

PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

**RESPONDENT'S SECOND SUPPLEMENTAL RESPONSES TO
COMPLAINANT'S FIRST DATA REQUESTS**

COMES NOW, Respondent, Missouri-American Water Company, by and through its counsel, and files its Second Supplemental Responses to Complainant's First Data Requests:

1. Repair records for last nineteen (19) years within a 1/4 mile radius of 11119 Carl, St.

RESPONSE: See Attachment #1.¹

2. What testing methods used to locate leaking water mains.

RESPONSE: Water characteristic sampling; visual observations; sounding methods by use of either correlating equipment or amplification instruments. Respondent further states see deposition of Derek Linam given in civil action styled Rob Lee v. Missouri-American Water Co., pending in Division 15 of St. Louis County Circuit Court, Cause No. 08SL-CC001242 attached hereto.

Complainant
Exhibit No. 18
Case No(s) WC-2009-0277
Date 6-10-09 Rptr PE

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

3. The degree of accuracy of each test.

RESPONSE: Correlating and testing methods employed by MAWC are considered to be highly accurate and consistent with known industry practices.

4. How often are these tests performed.

RESPONSE: When MAWC receives notification of a possible water main leak or break.

5. The number of feet of water pipe maintained by MAWC in this 1/4 mile area.

RESPONSE: McQuay – 787 feet;
Larimore – 2093 feet;
Lydia – 1,731 feet;
Lilac – 1,616 feet;
Duberry – 365 feet;
Red River – 920 feet;
Taos – 199 feet.

Starshine Dr
Dunklin Dr
Sunrise Dr
Coal Bank
Coal Bank QT

6. The number of feet of these pipes that have been tested with the ultrasonic type of test.

RESPONSE: See Attachment #6 which is all such tests conducted within a 1/4 mile radius of Complainant's. Respondent states that its records of such tests only go back until 2002.

7. All test records that can substantiate MAWC findings that the water leaking from the ground in my neighborhood is not coming from these pipes.

RESPONSE: See Attachment ##6 and 7 which are all such test records conducted within a 1/4 mile radius of Complainant's home. Respondent states that its records of such tests only go back until 2002.

IN 7
8. The number of gallons unaccounted for in this water system.

RESPONSE: MAWC has been tracking unaccounted for water in its St. Louis County system since 2007. The following are figures for unaccounted for water (in 1,000 gallons):

2007 = 12,408,753

2008 = 10,566,842

HEPLERBROOM, LLC

By: /s/ Matthew H. Noce

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