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.	)	

SECOND AMENDMENT TO COMPLAINT

COMES NOW, John Leuchtmann and Lakewood Hills Homeowners Association, Inc. ("HOA") (jointly, "Complainants"). by and through counsel, and for their *Second Amendment to Complaint*, state as follows:

1. Staff of the Missouri Public Service Commission ("Staff") filled its Staff's *Report* ("Report") in File No. WO-2022-0253 on November 23, 2022. Among other things, the Staff made the following recommendations:

   a. Staff Recommendation 8: Staff recommends that Liberty develop a method to measure the number of bills with irregularities sent on to Billing Operations for further review. Data should also be maintained on the reasons for the review, results of the review, and any actions or corrections made.

   b. Staff Recommendation 9: Liberty should, within 90 days, conduct a physical audit of customers at the Cape Rock system and ensure, to the best of its ability, that all occupied units are presently being appropriately billed. Liberty should develop a plan for monitoring turnover of 5 customers or construction of new units, and contacting new customers so that they are appropriately billed.

   c. Staff Recommendation 13: Staff recommends Liberty maintain a count of the types and number of water/sewer inquiries or complaints it receives through its Call Center.

   d. Staff Recommendation 19: Liberty should install AMR or AMI meters at Venice on the Lake as soon as possible, to minimize the estimated bills and resulting billing errors.

2. Liberty filed its *Liberty's Response to Commission Order and Staff Report* on December 29, 2022, agreeing or generally agreeing with each, with the exception of Staff Recommendation 9, to which it responded, giving an explanation that is not relevant here.

3. On March 13, 2024, Liberty filed its proposed tariff sheets in File No. WR-2024-0104 to increase its annual revenues.

4. On January 23, 2025, the Missouri Public Service Commission ("Commission") issued its *Order Approving Stipulation and Agreement* in that case. Among other things, the *Stipulation and Agreement* specified at paragraph 17:

> (a) Liberty to replace all master meters by December 31, 2025. (b) Liberty to replace all customer meters capable of being AMI or AMR with AMI or AMR technology in a manner consistent with Liberty's meter replacement practice. (c) Liberty to collect and retain gallons of water pumped and sold for each individual water system separately and not grouped together, such as the systems formerly owned by KMB, Taney County Water and Empire. (d) Beginning in 2025, and continuing until its next rate case, Liberty shall submit an annual water loss report/study. (e) Liberty to provide annual reporting showing systems that experience NRW equal to or greater than 20% and any leak detection efforts implemented by Liberty.

5. On May 19, 2026, John Leuchtmann filed his complaint against Liberty. The complaint was filed and treated as an informal complaint until the HOA filed its formal complaint on June 23, 2026.

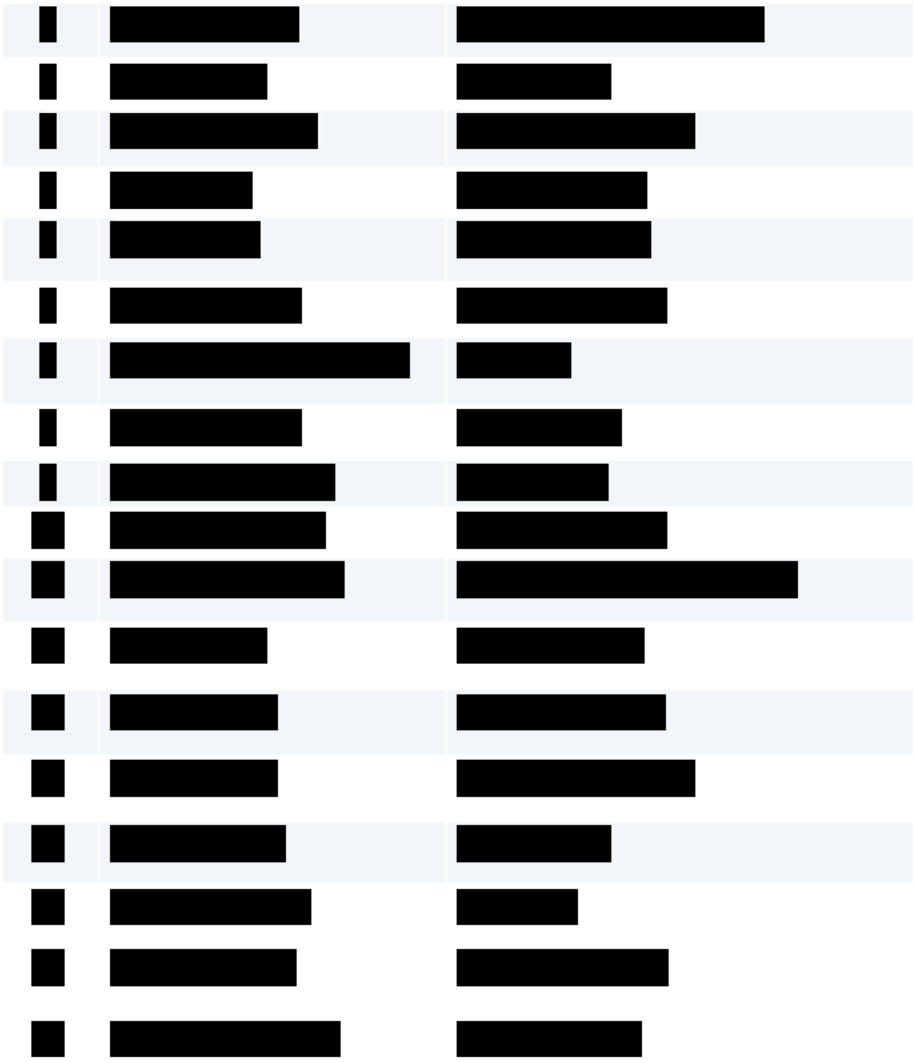
6. On June 23, 2026, the HOA filed its *Formal Complaint* against Liberty Utilities regarding Lakewood Hills HOA water system.

7. On June 24, 2026, the Commission issued a *Notice of Complaint and Order Directing Answer and Staff Report* ("Notice") in response to the HOA complaint in Case No. WC-2026-0368.

8. On August 19, 2026, the Staff filed its *Staff's Report* in Case No. WC-2026-0368

9. In response to *Staff's Report,* the HOA oversaw and coordinated other investigations. The first investigation identified the issues contained in its *Amendment to Complaint* ("Amendment"). The second investigation identified the issues contained in this *Second Amendment to Complaint* ("Second Amendment").

10. Complainants have attached as Attachment 1, which is incorporated herein and made a part hereof for all purposes, a tabulation of the results of its second investigation, which identifies eighteen separate Liberty billing and service issues that violate one or more of the Staff recommendations in File No. WO-2022-0253 or the *Stipulation and Agreement* in File No. WR-2026-0104. Eleven issues have been resolved only after Staff involvement or extensive effort and significant time by the affected resident. Seven have not been resolved. The following is a list of the affected homeowners:



WHEREFORE, for the above reasons, Complainants pray the Commission permit Complaints to amend their Complaint, direct the Staff to further investigate the amended Complaint, including an on-site investigation, direct Liberty to repair its water system within the Lakewood Hills subdivision, direct Liberty to take such further actions as are just and reasonable and within the scope of its authority, and 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,



David C. Linton, #32198
[redacted]
Attorney for John Leucthmann and Lakewood Hills Homeowners Association, Inc.

Filed: October 19, 2026

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was sent to all parties of record in Case No. WC-2026-0368 via electronic transmission on this 19th day of October, 2026.

