

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

Andrew J. Norris,	)	
	)	
Complainant,	)	
	)	
v.	)	<u>Case No. WC-2026-0372</u>
	)	
Missouri-American Water Company,	)	
	)	
Respondent.	)	

COMPANY’S REPLY TO COMPLAINANT’S RESPONSE TO STAFF’S REPORT

COMES NOW Respondent Missouri-American Water Company (“Company” or “MAWC”), by and through counsel, and for its *Reply to the Response to Staff’s Report* filed on August 19, 2026, *and the Complainant’s Response to Staff Report and Request of Witnessed Pressure Testing (“Response”)* filed on August 20, 2026, by Complainant Andrew J. Norris, states as follows:

1. Complainant Andrew J. Norris filed his *Formal Complaint* on June 24, 2026, alleging that the Company violated its tariff, Missouri statutes, and Commission rules by installing a malfunctioning valve at his premises in the course of changing the meter, resulting in burst pipes and damage amounting to some thousands of dollars. Complainant seeks money damages.

2. On June 25, 2026, the Commission issued its *Notice of Complaint and Order Directing Answer and Staff Report*, which directed Staff to investigate the complaint and file a report or request for an extension on later than August 20, 2026.

3. On July 27, 2026, the Company filed its Answer to the Complaint.

4. On August 19, 2026, the Staff filed its *Staff Report*. Therein, Staff stated, “Staff has found no violation of statutes, regulations, orders, or tariff provisions, and that MAWC

acted consistently with its tariff in installing the gate valve.” *Staff Report*, p. 2. Staff also recommended that “MAWC perform a pressure test on the shut off gate valve that was installed on December 26, 2024, to determine whether the gate seals properly when placed in a fully closed position to help verify whether the valve performed as expected under conditions consistent with typical distribution system pressure.” *Id.* Staff explained that it performed limited testing of the gate valve and that it operated “as expected.” *Staff Memo*, p. 7.

5. Complainant filed its *Response* to the *Staff Report* on August 20, 2026, requesting that the Commission require the Company to pressure test the gate valve at its expense. *Staff Report*, p. 2.

6. The Company accepts Staff’s Report and its conclusion. However, in response to Staff’s recommendation to test the gate valve and the Complainant’s request for it to be at MAWC’s expense, the Company is reluctant to conduct a pressure test because the gate valve has been in Complainant’s custody since it was removed, and the Company cannot verify the valve’s condition, handling, storage, or preservation during that period.

WHEREFORE, the Company respectfully requests the Commission to accept its *Reply* to Complainant’s *Response* to Staff’s *Report*; and grant such other and further relief as the Commission deems just and reasonable in the circumstances.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND, P.C.

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**ATTORNEYS FOR MISSOURI-AMERICAN
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to all parties of record, this 28th day of August 2026.

/s/ Kevin A. Thompson