

Update Letter to Missouri Public Service Commission

July 17, 2026

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

Re: **Case No. WC-2026-0372**

Andrew J. Norris, Complainant, v. Missouri-American Water Company, Respondent

To the Commission:

Complainant submits this update so the docket reflects a material development concerning the investigation of the valve and related shutoff failures at issue in this matter.

On April 7, 2026, insurer representative [REDACTED] stated in writing that she was actively working to retain an expert to inspect the valve and a property specialist to inspect and document the property. That written communication did not describe destructive testing. On April 8, 2026, Complainant then notified the Commission (Informal complaint PSC case number CI202601346) that destructive testing had been raised by the insurer representative during a phone discussion and requested that the evidence be preserved until any testing protocol could be addressed.

A July 17, 2026 letter from Travelers / The Phoenix Insurance Company now states that the claim is denied and that, if destructive testing is to occur, Complainant must retain an expert to perform the testing and document it, while giving the insurer and other relevant parties an opportunity to attend [file:427]. The same letter states that the insurer found no findings from its visual inspection of the valve sufficient to conclusively establish a cause of loss.

This appears to reflect a significant change in position. The prior written communication referred to an expert inspection of the valve and a property inspection, while the later letter places the burden of arranging and funding destructive testing on Complainant.

Complainant further notes that the evaluation performed to date appears to have been limited to visual observation and manual manipulation of the valve, including handling the valve and turning the knob, without pressure testing or other meaningful non-destructive functional testing. In addition, the forensic engineer who came to the property appeared to be conducting a broader site inspection and wanted the valve present at the same time, rather than performing a direct functional test of the valve itself. Despite

that limited evaluation, the matter has now been shifted directly to destructive testing at Complainant's expense.

Complainant further notes that three professionals (Aria Contractors, University City, MO; Flow King Plumbing St. Louis MO and LNC Contractors, St. Louis MO) have indicated that the valve was not functioning properly in situ. The current denial letter does not appear to address those observations, nor does it appear to reflect a complete evaluation of the broader system failure alleged in this complaint, including the curbside shutoff issues previously raised.

Complainant submits this update so the record reflects: (1) the April 7 written statement that an expert inspection and property inspection were being arranged; (2) the April 8 notice to the Commission that destructive testing had been raised verbally; (3) the insurer's current position that Complainant must now arrange and fund such testing; and (4) Complainant's concern that meaningful non-destructive functional testing was not completed before that burden was shifted.

The Commission's data requests correctly focus on whether Missouri-American Water Company has any policy allowing installation of valves or other appurtenances on the customer-owned portion of the service line, because that threshold question goes to both responsibility and scope of work. That issue appears to have been overlooked in the subcontractor-side communications, which focus on inspection and destructive testing without first addressing whether the valve was properly installed or whether the utility had authority to place it where it was located.

Complainant respectfully submits that the sequence of communications reflects that the inspection process began as a planned visual and non-destructive review of the property and plumbing components, with an engineer present, but later shifted to a demand that destructive testing be retained and funded by Complainant. Based on the written record, the change in position appears to move the burden of further investigation from Respondent's side to Complainant's side without first completing meaningful functional testing of the valve. Complainant respectfully submits that this sequence should be reflected in the docket record.

Respectfully submitted,

Andrew J. Norris

Complainant, pro se



The Phoenix Insurance
Company
P.O. Box 650293
Dallas, TX 75265-0293
Telephone: 720-200-8228
Fax: 877-789-5571

July 17, 2026

Andrew J. Norris
[REDACTED]

RE: INSURED: Loellke Plumbing Inc
DATE OF LOSS: 2/3/2026
CLAIM NUMBER: [REDACTED]
LOCATION: [REDACTED]

Dear Dr. Norris,

We are writing to confirm that we have reviewed all of the information available to us and completed our research into the incident which occurred on or about February 3, 2026.

We have an obligation to pay, on behalf of our insured, claims where our insured is determined to be legally liable for your claimed damages from the related incident.

During the investigation, we found that there were no findings from the visual inspection of the valve to conclusively establish a cause of loss with respect to this case. Therefore, we respectfully deny this claim.

In the event you would like to perform destructive testing on the valve, you will need to engage an expert to assist you in this case and document with written reports and photographs.

In the event you would like to proceed with this option, please have your expert contact us and all relevant parties so that we have the opportunity to attend. Any destructive testing without our attendance could result in a spoliation of evidence.

Lastly, In the event you have other information you would like us to consider, please forward for review.

