

Exhibit No.:	
Issues:	Meter Operations, Customer Service Support
Witness:	Paul Ebbeler
Exhibit Type:	Direct Testimony
Sponsoring Party:	Missouri-American Water Company
Case No.:	WC-2025-0204
Date:	August 14, 2025

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO. WC-2025-0204**

**DIRECT TESTIMONY**

**OF**

**PAUL EBBELER**

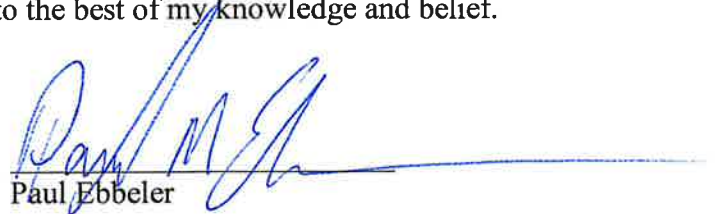
**ON BEHALF OF**

**MISSOURI-AMERICAN WATER COMPANY**

**\*\*Denotes Confidential Information\*\***

## AFFIDAVIT

I, Paul Ebbeler, under penalty of perjury, and pursuant to Section 509.030, RSMo, state that I am the Senior Manager, Operations Services of Missouri American Water Company, Inc., that the accompanying testimony has been prepared by me or under my direction and supervision; that if inquiries were made as to the facts in said testimony, I would respond as therein set forth; and that the aforesaid testimony is true and correct to the best of my knowledge and belief.



Paul Ebbeler

August 14, 2025  
Dated

**DIRECT TESTIMONY  
PAUL EBBELER  
MISSOURI-AMERICAN WATER COMPANY  
CASE NO.: WC-2025-0204**

**TABLE OF CONTENTS**

I. INTRODUCTION .....	2
II. PURPOSE .....	4
III. METER OPERATIONS AND DATA ACCURACY .....	4
IV. RESPONSE TO COMPLAINT .....	8
LEAK ADJUSTMENT .....	10
BILLING .....	12
METER LOCATION .....	12
RESPONSES TO SPECIFIC ALLEGED VIOLATIONS .....	15

**DIRECT TESTIMONY**

**PAUL EBBELER**

**I. INTRODUCTION**

**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Paul Ebbeler, and my business address is 727 Craig Road, Creve Coeur, Missouri 63141.

**Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

A. I am employed by Missouri-American Water Company (“MAWC” or the “Company”) within the Operations Group as Senior Manager, Operations Services. I am appearing on behalf of the Company in this proceeding.

**Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.**

A. In 2006, I graduated with a Bachelor of Science from Southern Illinois University. In 2015, I obtained my Masters in Business Administration from Lindenwood University. In addition to my formal educational background, I hold a variety of professional certifications such as project management, and certificated professional in management. I also hold a Class D Distribution Operator License from the Missouri Department of Natural Resources.

I started working at American Water Service Company (“Service Company”) in 2001 and have spent over 20 years working throughout varies sectors in the business, including customer service and operations. I began my career in the customer service organization as a representative before transitioning into a leadership role, where I supervised billing and collections teams. In that role, I provided support across all states in the American

1 Water footprint. Later, I moved into a regional role focused on the western U.S., where I  
2 continued supporting similar operational functions, including ensuring smooth operations,  
3 overseeing team training, managing meter configuration and functionality, and interpreting  
4 meter usage data. I transitioned to the MAWC team in 2017.

5 **Q. WHAT ARE YOUR CURRENT EMPLOYMENT RESPONSIBILITIES?**

6 A. As Senior Manager, Operations, I am responsible for the management of several areas of  
7 operations including oversight of our fleet management group, device management for  
8 operations personnel, employee training, revenue protection, customer experience,  
9 nonrevenue water, meter operations, including meter health and data management,  
10 ensuring data integrity. This ensures a seamless integration of meter technology from our  
11 vendor systems into our systems, preventing consecutive estimates, zero reads, and inactive  
12 with consumption. I also handle new service inquiries when a customer would like to  
13 connect to our system.

