BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
October 26, 2026
Missouri Public
Service Commission

Brett Felber,)
)
Complainant,)
)
vs.) File No. GC-2027-0114
)
Spire Missouri Inc. d/b/a Spire,)
Respondent.)

COMPLAINANT'S RESPONSE TO RESPONDENT'S NOTICE OF FILING

COMES NOW Complainant Brett Felber, pro se, and respectfully submits this Response to Respondent Spire Missouri Inc.'s ("Spire") Notice of Filing dated October 26, 2026, which submits Exhibits 1 and 2 that were inadvertently omitted from Spire's Response filed on October 23, 2026. Complainant states as follows:

1. Spire's Notice of Filing and attached Exhibits fail to address, much less demonstrate compliance with, the specific requirements of 20 CSR 4240-13.050(9). Spire continues to avoid discussion of this mandatory Commission rule in its filings related to the discontinuance of service at issue.

2. 20 CSR 4240-13.050(9) provides in full:

> *"Immediately preceding the discontinuance of service, the employee of the utility designated to perform this function, except where the safety of the employee is endangered, shall make a reasonable effort to contact and identify him/herself to the customer or a responsible person then upon the premises and shall announce the purpose of his/her presence. When service is discontinued, the employee shall leave a notice upon the premises in a manner conspicuous to the customer that service has been discontinued and the address and telephone number of the utility where the customer may arrange to have service restored."*

3. This provision is mandatory and is worded with precision by the Commission. Spire is raising defenses and justifications that are not worded in 20 CSR 4240-13.050(9). Spire is attempting to substitute other language, actions, and procedures—such as prior bills, automated IVR telephone calls, contact logs, or general telephone notifications—for the actual requirements set forth in the rule. These substituted defenses do not appear in the text of subsection (9) and do not satisfy its terms.

4. Compliance with other subsections of 20 CSR 4240-13.050—such as the ten-day written notice under subsection (5), or the twenty-four-hour contact efforts under subsection (8) consisting of a subsequent written notice, doorhanger, or telephone call attempts—does not satisfy or rectify the distinct requirements of subsection (9). Bills, automated phone calls (IVR), or general telephone contacts do not substitute for the required on-premises identification and announcement by the employee performing the discontinuance, nor for the conspicuous notice (door tag) left upon the premises when service is discontinued.

5. Exhibit 1 is a billing statement dated September 9, 2026, reflecting a past due amount of $[redacted] and a total amount due of $[redacted] for account number [redacted] in the name of Church of Jesus & Hope at [redacted]. The attached "Important Billing Notice" warns of

potential disconnection on or after September 30, 2026, if the disconnection amount is not received, and states that further notifications will be by telephone. This document relates to prior notice requirements but provides no evidence of compliance with subsection (9).

6. Exhibit 2 consists of customer contact logs showing two IVR outbound calls on October 2, 2026, resulting in "Machine, Left Message." These automated calls do not constitute the required effort by an employee immediately preceding discontinuance to contact and identify themselves to a person on the premises and announce the purpose of their presence, nor do they evidence the leaving of a conspicuous notice of discontinuance.

7. Spire's paragraph 2 in the Notice of Filing asserts that the exhibits "demonstrate that the reason for the discontinuance of service giving rise to this Complaint was due to the nonpayment of a significant past due balance on Complainant's account actually linked to Complainant's service address. The reason for discontinuance has not been eliminated as the past due balance remains outstanding in full." Spire fails to elaborate on the current status of the account in this dispute, including whether service is currently discontinued, suspended, or active.

8. On October 26, 2026, Complainant obtained an audio recording of a telephone conversation with Spire representatives concerning account [redacted]. This recording demonstrates that the account has not been disconnected or suspended. This evidence directly contradicts Spire's implication that a discontinuance occurred solely due to nonpayment and that the cause remains uneliminated, and further underscores Spire's failure to follow the Commission's prescribed process under 20 CSR 4240-13.050(9).

9. By relying on bills, phone calls, and contact logs while remaining silent on the actual wording of subsection (9), and by attempting to substitute defenses not found in the rule, Spire undermines the actual process the Commission has clearly defined. The rule requires specific on-premises actions that Spire has not shown it performed. Spire has not rectified the matter of improper discontinuance or failure to provide the required notice.

10. The account at issue is a residential account serving the premises at [redacted], [redacted], notwithstanding the account name. The substantial past due balance is disputed in this proceeding, and Spire's actions have not complied with the Commission's rules governing discontinuance of residential service.

WHEREFORE, Complainant respectfully requests that the Commission:

A. Accept this Response for filing;

B. Take notice that Spire has failed to demonstrate compliance with 20 CSR 4240-13.050(9), has avoided addressing this mandatory requirement, and is raising defenses and substitutions not worded in the rule;

C. Order Spire to immediately clarify the current status of service for account [redacted], including whether it is active, suspended, or discontinued, and to produce all records evidencing compliance with 20 CSR 4240-13.050(9), including any door tag or on-premises contact documentation;

D. Order immediate restoration of gas service if it has been discontinued or is being withheld without full compliance with 20 CSR 4240-13.050, particularly subsection (9);

E. Find that Spire's discontinuance procedures in this matter violated Commission rules; and

F. Grant such other and further relief as the Commission deems just and reasonable, including any appropriate sanctions or requirements for Spire to adhere strictly to the notice provisions of 20 CSR 4240-13.050 in this

and future matters.

Respectfully submitted,

Brett Felber
Pro Se Complainant
[redacted]

Dated: October 26, 2026

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of October, 2026, a true and correct copy of the foregoing Complainant's Response to Respondent's Notice of Filing was served upon the following by electronic mail, or as otherwise permitted by the Commission's rules of practice and procedure, and upon all other parties of record:

Counsel for Spire Missouri Inc.:

Brendan J. Kloeppel, MoBar #76341
Counsel – Regulatory
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
Email: brendan.kloeppel@spireenergy.com

J. Antonio Arias, MoBar #74475
Director, Associate General Counsel - Regulatory
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
Email: antonio.arias@spireenergy.com

Missouri Public Service Commission:

Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
(Electronic filing via EFIS as required)

/s/ Brett Felber
Brett Felber
Pro Se Complainant
[redacted]