

Complainant's First Set of Data Requests to Respondent, Spire Missouri Inc.

Here are your Data Requests in a single list, numbered 1 through 13, with a specific, question for each one.

DR 1: Provide all internal communications from Spire's legal counsel, IT, and customer service departments regarding the data breach that occurred on or about August 11, 2025. **What do these communications reveal about the company's internal knowledge of the breach and its plans to address it?**

DR 2: Provide all documents and records confirming that the affected customer from Case No. GC-2026-0021 has been formally notified of the breach, including the date of notification and a copy of the communication sent to said customer. **How does this notification ensure that the customer is fully informed of their legal rights and the extent of the compromised data?**

DR 3: Provide any and all records or reports from Spire's internal investigation into the cause of the data breach and the failure of their security protocols. **What specific changes, if any, have been made to Spire's security protocols based on the findings of this investigation?**

DR 4: Provide copies of all official corporate policies regarding the handling, storage, and transmission of confidential customer information. **How does Spire ensure that these policies are consistently enforced across all departments, including with outside counsel?**

DR 5: Provide a complete list of all third-party platforms (including but not limited to Kiteworks) used by Spire's legal or customer service departments to share confidential data, including a full description of each platform's security features and user access logs for this case. **Why does Spire use these third-party platforms for discovery instead of the Commission's official e-filing system, and what specific risks are associated with this practice?**

DR 6: Provide all training materials provided to Spire's legal counsel and employees on data privacy and security, as of August 2025. **How does the company measure the effectiveness of this training, and are employees tested on their understanding of these protocols?**

DR 7: Provide a list of all complaints or legal actions filed with the Missouri PSC or the Attorney General's office against Spire regarding improper budget billing enrollment or similar billing errors in the past five years. **What patterns, if any, emerge from Spire's responses to these complaints, and how does the company justify these repeated errors?**

DR 8: Provide any internal audit reports or memos from Spire addressing the "systemic auto-enrollment policy" that led to the improper budget billing enrollment. **What specific findings from these internal audits and memos led Spire to conclude that this was a systemic issue?**

DR 9: Provide all communications (emails, memos, or official filings) between Spire's legal counsel and the PSC or OPC staff regarding the handling of your case and the data breach. **How did Spire's communications with regulators in this case differ from its public-facing statements regarding transparency and accountability?**

DR 10: Provide all internal communications from Spire's customer service and management regarding my account, File No. GC-2026-0007, from January 2025 to June 2025. **What do these communications reveal about the internal discussions regarding the unauthorized changes to my account?**

DR 11: Provide the full transcript and the original audio file of the call on or about January 27, 2025, where a Spire representative allegedly discussed my account with a non-account holder and initiated the budget billing enrollment. **What does this specific call reveal about the company's internal procedures and the training provided to its customer service representatives?**

DR 12: Provide copies of all standard operating procedures or training materials provided to customer service representatives regarding budget billing enrollment and changes to customer accounts. **Why did the representative on my call deviate from these procedures, and what is Spire's policy for addressing such deviations?**

DR 13: Provide a list of all Spire accounts that were auto-enrolled in a budget billing plan without explicit, documented customer consent in the last five years. **What is the full scope of this systemic issue, and what is the company doing to rectify the harm caused to these customers?**