

PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

ROB LEE,)
)
Complainant,)
vs.) Case No. WC-2009-0277
)
MISSOURI-AMERICAN WATER CO.,)
)
Respondent.)

**RESPONDENT'S FIRST SUPPLEMENTAL RESPONSES TO
COMPLAINANT'S 2nd REQUEST FOR INFORMATION**

COMES NOW Respondent, Missouri-American Water Company (hereinafter "MAWC"), by and through its counsel, HeplerBroom LLC, and for its First Supplemental Responses to Complainant's 2nd Request for Information from MAWC, states as follows:

2. All records of any leak testing performed on the water system in the last 70 years within one quarter mile radius of my home at 11119 Carl, St. Louis Mo 63138. If no records exist please state how MAWC has verified the integrity of its (sic) aging water system.

RESPONSE: See Respondent's responses to Request Numbers 1, 6 and 7 of Complainant's First Data Request. See also Attachment #2. Respondent's reference to ten (10) years¹ of records previously produced in the civil lawsuit referred to the "leak testing" conducted in which leaks were actually detected and repaired which are included in Respondent's response to Request Number 1 of Complainant's First Data Request. Respondent further states that its records containing "leak testing" tickets where no leaks were detected only date back to 2002.

Complainant
Exhibit No. 19
Case No(s) WC-2009-0277
Date 6/10/09 Rptr PR

¹ Respondent's response includes all records for the past ten (10) years in compliance with the Commission's Protective Order issued June 2, 2009.

3. A list of all complaints within one quarter mile radius of my home at 11119 Carl, St. Louis Mo 63138 in the last 19 years and the action taken to resolve each complaint.

RESPONSE: See Respondent's responses to Request Numbers 1 of Complainant's First Data Request and Attachment #2 of this Data Request. See also Attachment #3. Respondent's reference to ten (10) years of records previously produced in the civil lawsuit referred to the "complaints" of possible water main leaks where leaks were actually detected and repaired which are included in Respondent's response to Request Number 1 of Complainant's First Data Request. Respondent further states that its electronic records containing "complaints" of possible water main leaks where no leaks were actually detected only date back to 2002.

6. Convert the total amount of "Non-revenue Water" to the total number of gallons of "Non-revenue Water" for this system.

RESPONSE: The following are figures for non-revenue water (in 1,000 gallons) in MAWC's St. Louis County System:

1999 = 10,076,954
2000 = 8,602,813
2001 = 8,992,050
2002 = 11,067,844
2003 = 13,001,695
2004 = 11,400,842
2005 = 12,080,994
2006 = 10,784,980
2007 = 13,176,294
2008 = 11,688,985

HEPLERBROOM, LLC

By: /s/ Matthew H. Noce

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