

Before The Public Service Commission  
of The State of Missouri

FILED  
June 24, 2026  
Missouri Public  
Service Commission

Andrew J. Norris

Complainant's Name(s)

Complainant,

Missouri-American Water  
Company

Utility Provider's Name

Respondent,

Case No. \_\_\_\_\_

(Completed by PSC)

## Formal Complaint

1. Complainant resides at:

(Address of Complainant)

(City)

(State)

(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)

Missouri-American Water Company  
(Address of Respondent)

MO 63141  
(Zip Code)

5. The type of utility service at issue is: Water  
(Example: Gas, Electric, Water, Sewer, etc.)

6. The amount at issue is: \$ [REDACTED], plus ongoing rent loss of \$ [REDACTED] per month beginning in March 2026 and continuing until the matter is resolved.

(If applicable, state how much money is in dispute.)

Table 1: Relief Requested

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8. 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 requested relief, including the specific facts and circumstances that demonstrate a violation of applicable statutes, tariffs, or Commission regulations or orders.)

Table 2: Explain Why Relief Should Be Granted:

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| On December 26, 2024, Missouri-American Water Company replaced the water meter and valve at [REDACTED]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| [REDACTED]. Missouri-American Water's tariff defines a service line as including related valves, fittings, and appurtenances used to provide water service, and distinguishes company-owned and customer-owned portions of the service arrangement. The PSC complaint guide states that a formal complaint must identify the statute, tariff, Commission regulation, or order allegedly violated and explain why relief should be granted. The property was winterized with the water believed to be off, but flooding was discovered on February 3, 2026. Contractors and plumbers later traced the flooding to the main shutoff valve installed by Missouri-American Water Company in connection with the meter replacement, and multiple licensed or professional parties concluded that the valve was defective, faulty, or nonfunctional because it did not stop water flow when closed. The original complaint also states that water continued to flow even after curbside shutoff efforts and that a Missouri-American Water representative personally observed the condition at the property. |

Complainant alleges that Respondent violated applicable tariff obligations and utility-service obligations by installing or causing to be installed a valve associated with utility service that failed to function properly, and by failing to resolve the resulting dispute through the informal PSC process despite repeated inspections, preservation of the extracted valve, and repeated access to the property and valve for investigation. Complainant further alleges that Respondent's handling of the matter caused continuing financial harm, including property damage and ongoing rent loss beginning in March 2026.

9. The Complainant has taken the following steps to present this matter to the Respondent:

(Provide a detailed description of the actions you have taken to resolve this matter, including any communications with the utility or other parties, the steps undertaken, and the outcomes of those efforts.)

8. The relief requested is appropriate because Respondent has violated a

*Table 3: Description of the Actions Taken*

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Complainant, through property management and directly, reported the flooding and valve issue after the loss was discovered on February 3, 2026. Contractors and licensed plumbers investigated the flooding and concluded that the shutoff valve installed by Missouri-American Water Company was defective or nonfunctional. A curbside shutoff was requested on February 9, 2026, and the valve was later replaced on March 10, 2026 at Complainant's expense, after continuing water flow and damage.                                                                                                                                                                                                                          |
| Complainant filed an informal complaint with the Missouri Public Service Commission and pursued the matter with Missouri-American Water Company and persons involved in the investigation. The informal complaint was later reopened after PSC staff indicated that the matter had been treated as though Respondent was waiting on Complainant, which Complainant disputed as inaccurate in light of the repeated inspections, preserved valve, and ongoing communications. Complainant preserved the extracted valve, documented the damage and installation with photographs and witness information, permitted inspection activity, and repeatedly requested clarification and resolution, but the matter remains unresolved. |

Table 4: Description of Actions Taken Continued...

[illegible]

6/24/2026  
Date

Digitally signed by Andrew J. Norris  
DN: cn=Andrew J. Norris, o=UCLA,  
ou, email=anorris@mednet.ucla.edu,  
c=US  
Date: 2026.06.24 10:25:52 -07'00'

Complainant's Phone Number

Andrew J. Norris  
Complainant's Printed Full Name

██████████  
Alternate Contact Number

Complainant's E-mail Address

Instructions:

- Attach additional pages, as necessary.
- Attach copies of any supporting documentation. -- Do not include original supporting documentation, as the documents will not be returned.
- This submission will initiate a formal case before the PSC.
- Per PSC rule 4 CSR 4240.02.040(5) Complainants may represent themselves in the complaint case. They may not file or appear on behalf of another individual, business, or organization, unless they are an attorney who is authorized to do so.
- Submit electronically via EFIS at <https://efis.psc.mo.gov/>; or
- Mail to:

The Missouri Public Service Commission  
Secretary of the Commission  
Attn: Data Center  
P.O. Box 360  
Jefferson City, MO 65102

# FORMAL COMPLAINT

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

**Complainant:** Andrew J. Norris

**Address:** [REDACTED],

**City, State, ZIP:** [REDACTED]

**Phone:** [REDACTED]

**Email:** [REDACTED]

vs.

