

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

Michele Goad,)	
)	
Complainant,)	
)	
v.)	File No. WC-2023-0142
)	
Missouri-American Water Company,)	
)	
Respondent.)	

MISSOURI-AMERICAN WATER COMPANY’S ANSWER

COMES NOW the Respondent, Missouri-American Water Company (“MAWC” or “Company”), pursuant to 20 C.S.R. 4240-2.070(8), and for its Answer, respectfully states as follows:

Answer to Formal Complaint

For its Answer to the Formal Complaint of Michele Goad (“Ms. Goad” or “Complainant”), MAWC states as follows:

1. Ms. Goad filed a formal complaint (“Complaint”) with the Commission on October 25, 2022.
2. On October 26, 2022, the Missouri Public Service Commission (“Commission”) issued a *Notice of Complaint and Order Directing Response* giving the Company until November 28, 2022 to file its Answer. This filing complies with that Order.
3. MAWC admits that it provides service to Ms. Goad at 8407 Eulalie Ave., St. Louis, MO 63144.
4. MAWC denies that it is responsible for the water main explosion referenced in the Complaint.
5. MAWC denies the assertion that the integrity of the water line and main were severely compromised.

6. MAWC denies any allegation that it failed to maintain the pipe.
7. MAWC admits that liability is addressed in Rule 3 of the Company's Rules and Regulations Governing the Rendering of Water Service ("Rules and Regulations") Sheet No. R 11, and the document speaks for itself.
8. MAWC admits that "main" is defined in the 3rd Revised Sheet No. R4 of the Company's Rules and Regulations and the document speaks for itself.
9. MAWC admits that Ms. Goad filed a claim with Traveler's Insurance Company in reference to this matter, as referenced in her Complaint.
10. MAWC denies any alleged violation of its Commission approved tariffs, rules or regulations.
11. MAWC denies all allegations of the Complaint not specifically admitted herein.
12. MAWC denies that Ms. Goad is entitled to any relief from this Commission.
13. In further response to Ms. Goad's Complaint, MAWC states that the Complaint fails to state a claim upon which relief may be granted and should be dismissed.

WHEREFORE, having fully answered, MAWC requests that the Commission accept this Answer and further relief as is just and proper under the circumstances.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

/s/ Rachel L. Niemeier

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or U.S. Mail on November 28, 2022, to the following:

Office of the Staff Counsel
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/s/ Rachel L. Niemeier