

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

Cordney Travis,)	
)	
Complainant,)	
)	
v.)	File No. WC-2019-0324
)	
Missouri-American Water Company,)	
)	
Respondent.)	

ANSWER TO COMPLAINT AND SUPPLEMENTAL COMPLAINT

COMES NOW the Respondent, Missouri-American Water Company ("MAWC"), and for its Answer to the Complaint filed by Cordney Travis, respectfully states as follows to the Missouri Public Service Commission ("Commission"):

1. MAWC is without sufficient information to admit or deny the allegations of paragraph one of the complaint.
2. MAWC admits the allegation of paragraph two of the complaint.
3. Complainant does not address paragraph three of the complaint. MAWC's address is 727 Craig Road, St. Louis, Missouri 63141.
4. MAWC admits the allegation of paragraph four of the complaint.
5. Regarding paragraph five of the complaint, MAWC admits that Mr. Travis alleges that \$1,664.57 is at issue.
6. Regarding paragraph six of the complaint, MAWC states that Mr. Travis' service was

disconnected due to non-payment on February 3, 2017. In May, 2017, water consumption at Complainants premise was discovered by MAWC. MAWC again shut off the meter in May, 2017 due to inactive consumption. MAWC states that in October, 2017, it was again determined that water consumption was taking place at Complainants premise despite the meter having been shut off in May, 2017.

MAWC further states that the last payment on Mr. Travis' account was received on October 27, 2016. Mr. Travis filed an informal complaint on July 26, 2018 due to non-payment of July 24, 2018. Mr. Travis was informed that he would need to pay \$406.96 in order to get service restored. Mr. Travis did not make a payment on his account. In November 2018, MAWC again determined that consumption was taking place at Complainants premise despite the meter having been shut off on July 24, 2018. During the course of the informal complaint, as an accommodation to Mr. Travis, MAWC agreed to back bill Mr. Travis for only 12 months of usage rather than the 24 months of water consumption by Mr. Travis. MAWC admits that Mr. Travis was back billed for a period greater than 12 months and this has since been corrected.

7. Regarding paragraph seven of the complaint, MAWC states that Mr. Travis filed his complaint on Friday, April 19, 2019 at approximately 4:57 p.m. MAWC did not receive notice that the complaint had been filed until after Mr. Travis' service had been discontinued. Once we were made aware of the complaint, we made every effort to restore service as soon as possible.

8. MAWC is without sufficient information to admit or deny the allegations of paragraph eight of the complaint.

WHEREFORE, having fully answered MAWC requests that Mr. Travis' complaint be dismissed, or that summary determination be issued in favor of MAWC and against Mr. Travis. MAWC requests such other relief and further relief as is just and proper under the circumstances.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

/s/ Timothy W. Luft
Timothy W. Luft, #40506
Missouri-American Water Company
727 Craig Road
St. Louis, MO 63141
(314) 996-2279 (telephone)
(314) 997-2451 (facsimile)
timothy.luft@amwater.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 28th day of May, 2019 to Commission Staff and Office of Public Counsel (opcservice@ded.mo.gov), and sent to Complainant as follows:

Cordney Travis
1922 Damato Court
St. Louis, MO 63138

/s/ Timothy W. Luft