

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

Robert Spicer,	)	
	)	
Complainant,	)	
	)	
vs.	)	File No. WC-2017-0234
	)	
Missouri-American Water Company,	)	
	)	
Respondent.	)	

**ANSWER TO COMPLAINT**

COMES NOW the Respondent, Missouri-American Water Company (“MAWC” or the “Company”), pursuant to the *Notice of Contested Case and Orders for Small Formal Complaint*, issued herein on March 13, 2017, and 4 C.S.R. 240-2.070, and for its Answer to the Complaint filed herein by Robert Spicer (“Mr. Spicer”), respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. MAWC admits the allegations of paragraph one of Mr. Spicer’s complaint filed herein.
2. With regard to paragraph two of the complaint, MAWC admits that Mr. Spicer contacted the Company in 2014 and that his meter was replaced at that time, that Mr. Spicer has failed and refused to pay a portion of his bill (\$500), and that MAWC sent a disconnection letter to Mr. Spicer due to nonpayment; MAWC denies any wrongdoing or liability in connection with the claim of Mr. Spicer; MAWC is without sufficient information or belief to admit or deny the remaining allegations of paragraph two of the complaint.
3. With regard to paragraph three of the complaint, MAWC admits that Mr. Spicer contacted the Company about his allegations and nonpayment; MAWC denies any

wrongdoing or liability in connection with the claim of Mr. Spicer; MAWC is without sufficient information or belief to admit or deny the remaining allegations of paragraph three of the complaint.

4. MAWC denies all allegations of the complaint not admitted above, and MAWC admits no wrongdoing or liability in connection with the claim of Mr. Spicer.

WHEREFORE, having fully answered, MAWC requests that Mr. Spicer's complaint be dismissed, or that summary determination be issued in favor of MAWC and against Mr. Spicer. MAWC requests such other and further relief as is just and proper under the circumstances.

Respectfully submitted,

**BRYDON, SWEARENGEN & ENGLAND, P.C.**

By: /s/ Diana C. Carter  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail on this 10<sup>th</sup> day of April, 2017, to Commission Staff, the Office of the Public Counsel, and the Complainant (spiceman199@aol.com).

/s/ Diana C. Carter