

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

Rebecca Stark,	)	
	)	
Complainant,	)	
	)	
v.	)	<u>Case No. WC-2026-0290</u>
	)	
Missouri-American Water Company,	)	
	)	
Respondent.	)	

MOTION FOR EXTENSION OF TIME TO RESPOND TO STAFF REPORT

COMES NOW Missouri-American Water Company ("MAWC"), by and through counsel, and for its *Motion for Extension of Time to Respond to Staff Report* pursuant to 20 CSR 4240-2.050(3)(B), states as follows:

1. On April 23, 2026, Rebecca Stark filed her formal *Complaint* against Missouri-American Water Company, alleging that MAWC installed faulty meters, or otherwise relied on faulty meter readings, causing water usage to be billed at levels that she contends could not have occurred. The *Complaint* identifies disputed water charges and related increased charges from the Metropolitan St. Louis Sewer District, and seeks reimbursement, interest, and other relief. Ms. Stark further alleges that she was not living in the home during the primary disputed period; that she disputed the usage; that she requested inspections; and that she disagreed with the Company's explanations attributing the usage to possible leaks, a toilet flapper, or customer-side conditions.

2. Also on April 23, 2026, the Commission ordered its Staff to investigate the *Complaint* and file a report no later than June 8, 2026.

3. In its *Answer* filed on May 26, 2026, MAWC admitted that it provides water service to the service address and that it is a public utility subject to the Commission's

jurisdiction. MAWC denied that it installed faulty meters, produced faulty readings, or billed Ms. Stark for excess water charges. MAWC stated that its personnel inspected the property, that the meter was found to be operating properly, that Company representatives did not observe leaks within the premises during their visits, and that all charges were based on actual meter readings obtained in the ordinary course of business.

4. After one extension, Staff filed its *Report and Recommendation* on July 2, 2026.¹

5. Pursuant to Rule 20 CSR 4240-2.080(13), “Parties shall be allowed ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered by the commission.” The Commission has not ordered otherwise, and this motion is thus timely as it is filed within ten days of the filing of Staff’s *Report and Recommendation* on July 2, 2026.

6. In the *Staff Report* and attached *Staff Memorandum*, Staff states that it interviewed Ms. Stark, reviewed the information provided by the parties, and also reviewed meter reading data, customer interaction records, service orders, and meter test results. Staff stated that despite its analysis of meter reading data, “Staff is unable to identify what caused the steady decrease in usage over time. If there had been a leak, it is logical that the usage would have been more consistent rather than steadily decreasing. While some of the usage appears consistent with a leaking flapper valve in a toilet, other information indicates unexpectedly high usage over certain hour-long periods. Furthermore, Staff is concerned about the high reads that showed up on each meter

¹ Staff’s *Report and Recommendation* consists of a cover pleading, referred to herein as the “*Staff Report*,” and an attached memorandum, referred to as the “*Staff Memorandum* or *Staff Memo*.”

shortly after installation. Some of those hourly reads are near or even exceed the maximum amount of water that can pass through a toilet water supply line.” *Staff Memo*, p. 10. Staff states in conclusion that it “cannot determine from the present record whether the disputed usage was caused by a customer-side leak, a meter or meter-reading issue, or some other condition.” *Staff Report*, p. 6. Staff also noted that a factual dispute exists concerning whether or not the customer was notified of her right to witness the meter test under Rule 16D of the Company’s tariff. *Staff Report*, p. 5. Staff’s recommendation is that “the Commission order the parties in interest to file such replies or other pleadings as they may deem necessary within a time certain and thereafter set a status hearing or issue such orders as the Commission deems appropriate,” in other words, that the case proceed to hearing. *Staff Report*, p. 6.

7. In view of Staff’s inability to determine the cause of the meter readings in question that resulted in the disputed bills, as well as Staff’s expressed doubts as to the meter test, e.g., “[t]he meter tested accurately at the time of the May 24, 2024 test, but that test does not conclusively establish how the meter or reading equipment functioned during the earlier disputed periods,” *Staff Report*, p. 5, the Company states that it requires additional time to further investigate and analyze this matter and prepare its *Response* to the *Staff Report and Recommendation*. The Company states that further clarity on the issues raised by the *Complaint* will be helpful to the Commission.

WHEREFORE, the Company now seeks an extension of time, up to and including thirty (30) days, within which to further investigate and analyze this matter in order to determine the cause of the readings that are the basis of this dispute; and for such other and further relief as is just and proper in the circumstances.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND, P.C.

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**ATTORNEYS FOR MISSOURI-AMERICAN
WATER COMPANY**

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to all parties of record, this 10th day of July 2026.

/s/ Kevin A. Thompson