

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

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

**MISSOURI-AMERICAN WATER COMPANY’S ANSWER**

COMES NOW the Respondent pursuant to the Order Directing Respondent to File an Answer of November 2, 2022, and states as follows:

1. Sarah Nangle filed a formal Complaint with the Commission on January 19, 2021.
2. This matter was referred to mediation on March 8, 2021. Mediation was not successful.
3. MAWC admits that it provides water service to 11 Lake Forest Drive, Richmond Heights, MO 63117.
4. MAWC denies all the allegations of the Complaint not specifically admitted herein, and MAWC denies that Nangle is entitled to any relief from this Commission.
5. In further response to the Complaint, MAWC states that the Complaint fails to state a claim upon which relief may be granted and should be dismissed.
6. Nangle last paid a water bill on September 28, 2022, over two years ago. This is the despite the fact she has been provided a detailed breakdown of her water usage in 15-minute increments which shows high water usage, particularly on days in which the

irrigation system is on. Pursuant to 4 CSR 240-13.045(5) she shall pay “an amount equal to the charge not in dispute” or face discontinuance of service.

Respectfully submitted,

**MISSOURI-AMERICAN WATER COMPANY**

/s/ Timothy Luft

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing pleading was sent through the Missouri e-Filing system to the registered attorneys of record and to all others by facsimile, hand delivery, electronic mail or US Mail, postage prepaid, to their last known address this 2nd day of November 2022.

/s/ Timothy Luft