

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

John Leuchtmann,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. WC-2026-0368
	)	
Liberty Utilities, LLC d/b/a/ Liberty,	)	
	)	
Respondent	)	

AMENDMENT TO COMPLAINT

COME NOW, John Leuchtman and Lakewood Hills Homeowners Association, Inc. (“HOA”) (jointly, “Complainants”), by and through their attorney, and for their Amendment to their Complaint in the above reference case, state as follows:

1. Complainant John Leuchtmann filed his *Formal Complaint* against Liberty Utilities, LLC d/b/a/ Liberty (“Liberty”) on June 23, 2026. Included with Mr. Leuchtmann’s *Formal Complaint* was a second document that was a complaint made by the Lakewood Hills Homeowners Association, Inc. (jointly, “Complaints”).
2. Complainants’ complained that, among other things, Liberty’s water system included asbestos-cement (“A/C”) pipe, which may pose a danger of Asbestos contamination; that the A/C pipe was improperly handled following repair of a main break in May 2026; that repeated service disruptions had occurred; that main breaks affect too much of the system due to the presence of too few isolation valves; that Liberty’s contractors failed to respond promptly to the service disruption; that Liberty’s emergency response practices were deficient; and that environmental concerns were raised by the improper handling of the disturbed A/C pipe, in particular that a contractor disturbed A/C pipe during a main break repair and left broken pipe fragments on the

roadside for several days without proper containment or disposal, despite deteriorating site conditions caused by heavy rainfall.

3. The Commission directed its Staff to investigate the circumstances of the Complaint and provide a report. Staff filed its *Report and Recommendations* on August 19, 2026, finding no violation of any tariff provisions, statutes, regulations, or Commission orders.

4. On July 29, 2026, a resident of Lakewood Hills subdivision discovered standing water at her residence at 54 Fairview Parkway. The water coming out of the resident's tap was "milk." The resident reported the leak to Liberty on the same day.

5. On or about August 10, 2026, Liberty dispatched a work crew to the residence and apparently excavated the leak, replaced the excavated soil, and covered the soil with straw.

6. On August 11, the resident observed the straw was wet. The water remained milky at the tap. The resident reported the leak to Liberty, and Liberty advised the resident it would dispatch a crew the next day. The crew failed to show up.

7. On August 24, the resident again notified Liberty of the leak. Liberty advised the resident it would dispatch a crew the next day. The crew failed to show up.

8. On September 27, the resident reported the leak to the HOA.

9. On September 28, the HOA toured the residence. During the tour, the HOA spoke with a neighbor at 60 Fairview Parkway, who advised the HOA of two similar leaks at his residence. Photographs of the two residences are attached hereto as Attachment 1 and incorporated hereto for all purposes.

10. As of the date of this Amendment, no repairs have been made. While the leaks persist, the water is now clear.

11. Liberty has failed to provide service instrumentalities and facilities that are safe and in all respects just and reasonable.

12. Section 393.130.1, RSMo. requires every water corporation to “provide such service instrumentalities and facilities as shall be safe and adequate and in all respects just and reasonable.” Further, section 393.140.1, RSMo. grants the Commission general supervision of water corporations, and section 393.140.2, RSMo. grants the Commission the authority to examine or investigate the methods employed by such water corporations.

WHEREFOR, for the above reasons, Complainants pray the Commission permit Complaints to amend their complaint, direct the Staff of the Missouri Public Service Commission to further investigate the amended Complain, including an on-site investigation, direct Liberty to repair its water system within the Lakewood Hills subdivision, and direct Liberty to take such further actions as are just and reasonable and within the scope of its authority to require Liberty to provide such service instrumentalities and facilities as shall be safe and adequate and in all respects just and reasonable.

Respectfully submitted,

By: 

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Filed: October 5, 2026

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Amendment to Complaint was sent to all parties of record in Case No. WC-2026-0368 via electronic transmission this 54th day of October, 2026.