**Respondent:** Missouri-American Water Company

**Service Address:** [REDACTED].

**City, State, ZIP:** [REDACTED]

**Account Number:** [ACCOUNT NUMBER]

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## NATURE OF COMPLAINT

This formal complaint is filed pursuant to Missouri Public Service Commission regulations concerning defective equipment installed by Missouri-American Water Company that has caused substantial property damage to the above-referenced rental property. Specifically, a faulty main water shutoff valve installed by Missouri-American Water Company during meter installation failed to function properly, resulting in catastrophic water damage during winter conditions.

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## STATEMENT OF FACTS

### Background

The property at [REDACTED] is a rental property managed by Complete Realty Solutions. The property was properly winterized for the winter season, with the main water supply turned off and a deep freeze unit in place. A complete review of events spanning before, during and after the incident is detailed below.

### Timeline of Events

**[12/26/24]** - Missouri-American Water Company replaces the meter and valve in [REDACTED]  
[REDACTED]

**[3/13/25]** - Received unusually high water bill from Missouri-American Water Company despite main water line being turned off and property winterized.

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**[6/27/25]** - Missouri-American Water Company representative came to property and stated that a toilet running was the source of water usage even though the water was shut off during the high water bill period.

**[2/3/26]** - Complete Realty Solutions (property management company) discovered flooding throughout the house and basement.

**[2/3/26-2-19-26]** - Complete Realty Solutions began emergency remediation, including pumping out water and initiating drying procedures.

**[2/9/26]** - LNC Contractors was called to investigate the source of flooding. Contractors discovered:

- Blown pipe in kitchen
- Flooded floors throughout house
- Basement flooding
- Flooded bathroom

**[2/9/26]** - LNC Contractors traced the source of the flooding to the main water shutoff valve that had been installed by Missouri-American Water Company in conjunction with the new water meter installation.

**[2/9/26]** - A request was made to shut off curbside to stop water inflow into the house.

**[2/10/26]** - Licensed plumber (ARIA Contracting, University City MO) conducted independent assessment and concluded that the main shutoff valve installed by Missouri-American Water Company was faulty and does not shut off water flow when closed.

**[2/10/26]** - Complete Realty Solutions reached similar conclusion regarding the defective main shutoff valve.

**[2/23/26]** - Complete Realty Solutions reached similar conclusion regarding the defective main shutoff valve.

**[2/29/26]** - Flow King Plumbing service reached a similar conclusion describing the valve as a "non functional valve."

**[3/4/26]** - I Andrew Norris visited the property and witnessed that water was still flowing out of the pipes as a slow bypass leak on the curbside main with water still coming through the cabinets, kitchen, bathroom and the basement was full of water underneath these areas and dripping water. One of the Missouri-American Water Company representative came to the property (Dru) and observed the valve and meter. He was confused as the water was still flowing but the meter read zero since Feb 9. The plywood underneath the bathroom and kitchen and hall were saturated and moldy and dripping with the curbside main shut. In addition, the walls and stairs were thick with mold. We were hoping the curbside would stop the waterflow, but it did not. Dehumidifiers were on the entire time.