14 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE MISSOURI PUBLIC**  
15 **SERVICE COMMISSION (“COMMISSION”)?**

16 A. No.

17 **Q. ARE YOU INCLUDING ANY SCHEDULES/APPENDICES WITH YOUR**  
18 **DIRECT TESTIMONY?**

19 A. Yes. I am including Schedule PE-1-C (Confidential), Schedule PE-2-C (Confidential),  
20 Schedule PE-3-C (Confidential), Schedule PE-4-C (Confidential), and Schedule PE-5-C  
21 (Confidential).

1 **II. PURPOSE**

2 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

3 A. On January 16, 2025, Jim Moriarty filed a Complaint against MAWC. The purpose of my  
4 Direct Testimony is to respond on behalf of MAWC to certain aspects of Mr. Moriarity's  
5 Complaint.

6 **III. METER OPERATIONS AND DATA ACCURACY**

7 **Q. YOU MENTIONED YOU WERE RESPONSIBLE FOR OVERSEEING ASPECTS**  
8 **OF METER HEALTH CAN YOU EXPLAIN THIS IN GREATER DETAIL?**

9 A. Yes. From a meter operations perspective, I ensure MAWC only deploys and installs  
10 meters on customer premises that have been certified by the manufacturer. Prior to  
11 installation, all meters must meet specific performance standards. This certification  
12 ensures the data collected at the meter is accurate and reliable for consumption purposes.

13 **Q. ARE THERE ANY ADDITIONAL CONTROLS THE COMPANY USES TO**  
14 **ENSURE RELIABLE DATA IS USED FOR CONSUMPTION PURPOSES?**

15 A. Yes. In addition to the meter certification process, the overall design of the meter system  
16 ensures data accuracy that can also be validated.

17 **Q. PLEASE EXPLAIN THE DESIGN OF THE SYSTEM.**

18 A. Meter placement is the first step in the design of the system. MAWC ensures any new  
19 meter installation, replacement, or relocation is located outside the customer's premises.  
20 This meter placement requires the creation of a meter pit and setter outside. This allows  
21 Company personnel to access the meter when needed for emergencies, routine meter reads,  
22 or maintenance and protects the health and safety of our employees. In addition, each

customer premises has a water meter that is directly connected through a wire to an end point, also known as a transmitter.

**Q. HOW IS DATA TRANSFERRED FROM THE METER TO MAWC?**

A. For customers who have an AMI transmitter attached to their meter, the endpoint transmits meter readings through a cellular or fixed network to the manufacturer's cloud-based system ("transmitter headend system"). Typically, this occurs three to four times per day. Once per day, for the previous day, the manufacturer's network then securely transfers the meter data to the Service Company's cloud infrastructure ("Company's cloud"). I will refer to the process of transferring data from the manufacturer's network to Company's cloud infrastructure as "the data transfer process." Once within the cloud-based system, data is sent to several other systems for different consumption purposes on a daily basis.

**Q. WHAT ARE "CONSUMPTION PURPOSES"?**

A. "Consumption purposes" refer to the different uses of the data, including the customer billing system, internal reporting system, and the MyWater customer portal.

**Q. HOW FREQUENTLY DOES AMI METER DATA GET UPLOADED TO THE MANUFACTURER'S CLOUD BASED SYSTEM?**

A. The frequency varies based on the cellular fixed-network connection, but generally speaking, data is transferred several times per day through the data transfer process.

**Q. WHAT DATA IS TRANSFERRED?**

A. All meter reading data, potential tamper alarms, and temperature data from the customer premises are transferred, including 15-minute increment data that allows the Company to know hourly, daily, and monthly totals. In some limited circumstances, hourly or daily

usage totals may not be available.

