

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

In the Matter of the Request of Liberty            )  
Utilities (Missouri Water) LLC d/b/a            )  
Liberty for Authority to Implement a            )     Case No. WR-2024-0104  
General Rate Increase for Water and            )  
Wastewater Service Provided in its            )  
Missouri Service Areas                            )

**NOTICE OF COMPLIANCE**

**COMES NOW** Liberty Utilities (Missouri Water) LLC (“Liberty” or the “Company”) and submits this Notice regarding the Company’s compliance with settlement paragraphs 15, 17, 20, and 21(c). No action on the part of the Missouri Public Service Commission (the “Commission”) is requested at this time.

1. On January 23, 2025, the Commission issued an *Order Approving Stipulation and Agreement*, effective February 2, 2025 (the “*Order*”). The *Order* approved the parties’ settlement agreement as a complete resolution of this rate case and ordered the parties to comply with the terms of the settlement agreement.

2. Included in the settlement agreement was a provision on the replacement of the Ozark Mountain Water Tank (paragraph 15) by December 31, 2025. In compliance with settlement paragraph 15, as of mid-September 2025, the Company completed the replacement of the Ozark Mountain Water Tank. The Company provided Commission Staff with an update on the status of the tank replacement during the operations meeting held on October 27, 2025. A copy of the applicable slide is included within Exhibit 1.

3. Included in the settlement agreement was a provision on water loss (paragraph 17), requiring the Company to: (a) replace all master meters by December 31, 2025; (b) replace all customer meters capable of being AMI or AMR with AMI or AMR technology in a manner

consistent with Liberty's meter replacement practice; (c) collect and retain gallons of water pumped and sold for each individual water system separately and not grouped together, such as the systems formerly owned by KMB, Taney County Water and Empire; (d) beginning in 2025, and continuing until its next rate case, to submit an annual water loss report/study; and (e) to provide annual reporting showing systems that experience NRW (non-revenue water) equal to or greater than 20% and any leak detection efforts implemented by Liberty.

4. In compliance with paragraph 17: (a) all master meters were replaced as of October 27, 2025; (b) replacement of AMI or AMR is ongoing and remains on track; (c) the Company is collecting and retaining data on gallons of water pumped and sold for each individual water system; (d) the Company has compiled and is submitting its annual water loss report/study, attached as Exhibit 2; and (e) the electronic excel submission of Exhibit 2 provides a listing of systems experiencing NRW levels equal to or greater than 20%.

5. In addition, the Company conducted a system-wide walkdown of all water meters, one purpose of which was to help identify potential leaks. The Company will continue to analyze the data collected through the meter walkdown. The Company has also developed reports to identify low-usage meters in order to evaluate the accuracy of usage readings. The Company believes that meter standardization is an important component of its efforts to reduce NRW. Currently, more than 20 different meter types are in use across the Company's 24 water systems. The Company recognizes the importance of identifying the underlying causes of NRW and will continue to develop and refine processes and procedures to drive further improvement.

6. Included in the settlement agreement was a provision on a Preventative Maintenance Plan ("PMP") (paragraph 20), requiring the Company to establish a general PMP for water and for

sewer by December 31, 2025. The specific tasks will be tracked and managed through Liberty's Preventive Maintenance system at an asset-by-asset level.

7. In compliance with paragraph 20, the PMP was fully implemented as of December 31, 2025. The Company adopted the following documents published by the U.S. Environmental Protection Agency (EPA) as the general guidelines for designing PMPs for each of the Company's systems: Preventative Maintenance for Small Public Water Systems Using Ground Water; and Maintenance Management Systems for Municipal Wastewater Facilities. Likewise, the Company assigned periodic maintenance schedules for approximately 9,500 assets to date in its Preventative Maintenance System (SAP Maintenance Module) based on manufacturer recommended service schedules. Work orders are generated automatically by SAP in advance, allowing assignment and completion of tasks by the scheduled dates. New assets are assigned schedules as they are placed into service.

8. The Company provided Commission Staff with an update on the status of the PMP during the operations meeting held on October 27, 2025. A copy of the applicable slide related to the PMP is included as Exhibit 3.

9. Included in the settlement agreement was a provision on the Pre-Checked Box for Paperless Enrollment (paragraph 21(c)), requiring the Company to remove the pre-checked box for paperless enrollment.

10. In compliance with settlement paragraph 21(c), the Company removed the pre-checked paperless billing option from My Account on February 27, 2025. On June 5, 2025, a vendor-implemented system update unrelated to this issue briefly reinstated the pre-checked box. The Company promptly identified the issue, and the vendor implemented a corrective fix on June 6, 2025. Since that time, the pre-checked option has remained removed.

WHEREFORE, Liberty respectfully submits this Notice regarding the Company's compliance with the noted settlement provisions. No action on the part of the Commission is requested at this time.

Respectfully submitted,

/s/ Diana C. Carter

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**Certificate of Service**

I hereby certify that the above document was filed in EFIS on this 31<sup>st</sup> day of March, 2026, with notification of the same being sent to all counsel of record. This filing was also sent by electronic transmission to all counsel of record.

/s/ Diana C. Carter