

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

Timothy O’Leary,	)	
	)	
Complainant,	)	
	)	
v.	)	<u>Case No. WC-2026-0371</u>
	)	
Missouri-American Water Company,	)	
	)	
Respondent.	)	

ANSWER

COMES NOW Missouri-American Water Company ("MAWC"), by and through counsel, and for its *Answer* to the *Complaint* filed by Timothy O’Leary (“Complainant”), states as follows:

1. MAWC is without sufficient information to admit or deny that Complainant resides at
**** [REDACTED] **** and therefore denies the same.

2. Complainant did not plead the service address but MAWC states that it provides water service to the service address of **** [REDACTED] **** (“premises”) in the name of Complainant.

3. MAWC admits that its address is 727 Craig Road, St. Louis, MO 63141-7114.

4. MAWC admits that it is a public utility under the jurisdiction of the Missouri Public Service Commission.

5. Complainant did not plead the amount at issue but elsewhere in the *Complaint* it is stated as **** [REDACTED] ****. MAWC denies that this is the amount at issue.

6. MAWC denies that Complainant is entitled to any relief.

7. Complainant did not plead the provision that he believes entitles him to relief; but MAWC denies that it has violated any statute, Commission rule or order, or any provision of its Commission-approved tariff.

8. With respect to the allegations in Paragraph 8 of the *Complaint*, MAWC admits Mr. O'Leary filed an informal complaint with the Commission's Customer Service department and MAWC responded to the informal complaint on June 5, 2026. MAWC further admits that Complainant initially contacted MAWC's Customer Service department on May 15, 2026, regarding concerns about increased water usage at the premises and that a field service representative ("FSR") visited the premises on May 22, 2026, in response to those concerns. MAWC further states the Complainant contacted MAWC after the FSR visit requesting a second inspection. MAWC admits that it replaced the water meter on June 1, 2026, and subsequently tested the removed meter on June 5, 2026. The test results confirmed the meter was operating within applicable accuracy standards and properly recording water consumption. MAWC denies all other allegations contained in Paragraph 8 of the *Complaint*.

9. With respect to the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC denies the allegations set out in Paragraph 1.

10. With respect to Paragraph 2 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC admits that it sent a letter to Complainant on April 27, 2026, that the Complainant's meter had been recording constant consumption for at least three consecutive days, but denies all of the other the allegations set out therein.

11. MAWC denies the allegations contained in Paragraph 3 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*.

12. With respect to Paragraph 4 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC states that it is without sufficient information to either admit or deny the allegations set out therein and therefore denies the same.

13. With respect to Paragraph 5 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC admits that constant water consumption was recorded at Complainant's premises starting at 11:00 pm on April 23, 2026, through 1:00pm on April 30, 2026. MAWC further admits it sent the Complainant a letter dated April 27, 2026, a copy of which is attached to the *Complaint* as Exhibit 1. MAWC admits that Exhibit 2 reflects historical usage data for the Complainant's premises as displayed in MAWC's MyWater application. MAWC admits that Exhibit 3 attached to the *Complaint* is a portion of the Complainant's water bill sent by MAWC. MAWC denies all of the other the allegations set out in Paragraph 5.

14. With respect to Paragraph 6 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC admits that it sent Complainant a letter dated April 27, 2026, but is without sufficient information to admit or deny when the Complainant received the letter and therefore denies the same.

15. With respect to Paragraph 7 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC admits that Exhibit 4 attached to the *Complaint* appears to be a copy of a letter from the Consumer Services Department of the Missouri Public Service Commission resolving Complainant's informal complaint against MAWC, but denies all of the other the allegations set out therein.

16. With respect to Paragraph 8 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC admits that it sent Exhibit 5 and 6 to

Complainant, but states that it is without sufficient information to either admit or deny the other allegations set out therein and therefore denies the same.

17. With respect to Paragraph 9 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC denies that it violated any statute, Commission order or regulation, or any provision of its tariff.

18. With respect to Paragraph 10 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC states that it is without sufficient information to either admit or deny the other allegations set out therein and therefore denies the same.

19. With respect to Paragraph 11 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC admits the Complainant's meter ID number included in Paragraph 11 is the Complainant's meter ID number, a FSR visited Complainant's premises on May 22, 2026, and that it sent Complainant a letter on May 26, 2026, but states that it is without sufficient information to either admit or deny the other allegations set out therein and therefore denies the same.

20. With respect to Paragraph 12 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC states that it is without sufficient information to either admit or deny the other allegations set out therein and therefore denies the same.

21. With respect to Paragraph 13 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC states that it is without sufficient information to either admit or deny the other allegations set out therein and therefore denies the same.

22. With respect to Paragraph 14 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC admits a FSR visited Complainant's premises on May 22, 2026, but states that it is without sufficient information to either admit or

deny the other allegations set out therein and therefore denies the same.

23. With respect to Paragraph 15 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC admits it changed the Complainant's meter on June 1, 2026, with a new meter ID number **[REDACTED]** MAWC admits that Exhibits 7a, 7b, and 7c are photographs of meters and that Exhibit 7d displays meter readings. MAWC further states as of July 27, 2026, the new meter readings are displayed in MyWater, but states that it is without sufficient information to either admit or deny the other allegations set out therein and therefore denies the same.

24. With respect to Paragraph 16 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC admits that the meter at Complainant's premises was tested on June 5, 2026, but states that it is without sufficient information to either admit or deny the other allegations set out therein and therefore denies the same.

25. With respect to Paragraph 17 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC states that the same is not an allegation of fact that must be admitted or denied.

26. MAWC denies the allegations set out in Paragraph 18 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*.

27. MAWC denies the allegations set out in Paragraph 19 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*.

28. MAWC denies the allegations set out in Paragraph 20 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*.

29. With respect to Paragraph 21 of the document entitled *Request for Remediation of Wrongful Process* attached to the *Complaint*, MAWC denies that Complainant is entitled to any

relief.

30. Except as expressly admitted herein, MAWC denies each and every allegation in the *Complaint*.

WHEREFORE, having fully answered, MAWC respectfully requests that the Commission dismiss or deny the *Complaint* and grant such additional relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Jennifer Coleman

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ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was sent via electronic mail on this 27th day of July, 2026, to all parties appearing on the Commission's Service List for this case.

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