

FILED

JUL 30 2025

**Missouri Public
Service Commission**

Dear Missouri Public Service Commission,

I am submitting this complaint regarding repeated flooding and property damage at my residence located at: [REDACTED]. Our home has been severely affected by three separate flooding incidents, all caused by water line breaks on our street. The most recent event occurred after Missouri American Water replaced water lines in our neighborhood in 2024, and shortly after that, repairs continued at the same location.

Although crews reportedly responded within 1.5 hours of the latest reported rupture, the damage to my property had already occurred by then. Serious destruction has been done to walls, flooring, furniture, and household systems. Multiple households on our street were impacted, and we are currently pursuing a potential group legal action. I am requesting that the Public Service Commission: Investigate whether Missouri American Water properly maintained and replaced its infrastructure; Confirm whether the water pressure in our neighborhood has been properly regulated; Determine if negligence in prevention, response, or repair contributed to repeated failures. If needed, I can provide photos of damage, repair estimates, and neighbor testimonies.

I respectfully request that my complaint be added to any ongoing investigation related to water system failures in the 63125 area. Thank you for your time and attention.

Sincerely,

Nizama Junuzovic

PUBLIC

02/14

02/14/14

Missouri Public Service Commission
FORMAL COMPLAINT FORM

Attach extra pages as necessary.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Nizama Junuzovic

(Your name here)

Complainant,

v.

File No.

Missouri-American Water Company

(Utility's name here)

Respondent,

(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.

b. A different address:

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

(City)

(State)

(Zip Code)

PUBLIC

3. Respondent's address is:

727 Craig Rd.

(Address of complainant)

St. Louis
(City)

MO
(State)

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.)

I am submitting this complaint regarding repeated flooding and property damage at my residence located at: [REDACTED]. Our home has been severely affected by three separate flooding incidents, all caused by water line breaks on our street. Although crews reportedly responded within 1.5 hours of the latest reported rupture, the damage to my property had already occurred by then. Serious destruction has been done to walls, flooring, furniture, and household systems. Some of the items that were destroyed are priceless to me and my family because they are irreplaceable memories. Multiple households on our street were impacted, and we are currently pursuing a potential group legal action. I am requesting that the Public Service Commission: Investigate whether Missouri American Water properly maintained and replaced its infrastructure; Confirm whether the water pressure in our neighborhood has been properly regulated. If needed, I can provide photos of damage, repair estimates, and neighbor testimonies. While I have been told that the PSC does not determine negligence or award damages, I believe the company should be responsible for the water that rushed out of the pipes they own and flooded my home and many others on my street.

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.)

My home filled with water over the electrical outlets and filled the hot water heater and furnace with dirty water. This caused a very unsafe situation for me and my family and my neighbors. Constitution State Services claims that Missouri-American is not liable for damages because they are protected by Rule 3E of the tariff. I do not believe that a tariff should be able to protect a company from damage caused. I have been informed that this rule has been removed from the tariff.

PUBLIC

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 the company and I have talked to the insurance company. My claims have been denied.

7/24/25

Date

Nizama Junuzovic

Signature of Complainant

Complainant's Phone Number

Nizama Junuzovic

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.

PUBLIC



**Constitution
State
Services**

A TRAVELERS COMPANY

Constitution State Services
P O Box 650293
Dallas, TX 65265-0293
Telephone: (314) 679-8892
Fax: (877) 786-5571

June 13, 2025

Mr. & Mrs. Sakib & Nizama Junuzovic
[REDACTED]

RE: **Client Name:** **American Water Works Company**
 Claim Number: [REDACTED]
 Claimant: **Sakib & Nizama Junuzovic**
 Date of Loss: **06/05/2025**

Dear Mr. & Mrs. Sakib & Nizama Junuzovic:

We have completed our investigation into the above referenced incident. Based upon our investigation, we have found American Water Works was notified of this main break and responded quickly and turned off the water. This main doesn't have a history of main breaks and this incident was not foreseeable. For these reasons, we must respectfully deny liability for this incident at this time.

In addition, we have found the following Missouri Public Service Commission - Rules and Regulations Governing the Rendering of Water Service applies to this loss:

Rule 3: Liability of the company

E. The company shall not be liable for damages resulting to customer or to third persons, unless due to contributory negligence on the part of the company, and without any contributory negligence on the part of the customer or such third party.

We are very sorry this unfortunate incident occurred. We regret any inconvenience you may have sustained.

Remediation is offered as a customer service and not an admission of fault or liability.

If you have any additional information that we have not considered in our review, or have any questions, please feel free to contact me.

Best regards,

Peter Muzik
Liability Claim Representative
[REDACTED]

Constitutional State Services TPA for TRAVELERS INDEMNITY CO OF CT