Attach extra pages as necessary.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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)	
Complainant,)	
)) File No.)	
r Company, Respondent,)))	(PSC fills this in)
) File No.)) r Company,))

COMPLAINT

1. Complainant resides at:

(Address of complainant)		
(City)	(State)	(Zip Code)
2. The utilit	/ service complained of was recei	ved at:
a. Co	omplainant's address listed in para	agraph 1.

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

3. Respondent's address is:

727 Craig Rd.

(City)

(Address of complainant) St. Louis MO

63141	
(Zip Code)	

4. Respondent is a public utility under the jurisdiction of the Missouri Public

Service Commission.

5. The amount at issue is: \$

(If your complaint is about money state how much is in dispute here.)

6. Complainant now requests the following relief:

(Explain what you want the Commission to do: the specific results you are seeking in this complaint.)

(State)

I would like Missouri American to pay for the damages caused to my home, hot water heater, furnace, and to my belongings due to water and sewage that entered my home as a result of the negligence on the part of the contractors hired by Missouri American because they dug through my sewer line while digging up a water line in the street and because they left the hole open. I have attached a photo which shows the area of the digging. The blue lines are the marked water lines and the yellow line is my sewer line.

7. The relief requested is appropriate because Respondent has violated a

statute, tariff, or Commission regulation or order, as follows:

(Explain why the Commission should grant the relief you seek: the facts that constitute a violation of a statute, tariff, or Commission regulation or order.)

I believe the Commission should grant me relief because the water company's contractor broke my sewer pipe and filled it with rock. The ditch was left open for many days allowed rain water to enter the hole allowing water and come back up the pipe and into my home. The rock blocked the sewage in the pipe which flowed back into the home also. My basement was full of water and sewage. My floors and baseboards were ruined. The basement needs to be torn up and built back. The furnace and hot water heater filled with sewage and are ruined and need to be replaced.

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

Complainant's Printed Full Name

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: Claim Number: Claimants: Date of Loss: American Water Works Company Debra Edwards, Keith Edwards, & Rhonda Lawson 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

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:

Claimants' contract information:



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 jlfishe2@travelers.com

