

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

Marcia Eason,	)	
	)	
Complainant,	)	
	)	Case No. WC-2013-0010
v.	)	
	)	
Missouri-American Water Company,	)	
	)	
Respondent.	)	

**ANSWER AND AFFIRMATIVE DEFENSE OF MISSOURI-AMERICAN WATER COMPANY**

COMES now Respondent Missouri-American Water Company ("MAWC") and for its Answer to the Complaint of Marcia Eason ("Complainant"), states as follows:

1. *Respondent Missouri American Water of 727 Craig Rd, St. Louis, Missouri, is a public utility under the jurisdiction of the Public Service Commission of the State of Missouri.*

Answer: MAWC admits that it is a public utility under the jurisdiction of the Public Service Commission of the State of Missouri with an address of 727 Craig Rd, St. Louis, Missouri.

2. *(a) As the basis of this complaint, Complainant states the following facts:*  
*I am being charged an extremely high bill for a residential property. My son and I live at the residence, and according to meter reading we are using 86,000 gallons of water for a quarter, I am working between the hours of 11:45 - 8:30, M-F, I don't know how it is possible to consume this much water.*

Answer: Complainant's February 2012 bill showed that 86,250 gallons were used during the period of November 2011 through February 2012. MAWC investigated the usage in March 2012 and May 2012, and both readings were found to be correct. MAWC is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 2 (a) and therefore denies the same.

*b. I've had a professional plumber to come to my residence, to see if I had leaks, no leaks on the premises.*

Answer: MAWC is without knowledge or information sufficient to form a belief as to the truth of the averments contained in paragraph 2(b) and therefore denies the same.

*c. There was a major water leak about 2 doors from me about four months ago please review, something not right here.*

Answer: MAWC is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2(c) and therefore denies the same.

*d. I've contacted customer service, Missouri American Water four times to get the issue somehow resolved, they changed meter twice according to customer service reps, will not allow speak with escalation parties (no supervisor).*

Answer: MAWC's records show that the Complainant first contacted MAWC for this particular complaint on February 16, 2012 with complaints of a high bill. MAWC issued a service order to address her issue. Thereafter, she called on February 29, 2012 at which time she said that something was wrong with her meter. She asked for a supervisor. A supervisor was given her number and attempted to call her back but the phone went unanswered. On March 1, 2012, Ms. Eason called back to provide the best times that a supervisor could call her back to discuss the matter. On March 8, 2012, MAWC had a discussion with Ms. Eason, where she claimed that she has no water leaks, and that she had not repaired any leaks in the home. On April 26, 2012 she called to dispute her bill again, and MAWC issued another service order. On May 1, 2012 she called back to complain about a high bill. MAWC informed her that there was no movement on the meter showing a leak in the home. MAWC explained to her that there were no leaks found in her home and provided her the meter test results, at which time Complainant hung up the phone. At this point MAWC escalated her complaint over the supervisor level

to our PSC liaison. On June 20, 2012 she requested her billing statement and again advised that she is disputing her bill.

MAWC admits that Complainant's meter was changed on or about November 2009 and again on March 22, 2012. The meter removed from the Complainant's property in March 2012 was tested. The meter tested within permissible limits at the high, medium and low flow rates at 99.40%, 100.70%, and 98.00% respectively. MAWC is without knowledge or information sufficient to form a belief as to the truth of the remaining claims contained in paragraph 2(d) and therefore denies the same.

*e. According to MAWC and both reading of meters, the readings are accurate.*

Answer: MAWC restates it's answer as set forth above in paragraph 2(d).

*f. I then contacted Missouri Public Service Commission.*

Answer: MAWC admits the allegations contained within paragraph 2(f).

*g. I don't feel this bill is accurate and fair. Please review accounting records. Give dates and times of extreme usage to get to bottom of reason I'm being charged this extreme amount. Resolve bill issue.*

Answer: MAWC denies that its bill is inaccurate. Complainant's meter was tested on February 17, 2012 and again on April 27, 2012 and both readings were accurate and no leaks were found. Further answering, as stated above, upon investigation of the meter that was replaced, it tested within permissible limits. MAWC further investigated during a visit on July 17, 2012 and found movement on the meter that would be consistent with a leak on the customer's side. MAWC is not aware of the reasons for any changes in Complainant's usage but denies it was related to the meter that was replaced.

#### AFFIRMATIVE DEFENSE

1. MAWC states that Complainant fails to state a claim upon which relief may be granted.

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

Respectfully submitted,

**MISSOURI-AMERICAN WATER COMPANY**

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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 8<sup>th</sup> day of August, 2012, to:

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