

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

Ron Hobson,)
)
 Complainant,)
)
 vs.) File No. WC-2025-0127
)
 Missouri-American Water Company,)
)
)
 Respondent.)

**MISSOURI-AMERICAN WATER COMPANY’S ANSWER
AND MOTION TO DISMISS**

COMES NOW the Respondent, Missouri-American Water Company (“MAWC” or “Company”), pursuant to 20 C.S.R. 4240-2.070, and for its Answer, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

PROCEDURAL HISTORY

1. Ron Hobson (“Mr. Hobson” or “Complainant”) filed a formal complaint (“Complaint”) with the Commission on October 2, 2024.
2. On October 2, 2024, the Commission issued an *Order Giving Notice of Case Filing, Directing an Answer, and Directing a Staff Investigation*, giving the Company until November 1, 2024, to file its Answer. This filing complies with that Order.

ANSWER

3. MAWC admits that it provides service to ** [REDACTED] **, St. Louis, MO 63129.
4. MAWC denies that Mr. Ron Hobson is the name associated with the account for ** [REDACTED] **, St. Louis, MO 63129.
5. MAWC admits that its office address is 727 Craig Road, St. Louis, MO 63141, as alleged in paragraph 3 of Complaint.

****Denotes Confidential Information****

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6. MAWC admits that it is a public utility under the jurisdiction of the Missouri Public Service Commission as alleged in paragraph 4 of the Complaint.

7. MAWC denies that the amount at issue in this Complaint is ** [REDACTED] [REDACTED] ** as alleged in paragraph 5 of the Complaint. MAWC further denies that the Commission has jurisdiction to award damages.

8. MAWC admits that Complainant contacted the Company and denies all allegations related to the meter and the violation of constitutional rights of the Complainant. MAWC is without sufficient information to admit or deny the communication with the Office of the Public Counsel and therefore denies the same.

9. MAWC denies the allegations contained within paragraph 7 of the Complaint. The Company asserts that a door tag was placed on Mr. Hobson's door and correspondence was sent to Mr. Hobson on numerous occasions requesting access to the property in order to read the meter, inspect and make any necessary repairs.

10. MAWC denies any allegation contained within the Complaint that is not specifically admitted herein.

11. MAWC denies violating any of the Company's tariff, Commission Rule or statute in regard to this matter.

MOTION TO DISMISS

12. MAWC asserts that Mr. Hobson fails to state a claim upon which relief may be granted, as the Commission is not authorized to award damages.

13. MAWC asserts that the Commission does not have jurisdiction over claims for negligence and therefore this case should be dismissed.

WHEREFORE, MAWC requests that the Commission accept this Answer and Motion to Dismiss and further relief as is just and proper under the circumstances.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

/s/ Rachel Niemeier

Timothy Luft, #40506
Rachel Niemeier, #56073
Missouri-American Water Company
727 Craig Road
St. Louis, MO 63141
(314) 996-2279 (Tim)
(314) 996-2390 (Rachel)
tim.luft@amwater.com
rachel.niemeier@amwater.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or U.S. Mail on November 1, 2024, to the following:

Office of the Staff Counsel
Governor Office Building
Jefferson City, MO 65101
staffcounsel@psc.mo.gov

Office of the Public Counsel
Governor Office Building
Jefferson City, MO 65101
opcservice@opc.mo.gov

Mr. Ron Hobson
443 Golden Valley Drive
St. Louis, MO 63129
4451089@gmail.com

/s/ Rachel Niemeier