

CASE NO. WC-2025-0204

MORIARTY FORMAL COMPLAINT

COMPLAINANT'S ANALYSIS OF RESPONDENT'S RESPONSE TO COMMISSION STAFF INTEROGATORIES

April 14, 2025

I'm filing this analysis with the MOPSC because I don't believe my Formal Complaint answered every possible question, I was not contacted by the Staff for any clarification of the issues, nor even copied with the Staff interrogatories to MAWC.

Even though MAWC has fixed some of the problems raised in the Complainant's Formal Complaint, Complainant is not satisfied with the progress of MAWC nor has MAWC provided, to Complainant's knowledge, any notice to customers on MyWater to explain either that a correction period has started or why MyWater has been presenting strange information during the correction period. Some of these strange presentations Complainant has observed during the correction period suggests that inadequate testing is being performed prior to making the corrections in the live version of MyWater. The Staff has not even addressed the issue of MAWC progress on correcting the problems raised by the Complainant's Formal Complaint.

MoPSC 0001: Does any part of Commission Rule 20 CSR 42402.135(2)(A)1 address customers water usage data?

MoPSC 0002: Does any part of Commission Rule 20 CSR 4240-2.135(2)(A)1 and 2 address customers' water usage data? Does any part of Section 386.480 RSMo address customers' water usage data?

MoPSC 0010: The last sentence reads "All identified users (as identified by MSD) have access to the folder where these files are located. More information is needed to direct those "identified users" to the folder since the answer to this interrogatory does not even indicate where the folder resides (MAWC or MSD?).

MoPSC 0012: Can MAWC be more specific as when in Q2 2025 this will occur?

MoPSC 0013: This does not describe the Plaintiff's experience since the Customer Care representatives have shown little knowledge of MyWater.

MoPSC 0014: This does not describe the Plaintiff's experience since the Customer Care supervisors have shown little knowledge of MyWater.

MoPSC 0015: The response suggests that the delays are measured in hours and that is very misleading. The delays are more accurately described as days and hours since MyWater is presently reporting usage for two or three days earlier. Since there was no MyWater update between April 4 and April 9 (6 am), the usage was delayed up to five days.

MoPSC 0016: This response confirms the Plaintiff's analysis in the previous interrogatory because the MAWC's answer specifically states "four-hour delay" which is certainly not true for the same reasons given in the previous interrogatory.

MoPSC 0018 The MAWC response to this interrogatory is misleading because it does not state a time frame for the usage measurement. For example, My account showed usage of 1124 gallons over a five hour period on January 8, 2025 due to a stuck toilet fill valve. That is more than ninety times my average hourly usage but I did not receive any "notification." This notification process, like the leak adjustment process, needs to be studied, particularly as it relates to the time increments and excess usage criteria.

MoPSC 0019: The answer to this interrogatory is very misleading because the real issue is not the data transfer from the meter to MyWater but the accuracy and timeliness of MyWater as it relates to the customers' need for water usage data. It is also a matter of opinion as to whether the "issues" are "few" or many and serious as claimed by the Plaintiff.

MoPSC 0020: MyWater is not a real time app as advertised by MAWC and has many flaws. Perhaps more importantly, customers have no way to practically verify the accuracy of the data provided by either MyWater or MAWC monthly billing statements. The only solution is to provide a practical way for customers to read and test their own meters. Outdoor meters in dark pits make it very difficult, if not impossible, for customers to read their own meters. It also subjects those meters to possible tampering because they are not secured. MAWC should be ordered by the Commission to provide a study of the cost and benefits of remote wireless devices to enable all customers to read their own meters from inside their own home, any time, day or night, in good weather and bad.

MoPSC 021: This answer is incomplete and leaves out that part of the problem that resulted from the use of Greenwich Mean Time in MyWater rather than Central Time. I cannot imagine why this was the case and it appears to have been corrected. The other apparent part of the problem persists today in that the 30 Days Report still does not show 30 days and never has. I recently printed a 30 Days Report that had only 25 days.

MoPSC 0022: This response does not answer the interrogatory. Two or three times I did get a call back from a supervisor but they didn't know anything about MyWater and were of no help. The times I requested a call from the "local office", "Meter Department" and "Web Services," I did not get a return call.

MoPSC 0023: "Consistently" would better describe the frequency of the data transfer problem than "In some instances." If customers cannot trust the data provided by MyWater, how can they trust the billings? If customers cannot easily read their meters (especially outside meters in a dark pit, how can they ever trust the data on MyWater?

MoPSC 0024: This problem may not happen as often as it in the past but it still occurs to frequently. I'm also concerned that it also occurs on days where the pit is full of water, the meter is completely submerged and I cannot read my meter. I don't understand why that should effect MyWater if MyWater is at least two days behind in its reporting.

MoPSC 0025: This answer is misleading. In that I emailed the Account Resolution Team (ART) back because the initial correspondence did not explain the refusal adequately and I wanted an explanation

for the tree day period in late January when my usage did exceed two times the previous year. I never suggested that the ART representative to look at other periods.

MoPSC 0026: One need only to look at Exhibit J and see the numerous problems that likely have no logical explanation. That is probably why the MAWC has not answered this interrogatory.