**Q. DOES THE COMPANY FACE ANY CHALLENGES WITH RECEIVING METER DATA THROUGH THE CELLULAR NETWORK?**

A. Yes, as with any technology, there can be issues. For example, if the transmitter gets submerged underwater due to a weather event, the transmitter cannot connect to the cellular or fixed network until the water subsides. In addition, if the cellular network is unavailable, the Company will not be able to obtain meter usage information while the network is down.

**Q. ONCE THE NETWORK BECOMES AVAILABLE AGAIN, DOES THE COMPANY HAVE ACCESS TO THAT DATA?**

A. In most cases, yes. The meter read data will be uploaded to, and move through, the data transfer process. In some cases, the meter reading data is not available and therefore the hourly or daily consumption is not available. If the data for specific time intervals is unavailable in the transmitter headend system, a customer will not be able to view that data in MyWater since the meter reading data is ultimately populated from the manufacture's cloud.

**Q. WITH THE DATA BEING UNAVAILABLE IN THE TRANSMITTER HEADEND SYSTEM, HOW DOES THE COMPANY KNOW THE USAGE INFORMATION FOR THE SPECIFIC TIME INTERVAL?**

A. The Company will ultimately receive a valid read. Usage or consumption is a calculation of the difference between meter reads at two different points in time which could be a matter of minutes, hours, days, or even a month. Historically, prior to AMI, consumption was calculated using only two reads, one month apart. With AMI, the Company has read

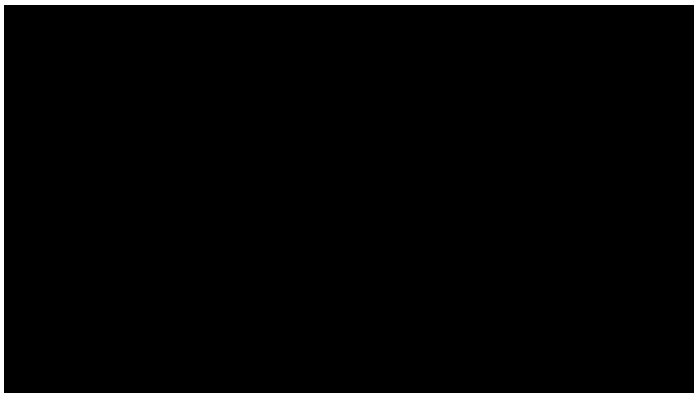


1 data every 15 minutes or every hour. Therefore, the Company can calculate usage more  
2 frequently. Even if a read is missed between a period of time, the usage can be calculated  
3 and allocated based on the newest read received and the prior read.

4 **Q. DO YOU HAVE AN EXAMPLE RELATED TO MR. MORIARTY'S DATA?**

5 A. Yes. Recently, Mr. Moriarty's usage data was not transmitted via cellular network and  
6 therefore it could not synchronize to MyWater from July 13-14, 2025. The screenshot  
7 below from MyWater shows no usage on those dates. Even though the Company did not  
8 receive specific meter reads for July 13<sup>th</sup> and 14<sup>th</sup> to determine hourly usage, the Company  
9 can accurately calculate the usage that encompasses that period (July 12<sup>th</sup> through 15<sup>th</sup>).  
10 The Company uses the meter reads from July 12<sup>th</sup> and July 15<sup>th</sup> to determine the total usage  
11 for that time period. In the headend system, this total usage for the missing meter read data  
12 was then evenly allocated to the missing meter read times.<sup>1</sup> It is worth noting, this is the  
13 only period of time over a two-and-a-half-year span when the hourly readings from this  
14 location were not transmitted to the Company's headend system.<sup>2</sup>

\*\*



\*\*

---

<sup>1</sup> In Schedule PE-5-C (Confidential), under the tab labeled AMI Data, when filtering the data from newest to oldest, under column P, lines 475 through 522 under column S, show the hourly usage data estimated for the period of time that actual meter reads were unavailable.

