

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

Andrew J. Norris,)

)

Complainant,)

)

v.) Case No. **WC-2026-0372**

)

Missouri-American Water Company,)

)

Respondent.)

COMPLAINANT’S CASE UPDATE REGARDING UNRESOLVED STAFF INQUIRIES

Complainant Andrew J. Norris, appearing pro se, respectfully submits this update concerning the Commission Staff inquiries summarized in Complainant’s July 27, 2026 Response in Opposition to Respondent’s Motion to Dismiss.

Missouri-American Water Company (“MAWC”) has filed an Answer admitting certain background facts, including that, through its contractor, it replaced the meter and main shutoff valve during the relevant meter work. MAWC also admits the unusually high water-usage bills, receipt of the February 9, 2026 emergency shutoff request, and that it subsequently shut off service at the curb stop. MAWC denies installing a faulty valve and generally denies liability.^[1]

However, MAWC’s publicly filed Answer does not identify the policies, records, procedures, technical analysis, or functional testing that would resolve the Commission-relevant factual questions identified by Staff. Those unresolved questions are summarized below.

1. Exact equipment installed

Staff has asked whether MAWC or its subcontractor installed a shutoff valve during the December 2024 meter replacement.

MAWC admits that it replaced the meter and main shutoff valve through its contractor. However, its Answer does not identify the contractor that performed the work, the specific valve or component installed, the precise location of the installed component relative to the meter and service line, the work order or installation record, or the factual basis for its position concerning what was installed.^{[2][1]}

2. Ownership and responsibility boundary

Staff has asked whether MAWC has a documented process for determining whether a defect lies on the utility-owned side or customer-owned side of the service arrangement.

MAWC's Answer does not identify a documented boundary-determination process, a tariff provision, a work standard, a facility-ownership map, or a property-specific analysis applying such a process to the valve and related service components at issue. It therefore does not explain how MAWC determined where its responsibility ended and the customer's responsibility began.^{[1][2]}

3. Authority to install equipment

Staff has asked whether MAWC has a policy allowing installation of valves, fittings, or other appurtenances on the customer-owned portion of the service line.

MAWC's Answer does not identify any policy, tariff provision, procedure, installation standard, or other authority that would allow or prohibit installation of a valve or related appurtenance on customer-owned piping. Nor does it state whether MAWC determined that the particular installation at issue was on the Company side or customer side of the service arrangement.^{[2][1]}

4. Post-installation verification

Staff has asked whether MAWC has a standard procedure for verifying proper installation and function after replacing a meter or shutoff valve.

MAWC's Answer does not identify a post-installation inspection, verification, pressure test, flow test, closure test, checklist, work-order notation, or other procedure performed after the December 2024 work. It does not state whether the installed valve was functionally verified at the time of installation or at any time before the reported loss.^{[1][2]}

5. Functional testing of the valve

MAWC denies that it installed a faulty valve. However, its Answer does not identify a pressure test, flow test, closure test, nondestructive functional test, destructive test, or technical test result demonstrating that the valve functioned properly or excluding it as a cause or contributing cause of the water intrusion.^[1]

The August 7, 2026 Travelers denial letter similarly concludes that American Water was not negligent, but does not identify substantive functional testing of the valve, a test protocol, an inspection methodology, or any technical basis by which the equipment was affirmatively ruled out.^[3]

6. Abnormal water usage

Staff has asked whether MAWC evaluated whether the installed valve or a related shutoff condition contributed to the earlier abnormal usage, including the unusually high 2025 water bills.

MAWC admits the bills reflecting 85,000 gallons and then 108,100 gallons of usage and states that a June 2025 field representative noted a leaking toilet. However, the Answer does not disclose an evaluation of whether the valve installed during the meter work, a bypass condition, or an inability to fully shut off water contributed to the abnormal usage.^{[2][1]}

7. Investigation of indoor and curbside shutoffs

Staff has asked whether MAWC conducted and documented a complete investigation after the reported problems with the interior shutoff valve and curbside shutoff.

MAWC states that it responded to the February 9 emergency request and subsequently shut off service at the curb stop. The Answer does not identify a complete documented investigation of the reported continued water flow, the functionality of the curbside shutoff, the functionality of the interior valve, the relationship between those components, or the cause of the reported failure.^{[2][1]}

Clarification regarding Staff materials

Complainant recognizes that MAWC may have provided information directly to Staff outside its publicly filed Answer, including information treated as confidential or otherwise not visible to Complainant in the public docket.

Accordingly, Complainant does not assert that MAWC necessarily failed to provide any information to Staff. Rather, Complainant respectfully requests that Staff's report identify:

1. The information, documents, work orders, policies, test results, or other materials upon which Staff relied in addressing each of the foregoing questions;

2. Whether MAWC provided a documented ownership-boundary analysis for the equipment at issue;
3. Whether MAWC identified any policy or authority governing installation of valves or appurtenances on customer-owned piping;
4. Whether MAWC identified a post-installation verification procedure and whether that procedure was followed in this instance;
5. Whether any functional, pressure, flow, closure, nondestructive, or destructive testing of the installed valve was performed; and
6. Whether the information provided resolves the questions regarding abnormal water usage, the interior valve, the curbside shutoff, and the adequacy of MAWC's investigation.

These questions are material to the Commission's consideration of utility installation practices, service-line responsibility, post-installation verification, and the adequacy of the Company's response to reported service-related failures. They remain distinct from any ultimate request for private money damages.

Respectfully submitted,

Andrew J. Norris, Complainant, pro se

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References:

1. WC-2026-0372-MAWC-Answer-FINAL-C.pdf
2. July-27-2026-response_opposition_motion_to_dismiss.docx
3. E4A4677.doc