

**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 SUPPLEMENTAL
NOTICE REGARDING TRAVELERS’
INVESTIGATION BASIS**

Complainant Andrew J. Norris, appearing pro se, respectfully submits this supplemental notice and attached August 26, 2026, email from Ron Jordan of Constitution State Services, third-party administrator for Travelers Indemnity Company of Connecticut, concerning Claim No. E4A4677.

In the attached email, Travelers states that its factual and technical basis for denying liability was a visual inspection of the valve and associated installation. Travelers states that the visual inspection revealed no signs of defectiveness, improper installation, or faulty setup, and that it concluded there was insufficient evidence to establish negligence by American Water Works. Travelers further states that destructive testing was not authorized and that no destructive testing was performed.

The email does not identify any pressure testing, flow testing, closure testing, nondestructive functional testing under normal service pressure, testing protocol, or test results establishing that the valve sealed properly when closed under ordinary residential water-distribution pressure.

This information is relevant to Staff's recommendation that the removed gate valve be pressure-tested up to approximately 80 psi for 15 minutes, with the valve fully closed and the opposite side monitored for leakage. Staff recognized that the prior unpressurized inspection was not definitive of whether the valve sealed under ordinary residential pressure.

Complainant submits this notice so that the Commission's record reflects that MAWC's insurer's liability determination was based on a visual inspection and not on the pressure testing recommended by Staff. Complainant respectfully requests that the Commission consider the attached correspondence in connection with Complainant's pending request for witnessed pressure testing.

Respectfully submitted,

Andrew J. Norris, Complainant, pro se

[REDACTED]
[REDACTED]
[REDACTED]


Digitally signed by Andrew
J. Norris
DN: cn=Andrew J. Norris,
o=UCLA, ou,
email=anorris@mednet.ucl
a.edu, c=US
Date: 2026.08.27 13:17:55
-07'00'

Attachment A: August 26, 2026 email from Ron Jordan, Constitution State Services / Travelers, regarding Claim No. [REDACTED].

Andrew Norris [REDACTED]

RE: [External] Re: Claim Nbr: [REDACTED] - Constitution State Services TPA for TRAVELERS INDEMNITY CO OF CT

1 message

Jordan, Ron C [REDACTED] >
To: Andrew Norris [REDACTED]

Wed, Aug 26, 2026 at 2:28 PM

Dear Mr. Norris,

The claim file materials, communications, photographs, inspection notes, expert materials, and related documents you have requested are protected work product and are not subject to disclosure. We are therefore unable to provide the materials identified in your letter.

With respect to the factual and technical basis for our coverage determination, a visual inspection of the valve and associated installation was conducted. That inspection revealed no signs of defectiveness, improper installation, or faulty setup. Based on the results of that inspection, there is insufficient evidence to establish negligence on the part of American Water Works.

We note that destructive testing of the valve was not authorized. Accordingly, no such testing was performed, and our determination is based on the evidence available from the visual inspection conducted.

Thank you,

Ron Jordan | Claim Professional | General Liability

Constitution State Services TPA for TRAVELERS INDEMNITY CO OF CT

[REDACTED]

[REDACTED]

[REDACTED]

We now have capability of you uploading your supports directly to our file. It only requires the above claim number and date of loss. The link to this if you would like to use is: [REDACTED]

If you need immediate attention please contact my supervisor [REDACTED]



From: Andrew Norris [REDACTED]

Sent: Saturday, August 8, 2026 1:13 PM

To: Jordan, Ron C [REDACTED]

Subject: [External] Re: Claim Nbr: [REDACTED] - Constitution State Services TPA for TRAVELERS INDEMNITY CO OF CT

CAUTION: This email came from outside of the company.

Please exercise caution when opening attachments, clicking links or responding to this email. The original sender of this email is andrew.j.norris@gmail.com.

Re Claim No [REDACTED] August 7, 2026 denial

Dear Mr. Jordan:

I acknowledge receipt of your August 7, 2026 letter denying liability on behalf of American Water Works. I disagree with the conclusion and reserve all rights.

Please identify the factual and technical basis for concluding that American Water's conduct and the valve installed through its meter work did not cause or contribute to the reported loss. In particular, please identify any pressure testing, flow testing, closure testing, nondestructive functional testing, destructive testing, inspection protocol, expert opinion, work order, or other evidence relied upon to exclude the installed valve and the reported curbside shutoff condition as contributing causes.

Please also preserve all claim-file materials, communications, photographs, inspection notes, expert materials, subcontractor communications, and other documents relating to this claim and the investigation.

Sincerely,

Andrew J. Norris

On Fri, Aug 7, 2026 at 2:55 PM Jordan, Ron C [REDACTED] wrote:

Andrew,

Attached is the letter regarding our liability decision. Please let me know if you have any questions.

Thank you,

Ron Jordan | Claim Professional | General Liability

Constitution State Services TPA for TRAVELERS INDEMNITY CO OF CT

[REDACTED]

[REDACTED]

[REDACTED]

We now have capability of you uploading your supports directly to our file. It only requires the above claim number and date of loss. The link to this if you would like to use is: <https://www.travelers.com/claimuploadcenter/>

If you need immediate attention please contact my supervisor Colin Dutton at 913-402-5431 or cdutton@travelers.com



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Andrew J. Norris Ph.D.