

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

Thirty and 141, L.P.,)	
)	
Complainant,)	
)	
v.)	File No. WC-2019-0004
)	
Missouri-American Water Company,)	
)	
Respondent.)	

ANSWER TO COMPLAINT

COMES NOW the Respondent, Missouri-American Water Company (“MAWC”), pursuant to the *Order Giving Notice of Contested Case and Directing Answer*, issued herein on July 5, 2018, and for its Answer to the Complaint filed by Thirty and 141, L.P., respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. MAWC admits the allegations of paragraph 1.
2. MAWC is a Missouri corporation with its principal office and place of business at 727 Craig Road, St. Louis, Missouri, 63141. MAWC is a wholly-owned subsidiary of American Water Works Company, Inc. MAWC is qualified to conduct business as a public utility in the state of Missouri subject to the jurisdiction of the Commission as provided by law. MAWC denies the remaining allegations of paragraph 2.
3. MAWC admits the allegations of paragraphs 3-5.
4. While denying any wrongdoing, MAWC admits the allegations of paragraphs 6-10.
5. MAWC admits that a document labeled “Gravois Bluffs Waterfall Usage Report” is attached to the Complaint as Exhibit 1. MAWC is without sufficient information to admit or deny the remaining allegations of paragraph 11.
6. MAWC denies the allegations of paragraph 12.

7. MAWC is without sufficient information to admit or deny the allegations of paragraph 13.
8. MAWC denies the allegations of paragraphs 14-16.
9. MAWC denies all allegations of the Complaint not admitted above and states that it has not violated any law, rule, or Commission order regarding the allegations as set forth in the Complaint.
10. In further response, MAWC asserts that the Complaint fails to state a claim upon which relief may be granted and should be dismissed, in that the allegations, even if taken as true, fail to establish any violation by MAWC of any law under the Commission's jurisdiction or of any Commission rule or order.
11. Regarding the request in in the "WHEREFORE" paragraph on page 4 of the Complaint that "said meter be properly tested in the presence of all interested parties," MAWC notes that the meter was, in fact, properly tested in the presence of representatives for the Complainant and the Staff of the Commission on July 30, 2018. The meter was found to be working properly.
12. MAWC further notes that, although not required by any law, Commission rule or order, or MAWC tariff, MAWC, on September 17, 2012, provided a leak adjustment credit of \$24,510.10 to Complainant regarding the meter and waterfall at issue in this Complaint.

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

BRYDON, SWEARENGEN & ENGLAND, P.C.

By: /s/ Diana C. Carter

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CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing document was filed with EFIS on this 6th day of August, 2018, with notice of the same being sent to all counsel of record.

/s/ Diana C. Carter