

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

██ (Complainant)

V.

Liberty Utilities (Missouri Water) LLC, d/b/a Liberty (Respondent)

Case No. WC-2026-0370

RESPONSE TO STAFF'S REPORT

I agree with essentially everything reported by the Staff except for the issue of the \$325 hydraulic test fee. The Staff has stated that Rule 5 of the Tariff allows Liberty to pass the cost of an updated hydraulic test on to the customer. I have read through Rule 5 and have found no such allowance. What Rule 5. (B) does state is, "The Customer shall be responsible for payment of the New Service Connection Fee, as specified by or provided for in the Schedule of Service Charges."

The Schedule of Service Charges states that a "New Service Connection Fee" is "Actual Cost" and qualifies that this cost is specifically for the construction of a New Service Connection such as "...parts, materials, labor and equipment..." By Liberty's and the Staff's own admission, this hydraulic test fee of \$325 does not guarantee that Liberty will be able to install a service connection after the hydraulic test is performed. Therefore, this test fee cannot be said to be for the construction of a new service connection. It is a test to determine whether a service is even possible. I would also point out that in the Schedule of Service Charges there is no line for a \$325 test fee of any kind.

Additionally, Liberty is legally bound by the Tariff and the Franchise with Noel Missouri to provide water to my duplex. If their system is in disrepair, I contend that it is not my responsibility (nor is it reasonable) to pay them \$325 to confirm that.

Respectfully,

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October 27, 2026