

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Jonathan Miller,

Complainant,

v.

Spire Missouri Inc. d/b/a Spire,

Respondent.

File No. GC-2026-0007

Related Case No. [REDACTED]

Attorney General Complaint No. CC-2025-08-002680

Date: August 13, 2025

COMPLAINANT'S CONSOLIDATED MOTION AND SUPPLEMENTAL EVIDENCE

COMES NOW Complainant, Jonathan Miller, and submits this consolidated motion and supplemental evidence to formally present Respondent Spire Missouri Inc.'s egregious misconduct, including the attempted spoliation of evidence and deliberate concealment of a data breach from the Commission and affected parties.

1. Summary of Factual Allegations

a) **The Data Breach:** On August 11, 2025, Respondent's counsel, [REDACTED], improperly sent Complainant an unencrypted zip file containing highly confidential and sensitive information from an unrelated case, **File No.** [REDACTED]. This data included the full names, Social Security number, bank card details, residential addresses, and a comprehensive payment history for another customer and their partner.

b) **Attempted Spoliation of Evidence:** Upon discovering the breach, Respondent's counsel did not formally notify the court of the issue. Instead, as documented in exhibits previously filed, she formally attempted to have the evidence "withdrawn" and "destroyed." This constitutes a clear and documented act of spoliation of evidence and obstruction of an ongoing regulatory investigation.

c) **Deliberate Concealment:** Complainant has since reviewed the official docket for File No. [REDACTED]. As of the date of this filing, there is **no record of Spire or its counsel ever filing a notice of the data breach** in that case. This is in direct and stark contrast to Respondent's actions in this case (**File No.** [REDACTED]), where they did file a notice.

Complainant submits a screenshot of the official docket from **File No. [REDACTED]** as **Exhibit 6** to prove this deliberate concealment.

2. Legal, Ethical, and Regulatory Implications

Respondent's actions demonstrate a profound and systemic failure to uphold its legal and ethical duties. This is not a matter of a simple clerical error but a calculated pattern of misconduct.

- a) **Violation of RSMo § 407.1500:** The disclosure of a customer's Social Security number and bank card information is a direct violation of Missouri's Personal Information Protection Act.
- b) **Attempt to Obstruct Justice:** Respondent's deliberate decision to file in one docket while withholding the same information from a related docket where it was actively trying to get a complaint dismissed is irrefutable proof of a deliberate attempt to obstruct justice.
- c) **Bad Faith and Gross Negligence:** The use of unencrypted files to transmit sensitive data, combined with a documented attempt at a cover-up, goes beyond simple negligence and demonstrates a pattern of bad faith.
- d) **Violation of Professional Conduct:** This selective filing could be a violation of the Missouri Rules of Professional Conduct, which require lawyers to be transparent and honest with the court and all parties.

3. Actionable Fines and Consequences

Due to these violations, Spire is now subject to severe fines and consequences from the Public Service Commission.

- a) **Regulatory Fines:** Under **RSMo § 386.250**, the Commission has the authority to impose significant fines for these regulatory violations, which are intended to punish a utility's bad faith and negligence.
- b) **Civil Lawsuits and Class-Action Risk:** Spire's actions give rise to potential civil lawsuits, where a court could award significant punitive damages, and a class-action lawsuit, which could result in exponentially larger financial liability.

WHEREFORE, Complainant respectfully requests the Commission:

- a) Consider this irrefutable proof of Respondent's egregious misconduct, including a deliberate attempt to conceal information from the Commission and affected parties.
- b) Launch an immediate and comprehensive investigation into Spire's data security protocols and the professional conduct of their legal counsel.

c) Issue any sanctions, penalties, or other relief as is just and reasonable to punish Respondent's bad faith and negligence.

Respectfully submitted,

/s/ Jonathan Miller Jonathan Miller

[REDACTED]

[REDACTED]

[REDACTED]