## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

Sarah Nangle,	)
Complainant,	)
v.	) File No. WC-2021-0227
Missouri-American Water Company,	)
Respondent.	)

## MISSOURI-AMERICAN WATER COMPANY'S RESPONSE TO STAFF REPORT

Comes now Missouri-American Water Company ("MAWC" or "Company) and filed its response to the Missouri Public Service Commission ("Commission") Staff ("Staff") Report and in support states as follows:

- 1. On January 19, 2021, Sarah Nangle ("Complainant" or "Ms. Nangle"), filed a Complaint against MAWC.
- On March 8, 2021, the Commission issued on Order Granting Request for Mediation,
   Suspending Procedural Schedule and Appointing a Mediator.
- 3. On October 6, 2022, the Commission issued a Notice of Termination of Mediation.
- 4. On January 31, 2023, the Staff filed its Staff Report wherein it concluded, among other matters, Staff's investigation uncovered no evidence of overbilling by MAWC.
- 5. On February 2, 2023, the Commission issues an Order Extending Time To Respond to Staff's Report, setting February 16, 2023 as the deadline. This filing complies with that Order.

- 6. The Staff Report concludes that Staff's investigation uncovered no evidence of overbilling by MAWC.
- 7. Staff further recommends that MAWC take the necessary action to recover the remaining balance that is not in dispute from Ms. Nangle.
- 8. MAWC agrees to follow Staff's recommendation and to pursue the amount not in dispute, however given the length of time this complaint has been pending, MAWC proposes to work with Staff on determining the appropriate amount and time period to collect such charges in order to implement its recommendation.

Wherefore MAWC asks the Commission to accept this Response to Staff Report and any such relief the Commission deems appropriate.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

/s/ Rachel L. Niemeier
Tim Luft, #40506
Rachel Niemeier, #56073
Corporate Counsel
Missouri-American Water Company
727 Craig Road
St. Louis, MO 63141
(314) 996-2390 (telephone)
tim.luft@amwater.com
rachel.niemeier@amwater.com

## **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 February 15, 2022, to the following:

Office of the Staff Counsel Governor Office Building Jefferson City, MO 65101 staffcounselservice@psc.mo.gov Office of the Public Counsel Governor Office Building Jefferson City, MO 65101 opcservice@opc.mo.gov Sarah Nangle 11 Lake Forest Drive Richmond Heights, MO 63117 sarahnangle@hotmail.com