

THE VLASATY LAW FIRM, LLC

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Attorneys at Law*

FILED
March 6, 2023
Missouri Public
Service Commission

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March 1, 2023

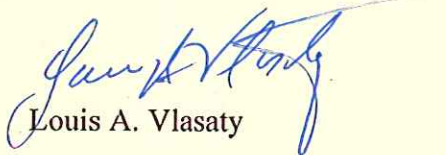
Secretary of the Missouri Public Service Commission
Attn: Data Center
P.O. Box 360
Jefferson City, MO 65102-0360

RE: Union Corporate Realty LLC v Missouri American Water
Case no. C202300441

Gentlemen,

This is to advise that the undersigned represents Union Corporate Realty LLC regarding its dispute with Missouri American Water. Attached please find a formal complaint on behalf of my client. Please acknowledge receipt of the complaint and advise me of the case number for the complaint. Thank you for your cooperation in this matter.

Sincerely,


Louis A. Vlasaty

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

UNION CORPORATE REALTY LLC)	
)	
Complainant,)	File Number:
)	
vs.)	
)	
MISSOURI AMERICAN WATER)	
)	
Respondent)	

COMPLAINT

Comes now Complainant and for its claim against the Respondent states as follows:

1. Complainant resides at 8123 Delmar Blvd St Louis, MO 63130.
2. The utility service complained of was received at 7300 Dartmouth Ave., St Louis, MO 63130.
3. The Respondent's address is P.O. Box 91623 Rantoul, IL 61866-8623.
4. Respondent is a public utility under the jurisdiction of the Missouri Public Service Commission.
5. The amount at issue is \$2,667.00
6. Complainant now requests the following relief; Complaint has had service at the above location for more than 5years. The average water bill during that time period has been approximately \$50.00 per month. That during July, August and September 2022 the water bill exceeded \$1,600.00. Complainant researched to see if there was any unusual use by the tenants

and could find none. Complainant contacted the Respondent on numerous occasions and advised them that there was no extraordinary use. The Respondent indicated that it routinely makes a one time adjustment to the bill if, and only if, there is a leak and a repair made. Since the cause of the use in this this case is idiopathic, Respondent has refused to make any adjustment. Complainant states that it is entitled to the rate adjustment.

7. The relief requested is appropriate because Respondent has violated the tariff by instituting an arbitrary and capricious policy which is not applied on an equal and fair basis and as such is in violation of the tariff controlled by the Public Service Commission
8. Complainant has contacted the Respondent on numerous occasions to resolve the matter. On or about November 15, Complainant filed a complaint with the Missouri Public Service Commission in an attempt to resolve the matter. Shortly thereafter the Complainant was advised that the Respondent would only agree to a one time adjustment which Complainant accepted and the matter was closed. On December 19, 2022, Complainant contacted the Respondent and was advised the credit adjustment would appear on the following bill. The credit did not appear on the following bill. Complainant contacted Respondent on January 17, 2023 at which time Respondent stated that the credit would be issued on the February statement. No credit was issued. Upon further contact Respondent stated it would not issue a credit. At that point Complainant

advised the Public Service Commission, who reopened the case on
February 17, 2023.

Respectfully submitted,

The Vlasaty Law Firm LLC



By Louis A. Vlasaty, #27502
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