

**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 AND ANSWERS TO COMPLAINANT'S
REQUEST FOR A SUBPOENA**

COMES NOW Respondent Missouri-American Water Company (MAWC) and for its
Objections and Answers 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.

Answer: Russ Sievers, 1050 Research Blvd., St. Louis, MO 63132, was the first
MAWC employee at 32 Crabapple Court on December 4, 2009. His write-up describing his
visit is attached hereto as Exhibit A.

***Request 2: The report from the 2nd crew employees who were phoned by the first one,
and arrived on my property in 30 min later on December 4, 2009. Their contact
information. (This document will reflect which tests were conducted on my property and
resolutions.)***

Answer: Chris Gladwill and Matt Muenkes, 1050 Research Blvd., St. Louis,
MO 63132, were the two employees who arrived at 32 Crabapple Court on December 4,

2009, at the request of Russ Sievers. They did not prepare any write-up or report regarding their visit.

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.

Request 4: The report from the service employee dated April 16, 2010 between 9 am – 11 am on property located 7 Crabapple Ct., St. Louis, MO 63132 indicating a reason for service and results found. (It will reveal a customer call the company for the same reason which I have – no water pressure and fluctuation in the service pipes inside home).

Answer: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

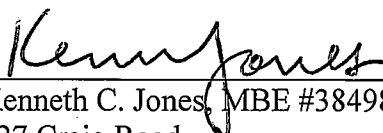
[REDACTED]

Request 5: The report(s) from the MOAWC 3 employees (representatives) who were on my property May 18, 2010 to install a backflow preventer. (It might reveal in details a reason why it wasn't installed, employees discussions with St. Louis County Inspector(s) and MPSC staff after the new facts appeared. This statement to each other about water backflow into main pipes from my house).

Answer: The three MAWC employees (Peter Matschiner, Gina Myers, and Russ Sievers) who attended the meeting at 32 Crabapple Court on May 18, 2010 did not draft any write-up or report.

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 3rd day of September, 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

