

# *Riverfork Homeowners Association*

## Objections to Riverfork Water Company's Request for Rate Increase

### Executive Summary

FILED

NOV 30 2015

Missouri Public  
Service Commission

Exhibit No. 3  
Date 11-19-15 Reporter PCY  
File No. WR-2015-0192



# RWC's Failure to Comply with Item 18 of MO PSC Agreement of 11/08/2008

- Water Storage Tank Inspection of 07/29/2008
  - Numerous OSHA violations (ladder and lack of railings)
  - Inadequate roof vent, modifications weakened roof
  - Inadequate overflow pipe, which causes Highway M-140 roadway safety problems
  - Totally failed interior tank lining, which is now resulting in iron oxide sludge and mold in residents' water
  - Totally failed exterior tank paint with mold and algae
  - Inappropriately dimensioned influent pipe, causing residual chlorine problems
  - Overgrown trees, fence problem not corrected for 2 yrs

# RWC's Failure to Comply with Item 20 of MO PSC Agreement of 11/08/2008

- Appendix G—Failure to establish 8:00-5:00, M-F office hours
- Appendix G—Locking of inactive meters
- Appendix G—Falsely shutting of water service to customers who have paid their bills—book-keeping function is in total disarray
- Appendix G—Emergency telephone number is NEVER answered
- Appendix G—Rudeness, denial of legitimate complaints and commonplace profanity by Mr. Brower
- Appendix G—Written service applications STILL not done
- Appendix G—No “Customer Rights and Responsibilities” documentation

# RWC Customer Complaints

- Low water pressure
- Erratic residual chlorine in water
  - MO DNR has cited RWC for excessive residual chlorine
  - MO DNR has admitted that it doesn't test for residual chlorine except when it receives complaints
    - our own tests commonly show 0 ppm residual chlorine, a violation of state law
- Mold, black sludge and organics in water
  - We are aware that hydrogen sulfide is not regulated.
  - RWC consistently denies everything
  - Most of this is directly traceable to the deteriorating storage tank
- Rude and consistently profane response to customer complaints
- Gross lack of maintenance of its facilities
- Refusal to assist construction contractors with new service hook-ups or modifications

# Synopsis of Discussions with MO DNR

- MO DNR inspectors and Water Section managers consistently frustrated with RWC's failure to comply. Mr. Brower has learned that MO DNR is a toothless agency.
  - Mark Rader's (MO DNR) most recent comment:
    - "As long as RWC maintains 20 PSIG minimum pressure and it passes an annual water test, we don't care."
  - MO DNR has yet to agree to test water quality more than once/year.

# CONCLUSIONS

- RWC failed to comply with Items 18 and 20 of MO PSC Agreement of 11/08/2008
- RWC consistently fails to do even the most rudimentary maintenance. Why should a rate increase for maintenance be granted?
- Neither MO PSC nor MO DNR will accept responsibility for doing anything. We believe the reason is financial, on both the State's and RWC's part.
- MO PSC should consider **rescinding** at least part of the rate increase granted in 2008, since RWC has failed to comply with the Agreement.