

**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 AUGUST 7, 2026 LIABILITY DENIAL

Complainant Andrew J. Norris, appearing pro se, respectfully submits this update to place into the record an August 7, 2026 letter from Constitution State Services / Travelers, issued regarding American Water Works Claim No. [REDACTED]. A copy of that letter is attached.

The letter states that the insurer has “completed” its investigation and has concluded that American Water Works “was not negligent for the water leak inside the residence.” It further states that the investigation “did not identify any act or omission by American Water that caused or contributed to the reported leak or resulting damage.” The letter therefore denies liability.^[1]

However, the letter does not identify the factual or technical basis for that conclusion. In particular, it does not state that the valve installed in connection with the utility’s meter work was pressure-tested, functionally tested, tested in its installed condition, removed for destructive testing, or otherwise affirmatively determined to be functioning properly. It also does not state that the subcontractor performed any such testing.^[1]

The denial letter likewise does not identify:

- the person or persons who conducted the investigation;
- the dates of any inspection;
- the documents, photographs, work orders, or other evidence considered;

- the inspection or testing protocol used;
- the observations of the professionals who indicated that the valve was not functioning properly in situ;
- the reported curbside shutoff issues; or
- the abnormal water usage and the related question whether the installed equipment or shutoff conditions contributed to the loss.^{[2][3]}

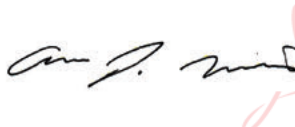
This omission is material because the prior record reflects that the evaluation of the valve was limited to visual observation and manual manipulation, rather than pressure testing or another meaningful nondestructive functional test. The earlier correspondence also shifted responsibility for arranging and funding destructive testing to Complainant, despite the insurer's prior indication that it was arranging an expert inspection.^[2]

Missouri-American Water Company's Answer admits that it replaced the meter and main shutoff valve through its contractor during the relevant meter work, while denying that it installed a faulty valve. Its Answer does not identify any actual functional, pressure, nondestructive, or destructive test that established the valve was functioning properly or that excluded the equipment as a cause or contributing cause of the reported loss.^[4]

Accordingly, Complainant submits that the August 7, 2026 denial letter is a conclusion of no liability without a disclosed investigative or technical basis for excluding the installed valve and related utility-service issues. The letter does not resolve the factual questions already identified in this proceeding concerning what equipment was installed, the location and responsibility for that equipment, post-installation verification procedures, the adequacy of Respondent's investigation, and the reported failure of the valve and curbside shutoff.

Complainant respectfully requests that this update and the attached denial letter be included in the docket record as Staff and the Commission consider the pending issues.

Respectfully submitted,

 Digitally signed by Andrew J. Norris
DN: cn=Andrew J. Norris, o=UCLA, ou,
email=anorris@mednet.ucla.edu,
c=US
Date: 2026.08.07 23:20:26 -07'00'

Andrew J. Norris, Complainant, pro se

[REDACTED]

[REDACTED]

[REDACTED]

Attachment: August 7, 2026 letter from Constitution State Services / Travelers, Claim No. [REDACTED].

Ref:

1. [REDACTED].doc
2. psc_update_destructive_testing_revised-1.docx
3. July-27-2026-response_opposition_motion_to_dismiss.docx
4. WC-2026-0372-MAWC-Answer-FINAL-C.pdf



Constitution State Services
P O Box 650293
Dallas, TX 65265-0293
Telephone: (314) 695-1875

August 7, 2026

Andrew Norris
9707 Portage Dr.
St. Louis Mo 63103

RE:	Client Name:	American Water Works Company
	Claim Number:	E4A4677
	Claimant:	Andrew Norris
	Date of Loss:	02/09/2026

Dr. Norris:

We have completed our investigation into the above referenced incident. Based upon our investigation, we have found American Water Works was not negligent for the water leak inside the residence. For this reason, we must respectfully deny liability for this incident at this time.

Based on the information available to us, our investigation did not identify any act or omission by American Water that caused or contributed to the reported leak or resulting damage. Specifically, we found no evidence of negligence on American Water's behalf in connection with the cause of the leak.

We are very sorry this unfortunate incident occurred. We regret any inconvenience you may have sustained.

If you have any additional information that we have not considered in our review, or have any questions, please feel free to contact me.

Best Regards,

Ron Jordan
Claim Professional
rcjordan@travelers.com