

Rob Lee

Missouri American Water Company

April 20, 2009

Case # WC-2009-0277

Motion To Compel

Requests for information are reasonable and necessary as outlined in MISSOURI RULES OF CIVIL PROCEDURE Rule #56 I ask that Missouri American Water Company be compelled to produce the information as requested.

Rob Lee
Pro se

Rob Lee
11119 Carl
St Louis Mo 63138

MAWC
Legal Department
727 Craig Road
St. Louis, MO 63114

March 23, 2009
Re: Case # WC-2009-0277

Dear Sirs or Madam,

I am writing to request information for the upcoming PSC hearing on case
WC-2009-0277.

1. I am requesting repair records for the last 19 years within a $\frac{1}{4}$ radius of my home at 11119 Carl, St. Louis Mo 63138
2. What testing methods are used to locate leaking water mains.
3. The degree of accuracy of each test.
4. How often are these tests performed.
5. The number of feet of water pipe maintained by MAWC in this $\frac{1}{4}$ mile area.
6. The number of feet of these pipes that have been tested with the ultrasonic type of test.
7. All test records that can substantiate MAWC findings that the water leaking from the ground in my neighborhood is not coming from these pipes.
8. The number of gallons unaccounted for in this water system.

Kind regards

Rob Lee

cc: Matthew Noce
800 Market Street, Suite 2300
St. Louis, MO 63101

Mailed to the two addressed us mail March 23, 2009