

**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.)	

RESPONSE TO APPLICATION FOR REHEARING

COMES NOW Respondent, Spire Missouri Inc., by and through counsel, and submits this response to Complainant’s application for rehearing, requesting the Missouri Public Service Commission deny Complainant’s application, 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.

6. On April 27, 2026, Respondent filed its *Motion for Clarification and More Definitive Statement of Facts*, noting that Respondent could not determine the allegations applicable to Spire Missouri and whether any of the allegations would represent violations of any law subject to the Commission’s authority, or rule, tariff, order, or decision of the Commission.

7. On April 30, 2026, in its *Order Granting Motion for More Definitive Statement of Facts*, the Commission granted Respondent’s motion, directing Complainant to respond specifying “what happened, when it happened, the disputed amount, and why she believes any billed amounts were incorrect.”

8. On May 1, 2026, Complainant filed a response to the Commission’s order.

9. On May 7, 2026, the Commission issued its *Order Dismissing Complaints*, noting that the Complainant failed to “explain what happened that constituted a violation, the time period when a violation occurred, the disputed amount, and why she believed billed amounts were incorrect.”

10. On May 11, 2026, Complainant filed an application for rehearing. For the reason that the complaint was originally dismissed, that Complainant fails to make allegations sufficient to establish a cause of action for a Commission complaint that would entitle Complainant to relief, Respondent requests that the Commission deny the application for rehearing.

11. Section 386.500.1, RSMo allows parties to apply for rehearing after an order or decision has been made by the Commission, providing that the Commission grant and hold a rehearing, “if in its judgment *sufficient reason therefor be made to appear*[.]” (Emphasis added.) Section 386.500.2, RSMo requires the application for rehearing to specifically state the “grounds on which the applicant considers said order or decision to be unlawful, unjust or unreasonable.”

12. In the application for rehearing, Complainant continues to include the same allegations against Respondent, none of which provide sufficient facts of any violations of any law subject to the Commission's authority, or rule, tariff, order, or decision of the Commission. There are additional statements Complainant has added, which all fail for the same reason. Further, Complainant also does not state any grounds on which the Commission's decision was unlawful, unjust or unreasonable. Instead, Complainant attempts to address the Commission's prior request for allegations sufficient to establish a cause of action, which the Commission has already provided the opportunity to do so multiple times before. For these reasons, the application for rehearing should be denied.

WHEREFORE, Respondent respectfully requests that the Commission deny the 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 either by mail or electronic mail to all parties of record on this 14th day of May, 2026.

/s/ J. Antonio Arias

J. Antonio Arias