BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

FILED
October 27, 2026
Missouri Public
Service Commission

Brett Felber,
Complainant,

v.

Spire Missouri Inc. d/b/a Spire,
Respondent.

Case No. GC-2027-0114

COMPLAINANT'S MOTION FOR RECONSIDERATION / RESPONSE TO ORDER DENYING MOTION FOR RESTORATION OF GAS SERVICE

Complainant Brett Felber is displeased with the Commission's October 26, 2026 Order Denying Motion for Restoration of Gas Service. The Order leaves out crucial details that undermine the Commission's own rules and fails to address Spire's clear noncompliance with mandatory notice requirements.

The regulatory judge's analysis treats this as a denial of service (refusal to commence service under Complainant's personal account) due to a past-due balance on the Church of Jesus and Hope account linked to the same service address. That framing triggers Commission Rule 20 CSR 4240-13.035. Under that rule:

> *"(1) When the utility refuses to provide service to an applicant, it shall inform the applicant in writing, and shall maintain a record of the written notice. A utility may refuse to commence service to an applicant for any of the following reasons:*
>
> *(A) Failure to pay a delinquent utility charge for services provided by that utility or by its regulated affiliate that is not subject to dispute under applicable dispute review provisions of [the dispute rules]."*

Spire did neither. It did not mail (or otherwise deliver) the mandatory written denial-of-service notice to the applicant, and it has produced no record of any such written notice. If Spire claims it sent a denial-of-service letter, it must immediately produce, today October 27, 2026, a true and complete copy of the letter, the front of the envelope showing the mailing date and postage, and the date of the letter itself. Spire's own Response admits the personal account (No. [redacted] was created, a deposit of [redacted] was billed and paid by Complainant, and the start-service order was later stopped and the deposit refunded—yet no written denial notice was ever sent to the applicant who had applied in his personal name.

Spire also knows the balances it relies upon are currently in dispute. Complainant is surprised Spire did not disclose to the Commission in its filings that the claimed balance is under dispute with the Consumer Financial Protection Bureau (CFPB). A utility may not refuse service for a delinquent charge that is subject to dispute.

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In addition, the Order fails to address the mandatory notice required under Commission Rule 20 CSR 4240-13.050(9). That rule provides:

> *"(9) 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."*

Spire has openly admitted it did not leave a door tag or any other conspicuous notice at the premises. Combined with the failure to send the required denial-of-service letter under 20 CSR 4240-13.035, Spire cannot distinguish which account it is referring to. It has failed to articulate which account was subject to discontinuance or denial because it never sent the mandatory written denial-of-service letter to the applicant who had obtained (or attempted to obtain) service in his personal name. Account No. [redacted] was created and a deposit was assessed and paid; Spire cannot now retroactively treat the matter solely as a church-account issue while ignoring the personal-account application and the notice rules that applied to it.

The Commission's reliance on 20 CSR 4240-13.050(12) (restoration when the cause for discontinuance has been eliminated) is misplaced when the predicate notices required by 20 CSR 4240-13.035 and 20 CSR 4240-13.050(9) were never given. Those notice requirements exist to protect applicants and customers and to ensure the utility's records and the Commission's review are clear. The Order's omission of these mandatory procedures undermines the very rules the Commission is charged with enforcing.

WHEREFORE, Complainant respectfully requests that the Commission:

1. Reconsider and reverse the October 26, 2026 Order Denying Motion for Restoration of Gas Service;

2. Direct Spire to immediately produce any claimed denial-of-service letter (with envelope and mailing proof) or admit that none exists;

3. Find that Spire failed to comply with the written-notice requirement of 20 CSR 4240-13.035 and the conspicuous-notice requirement of 20 CSR 4240-13.050(9);

4. Order restoration of gas service consistent with the Commission's rules; and

5. Grant such other and further relief as the Commission deems just and proper.

Respectfully submitted,

_____

Brett Felber

Complainant, Pro Se

[redacted]

[redacted]

[redacted]

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 27th day of October, 2026, upon the following parties of record by electronic mail and/or via the Commission's Electronic Filing and Information System (EFIS):

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