

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

Charles Harter,)	
)	
Complainant,)	
)	Case No. WC-2013-0468
v.)	SMALL FORMAL COMPLAINT
)	
Missouri-American Water Company,)	
)	
Respondent.)	

MOTION FOR AUTHORITY TO TERMINATE SERVICE

COMES now Respondent Missouri-American Water Company ("MAWC") and for its Motion for Authority to Terminate Service, states as follows:

1. On April 22, 2013, Complainant filed a complaint against MAWC (the "Complaint"). The Complaint alleges that MAWC refuses to honor payment agreements; hires third party contractors handle disconnections; does not provide proper notice prior to disconnection; and improperly charged Complainant \$**.** to reconnect his service.
2. The total amount in dispute in this matter is \$**.**.
3. Complainant's last payment to MAWC was a partial payment on May 1, 2013 for \$**.** leaving a balance at that time of \$***.**.
4. Complainant's current balance is \$***.**. Therefore, after subtracting the \$**.** in dispute in this matter, the undisputed amount of his bill is \$***.**.
5. Missouri Public Service Commission Rules do not provide that Complainant receive water service, free of charge, during the pendency of a complaint. In fact, MAWC is statutorily prohibited from directly or indirectly charging, demanding, collecting or receiving less compensation for utility service from any person than it charges from any other person for a like and contemporaneous service. Sec. 393.130.2 RSMo.

6. MAWC requests authority to discontinue service to Complainant pursuant to the procedures outlined in 4 CSR 240-13.050 based on Complainant's failure to pay the undisputed amount of his bill (\$574.56), which is due and owing and has been so for more than four (4) working days from the date of this dispute and beyond the delinquent date of Complainant's bill. See Commission Rule 4 CSR 240-13.045(7).

WHEREFORE, Missouri-American Water Company respectfully requests an order for the Commission allowing it to discontinue service in accordance with Missouri Public Service Commission rules for Complainant's failure to pay for water service for the undisputed portion of his bill.

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 to all counsel of record this 20th day of September, 2013.

/s/ Timothy W. Luft