<sup>2</sup> As discussed in Company witness Derek Tarca's testimony there were data display issues in MyWater during this time period, however the data display issues do not impact the Company's data it receives directly from the manufacturer and the billing process.

1 **Q. DO ANY OF THE DATA TRANSFER DELAYS OR MISSING DATA IMPACT A**  
2 **CUSTOMER’S BILLED USAGE?**

3 A. No. A customer’s bill is based on the total usage for a specific period of time (typically 28  
4 to 30 days), not a sum of specific daily usage. A bill is generated by subtracting the  
5 previous meter reading from the first day of the billing cycle from the current meter reading  
6 on the last day in the billing cycle, truncated to the nearest hundred gallons of usage.

7 **IV. RESPONSE TO COMPLAINT**

8  
9 **Q. GENERALLY, WHAT ARE MR. MORIARTY’S CONCERNS WITH THE**  
10 **ACCURACY OF HIS MONTHLY BILL AND CUSTOMER SERVICE RESPONSE**  
11 **TO HIS INQUIRIES?**

12 A. In his Complaint, Mr. Moriarty’s main concern is about the variability in his water usage  
13 data displayed in MyWater. In addition, Mr. Moriarty expressed concerns regarding the  
14 criteria where MAWC views a customer to be eligible for a leak adjustment, whether his  
15 monthly water and sewer bill<sup>3</sup> is accurate based on the data variability he observed in  
16 MyWater, and the Company’s response to his various inquiries during the last 18 months,  
17 including the Company’s response time to an indoor valve leak he had in November 2023,  
18 and the relocation of his meter from inside his home to outside his home.

19 **Q. HAS THE COMPANY WORKED WITH MR. MORIARTY TO ADDRESS HIS**  
20 **CONCERNS?**

21 A. Yes. The Company worked closely with Mr. Moriarty after he filed this Complaint in an

---

<sup>3</sup> Mr. Moriarty’s sewer service is provided and billed by the Metropolitan Sewer District (“MSD”), an unregulated sewer provider, not the Company.

1 attempt to address his concerns.

2 **Q. DID YOU PERSONALLY HAVE INTERACTION WITH MR. MORIARTY?**

3 A. Yes.

4 **Q. WHAT WAS THE NATURE OF THAT INTERACTION?**

5 A. I have had several telephone conversations and email communications with Mr. Moriarty.  
6 My first interaction with Mr. Moriarty was on January 21, 2025, when I called him to  
7 discuss his concerns regarding MyWater. Thereafter, I had several email exchanges  
8 summarizing enhancements to MyWater planned by the Company and the timeline for  
9 implementing those program updates. On February 21, 2025, Mr. Moriarty also emailed  
10 me concerning his unsuccessful attempts to file for a leak adjustment.

11 **Q. DID YOU HAVE ANY IN-PERSON MEETINGS WITH MR. MORIARTY?**

12 A. Yes. MAWC staff, including myself and Mr. Tarcza, met with Mr. Moriarty on March 27,  
13 2025, in the Company's Craig Road office to review the matter and discuss the results of  
14 our investigation. This included looking at a live version of the MyWater application.  
15 Further, the Company provided printed copies of its responses to Staff's data requests to  
16 Mr. Moriarty for his review. These documents provided more details about MyWater and  
17 the Company's actions. Additionally, the Company provided Mr. Moriarty with his AMI  
18 usage data from January 1, 2024, to March 14, 2025, a summary of gallons billed March  
19 6, 2012, to March 14, 2025, all account notes, and electronic communications with Mr.  
20 Moriarty in response to data requests numbered MoPSC 0005, MoPSC 0005.1, MoPSC  
21 008 and the supplemental responses the Company provided on August 6, 2025. I am  
22 incorporating these responses into my testimony as **Schedules PE-1-C, PE-2-C, PE-3-C,**

1 **PE-4-C and PE-5-C. Schedule PE-1-C through Schedule PE-5-C** have been identified  
2 as Confidential in accordance with Commission Rule 20 CSR 4240-2.135(2)(A)1, as it  
3 contains customer-specific information.

