

Kenneth C. Jones Corporate Counsel Central Region

January 10, 2006

VIA OVERNIGHT DELIVERY

Colleen M. Dale Secretary of the Public Service Commission Governor Office Building 200 Madison Street P.O. Box 360 Jefferson City, Missouri 65102 **FILED**^₄

JAN 11 2006

Missouri Public Service Commission

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RE: Roverman v. Missouri-American Water Company, Case No. WC-2006-0248

Dear Ms. Dale:

Enclosed please find for filing an original and nine copies of Respondent Missouri-American Water Company's Answer in the above-referenced matter. Please return a file-stamped copy of the Answer in the enclosed self-addressed stamped envelope.

Thank you.

Sincerely,

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Kenneth C. Jones

Encl.

American Water

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)) JAN 11 2006

Gene Roverman,

Complainant,

v.

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Missouri-American Water Company,

Respondent.

Missouri Public Service Commission

Case No. WC-2006-0248

<u>ANSWER</u>

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COMES NOW Respondent Missouri-American Water Company (hereinafter "MAWC") and for its Answer to the Complaint of Gene Roverman (hereinafter "Complainant") states as follows:

1. MAWC is a public utility under the jurisdiction of the Public Service Commission of the State of Missouri.

2. Complainant is the owner of a four-unit apartment complex in St. Louis County, Missouri, 10952 Whitehall Manor Drive, which is the subject of this Complaint.

3. Complainant asserts that the \$386.30 water bill that he received in July for usage during the second quarter of 2005 is too high – "I think that bill is double, than regular bills for 4 units apartment," as he states in his Complaint.

4. Complainant's account history for 2004 and 2005 (attached hereto as Exhibit A) is as follows:

01/15/2004	\$219.01
04/14/2004	\$224.05
07/14/2004	\$265.66
10/14/2004	\$260.91
01/17/2005	\$227.12
04/15/2005	\$163.13
07/15/2005	\$386.30
10/12/2005	\$203.27

5. Complainant contacted MAWC after receipt of his July 2005 water bill and asked that his meter be inspected. On July 22, 2005, Field Service Representative Amy Heath checked Complainant's meter and found no problems with it.

6. Complainant again contacted MAWC, requesting another inspection. On July 28, 2005, Field Service Representative Al Rogers checked Complainant's meter and also found that the meter, which showed a slight registration, was not damaged and had not been tampered with. Complainant requested that the meter be taken apart and inspected internally. Rogers stated that this was not possible on site, but that such an inspection could be done by bringing the meter to MAWC's service center. Complainant declined. Rogers also stated that in general, if a meter is not functioning properly, this is to the advantage of the customer – a bad meter "slows down" and does not measure the full extent of water usage. In any case, Rogers stated that the meter was working properly, and that the higher bill could be attributed to either an internal plumbing leak at the apartment complex or increased water usage by Complainant's tenants.

7. MAWC notes that the next water bill received by Complainant following the \$386.30 July 2005 bill was in October 2005 and was in the amount of \$203.27. Clearly, there was no mechanical problem with the meter incorrectly registering high usage, because his bill decreased significantly in October 2005.

8. Regarding Complainant's sewer bill from the Metropolitan St. Louis Sewer District (hereinafter "MSD"), Complainant is incorrect in stating that his sewer bill increased because of the higher usage recorded on his July 2005 water bill. In fact, MSD determines its sewer charges based on water usage data collected in the winter months – that is, water usage for the first quarter. Accordingly, Complainant's MSD bill was not

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affected by the water usage recorded on his July 2005 water bill, which reflects second quarter water usage.

9. Except as expressly stated herein, MAWC denies each and every other allegation contained in the Complaint.

WHEREFORE, Respondent Missouri American Water Company prays that the Public Service Commission of the State of Missouri dismiss the Complaint with prejudice at Complainant's cost.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

By:

Kenneth C. Jones, MBE#38498 727 Craig Road St. Louis, MO 63141 kenneth.jones@amwater.com (314) 996-2278 (telephone) (314) 997-2451 (telefax)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was mailed postage prepaid the 10th day of January, 2006, to:

Dana K. Joyce General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Gene Roverman 10952 Whitehall Manor Dr. Bridgeton, MO 63044 Lewis R. Mills, Jr. Public Counsel Missouri Office of Public Counsel P.O. Box 2230 Jefferson City, MO 65102-2230

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MCMILLRL

Missouri (MOPR) Production

Ledger Information Report

Account # 617887-5 Gene's Properties LLC

Bill Date	Туре	Amount	Balance
Service Address	10952	Whitehall Manor Dr	
10/19/2005 10/12/2005 8/15/2005 7/15/2005 4/26/2005 1/27/2005 1/27/2005 10/26/2004 10/14/2004 7/14/2004 4/21/2004 4/21/2004 4/14/2004 1/26/2004 1/15/2004	PMT CHG PMT CHG LKB CHG LKB CHG LKB CHG LKB CHG LKB CHG LKB CHG	203.27CR 203.27 386.30CR 386.30 163.13CR 163.13 227.12CR 227.12 260.91CR 265.66CR 265.66 224.05CR 224.05 219.01CR 219.01	.00 203.27 .00 386.30 .00 163.13 .00 227.12 .00 260.91 .00 265.66 .00 224.05 .00 219.01

Current	31 - 60	61 - 90	Over 90
.00	.00	.00	.00
Aged Total	Unposted \$	Adjustments	Balance
.00	.00	.00	.00

Exhibit A