). Staff determined that the average maximum temperature during November 2025 was approximately 56.7°F and the minimum average temperature was 33.7°F.<sup>3</sup> Staff determined that the average maximum temperature during December 2025 was approximately 46.3°F and the average minimum temperature was 24.1°F.<sup>4</sup>

Mrs. Ginger’s December bill started on November 27, 2025, and ended on December 30, 2025. The average maximum temperature for the December 2025 bill was 45.8°F and the average minimum temperature was 25.2°F.<sup>5</sup> Staff did not observe any daily temperature readings at or above 70°F.<sup>6</sup>

## **CONCLUSION AND RECOMMENDATIONS**

After reviewing the information and investigation, Staff has not found any evidence of inaccurate meter readings or billing by Spire Missouri.

Staff acknowledges that the billing line item of Natural Gas Subtotal can cause confusion, as it can appear to customers that they are being charged twice for gas usage. Additionally, 20 CSR 4240-13.020(9)(I) requires, “Every bill for residential utility service shall clearly state—Purchased gas adjustment cost in total or cents per unit basis.” Therefore, Staff recommends that the Commission require Spire Missouri to revise monthly billing to show this billing line item as PGA and PGA Total volumetric charge and that the revision is completed by Spire Missouri by August 1, 2026.

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<sup>3</sup> <https://www.weather.gov/wrh/Climate?wfo=eax>

<sup>4</sup> Ibid.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

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 Respondent )

**AFFIDAVIT OF MICHAEL J. ABBOTT**

STATE OF MISSOURI )  
 ) ss.  
 COUNTY OF COLE )


**COMES NOW MICHAEL J. ABBOTT**, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Report; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
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**MICHAEL J. ABBOTT**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 7<sup>th</sup> day of May, 2026.

  
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**NOTARY PUBLIC**

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2027 Commission Number: 15207377
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