#### 4 **LEAK ADJUSTMENT**

5 **Q. WHAT IS A LEAK ADJUSTMENT?**

6 A. A leak adjustment is a discretionary billing adjustment the Company makes when a  
7 customer's usage is high as a result of a leak on the customer's side of the meter that the  
8 Company is not responsible for repairing. The Company uses a specific threshold as to  
9 when residential leak adjustments will be issued. If the customer does not meet the  
10 threshold, a leak adjustment will not be issued. Typically, a customer is only treated as  
11 being eligible for a courtesy leak adjustment once over the life of their account. The system  
12 reviews the customers' usage for the two-month period directly prior to filing for the  
13 adjustment, compared to the two-month period for the previous year. If the usage is not  
14 two times more than the period last year, the customer is not eligible for a leak adjustment.

15 **Q. YOU MENTIONED THAT MR. MORIARTY HAD SOUGHT A LEAK**  
16 **ADJUSTMENT. WHY WAS HE SEEKING A LEAK ADJUSTMENT?**

17 A. Most recently in January 2025, Mr. Moriarty sought a leak adjustment due to a toilet leak  
18 within his home.

19 **Q. DID MR. MORIARTY QUALIFY FOR A LEAK ADJUSTMENT IN JANUARY**  
20 **2025?**

21 A. No. In Mr. Moriarty's case, he was not eligible for a leak adjustment because his usage for  
22 the monthly period was not two times higher than the previous year's usage. Mr. Moriarty  
23 was using his daily usage to support his request. The Company does not evaluate hourly

usage to determine eligibility for a leak adjustment, it evaluates only monthly usage based on the billing period for the account, compared to the previous year. Using the billing period allows the Company to compare billing history from year to year for comparison. This comparison also allows the Company to capture any seasonal changes that could have an impact on the customer's bills.

**Q. TO YOUR KNOWLEDGE, WAS THIS THE ONLY LEAK ADJUSTMENT MR. MORIARTY EVER REQUESTED?**

A. No. Mr. Moriarty also requested a leak adjustment in February 2024, as well.<sup>4</sup>

**Q. WAS THAT LEAK ADJUSTMENT REQUEST GRANTED?**

A. No. In February 2024, Mr. Moriarty questioned his February bill based on January usage. That inquiry was eventually elevated to the Company's Account Resolution Team ("ART") who first reviewed Mr. Moriarty's concern with his February 2024 bill (January usage) on April 5, 2024. The ART representative noted that the high bill was not two times higher, and Mr. Moriarty was not eligible for a leak adjustment. The ART representative also emailed this information on April 15, 2024.

**Q. HAS THE COMPANY ISSUED MR. MORIARTY A LEAK ADJUSTMENT?**

A. No, the Company has not issued Mr. Moriarty a leak adjustment as explained above. However, the Company did later issue a courtesy adjustment in the amount of \$15.24 on Mr. Moriarty's March 2025 bill.

---

<sup>4</sup> Mr. Moriarty first called the customer service center on February 26, 2024, and spoke with an agent who stated he was not eligible for a leak adjustment. He subsequently called several additional times requesting the same leak adjustment, so the matter was escalated to the ART. Thereafter, the Company also sent a field service representative to his home in May 2024 to verify his meter readings were accurate.

1 **BILLING**

2 **Q. YOU MENTIONED MR. MORIARTY HAD CONCERNS ABOUT THE**  
3 **ACCURACY OF NOT ONLY HIS COMPANY WATER BILLS BUT ALSO MSD**  
4 **SEWER BILLS. WILL DISPLAY ISSUES WITH MYWATER IMPACT THE**  
5 **DATA PROVIDED TO MSD?**

6 A. No. As I outlined in my testimony above, information is transferred from the Company's  
7 cloud to MyWater and from the Company cloud to other users of the data, such as MSD.  
8 Thus, the water usage data transmitted to MSD is transmitted through a different  
9 consumption process than MyWater. The usage display shown in MyWater does not  
10 impact customer billing as the information provided to MSD is directly from the  
11 Company's main cloud-based system, not MyWater.

