

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 MAWC'S REPLY REGARDING PRESSURE TESTING AND VALVE CUSTODY

Complainant Andrew J. Norris, appearing pro se, respectfully responds to Missouri-American Water Company's ("MAWC") Reply filed August 28, 2026, concerning Staff's recommendation for a witnessed pressure test of the removed gate valve.

RELEVANT SEQUENCE OF EVENTS

For clarity, the relevant sequence is as follows:

1. Travelers, acting through Constitution State Services on behalf of American Water Works, stated that its liability determination rested on a visual inspection of the valve and associated installation. Travelers stated that it found no signs of defectiveness, improper installation, or faulty setup. Travelers further stated that destructive testing was not authorized and that no destructive testing was performed.
2. Staff later conducted limited visual, manual, flashlight, and gravity-fed testing of the removed valve. Staff expressly recognized that this non-pressurized testing was not definitive of whether the valve seals under ordinary residential water-distribution pressure.
3. Staff therefore recommended a defined witnessed pressure test: with the valve fully closed, one side pressurized to approximately 80 psi, pressure held for 15 minutes, the opposite side open to atmosphere or otherwise monitored, and observation for leakage past the gate.
4. Only after Staff recommended that test did MAWC state that it was reluctant to conduct it because the valve has remained in Complainant's custody and MAWC cannot independently verify its handling, storage, preservation, or condition during that period.

CUSTODY AND PRESERVATION

MAWC's present custody concern was not identified during prior visual inspections of the valve, including the inspection on which Travelers relied in denying liability. MAWC's Reply does not identify any observed alteration, damage, contamination, or other actual condition suggesting that the valve has changed since removal. Rather, MAWC states that it cannot independently verify the valve's handling and storage while it has been in Complainant's custody.

Complainant has maintained a chain-of-custody record for the removed valve. The record identifies the valve, its removal by Aria Plumbing on March 10, 2026, its transfer to Complete Property Management, its secured storage, and the two documented temporary releases for inspections requested by MAWC's side and by PSC Staff. Since its transfer to Complete Property Management's office on April 15, 2026, the valve has been stored in a secured, access-restricted office location except for those documented inspection releases.

The chain-of-custody record identifies a June 29, 2026 release for a property inspection involving MAWC's side and a July 29, 2026 release for a PSC Staff engineering/property inspection. The record reflects that the valve was returned after those inspections. The valve has not been subjected to destructive testing, and, to Complainant's knowledge, it has not been disassembled, altered, cleaned, or subjected to pressure testing. A copy of the chain-of-custody record is attached as Attachment A.

Complainant is prepared to transfer the valve immediately to a mutually agreed independent testing facility or neutral custodian. Before testing, the facility can document the valve's as-received condition through photographs, video, identifying markings, measurements, and a written chain-of-custody record. These procedures can address MAWC's stated concern while allowing the factual issue identified by Staff to be tested under the recommended protocol.

REQUEST FOR WITNESSED TESTING

MAWC accepts Staff's conclusion that no violation has presently been established, but does not agree to conduct the additional pressure test Staff recommended to resolve the remaining uncertainty concerning valve function.

Complainant respectfully submits that a generalized custody concern should not prevent the pressure test where MAWC does not identify any actual alteration and where neutral testing safeguards are available. The pressure test is particularly important because Staff stated that it cannot determine whether the valve was mechanically defective, frozen in a partially open position, or left open before the freezing event, and because Staff's current non-pressurized examination was not definitive.

Complainant therefore respectfully requests that the Commission:

1. Direct that the valve be transferred promptly to a mutually agreed independent testing facility or neutral custodian;

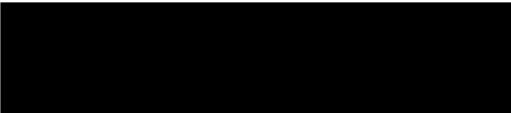
2. Require documentation of the valve's as-received condition, including photographs, video, identifying markings, measurements, and a written chain-of-custody record before any testing occurs;
3. Direct a witnessed pressure test consistent with Staff's recommended protocol: valve fully closed; one side 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;
4. Require advance written notice of the test date, time, location, equipment, test provider, and protocol to Complainant, MAWC, Staff, and other appropriate participants;
5. Require a written test report identifying the equipment used, actual pressure readings, duration, results, observations, photographs or video, and persons present; and
6. Permit Complainant a reasonable opportunity to respond after the test is completed and the report is filed.

Respectfully submitted,



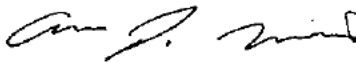
Digitally signed by Andrew J. Norris
DN: cn=Andrew J. Norris, o=UCLA, ou,
email=anorris@mednet.ucla.edu, c=US
Date: 2026.09.01 13:14:34 -07'00'

Andrew J. Norris, Complainant, pro se



CERTIFICATE OF SERVICE

I certify that a true and correct copy of this Complainant's Response to MAWC's Reply Regarding Pressure Testing and Valve Custody, together with Attachment A, was served by electronic mail upon all parties of record on September __, 2026.



