

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

**Robert L. Davis Jr., Trustee of  
MUSIQAA RAYIYS BEY PLT**

Complainant,

vs.

**SPIRE MISSOURI, INC. d/b/a SPIRE**

Respondent.

**File No. GC-2025-0276**

**MOTION FOR REHEARING AND OBJECTION TO FINAL ORDER WITH  
SUBMISSION OF NEW EVIDENCE - EXHIBIT L (S.E.C. REGISTRATION  
LETTER)**

NOW COMES Robert L. Davis Jr., Trustee of Musiqaa Rayiys Bey PLT, a private ecclesiastical trust, respectfully filing this Motion for Rehearing and Objection to the Final Order issued by the Missouri Public Service Commission (“Commission”) in Case No. GC-2025-0276. This motion is brought pursuant to 4 CSR 240-2.160 and other applicable Missouri administrative rules, and is supported by newly submitted and materially relevant evidence.

**I. PROCEDURAL SUMMARY**

1. On April 11, 2025, Complainant filed a formal complaint regarding Spire Missouri Inc.’s billing and financial disclosures.
2. The Commission issued a Notice of Deficiency, later reaffirmed in its Order Denying Reconsideration and Final Order, requiring attorney representation for trustees.

3. Complainant objected and filed a Motion for Leave to Proceed as Trustee in Administrative Capacity, supported by the Declaration of Trust (Exhibit J), IRS EIN Confirmation (Exhibit I), and related exhibits affirming the trust's legal existence, standing, and administrative nature.
4. On June 12, 2025, Complainant filed a **Final Notice of Administrative Default and Notice of Gatekeeping and Obstruction of Equitable Rights** based on continued denials of procedural access.

## **II. OBJECTION TO FINAL ORDER AND ONGOING LEGAL ERROR**

The Commission's Final Order improperly construes the trustee's participation as legal representation, despite:

- The trust being a non-statutory ecclesiastical entity;
- The trustee acting in a private, fiduciary, and administrative capacity;
- The Commission lacking a clear statutory basis to override equitable standing under Missouri and federal trust principles.

## **III. NEW EVIDENCE SUBMITTED - EXHIBIT L**

To further clarify and support the record, Complainant now submits:

- **Exhibit L - S.E.C. Transfer Agent Registration Confirmation**, acknowledging the trustee and trust entity's lawful status and role in securities administration.

This document affirms federal recognition of the trust's administrative authority and the trustee's eligibility to manage financial entitlements, such as tariff bond credits and billing offsets, at issue in this proceeding.

#### **IV. REQUEST FOR RELIEF**

Complainant respectfully demands the following:

- 1. Rehearing** of this matter based on newly submitted Exhibit L and clarification of administrative standing;
- 2. Vacatur or reconsideration** of the Commission's Final Order;
- 3. Restoration of Complainant's right to proceed**, including administrative resolution of the original complaint against Spire Missouri Inc.

Respectfully submitted,

**/s/ Robert L. Davis Jr.**

Robert L. Davis Jr., Trustee of  
MUSIQAA RAYIYS BEY PLT

**Email:**

**Phone:**

**Date:** June 20, 2025

***Complainant***

**Attachments:**

*Exhibit L - S.E.C. Registration Letter*