**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

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| [redacted], | ) |
| Complainants, | ) |
| v. | ) Case No. WC-2026-0370 |
| Liberty Utilities (Missouri Water) LLC, d/b/a Liberty, | ) |
| Respondent. | ) |

**COMPLAINANTS' SUPPLEMENTAL RESPONSE AND MOTION FOR EXPEDITED STATUS REPORT AND HEARING**

**COME NOW** Complainants [redacted], by counsel, and supplement their prior responses to the Staff Investigation and Report and Liberty's response, and request an expedited status report and hearing. In support, Complainants state:

1. Complainants seek water service for their newly constructed duplex at [redacted], using the existing meter pit and service connection located at or near the parcel frontage.

2. Commission Staff investigated and reported on October 9, 2026 that the existing equipment appeared comparable to functioning equipment on neighboring parcels; Liberty had provided no evidence that the existing pit and tap were physically incapable of providing service; and Complainants' proposed service-line route did not violate Rule 5(K) of Liberty's tariff.

3. Staff further found no generally applicable tariff or Commission regulation requiring a new survey as a prerequisite to service. Complainants recognize that the service line must not cross property belonging to another and that the precise location of the existing pit relative to the boundary remains a factual issue.

4. Liberty's response to Staff indicated willingness to use the existing meter pit if the customer installed a specified line, addressed grading and drainage conditions, avoided the planned parking area, and permitted inspection before covering the line. Complainants request that Liberty identify the specific tariff and engineering bases for any remaining conditions.

5. Staff agreed with Liberty that hydraulic-modeling costs could be assigned to the requesting customer because of documented capacity concerns. Complainants preserve their objection to the $325 charge and request identification of the specific filed tariff provision and actual work supporting that charge.

6. More significantly, Complainant [redacted] stated in his October 27, 2026 filing that Liberty representative [redacted] informed him by email on October 20, 2026 that payment of the $325 fee was unnecessary because Liberty already knew the water system could not support an additional customer. [redacted] also reported that Liberty was planning improvements potentially beginning in the second quarter of 2027 and had declined his request for temporary

service. Complainants request that the Commission consider the underlying correspondence and obtain Liberty's response to these assertions.

7. Liberty previously acknowledged low-pressure problems in the Noel system, including issues affecting existing customers on [redacted]. Staff reported that Liberty had no established timetable for capacity improvements. Complainants do not seek an order requiring water service under conditions that would jeopardize public health, system pressure, or service to existing customers.

8. The present dispute therefore requires determination not only of the meter-pit and tariff questions, but of whether safe interim service is feasible, what engineering evidence supports Liberty's present position, and what specific measures and schedule will permit permanent service.

9. Prompt consideration is warranted because Complainants allege prolonged inability to use their completed duplex and continuing economic loss. Any monetary damages or other remedies not within the Commission's authority are reserved, without requesting an award beyond the Commission's jurisdiction.

**WHEREFORE**, Complainants respectfully request that the Commission:

A. Direct Liberty to file, within a time set by the Commission, a verified status report identifying the present engineering basis for denying service, including whether an updated hydraulic model exists, its results, relevant pressure measurements, and the current status of DNR-related corrective measures;

B. Require Liberty to identify all feasible temporary or alternative service arrangements it evaluated, including any connection to another nearby main, and explain any engineering, tariff, or safety impediments to each option;

C. Require Liberty to state the scope, funding status, milestones, and reasonably anticipated dates of the improvements necessary to provide permanent service, and to provide periodic status updates if service remains unavailable;

D. Determine, after appropriate evidence, whether the existing meter pit and proposed service-line alignment may be used subject to legitimate boundary, inspection, construction, and safety requirements, and specify the factual basis for any contrary conclusion;

E. Require Liberty to identify the specific tariff authority and work performed for the $325 hydraulic-modeling charge, and determine whether the charge remains applicable given Liberty's reported October 20 statement;

F. Set this matter for an expedited status conference or evidentiary hearing, permit appropriate supplementation of the complaint to address subsequent events, and grant such other relief as is lawful and just.

Respectfully submitted,

/s/ William G. Weber
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First-Class United States Postal Mail, postage prepaid, on this 16th day of November, 2026, to all counsel of record.

**/s/ William G. Weber**