

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

George L. Eliceiri,	)	
	)	
Complainant,	)	
	)	
v.	)	File No. WC-2019-0271
	)	
Missouri-American Water Company,	)	
	)	
Respondent.	)	

**ANSWER TO COMPLAINT AND MOTION TO REFER COMPLAINT TO MEDIATION**

COMES NOW the Respondent, Missouri-American Water Company (“MAWC”), and for its Answer to the Complaint filed by George L. Eliceiri, 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 allegations of paragraphs two and three of the complaint.
3. Regarding paragraph four of the complaint, MAWC admits that Dr. Eliceiri alleges that \$786.00 is at issue.
4. Regarding paragraph 5 of the complaint, MAWC states that the meter was changed on June 10, 2009 due to length of service. MAWC admits that a new meter was installed on December 8, 2018 and further states that this new meter was installed due to the prior meter being incompatible with an Advanced Metering Infrastructure reading device. MAWC admits providing water usage information to Dr. Eliceiri. As to the remaining allegations

of paragraph 5A and the allegations in 5B, MAWC is without sufficient information to admit or deny the allegations and therefore denies the allegations.

5. Regarding paragraph 5C of the complaint, MAWC admits that the old meter was removed. As to the remaining allegations in paragraph 5C, MAWC is without sufficient information to admit or deny the allegations and therefore denies the allegations. MAWC further states as follows:

a. The meter at the subject property was removed on December 8, 2018 and a new meter was installed due to the prior meter being incompatible with an Advanced Metering Infrastructure reading device.

b. Upon removal of the meter, Dr. Eliceiri did not request that the meter be tested.

6. Regarding paragraph 6 of the complaint, MAWC states that Dr. Eliceiri's last payment to MAWC was on April 1, 2019. As to the remaining allegations in paragraph 6, MAWC is either without sufficient information to admit or deny the allegations and therefore denies the allegations.

7. MAWC denies all allegations of the complaint not admitted above and states that it has not violated any law, rule, or Commission order with regard to Dr. Eliceiri's allegations as set forth in his complaint.

8. Regarding paragraph 8 of the complaint, MAWC admits working with Dr. Eliceiri toward a resolution of this matter. When it appeared that Dr. Eliceiri was not satisfied with our decision, it was suggested that Dr. Eliceiri contact the Missouri Public Service Commission. As to the remaining allegations in paragraph 8, MAWC is either without sufficient information to admit or deny the allegations or denies the allegations.

9. MAWC has agreed to engage in a mediation with Dr. Eliceiri in an effort to amicably resolve this matter. Senior Staff Counsel Whitney Payne has stated that the Complainant is agreeable to mediation.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

/s/ Timothy W. Luft  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 18th day of April, 2019 to Commission Staff and Office of Public Counsel ([opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)), and sent to Complainant as follows:

George Eliceiri  
[gleliceiri@gmail.com](mailto:gleliceiri@gmail.com)

/s/ Timothy W. Luft