

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

Jocelyn Lewis,)	
)	
Complainant,)	
v.)	File No. WC-2023-0166
)	
The Raytown Water Company,)	
)	
Respondent.)	

RESPONSE OF RAYTOWN WATER COMPANY

The Raytown Water Company ("RWC"), makes the following Response to the allegations contained in the Complaint filed by Joycelyn Lewis ("Lewis"):

1. RWC admits the allegations contained in paragraph 1, 2, 3 and 4 of the Complaint.
2. RWC is without information to ascertain the allegations of paragraph 5 of the Complaint and demands strict proof thereof.
3. RWC denies the allegations of paragraphs 6, 7, and 8 of the Complaint and demands strict proof thereof.

AFFIRMATIVE DEFENSES

4. Further Answering, RWC states that the Missouri Public Service Commission lacks jurisdiction over this Complaint.
5. Further responding, RWC states that the Complaint fails to state a claim upon which relief may be granted in that the Complainant is not a party authorized to bring the complaint.

6. Further answering RWC states that the Complaint fails to state a claim upon which relief may be granted in that the Complaint does not allege a violation of any provision of law or of any rule or order or decision of the Commission.

7. Further answering, RWC states that the Complaint fails to state a claim upon which relief may be granted in that the Complaint requests relief that is beyond the Commission's jurisdiction.

8. Further answering RWC states that is has acted in accordance with its tariffs and applicable statutes and regulations.

9. Except as expressly admitted in this response, RWC denies each and every allegation contained in the Complaint.

WHEREFORE, having responded, answered and set forth its affirmative defenses, The Raytown Water Company requests that the Complaint be dismissed, and for such other and further relief as the Commission deems just.

Respectfully submitted,

THE BLAUVELT LAW FIRM, LLC

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