**3/11/2026:** I received a call from Loellke plumbing from an individual Andrew ([REDACTED]) who he said he had questions. He stated that he was there on behalf of Missouri-American Water Company as a subcontracted plumbing company. He proceeded to tell me he observed the valve and it was not the valve they installed (admitting they installed a valve). I let him know I have been trying to coordinate with his company since the 4<sup>th</sup> to have one of their people come out and look but we could not wait as we realize that the curbside shutoff also is leaking and there is still water coming out of the pipes (curbside main was shut off Feb 9, 2026) and water is saturating the floors (which he also acknowledged that it is still dripping). Dru ([REDACTED]) an Missouri-American Water Company representative entered the property on 3/3/2026 with me personally and was able to witness the installed valve from Loellke plumbing, water pipe breakage etc. We had Aria plumbing out the day before to fix the pipes and install a new valve. The valve was replaced on 3/10/2026 between 11am to noon. Andrew proceeded to tell me that it is illegal in St. Louis County to have the HVAC off when the property is winterized (not true) and that the representative from the property management company said it was off. He said that the installed ball valve was also illegal in St. Louis County to have as the house main shutoff (Not a true<sup>1</sup> statement). He proceeds to cycle back to the HVAC stating that legally it must be on in the winterization process otherwise it is not his company's problem even if the pipes are empty, and "the property management representative said it was off." I told him that this was not a legal requirement<sup>2</sup>, the management company properly winterized the property by draining out ALL water out of the lowest pipes and a certified licensed technician came out a day later to service the HVAC and that it was working. Now it is not working because it was submerged under 2 feet of water. He seemed to go back and forth with differing reasons to say it is not their fault with several non-factual statements in between. He ended the conversation saying, "I need to go." I called him back and left a message letting him know that I did confirm and have documentation showing the HVAC was working the day after the technician for winterization left. He did not answer or return the call.

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<sup>1</sup> St. Louis city and county plumbing codes do not prohibit ball valves for the interior main shutoff valve (the one inside the house after the meter or curb stop); local plumbers and forums confirm ball valves are commonly used and recommended for reliability over old gate valves. The city Water Division regulations specify a "suitable water shut off valve" between the water main and meter (or on service lines), but do not mandate valve type for the homeowner's interior main shutoff.

<sup>2</sup> St. Louis plumbing codes (2021 Uniform Plumbing Code) and Water Division regulations require accessible main shutoff valves but impose no mandates to keep HVAC running, maintain heat, or leave water pressurized during unoccupied periods or winterization. Missouri PSC and local St. Louis guidance explicitly recommend shutting off the main water valve and draining pipes to prevent freezing bursts, with no legal prohibition on turning off HVAC (common for vacation/second homes).

# DESCRIPTION OF DAMAGES

The faulty main water shutoff valve installed by Missouri-American Water Company has resulted in extensive property damage, including but not limited to:

- Blown pipes in kitchen and bathroom areas
  - Water damage throughout interior floors, subfloor and floor joist damage
  - Damage to kitchen cabinetry.
  - Delamination of most of the oak flooring (urethane coming off wood throughout house)
  - Basement flooding requiring professional water extraction
  - Damage to HVAC system (assessment completed).
  - Damage to new hot water tank (submerged).
  - Costs associated with emergency remediation and drying services
  - Mold accumulation and damaged wood and drywall
  - Ongoing repair and restoration costs
  - Loss of rent will be an ongoing factor until repaired.
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## FACTUAL BASIS FOR COMPLAINT

### Defective Equipment Installation

Missouri-American Water Company installed a main water shutoff valve in connection with a new water meter at the subject property. This valve is defective and does not perform its essential function: shutting off the water supply to the property when turned to the "off" position. The curbside shutoff also leaked substantially when turned off.

### Insidious Nature of the Defect

The defective valve created an insidious situation where:

1. The property owner and management believed the main water supply was shut off for winterization.
2. Water continued to flow through the system despite the valve being in the "off" position.
3. The property was left vulnerable during a deep freeze weather event.
4. Pipes froze and burst due to water remaining in the system.
5. Damage occurred over an extended period.
6. The property could not be protected from freezing damage despite proper winterization procedures.

### Multiple Professional Confirmations

The defective nature of the shutoff valve has been confirmed by:

1. LNC Contractors - physically tested the valve and confirmed it does not stop water flow when closed.
2. Licensed plumber – Aria Plumbing independent professional assessment confirming faulty main shutoff valve.
3. Licensed plumber – Flow King Plumbing independent professional assessment confirming faulty main shutoff valve.
4. Complete Realty Solutions - property management company observation and conclusion.

## **Utility Company's Responsibility**

Missouri-American Water Company is responsible for the proper installation and functioning of equipment it installs on customer properties, including water meters and associated shutoff valves. The installation of a non-functioning shutoff valve constitutes:

- Defective installation of utility company equipment.
- Failure to provide essential service control to the customer.
- Violation of reasonable service standards.
- Direct causation of substantial property damage.
- Undue expenses associated with excessive water usage when main installed by MO American Water Company was shut off.

