

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

Louis DeFeo,)	
)	
Complainant,)	
)	
vs.)	Case No. WC-2021-0075
)	
Missouri American Water Company,)	
)	
Respondent.)	

**Public Counsel’s Response to
Recommended Report and Order**

COMES NOW the Office of the Public Counsel (“OPC”) and offers this response to the Recommended Report and Order issued by the Regulatory Law Judge on February 28, 2022.

The OPC appreciates this opportunity to provide feedback on the Recommended Report and Order, and respectfully requests that the Commission not issue a final order in this case until after a thorough investigation into the high water usage readings experienced by customers of Missouri American Water Company (MAWC) over the past several years.

In the pending complaint case of *Rudolph v MAWC* (Case No. WC-2022-0162), another high usage complaint case, the Commission’s Staff filed a recommendation that states; “Staff has seen an increase in the number of customer complaints against MAWC about temporary, unexplained high

water meter readings.” After recommending the Commission find in favor of the complainant, the Staff recommends:

Staff recommends MAWC be ordered to investigate its high bill complaints for the past three years and prepare a report to the Manager of the Water, Sewer, & Steam Department (“Water Manager”), contain the following information for each complaint: customer name, address, meter size, meter brand, meter install date, system operating pressure at that meter, daily billing information for the period of high meter readings, company determination for the cause of the leak based on evidence, and any relief given to the customer.¹

The OPC shares the Staff’s concern with MAWC’s high usage readings and recommends the Commission order an investigation and withhold from issuing an order in the present case until the investigation is complete.

The OPC also recommends that:

1. MAWC submit its report into a separate docket opened for purposes of conducting the investigation;
2. The complaints to be included in the report include all formal and informal high usage complaints and inquiries received by the Commission and MAWC;
3. The data collected also include data on advanced metering infrastructure (AMI) devices, including the brand, model, manufacture date, and install date; and all information in MAWC’s

¹ Staff Report and Recommendation, Case No. WC-2022-0162, March 1, 2022, pp. 4-5.

possession and available to MAWC and its parent company regarding issues with faulty meters and faulty AMI devices; and

4. The Staff, OPC and any other interested party have an opportunity to provide feedback on the report and offer any recommendations to the Commission, such as a request for additional investigations into these issues.

WHEREFORE, the Office of the Public Counsel respectfully offers this response to the Recommended Report and Order.

Respectfully submitted,

/s/ Marc Poston

Marc Poston (Mo Bar #45722)
Missouri Office of Public Counsel
P. O. Box 2230
Jefferson City MO 65102
(573) 751-5318
(573) 751-5562 FAX
marc.poston@opc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 10th day of March, 2022.

/s/ Marc Poston
