

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

Louis DeFeo,)	
)	
Complainant,)	
)	
v.)	<u>File No. WC-2021-0075</u>
)	
Missouri-American Water Company,)	
)	
Respondent.)	

**ANSWER TO COMPLAINT AND
REQUEST FOR MEDIATION**

COMES NOW the Respondent Missouri-American Water Company (“Missouri-American”), and respectfully states for its Answer to the Complaint filed by Mr. Louis DeFeo (“Complainant”) as follows:

1. Missouri-American admits it provides service to the address contained in Paragraph 1. Missouri-American is without sufficient information to admit or deny that Complainant resides at this address and therefore denies the same.
2. Missouri-American admits that it provided water service to the Complainant’s service address for which the Complainant disputes the recorded usage and associated charges.
3. Missouri-American denies the allegation contained in Paragraph 3.
4. Missouri-American admits it is a public utility under the jurisdiction of the Missouri Public Service Commission as alleged in Paragraph 4.
5. Missouri-American denies the allegations contained in Paragraph 5.
6. Paragraph 6 contains the Complainant’s request for relief to which no answer is necessary. To the extent the Commission determines an answer to the allegations in Paragraph 6 is necessary, Missouri-American hereby denies the same.
7. Missouri-American denies the allegations contained in Paragraph 7.

8. Missouri-American denies the allegations contained in Paragraph 8.

REQUEST FOR MEDIATION

9. Pursuant to Commission Rule 20 CSR 4240-2.125(2), Missouri-American requests the Commission order mediation of this Complaint before any further proceedings in this case. Missouri-American requests the Commission appoint a regulatory law judge to serve as mediator in this case to mediate the dispute. Missouri-American agrees to try in good faith to resolve the dispute through this process and requests all other actions on the case cease and time limitations tolled pending the completion of the mediation process.

WHEREFORE, having fully answered the Complaint, Missouri-American provides this Answer and requests the Commission order mediation of this Complaint.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

/s/ Timothy W. Luft #40506

727 Craig Road

St. Louis, MO 63021

Telephone 314-996-2279

Email: tim.luft@amwater.com

BRYDON, SWEARENGEN & ENGLAND P.C.

By: /s/ Jennifer L. Hernandez

Jennifer L. Hernandez #59814

312 E. Capitol Avenue

P.O. Box 456

Jefferson City, MO 65102

Telephone: (573) 635-7166

Facsimile: (573) 635-0427

E-mail: jhernandez@brydonlaw.com

**ATTORNEYS FOR MISSOURI-AMERICAN
WATER COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been transmitted by electronic mail and United States Postal Mail, postage prepaid, to the Complainant, and by electronic mail to all counsel of record, this 16th day of October 2020.

/s/ Jennifer L. Hernandez