12 **METER LOCATION**

13 **Q. WHAT IS MR. MORIARTY'S COMPLAINT REGARDING THE PLACEMENT**  
14 **OF HIS METER?**

15 A. Mr. Moriarty finds it difficult to read his meter because it is outside the home in a meter  
16 pit. Further, he recommends that part of the meter reading "procedures" should include  
17 the installation of a wireless device in the customer's home that will enable the customer  
18 to read his own meter any time. He also references a time when his water meter was in his  
19 basement.

20 **Q. HOW DO YOU RESPOND?**

21 A. The Company appreciates that outside meters can be more difficult for a customer to read  
22 than those inside. However, an outdoor meter allows the Company to more effectively and  
23 efficiently perform duties like meter reads and provides safety for our customers and

1 employees by eliminating, in most cases, the need for an employee to enter a customer's  
2 home. For these reasons, MAWC has been moving toward outside meter sets for many  
3 years.

4 **Q. WHEN WAS MR. MORIARTY'S METER MOVED OUTSIDE?**

5 A. Mr. Moriarty's meter was removed from a setter inside the home to a new meter pit outside  
6 on December 11, 2023.

7 **Q. WHY WAS IT MOVED AT THAT TIME?**

8 A. The curb stop in Mr. Moriarty's yard was broken. Because of the expense and work  
9 required to replace a curb stop, MAWC uses this opportunity to create a meter pit and setter  
10 outside, instead of installing a new curb stop. Outdoor meters prevent the Company from  
11 having to disturb, schedule an appointment, or inconvenience a customer to read/service  
12 the water meter. By placing the meter outside, the Company does not need the customer  
13 present and therefore reduces service delays, interruptions in service, and meter read  
14 estimates when a meter needs servicing.

15 **Q. HOW DID THE COMPANY BECOME AWARE THAT THE CURB STOP WAS**  
16 **BROKEN?**

17 A. Mr. Moriarty called the Company several times starting on October 16, 2023, due to  
18 increased water usage. Mr. Moriarty believed the meter was faulty and that was the cause  
19 of the increased usage. The Company conducted a visual meter inspection on November  
20 8, 2023, and confirmed that the meter displayed accurate information. The Company field  
21 service representative also reviewed the AMI water data and determined there were periods  
22 of increased usage, but not constant usage.

1 Subsequently, a plumber for Mr. Moriarty discovered a leaking valve inside his property  
2 in late November 2023. In order to replace the leaking valve within Mr. Moriarty's  
3 property, the plumber needed to turn off the water outside. In order to do this, the valve  
4 within the curb stop had to be turned, but it was bent and unable to be turned. Mr. Moriarty  
5 informed the Company on November 17, 2023, that it was bent and needed to be replaced.  
6 Mr. Moriarty's address was then placed on a high priority service order request queue and  
7 was addressed within five days of the request. A new meter pit was installed, relocating  
8 the meter from inside Mr. Moriarty's home to outside his home within the meter pit to  
9 allow the plumber to correct the leaking toilet within Mr. Moriarty's home.

10 **Q. WHAT WAS THE RESULT ONCE THE METER WAS RELOCATED AND THE**  
11 **INDOOR VALVE COULD BE REPLACED?**

12 **A.** This fix allowed Mr. Moriarty to have the ability to shut off the water and correct the leak  
13 within his home.

14 **Q. HAS MR. MORIARTY HAD FURTHER ISSUES?**

15 **A.** Yes. In early February 2024, as outlined above, Mr. Moriarty observed increased water  
16 usage in MyWater and requested a leak adjustment, but was not eligible for a leak  
17 adjustment, based on Company policy. Mr. Moriarty then began to see what he perceived  
18 as data inconsistencies in MyWater and he could not view his usage data directly on his  
19 meter without having to go to the meter pit.

