BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas	)))))	**Case No. GR-2027-0075**

NOTICE OF DEFICIENCY

Issue Date: November 18, 2026

On November 18, 2026, Boardwalk Continuum Marketing, LLC (Boardwalk Continuum) timely filed an application to intervene in the above-captioned case. The application is signed by Greg Staton. The application's signature block identifies Mr. Staton as an attorney licensed in Texas. However, the application does not indicate that Mr. Staton is licensed in Missouri.

Missouri statute Section 484.020, RSMo (2016), restricts the practice of law to licensed attorneys. Consequently, Commission Rule 20 CSR 4240-2.040(3) sets forth the requirements for out-of-state attorneys to practice before the Commission. Missouri Supreme Court Rule 6.01(n) addresses attorneys wishing to appear *pro hac vice*.[1]

[1] Note that the Commission's rule regarding visiting attorneys, 20 CSR 4240-2.040(3)(C), incorrectly cites Missouri Supreme Court Rule 6.01(m) – which provisions have been moved to subdivision (n).

Additionally, Commission Rule 20 CSR 4240-2.040(5) allows non-attorneys that are natural persons to act solely on his or her own behalf and represent only him or herself.[2]

The application to intervene is filed on behalf of Boardwalk Continuum, a limited liability company, rather than by Mr. Staton as a natural person on his own behalf. Additionally, Mr. Staton is not an attorney licensed by the State of Missouri.

Therefore, Boardwalk Continuum's filing is deficient, and the Commission cannot take action on its application to intervene until the deficiency is corrected.

BY THE COMMISSION

Nancy Dippell

Nancy Dippell
Secretary

Charles Hatcher, Senior Regulatory
Law Judge, by delegation of authority
pursuant to Section 386.240, RSMo (2016).

Dated at Jefferson City, Missouri,
on this 18th day of November, 2026.

[2] See also *Clark v. Austin*, 340 Mo 467, 101 S.W. 2d 977 (Mo 1937); *Reed v. Labor and Indus. Relations Com'n*, 789 S.W.2d 19 (Mo 1990).

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

Pursuant to 386.290, RSMo., I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 18th day of November, 2026.

Nancy Dippell
Secretary

MOPSC Digitally signed by MOPSC
Date: 2026.11.18 14:20:30 -06'00'

MISSOURI PUBLIC SERVICE COMMISSION

November 18, 2026

Case No: GR-2027-0075

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Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).[1]

Sincerely,

Nancy Dippell

Nancy Dippell
Secretary

[1] Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.