

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

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

OBJECTIONS TO COMPLAINANT'S REQUEST FOR A SUBPOENA

COMES NOW Respondent Missouri-American Water Company (MAWC) and for its
Objections to Complainant's Request for a Subpoena states as follows:

***Request 1: The report from the first service employee who was on my property on
December 4, 2009, his full name, home address, title and if possible his phone #.***

Objection: MAWC objects to provision of the home address and phone number of
employees, as such information is irrelevant, immaterial, and not reasonably calculated to
lead to the discovery of admissible evidence, and would invade the privacy of the employees.

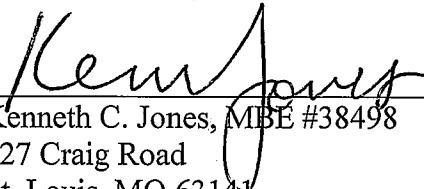
***Request 3: Graphic recording water pressure in the main pipes of 24 hours duration on
December 4, 2009 at various points on the system. (It will reveal the water pressure
fluctuations which triggers water backflow from my pipes into main system).***

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.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

By:


Kenneth C. Jones, MBE #38498
727 Craig Road
St. Louis, MO 63141

kenneth.jones@amwater.com
(314) 996-2278 (telephone)
(314) 997-2451 (telefax)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was filed electronically and mailed postage prepaid the 26th day of August, 2010, to:

Jennifer Hernandez
Legal Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Lewis R. Mills, Jr.
Public Counsel
Missouri Office of Public Counsel
P.O. Box 2230
Jefferson City, MO 65102-2230

Roman Dzhurinskiy
32 Crabapple Ct.
St. Louis, MO 63132