20 **Q. HAS MAWC ATTEMPTED TO ADDRESS MR. MORIARTY'S CONCERNS**  
21 **REGARDING THE DATA DISPLAY IN MYWATER?**

22 **A.** Yes. The Company has worked with Mr. Moriarty to listen to, and address, his concerns.



1 The Company has used some of his observations and findings to update features of  
2 MyWater, as more fully explained by Company witness Derek Tarcza. However, none of  
3 these MyWater issues have had an impact on Mr. Moriarty's bill, or on any other  
4 customer's bill.

5 **RESPONSES TO SPECIFIC ALLEGED VIOLATIONS**

6 **Q. MR. MORIARTY ALLEGES THAT MAWC HAS VIOLATED COMMISSION**  
7 **RULE 20 CSR 4240-13.025(1)(A). WHAT DOES THIS RULE PROVIDE?**

8 A. It provides as follows:

9 (1) For all billing errors, the utility will determine from all related and available information  
10 the probable period during which the condition causing the errors existed and shall make  
11 billing adjustments for that period as follows:

12 (A) In the event of an overcharge, an adjustment shall be made for the entire period that  
13 the overcharge can be shown to have existed not to exceed sixty (60) consecutive monthly  
14 billing periods, or twenty (20) consecutive quarterly billing periods, calculated from the  
15 date of discovery, inquiry, or actual notification of the utility, whichever comes first.

16 **Q. ARE YOU AWARE OF ANY BILLING ERRORS ASSOCIATED WITH MR.**  
17 **MORIARTY'S ACCOUNT?**

18 A. I am not. As discussed above, billing is separate from the MyWater display. The meter  
19 readings for Mr. Moriarty's account match the amounts he has been billed after being  
20 truncated to the nearest hundred gallons of usage.<sup>5</sup>

21 **Q. COMPLAINANT ALLEGES THAT MAWC HAS VIOLATED COMMISSION**

---

<sup>5</sup> Schedule PE-5-C supports this assertion and contains all AMI usage data.

1       **RULE 20 CSR 4240-13.040(1), WHICH PROVIDES THAT A UTILITY SHALL**  
2       **ADOPT PROCEDURES WHICH SHALL ENSURE THE PROMPT RECEIPT,**  
3       **THOROUGH INVESTIGATION AND, WHERE POSSIBLE, MUTUALLY**  
4       **ACCEPTABLE RESOLUTION OF CUSTOMER INQUIRIES. DOES MAWC**  
5       **HAVE SUCH PROCEDURES?**

6    A.    Yes. The Company has a call center that is available to its customers who have inquiries.  
7       Those inquiries are typically handled by Customer Care Agents (“CCA”). If that CCA is  
8       unable to resolve or address the inquiry to the customer’s satisfaction, MAWC has a call  
9       escalation process that allows CCA to follow the process, which includes directing the  
10      customer to a supervisor. As mentioned above, the Company also has an ART that handles  
11      complaints and inquiries that are not resolved by the CCA. In April 2025, the CCAs and  
12      supervisors received additional guidance on appropriate escalation of complaints related to  
13      MyWater, including access to individuals with IT background to assist in resolving any  
14      issues.

15   **Q.    COMPLAINANT ALLEGES THAT MAWC HAS VIOLATED COMMISSION**  
16   **RULE 20 CSR 4240-13.040(2)(A), WHICH PROVIDES THAT A UTILITY SHALL**  
17   **ESTABLISH PERSONNEL PROCEDURES WHICH ENSURE THAT AT ALL**  
18   **TIMES DURING NORMAL BUSINESS HOURS QUALIFIED PERSONNEL**  
19   **SHALL BE AVAILABLE AND PREPARED TO RECEIVE AND RESPOND TO**  
20   **ALL CUSTOMER INQUIRIES, SERVICE REQUESTS, SAFETY CONCERNS,**  
21   **AND COMPLAINTS. HOW AND FOR WHAT TIMES IS THE CALL CENTER**  
22   **STAFFED?**

23   A.    The Company’s call center is staffed Monday through Friday, 7:00 am – 7:00 pm, for

customer concerns. Customers can call 24 hours a day for emergencies, such as where the water is off or water is leaking.

