

Rob Lee

Missouri American Water Company

May 16, 2009

Case # WC-2009-0277

Motion To Compel 2nd Request For Information From MAWC

Requests for information are reasonable and necessary as outlined in MISSOURI RULES OF CIVIL PROCEDURE Rule #56. All information requested is relevant in showing the integrity of the aging and failing water system in question. Much of the information requested in the PSC complaint is different than the information requested in the civil case Rob Lee v. Missouri-American Water Co. MAWC is aware of this fact and claims it is the same information to further undermine this complaint. The civil case Rob Lee v. Missouri-American Water Co. and the PSC complaint are two different entities with two different addresses in two different parts of the state and if I understand correctly with two different purposes. Still MAWC continues to undermine this complaint process and is trying to force me to hire an attorney at my expense when I am prose. This adds unnecessary hardship to my life and makes it impossible for me to participate in the PSC complaint process because of financial status as I have no money to hire an attorney. This seems like a maneuver to force a change in the rules of the

complaint process and shut me out of this process. It is easy to see that MAWC has taken the total denial approach, undermining intelligence, undermining this complaint process and attempting to keep well hidden any records that tell the story of the aged and failing water system in my neighborhood. Eight repairs (That I know of) have been made to this water system near my home since last July or August. This fact alone speaks to the integrity of this water system. MAWC continues to display incompetence and total disregard for customers and citizens of Missouri as they allow water to continue to flow from the ground in several places destroying property, inter structure and my health. I ask that MAWC be compelled to immediately produce all information as requested as the hearing date is nearing.

Rob Lee
Pro se

Rob Lee

Missouri American Water Company

May 5, 2009

Re: Case # WC-2009-0277

2nd Request For Information From MAWC

1. Provide a map of the water system owned or maintained by Missouri American Water Company within one quarter mile radius of my home at 11119 Carl, St. Louis Mo 63138
2. All records of any leak testing performed on the water system in the last 70 years within one quarter mile radius of my home at 11119 Carl, St. Louis Mo 63138. If no records exist please state how MAWC has verified the integrity of its aging water system.
3. A list of all complaints within one quarter mile radius of my home at 11119 Carl, St. Louis Mo 63138 in the last 19 years and the action taken to resolve each complaint.
4. The year each section of the water system was installed
5. Actions being implemented to reduce unaccounted water
6. Convert the total amount of "Non-revenue Water" to the total number of gallons of "Non-revenue Water" for this system.

Rob Lee
Pro se