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## **RELIEF REQUESTED**

The complainant respectfully requests that the Missouri Public Service Commission:

1. Investigate Missouri-American Water Company's installation of the defective main water shutoff valve at the subject property.
2. Determine that Missouri-American Water Company is responsible for damages resulting from the installation of defective equipment.
3. Order Missouri-American Water Company to immediately replace the defective shutoff valve at curbside with a properly functioning valve at no cost to the property owner.
4. Order Missouri-American Water Company to compensate the property owner for all damages resulting from the defective valve installation, including:
  - Water damage to floors and structures.
  - Emergency water extraction and remediation costs.
  - Repair and restoration costs for blown pipes.
  - HVAC system repair costs and water tank.
  - Remediate mold damage.
  - Any other consequential damages resulting from the defective equipment.

5. Credit the property owner's account for water charges incurred due to the faulty valve that could not be shut off.
  6. Investigate whether similar defective shutoff valves have been installed at other properties served by Missouri-American Water Company.
  7. Impose such other relief as the Commission deems just and appropriate.
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## VERIFICATION

I hereby verify under penalty of perjury that the facts stated in this complaint are true and correct to the best of my knowledge and belief.

**Signature:** \_\_\_\_\_

**Printed Name:** Andrew J. Norris Ph.D.

**Date:** \_\_\_\_\_

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## ATTACHMENTS

The following documents are attached in support of this complaint:

1. Licensed plumber's written assessment of faulty main shutoff valve
  2. Complete Realty Solutions documentation of flooding discovery and remediation
  3. LNC Contractors report and findings regarding defective valve
  4. Photographs of water damage
  5. Invoices for emergency remediation and repair services
  6. Any other relevant documentation
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## FILING INSTRUCTIONS

**Mail this complaint to:**

Secretary  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102-0360

**Or file electronically at:** <https://psc.mo.gov>

**For questions, contact PSC Consumer Services:**

Phone: 1-800-392-4211

Fax: 573-526-1500

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**Note:** Prior to filing this formal complaint, the complainant attempted to resolve this matter directly with Missouri-American Water Company. The utility company has failed to adequately address the defective equipment installation and resulting damages, necessitating this formal complaint to the Commission.

## FORMAL NOTICE FROM CONTRACTOR ON BEHALF OF PROPERTY OWNER

Issued by: LNC Contracting LLC

On behalf of: Dr. Andrew Norris

Property Address: [REDACTED]

In coordination with: Complete Realty Solutions (Property Management)

This notice is being issued by LNC Contracting LLC on behalf of the property owner, Dr. Andrew Norris, regarding a serious issue involving the main water shutoff valve serving the above-referenced property. Based on observed conditions, the main shutoff valve appears to have been improperly installed or is otherwise failing to fully seal when placed in the closed position.

On Thursday of last week, during a scheduled occupancy inspection, the main water supply to the property was turned on and subsequently shut back off. Despite the main valve being in the closed position, water continued to flow from interior plumbing connections.

On Monday, we personally inspected the property and confirmed that water was still actively flowing from interior plumbing locations, despite the main shutoff valve remaining closed. This behavior is not consistent with a properly functioning main shutoff valve and indicates that water was continuing to pass through the valve internally.

A main shutoff valve that does not fully seal can result from improper installation (including being installed backwards), debris or sediment lodged on the valve seat, or failure of the internal sealing components. In these situations, the valve can feel fully closed and stop turning, while still allowing continuous water flow. The conditions observed at this property are consistent with this type of failure.

This condition directly explains not only the recent flooding event, but also a significantly elevated water bill incurred over a three-month period within the past year. A main shutoff valve that leaks internally would allow any downstream leak—particularly exterior lines or concealed plumbing—to run continuously without obvious signs, resulting in substantial water usage being recorded at the meter.

The plumbing failures discovered during recent work did not create this condition; they exposed it. A properly functioning main shutoff valve would have prevented continued water flow once closed. The continued movement of water with the valve shut demonstrates that the source of the issue originates at or upstream of the main shutoff valve.

This notice is provided to formally document that the excessive water usage and resulting property damage are consistent with a main shutoff valve that was not functioning correctly at the time of service. Responsibility for water passing through a valve that does not fully close rests with the integrity and installation of that valve.

Date Issued: February 09, 2026

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Sincerely,

LNC Contracting LLC

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