Sincerely,

[REDACTED]
Construction Claim Professional
[REDACTED]



Andrew Norris <[REDACTED]>

RE: [External] Re: Travelers claim [REDACTED]

1 message

Wolett, Meg A [REDACTED]
To: Andrew Norris [REDACTED]

Tue, Apr 7, 2026 at 1:11 PM

Good afternoon Andrew,

Thank you for your time yesterday regarding your case. As discussed, I am actively working to retain an expert to inspect the valve. If you have a representative you would like to be present while the inspection occurs, please advise and provide their contact information. If you have retained an attorney or opened an insurance claim, please forward their contact information and I will issue communications to their office.

In addition to the inspection, I am working to retain a property specialist to inspect and document the property. Do I have permission to share your contact information, or the property manager's contact information to look at the home?

Do I have permission to speak with the property manager to discuss the mitigation work and any repairs that have occurred?

Thank you for your time,

[REDACTED]
Construction Claims
Travelers

[REDACTED]
[REDACTED]
[REDACTED]

THE PHOENIX INSURANCE COMPANY



Please use our upload feature to send documentation to me referencing your claim number and date of loss using the following link: <https://www.travelers.com/claimuploadcenter/>

For best results:

- Be sure to have a strong internet connection.
- Remain on the upload screen until the transfer is complete.
- For mobile devices, keep the transfer window active and do not allow it to lock until the upload is complete.

Files up to 30MB are supported and the file size will automatically detect during the upload process. If your files are larger than 30MB, please let me know.



Andrew Norris <[REDACTED]>

Re: Attn: Charm

1 message

Andrew Norris <[REDACTED]>

Wed, Apr 8, 2026 at 10:23 AM

To: pscinfo@psc.mo.gov

Subject: Request to preserve evidence and require non-destructive testing first

Dear Missouri Public Service Commission/ Charm,

Just a follow up on my previous email. I writing to formally request that the Commission take notice of the insurer's request to inspect and potentially destroy the valve at issue in my complaint.

The valve is central evidence in this matter. I am concerned that destructive testing at this stage could permanently alter or destroy key evidence before the defect can be established through less invasive means. I have already informed the insurer that I believe non-destructive testing should be performed first to determine whether the valve bypasses or otherwise fails to shut off properly when hand-tight and closed. (photo of the removed valve is in my complaint),

Because this valve is a simple hand-operated shutoff valve, there is no justification for immediately proceeding to destructive testing without first exhausting non-destructive methods that could show whether the valve is defective while preserving the evidence intact.

I respectfully request that the Commission:

1. note my objection to premature destructive testing;
2. direct that the valve and related shutoff components be preserved;
3. require that any testing begin with non-destructive inspection and leak testing;
4. ensure that any destructive testing only occur, if at all, under a written protocol after the less invasive methods have been exhausted.

Thank you kindly for your help with this matter.

Sincerely,
Andrew Norris



Andrew Norris [REDACTED]

RE: Request for non-destructive walkthrough of loss location PSC: CI202601346

1 message

[REDACTED]
To: Andrew Norris <andrew.j.norris@gmail.com>

Cc: [REDACTED]

Mr. Norris:

We are requesting that you provide potential dates that the property can be available. We would ask that you provide three or four dates over the next few weeks that we can confirm with our engineer. Mr. Jordan can also provide his availability upon receipt of your proposed dates, should he care to attend. On behalf of Loelke Plumbing, [REDACTED] of Semke Forensic and I will attend. We would ask that the valve be present at the time of the inspection. We reserve the right to take any non-destructive observations and measurements, including photographs and video, during the inspection. This request includes a visual inspection of the relevant plumbing components. The purpose of the inspection is to ensure that our engineer has an opportunity to visually inspect and document the loss location and relevant plumbing system.

At this time, we are maintaining all applicable privileges, including the work-product, attorney-client, and insured-insurer privileges.

Thank you.

[REDACTED]

ATTORNEY

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

A PROFESSIONAL CORPORATION

[REDACTED]

[REDACTED]

CONFIDENTIALITY NOTICE: This email and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or take action in reliance upon this message. If you have received this in error, please notify us immediately by return email or phone and promptly delete this message and its attachments from your computer system. We do not waive attorney-client or work product privilege by the transmission of this message.

NOTE: Email is not a secure method of communication. Any email that is sent to you or by you may be copied and held by various computers as it is transmitted. Persons not participating in our communication may intercept our communications by improperly accessing your computer or this law firm's computers—or even some computer unconnected to either of us—that the email may have passed through. I am communicating to you via email because you have consented to receive communication via this medium. If you change your mind and want future communication to be sent in a different fashion, please let me know at once.

From: Andrew Norris <[REDACTED]>

Sent: Monday, June 22, 2026 5:58 PM

To: [REDACTED]