

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

Roman Dzhurinskiy,)	
)	
Complainant,)	
)	Case No. WC-2010-0215
v.)	
)	
Missouri-American Water Company,)	
)	
Respondent.)	

**SECOND SUPPLEMENTAL OBJECTIONS AND ANSWERS TO
COMPLAINANT'S REQUEST FOR A SUBPOENA**

COMES NOW Respondent Missouri-American Water Company (MAWC) and for its Supplemental Objections and Answers to Complainant's Request for a Subpoena, in response to the Missouri Public Service Commission's Order dated September 14, 2010, states as follows:

Request 3: Graphic recording water pressure in the main pipes of 24 hours duration on December 4, 2009 at various points on the system. (It will reveal the water pressure fluctuations which triggers water backflow from my pipes into main system).

Objection: MAWC objects that Request 3 is irrelevant, immaterial, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence, in that it seeks information about MAWC's entire St. Louis County distribution system, which includes approximately 4,200 miles of main, and not areas near Complainant's residence. Without waiving said objection, MAWC states that it does not measure or record pressure in its water mains.

Further answering, MAWC states that it maintains graphic recording pressure gauges at sites throughout its St. Louis County system, but not "in the main pipes" as requested by Complainant. Attached hereto is a graphic showing the water pressure at three points for the

24-hour period of December 4, 2009: Stratmann Tank, 9989 Old Olive Street Road (about one mile from Complainant's residence); Overland Gauge, 10417 Lackland Road (about three miles from Complainant's residence); and Walton Tank, 8606 Lackland Road (about four miles from Complainant's residence).

Further answering, and in response to an oral request by Complainant, MAWC states that the water in the main that serves Complainant's residence is last measured for pressure at the Stratmann Tank site (one tank flows into the other tank, so there is only one discharge point from the Stratmann Tank site). The pressure in the main serving Complainant's residence will generally be about 5 to 8 psi higher than the Stratmann Tank pressure (graphic was previously provided to Complainant) because the elevation of the Stratmann Tank site is about 20 feet higher than the elevation of Complainant's residence, according to Google Earth.

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 mailed postage prepaid the 23rd day of September, 2010, to:

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