

FORMAL COMPLAINT FORM

Attach extra pages as necessary.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Keith Edwards,
(Your name here)
Complainant,
v.
Missouri-American Water Company,
(Utility's name here)
Respondent,

File No.

(PSC fills this in)

COMPLAINT

1. Complainant resides at:

[Redacted]
(Address of complainant)

[Redacted] (City) [Redacted] (State) [Redacted] (Zip Code)

2. The utility service complained of was received at:

a. Complainant's address listed in paragraph 1.

(Address where service is provided, if different from Complainant's address)

(City) (State) (Zip Code)

8. The Complainant has taken the following steps to present this matter to

the Respondent:

(Please describe in detail what steps you have already taken to resolve this complaint.)

I have talked to different people at the water company to try and resolve this but it has not been resolved yet. I have filed a claim with the insurance company. I have received a letter from Constitution State Services (attached) that was sent to O.J. Laughlin which states: "O.J. Laughlin backfilled the hole with rock. On the date of loss, a rainstorm occurred at the loss location. Water from the rainstorm entered the hold dug by O.J. Laughlin, proceeded through the claimants' sewer lateral line, and flooded their basement. We are tendering this claim on to you pursuant to the agreement between O.J. Laughlin Plumbing Company, Inc., and Missouri-American Water Company (Contract). Pursuant to the terms and conditions of the Contract, we are hereby tendering indemnification of Missouri-American Water Company to you and/or your Liability Insurance carrier. We are further requesting that your insurance carrier provide General Liability Coverage to Missouri American Water Company on a primary basis as an additional insured under your liability insurance policy." Missouri American refuses to take responsibility for the damage caused by the contractor they hired to do work on their behalf.

6/24/2024

Date

Keith Edwards

Signature of Complainant

keith edwards

Complainant's Phone Number

[REDACTED]

Complainant's Printed Full Name

[REDACTED]

Alternate Contact Number

Complainant's E-mail Address

Attach additional pages, as necessary. Attach copies of any supporting documentation. Do not send originals of any supporting documentation.





Constitution State Services
P O Box 650293
Dallas, TX 65265-0293
Telephone: (314) 579-8892
Fax: (877) 786-5571

April 17, 2024

O.J. Laughlin Plumbing Company, Inc.
Attn: Daniel Laughlin
306 St. Louis Ave.
Valley Park, MO 63088

RE: Client Name: American Water Works Company
Claim Number: [REDACTED]
Claimants: Debra Edwards, Keith Edwards, & Rhonda Lawson
Date of Loss: 04/02/2024

Dear Mr. Laughlin:

Constitution State Services is the General Liability carrier for Missouri American Water Company. Our client has received notice of a claim for property damage, which occurred at [REDACTED]. Our investigation indicates the claimants had been experiencing problems with their sewer in February 2024. The claimants hired Tope Plumbing to inspect their sewer lateral line. Tope Plumbing advised the claimant that Missouri American Water Works damaged the sewer lateral line while installing a new watermain in 2023. Missouri American Water Company contracted with O.J. Laughlin to inspect and determine if Missouri American Water Company damaged the sewer later line while installing the new watermain. O.J. Laughlin dug a hole in the street to complete the inspection. O.J. Laughlin determined approximately 2 feet of the claimants' sewer lateral line was missing at no fault of Missouri American Water Company. O.J. Laughlin backfilled the hole with rock. On the date of loss, a rainstorm occurred at the loss location. Water from the rainstorm entered the hold dug by O.J. Laughlin, proceeded through the claimants' sewer later line, and flooded their basement. We are tendering this claim on to you pursuant to the agreement between O.J. Laughlin Plumbing Company, Inc., and Missouri-American Water Company (Contract).

Pursuant to the terms and conditions of the Contract, we are hereby tendering indemnification of Missouri-American Water Company to you and/or your Liability Insurance carrier. We are further requesting that your insurance carrier provide General Liability Coverage to Missouri American Water Company on a primary basis as an additional Insured under your liability insurance policy.

The loss location: [REDACTED]

Claimants' contract information:

[REDACTED]

If liability is being denied, please provide us with the basis in law upon which you support your denial of our tender of our demand for indemnification of Missouri American Water Company.

Thank you for your kind attention to this matter and we look forward to receiving your acceptance letter in the very near future.

Best regards,

Jerry L. Fisher
Claim Professional
jlfishc2@travelers.com

CC:

[REDACTED]

[REDACTED]

[REDACTED]