

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

Gene Koverman,)	
)	
Complainant,)	
)	Case No. WC-2014-0358
v.)	
)	
Missouri-American Water Company,)	
)	
Respondent.)	

**ENTRY OF APPEARANCE, ANSWER AND STATEMENT REGARDING METER PRESERVATION OF
MISSOURI-AMERICAN WATER COMPANY**

Comes now, Timothy W. Luft and enters his appearance on behalf of Missouri-American Water Company in this proceeding.

ANSWER AND STATEMENT REGARDING METER PRESERVATION

Comes now, Missouri-American Water Company (“MAWC”), by and through counsel, and for its Answer to the Complaint of Gene Koverman (“Koverman”) states as follows:

1. On June 17, 2014, Koverman, with a mailing address of 725 Judson Manor Drive, St. Louis, Missouri, 63141, filed a complaint against MAWC (the “Complaint”).

2. The subject of Mr. Koverman’s complaint are bills for service provided at 10952 Whitehall Manor, Bridgeton, Missouri. The Complainant is not a customer of MAWC at that address. MAWC’s customer at that address is a Limited Liability Corporation, “Gene’s Properties, L.L.C.”.

3. Under 4 CSR 240.-2.040(5), Koverman is “strictly limited to the appearance of an natural person on his or her own behalf and shall not be made for any other person or entity.”

4. Accordingly, Koverman, who is not an attorney, may not represent the Limited Liability Corporation that is the customer in this matter.

5. Any allegation not specifically admitted herein by MAWC is denied.

6. In response to the allegations of paragraph 1 of Koverman's Complaint, MAWC admits that it is a public utility under the jurisdiction of the Public Service Commission of the State of Missouri.

7. MAWC further notes that its principal location is at 727 Craig Road, St. Louis, Missouri 63141.

8. In response to the allegations of paragraph 2 of the Complaint, MAWC states that on January 31, 2014, it received a request for a meter change at 10952 Whitehall Manor, Bridgeton, Missouri, without a complaint regarding a high bill or usage.

9. On February 4, 2014, MAWC removed and replaced the meter at 10952 Whitehall Manor in Bridgeton, Missouri, per this request. The new meter that was installed was tested by the manufacturer prior to installation and passed that test in accordance with all regulatory requirements.

10. At the time of the meter replacement, there was no request that the meter be tested, and there was no complaint about the meter's performance. Therefore, pursuant to MAWC's tariffs, the meter was not tested.

11. The meter was sent to salvage on February 12, 2014, and is no longer in MAWC's possession.

12. The first contact with MAWC with regard to billing concerns was on April 21, 2014, after the meter had been replaced and salvaged.

13. MAWC denies that it overcharged Complainant or that it owes any adjustment to the past bills of the Limited Liability Corporation. The Company is not aware of the reasons for any changes in Limited Liability Corporation's usage, but denies any such changes are related to the meter it replaced.

14. The following attorney should be served with all pleadings in this case:

Timothy W. Luft #40506
Vice President Legal and Secretary
622 Craig Road
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WHEREFORE, Missouri-American Water Company respectfully requests that the Missouri Public Service Commission dismiss the Complaint with prejudice.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

By: /s/ Timothy W. Luft
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was filed electronically and served either electronically or mailed postage prepaid the 9th day of July, 2014, to:

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