

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

Rebecca Stark,)	
)	
Complainant,)	
)	
v.)	File No. WC-2026-0290
)	
Missouri-American Water Company,)	
)	
Respondent.)	

ANSWER

COMES NOW Respondent Missouri-American Water Company (“MAWC” or “Company”), by and through the undersigned counsel, and for its Answer to Complaint in response to the Complaint filed by Rebecca Stark (“Complainant”), respectfully states to the Missouri Public Service Commission (“Commission”) as follows:

1. MAWC is without sufficient information to admit or deny that Complainant resides at ** _____ ** and therefore denies the same.
2. MAWC admits that it has provided, and provides, water service to the service address of ** _____ ** (“property”) in the name of the Complainant.
3. MAWC admits that its address is 727 Craig Road, St. Louis Missouri 63141.
4. MAWC admits that it is a public utility under the jurisdiction of the Missouri Public Service Commission (“Commission”).
5. MAWC denies that the amount at issue is ** _____ **.
6. MAWC denies the allegations that it installed two faulty meters or otherwise produced faulty readings at Complainant’s residence and further denies MAWC billed for

** _____ ** in excess water charges. MAWC further states that it is without sufficient knowledge or information to form a belief as to the truth of Complainant's allegation that the Metropolitan St. Louis Sewer District ("MSD") bill increased by approximately ** _____ **, and therefore denies the same. The remainder of the allegations in Paragraph 6 are not allegations of fact to which a response is required,

7. In response to the allegations contained in paragraph 7:

- The reference to Commission Rule 20 CSR 4240-13.024 contained in Paragraph 7 is not an allegation of fact to which a response is required and further notes that there does not appear to be a utilizing that citation.
- MAWC admits that it installed a water meter at Complainant's residence on January 7, 2024, and again on May 20, 2024.
- MAWC further admits that it billed Complainant for 15,200 gallons in the billing period January 8, 2024, through January 25, 2024, and 19,200 gallons of water usage for the billing period of January 26, 2024, through February 26, 2024.
- MAWC is without sufficient knowledge or information to form a belief as to the truth of Complainant's allegation that she was not residing in the home during that period or otherwise could not have used that quantity of water, and therefore denies the same.
- MAWC further admits that it billed Complainant for approximately 8,300 gallons of usage for the period May 24, 2024, to June 25, 2024, but denies the allegation that such bill was "a very high water bill."

8. In response to the allegations contained in paragraph 8:

- MAWC states that on a field service visit on April 15, 2024, the field service representative did notate a possible problem with the toilet flapper.

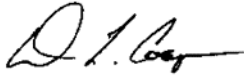
- MAWC denies any implication that it failed to timely update Complainant's contact information.
- MAWC admits that Complainant contacted the Company to request an inspection and that Company personnel subsequently conducted inspections at the property, including in or around April 25, 2024, and July 2024.
- MAWC further admits that, at the time of such inspections, the meter was found to be operating properly.
- MAWC denies the allegation that its personnel improperly shifted focus to "inexplicable" usage or unsubstantiated leaks.
- MAWC admits that its representatives did not observe leaks within the premises during their visits.
- MAWC further denies the allegation that its personnel acted improperly or made inappropriate statements regarding the Complainant's water usage and denies any implication that it inaccurately attributed usage to Complainant.
- MAWC admits Complainant contacted the Better Business Bureau ("BBB") and further states that the Company responded to the BBB on October 24, 2024, and the BBB closed the matter on November 1, 2024.

9. MAWC denies that any meter installation resulted in improper or inaccurate meter readings and denies that any alleged increase in usage was attributable to a faulty meter. MAWC states that its determinations were based on actual meter readings. Further, MAWC affirmatively states that all metering equipment is installed, maintained, and tested in accordance with applicable standards and tariffs, and that all charges assessed were based on readings obtained in the ordinary course of business.

10. Except as expressly admitted in this *Answer*, MAWC denies each and every allegation contained in the *Formal Complaint*.

WHEREFORE, MAWC having fully answered the *Formal Complaint*, MAWC requests the Commission grant such further relief as the Commission deems just and reasonable.

Respectfully submitted,



**BRYDON, SWEARENGEN
& ENGLAND, P.C.**

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following parties of record, this 26th day of May 2026:

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