

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

Rob Lee,)	
)	
Complainant,)	
)	
v.)	Case No. WC-2009-0277
)	
Missouri American Water Company,)	
)	
Respondent.)	

STAFF MEMORANDUM

COMES NOW Staff of the Public Service Commission of Missouri (Staff), and for its suggestions, states:

1. On January 27, 2009, Rob Lee filed a complaint against Missouri American Water Company (MAWC or Company). On February 3, 2009, Mr. Lee filed an email with additional documentation. On March 20, 2009, Mr. Lee filed four more complaint forms. On April 6, 2009, Mr. Lee filed two amendments to the complaint.

2. Complainant alleges that there has been continuous leaking in his basement for the last 19 years as a result of leaks in the MAWC system. Complainant further alleges water leaks throughout his neighborhood from MAWC water mains. Complainant has provided the Commission with photographs and videos of the alleged leaks in his basement and neighborhood.

3. The Commission ordered all parties to file a memorandum setting forth its suggestions as to whether all locations should be joined in one contested case, whether some locations should be severed into separate contested cases, and the procedure required for each location alleged.

4. Staff recommends joining all the complaints together in one contested case due to the similar nature of each complaint, the same or substantially similar relief requested in each complaint and in the interests of judicial economy.

5. Each of Mr. Lee's different complaints alleges MAWC's water main leaks in and around Mr. Lee's neighborhood.

6. Each of Mr. Lee's different complaints seeks the same or substantially similar relief: For MAWC to repair the leaking water mains in Mr. Lee's neighborhood so that his basement stops leaking.

7. Consolidation of Mr. Lee's various complaints would facilitate judicial efficiency and minimize duplication of effort in the operation of the Commission.

WHEREFORE, the Staff submits its Staff Memorandum in support of one consolidated complaint case as directed by the Commission.

Respectfully submitted,

/s/ **Sam Ritchie**

Sam Ritchie

Legal Counsel

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronic mail to all counsel of record this 15th day of April, 2009.

/s/ Sam Ritchie