

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Zachary Beauford and Cassandra Beauford (Complainant)

V.

Liberty Utilities (Missouri Water) LLC, d/b/a Liberty (Respondent)

Case No. WC-2026-0370

Response

Responding to point 1:

I affirm that the complainants reside at [REDACTED].

To point 3:

I did not plead respondent's address because Liberty has multiple locations.

To point 6:

I did not plead a specific dollar amount because Liberty is demanding the installation of a new service connection which at this time is an unspecified "actual cost".

To point 11:

Liberty has argued that Rule 5.E of the Tariff is not applicable to my situation "because the subject premises is a new building requiring a new service connection." Rule 5.E expressly gives allowance for the connecting of "new buildings" rather than forbidding it. Additionally, the only stated reason for which a new building can be denied connection to an existing service connection is when said connection has been proven to be a hazard to health and safety by testing and examination. I contend that Rule 5.E is applicable to my situation and the Rule gives express allowance for me to use the existing service connection that was, to the best of my knowledge, installed for the future development of my lot in an existing subdivision.

To point 12:

I deny that Rule 5.B is applicable. Rule 5.B governs the construction of a new service connection, which, according to Rule 5.E, I am exempt from. Rule 5.E gives express permission for the use of an existing service connection for "new buildings".

To point 13:

The "Actual Cost" of a New Service Connection in the Schedule of Service Charges (Tariff 3-1-2025) is "for the construction" of a "New Service Connection". This is not applicable because Rule 5.E does not require me to install a new service connection but gives permission

to use the existing one. Additionally, I contend that the \$[REDACTED] hydraulic test fee is arbitrary. In the Schedule of Service Charges (Tariff of 3-1-2025) there is no designation for a “hydraulic modeling” fee to determine the “potential” impact of a “requested service” connection. I maintain that Liberty does not have the authority to charge this arbitrary fee. Please note that no Tariff reference was provided for it.

More to point 13:

Liberty has stated that I am requesting “service extension on the water system”. This information is incorrect. This terminology seems to have been derived from Rule 14 which addresses the “Extension of Water Mains” and gives allowance to charge for extensions in areas where no water mains exist. I would like it to be on record that I am not requesting an extension of the water main. A two-inch water main runs across my property frontage and supplies water to houses on every side of my property and is the water main that services my existing service connection.

Liberty has failed to demonstrate according to the Tariff or any applicable laws that my request to use the existing service connection should be denied. I respectfully ask the Public Service Commission to require Liberty to comply with the Tariff (Rule 5.E) and provide water service using the existing service connection at my property and to dispense with the arbitrary hydraulic test fee.

Respectfully,

Zachary Beauford

July 24, 2026