

Before The Public Service Commission
of the State of Missouri

Roman Dzhuetuskir

Complainant

Case No. , WC-2010-0215

v

Missouri American Water Company

Respondent

Objections to respondent's supplemental objections and answers, and
original objections and answers to the subpoena

Comes now, Complainant, for his objections and answers, and original subpoena answers by MAWC, as follows:

By order of the MPSC regarding my subpoena, the MAWC had to present "Graphic recording water pressure in the main (system) pipes of 24 hours duration on December 4, 2009 at various points on the system (it will reveal the water pressure fluctuation which triggers water backflow from my pipes into main system).

As of today's day the MAWC has not complied with the MPSC order regarding commission regulation 4CSP-240-10.36(36) and supplied me only partially with graphic recordings at their sites, no main, which has at this point no value. Even at this point there is visible and significant fluctuations, and different pressure levels (between them), there is no indication which of them is a supplier station to my location, and only represent recordings at the station level. Revealing the water pressure in the mains from a particular station (or tank) could show even more fluctuations due to a significant usage (not enough supply at various points and time) or apparently a lot of cracks in the mains, seeping water underground for a long period of time because of deterioration. Even the company showed the closest location (about 1 mile from my house) of the station, there is one more tank (STRT Lodge*) located on the premises, not showing recordings. And even after that there is no understanding which station for my City (if even indicated here, is a distributor, apart from a main pressure affiliated. There could be even another station supplying my City with water.

As the MAWC states again in violation of the law and order, not maintaining the water pressure in the main (and they appeared not truthfull again from the previous answers), I am asking the MPSC to order MAWC supply me with the digital recordings (timely) of the mains in our only City, indicating also which station is a distributor (affiliated) with them, or explain why they in violation of the law, Commission Orders and rules.

As I indicated in my original subpoena and MAWC later objected to it (#2)

"The report from the 2nd crew employees who were phoned by the first one, and arrived on my property in 30min later December 4, 2009, their contact information, including names, address and Ph.#." This document will reflect which tests were conducted on my property and their statement", the company only supplied me with the address of their employment, 1050 Research blv., St. Louis, MO 63132. I would accept this if the place was even partially accessible to the general public directly or through the company appointments. Even the company physically maintained the facility (from the tax room and outside the gates) it is a very highly security place, no signs who it belongs to, trespass signs and no a checkpoint building next to gates. Beside commercial cars no evidence how their employees enter the facility. Any attempts to reach the mentioned employees by mail have been unsuccessful.

I believe I have rights to contact these employees to see if they are the same ones who were on my property, take testimony (if they agree), ask questions and check if they have not been brain washed by their company, and even physically deliver a subpoena if necessary (depending on the circumstances). The MAWC didn't provide me completely with their contact information as I requested motivating of invading their privacy. And providing me with the only above mention address (indicating also the employees didn't provide a report), the company intentionally creates obstacles and a great hardship for me not only for this but completely all the way of the process by not cooperating.

I am asking the MPSC including above mention facts to order the MAWC to provide me with the home address and phone number of the employees 2nd crew, Mr. Chris Gladwill and Mr. Matt Muentkes. If the company still considers to object this, I can still compromise by the arrangement of the company's legal council to meet the employees in a suitable place as soon as possible. If company objects both (either the order if any or compromise) I will consider this as obstructive of law and it may delay our already scheduled hearing, which was based on the company's timely supplied documents and information.

Respectfully submitted.

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