

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

Andrew J. Norris,)

)

Complainant,)

)

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

)

Missouri-American Water Company,)

)

Respondent.)

COMPLAINANT'S RESPONSE TO STAFF REPORT AND REQUEST FOR WITNESSED PRESSURE TESTING

Complainant Andrew J. Norris, appearing pro se, respectfully responds to the Staff Report filed August 19, 2026, and requests implementation of Staff's recommended witnessed pressure test of the removed gate valve.

Support for Staff's recommendation

Complainant supports Staff's recommendation that the gate valve installed on December 26, 2024 be tested under pressure up to approximately 80 psi, with all parties given a reasonable opportunity to observe. Staff expressly recognizes that its visual observation, manual operation, flashlight examination, and gravity-fed water test conducted under non-pressurized conditions are not definitive of whether the valve seals under normal residential water-distribution pressure.^[1]

Staff recommends a specific leakage-testing protocol: fully close the valve by hand; pressurize one side to approximately 80 psi; hold pressure for 15 minutes; leave the opposite side open to atmosphere or otherwise monitor it; and observe whether water leaks past the gate. This test would directly address an unresolved issue identified by Staff: whether the valve sealed properly when fully closed under pressure consistent with ordinary residential service.^[1]

Distinction from prior proposed testing

Earlier communications from the subcontractor-side insurer placed the burden on Complainant to retain and fund possible destructive testing, while offering only to attend and later reconsider its position. That

proposal did not provide a commitment to accept responsibility, pay damages, or resolve the claim based on the test outcome.^[2]

The testing now recommended by Staff is different. Staff has proposed a defined pressure/leakage test of the removed valve, rather than requiring destructive testing as a condition to further consideration of responsibility. Complainant respectfully requests that the Commission treat Staff's recommended pressure test as the appropriate next evidentiary step before the factual record is treated as complete on valve function and causation.^[1]

Request that MAWC coordinate and fund testing

MAWC's contractor installed the gate valve during meter-related work on December 26, 2024. MAWC has maintained that the valve operated properly, has denied responsibility, and has access to the relevant work records, contractor relationship, and technical resources.^{[3][1]}

Because Staff has identified the pressure test as necessary to clarify a material and otherwise inconclusive factual issue, Complainant respectfully requests that the Commission direct MAWC to coordinate and bear the reasonable cost of the non-destructive pressure test recommended by Staff.

This request is not based solely on Complainant's request for private damages. It is based on Staff's conclusion that testing is necessary to determine whether the valve functions as expected under typical system pressure, together with MAWC's position that the valve was properly installed and functioned normally.^[1]

Alternative request for protocol and deadline

If the Commission does not direct MAWC to fund the test, Complainant respectfully requests that the Commission establish a prompt written protocol and deadline for its completion. The protocol should require:

1. Written disclosure of the proposed test method before testing occurs;
2. Notice to Complainant, MAWC, Staff, and other appropriate parties of the date, time, location, test provider, and equipment to be used;
3. A reasonable opportunity for Complainant, MAWC, Staff, and appropriate representatives to attend or observe;

4. Testing consistent with Staff's recommended procedure: valve fully closed, one side pressurized to approximately 80 psi, pressure held for 15 minutes, opposite side open to atmosphere or otherwise monitored, and observation for leakage past the gate;
5. Preservation of the valve's condition and documented chain of custody before, during, and after testing;
6. Photographs or video of the valve and test setup before, during, and after testing;
7. A written report identifying the person conducting the test, equipment used, actual pressure readings, duration, observations, results, and persons present; and
8. Filing of the report and supporting materials in this docket, subject to appropriate confidentiality procedures if necessary.

Reservation of response

Complainant respectfully reserves a full response to Staff's present causation and no-violation conclusions until the recommended pressure testing has been completed and its results are available to the parties and the Commission.

Staff states that it cannot determine whether the valve was mechanically defective, frozen in a partially open position, or left open before the freezing event. Staff also recognizes that its current unpressurized testing is not definitive because residential pressure generally ranges from approximately 40 to 80 psi.^[1]

Because the recommended test may materially clarify whether the valve sealed under normal service pressure when fully closed, Complainant respectfully submits that the record should not be treated as complete on valve function or causation before the test has occurred and been documented.

Tariff clarification

Complainant further requests that Staff identify the specific tariff sheets and Rule 6 provisions relied upon in concluding that MAWC acted consistently with its tariff. This request includes identification of any provision governing voluntary replacement of customer-owned valves or piping during meter-related work; customer notice, authorization, consent, or opportunity to elect whether such work proceeds; ownership and maintenance responsibility after the work; and post-installation verification. This clarification is particularly relevant because Staff recommends that MAWC adopt a process to notify customers and provide them the option to proceed when MAWC replaces customer-owned service-line components.

Requested relief

Complainant respectfully requests that the Commission:

1. Direct implementation of Staff's recommended witnessed 80-psi pressure test of the removed gate valve;
2. Direct MAWC to coordinate and bear the reasonable cost of the non-destructive pressure test; or, alternatively, establish the testing protocol and deadline described above;
3. Require preservation, chain-of-custody documentation, attendance notice, and filing of a test report and supporting materials; and
4. Allow Complainant a reasonable opportunity to respond to the testing results and Staff's conclusions after testing is complete.

Respectfully submitted,


Digitally signed by Andrew J. Norris
DN: cn=Andrew J. Norris,
o=UCLA, ou,
email=anorris@mednet.ucla.edu
, c=US
Date: 2026.08.20 09:20:44 -07'00'

Andrew J. Norris, Complainant, pro se



References:

1. WC-2026-0372-Staff-Report-C.pdf
2. psc_update_destructive_testing_revised-1.docx
3. WC-2026-0372-MAWC-Answer-FINAL-C.pdf