BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Charles Harter,)
Complainant,))
V.)
Missouri-American Water Company,)
Respondent.)

File No. WC-2023-0106

MISSOURI-AMERICAN WATER COMPANY'S ANSWER

COMES NOW the Respondent, Missouri-American Water Company ("MAWC" or "Company"), pursuant to the *Order Giving Notice of Case Filing, Directing Filing of Answer and Directing Staff Investigation*, issued herein on September 19, 2022, and 20 C.S.R. 4240-2.117(1), and for its Answer, respectfully states as follows to the Missouri Public Service Commission ("Commission"):

- ^{1.} Mr. Harter ("Mr. Harter" or "Complainant") filed a formal complaint ("Complaint") with the Commission on September 16, 2022.
- On September 19, 2022, the Commission issued an Order Giving Notice of Case Filing, Directing Filing of Answer and Directing Staff Investigation giving the Company until October 19, 2022 to file its Answer. This filing complies with that Order.
- 3. MAWC admits that it provides service to 827 Sappington, St. Louis, MO 63126.
- MAWC admits that it has entered a payment agreement with Complainant on February 11, 2022, as indicated on the bill attached to Mr. Harter's Complaint.
- MAWC denies Complainant's assertion that the Company violated Commission Rule 20 CSR 4240-13.040(2)(A).
- MAWC denies Complainant's assertion that the Company violated Commission Rule 20 CSR 4240-13.060(2).

- MAWC denies Complainant's assertion that the Company did not answer the phone or was unhelpful when reached by Complainant.
- 8. MAWC is without sufficient information to admit or deny and therefore denies Complainant's assertion that he "called repeatedly fruitlessly" as described in the Complaint.
- MAWC denies all allegations of the Complaint not specifically admitted herein, and MAWC denies that Mr. Harter is entitled to any relief from this Commission.
- 10. In further response to Mr. Harter's Complaint, MAWC states that the Complaint fails to state a claim upon which relief may be granted and should be dismissed.

WHEREFORE, MAWC requests that the Commission accept this Answer and further relief as is

just and proper under the circumstances.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

<u>/s/ Rachel L. Niemeier</u> Tim Luft, #40506 Rachel Niemeier, #56073 Corporate Counsel Missouri-American Water Company 727 Craig Road St. Louis, MO 63141 (314) 996-2390 (telephone) tim.luft@amwater.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or U.S. Mail on October 19, 2022, to the following:

Office of the Staff Counsel Governor Office Building Jefferson City, MO 65101 <u>staffcounselservice@psc.mo.gov</u>

Mr. Charles Harter 827 Sappington, St. Louis, MO 63126 harleycharter@sbcglobal.net Office of the Public Counsel Governor Office Building Jefferson City, MO 65101 opcservice@opc.mo.gov

/s/ Rachel L. Niemeier