Digitally signed by Andrew J. Norris
DN: cn=Andrew J. Norris, o=UCLA,
ou,
email=anorris@mednet.ucla.edu,
c=US
Date: 2026.09.01 13:15:01 -07'00'

Andrew J. Norris

Attachment A: Chain-of-Custody Record for Removed Gate Valve

Chain of Custody Form — Valve Evidence

This form is intended to document custody, storage, transfer, inspection, and testing of the valve associated with the property-damage claim. A documented chain of custody helps preserve evidence integrity by recording who had possession of the item, when transfers occurred, and what actions were taken while the item was in custody. [cite:77][cite:80]

Matter information

Field	Information
Property address	[REDACTED]
Claim / file number	[REDACTED]
Missouri PSC complaint number	[REDACTED]
Date valve removed	3/10/2026
Removed by	Aria Plumbing
Current custodian	Complete Property Management [REDACTED]
Current custodian phone/email	[REDACTED]
Current storage location	
Litigation hold / preservation notice sent on	5/20/2026

Evidence item description

Field	Hand shut off main water valve
Item number	001
Evidence description	Brass/copper service valve / water valve
Manufacturer / brand	
Model number	Hard to read [REDACTED] parenthesis is option for non clarity.
Serial / part number	
Size / dimensions	3/4 inch
Material / finish	Brass/copper, lead free, green handle

Condition at time of collection	Defective, does not completely close
Identifying marks / labels	Green knob, new brass, [REDACTED]
Photo numbers associated with item	
Packaging / seal number	

Collection details

Field	Information
Date collected	
Time collected	
Exact location collected	
Collected by	
Witness present	
Method of collection / removal	
Immediate condition observations	
Initial photographs taken	Yes / No
Video taken	Yes / No

Storage record

Field	Information
Stored by	Complete Property Management
Storage start date/time	April 15, 2026
Storage location	[REDACTED]
Storage conditions	Locked cabinet / sealed box / other: _Locked office: desk_____
Tamper-evident seal used	No
Seal number	
Access restrictions	Yes

Notes	Brought from [REDACTED] to location above and stored in locked office under supervision.
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Transfer log

Record every change in possession, including temporary release for inspection, expert review, photography, or testing. Chain-of-custody guidance emphasizes documenting each transfer with dates, times, identities, and signatures to maintain integrity of the evidence trail.[cite:77][cite:80]

Transfer date	Transfer time	Released by: name/signature	Released to: name/signature	Purpose of transfer	Item condition at transfer	Seal intact?	Returned date/time	Notes
6/29/26	8am	Keli Lowe	Travis Sexton	visual inspection	same/intact		5pm 6/29/26	
7/29/26	9am	Keli Lowe	Dayvon Whitfield	visual inspection	same/intact		5pm 8/5/26	

Inspection / testing record

Use this section for any visual inspection, non-destructive testing, imaging, laboratory intake, or destructive testing. If destructive testing is ever proposed, best practice is to document the protocol, persons present, and disposition of all remnants and samples.[cite:65][cite:77]

Date	Inspector / entity	Type of inspection or test	Non-destructive or destructive	Protocol referenced	Photos/video taken	Samples removed	Results / observations	Remnants preserved by
6/9/26	Michael Cerullo	visual						Keli Lowe

Associated materials

PSC Statement contains all supporting materials kept with this evidence file.

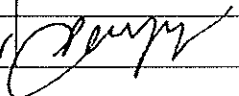
- Photographs of valve before removal.
- Photographs after removal.
- Property-damage photographs.
- Licensed plumber report 1.
- Licensed plumber report 2.
- Damage assessment report.
- Preservation letters / litigation hold notices.
- Emails with insurer, utility, attorneys, or regulators.
- Shipping receipts, packaging receipts, or lab intake forms.

Custodian certification

The undersigned certifies that the information entered on this form is accurate to the best of their knowledge and that the evidence described above has been handled and stored as documented on this form.

Name	Role	Signature	Date
Keli Lowe	Property Manager		5/20/24

Witness certification

Name	Role	Signature	Date
Duygu McMillen	Property Manager		5/21/26

Use notes

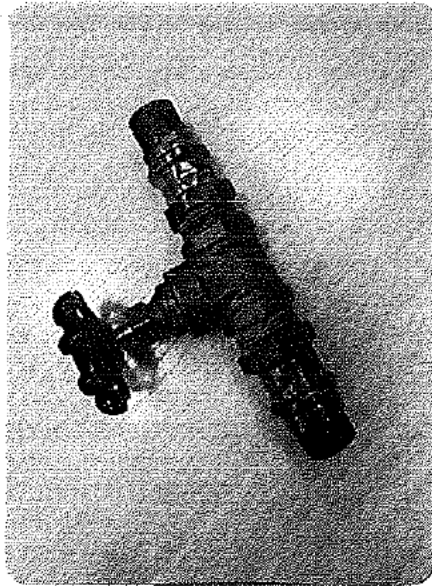
- Keep the valve in a secure location with limited access, and photograph the item and any seal before and after each transfer.[cite:77][cite:80]
- Do not allow destructive testing without a written protocol, notice to all interested parties, and documentation of all remnants and samples retained after testing.[cite:65]

- Store this form with copies of emails(electronic), reports, photos (electronic), and shipping or delivery receipts so the documentary record stays together.[cite:77]

April 15, 2026 arrival at Complete Property Management

may apply. Reply STOP to stop receiving messages from us. Reply HELP for more information.

It's on my desk



Kell Lane • Apr 15, 5:13 AM