**Q. COMPLAINANT ALLEGES THAT MAWC HAS VIOLATED COMMISSION RULE 20 CSR 4240-13.040(3)(G), WHICH PROVIDES THAT A UTILITY SHALL PREPARE, IN WRITTEN FORM, INFORMATION IN PLAIN LANGUAGE, WHICH SUMMARIZES THE RIGHTS AND RESPONSIBILITIES OF THE UTILITY AND ITS CUSTOMERS, TO INCLUDE AN EXPLANATION OF METER READING PROCEDURES WHICH WOULD ENABLE A CUSTOMER TO READ HIS/HER OWN METER. DOES MAWC HAVE SUCH A WRITTEN SOURCE?**

**A.** Yes.

**Q. HOW IS IT MADE AVAILABLE TO CUSTOMERS?**

**A.** The Company has a written Customer Rights and Responsibilities document that it shares with new customers. This document is also available on the Company's website ([www.amwater.com/moaw/Customer-Service-Billing/Rights-Responsibilities/Customer-Rights-And-Responsibilities/index](http://www.amwater.com/moaw/Customer-Service-Billing/Rights-Responsibilities/Customer-Rights-And-Responsibilities/index)). The Company also has a document titled "How to Read Your Water Meter" that provides a written description of the process for different water meters the Company utilizes. This can be found at: [www.amwater.com/moaw/resources/PDF/Customer-Service/MOAW\\_WaterMeter\\_FactSheet.pdf](http://www.amwater.com/moaw/resources/PDF/Customer-Service/MOAW_WaterMeter_FactSheet.pdf).

**Q. COMPLAINANT ALLEGES THAT MAWC HAS VIOLATED COMMISSION RULE 20 CSR 4240-13.040(5), WHICH PROVIDES THAT THE UTILITY MUST**

1           **MAINTAIN CERTAIN RECORDS ON ITS CUSTOMERS FOR AT LEAST TWO**  
2           **(2) YEARS. WHAT RECORDS MUST THE COMPANY MAINTAIN?**

3    A.     Pursuant to the Rule, the Company must maintain the following: (A) The payment  
4           performance of each of its customers for each billing period; (B) The number and general  
5           description of complaints registered with the utility; (C) The number of settlement  
6           agreements made by the utility; (D) The actual number of discontinuances of service due  
7           to each of the following categories of reasons: 1. The customer's failure to comply with a  
8           settlement agreement or cold weather rule payment agreement; 2. The customer's failure  
9           to make any other required utility payment; 3. Unauthorized interference, diversion, or use  
10          of utility service; and 4. All other reasons combined; (E) Actual number of reconnections;  
11         and (F) Actual number and amounts of refunds of deposits.

12   **Q.     DOES MAWC MAINTAIN SUCH RECORDS FOR AT LEAST TWO YEARS?**

13   A.     Yes.

14   **Q.     DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

15   A.     Yes.

**THE FOLLOWING SCHEDULES ARE CONFIDENTIAL IN  
THEIR ENTIRETY PURSUANT TO 20 CSR 4240-2.135.1 AS  
THEY CONTAIN CUSTOMER SPECIFIC INFORMATION.**

**SCHEDULE PE-1-C (CONFIDENTIAL)**

**SCHEDULE PE-2-C (CONFIDENTIAL)**

**SCHEDULE PE-3-C (CONFIDENTIAL)**

**SCHEDULE PE-4-C (CONFIDENTIAL)**

**SCHEDULE PE-5-C (CONFIDENTIAL)**