

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE
STATE OF MISSOURI

FILED²

JUN 07 2010

Name: Mike & Carol Medlin
Complainant

Missouri Public
Service Commission

vs.

Case No.

Company Name: Raytown Water Co.
Respondent

COMPLAINT

Complainant resides at 1905 SW Sampson Rd.
(address of complainant)

Lee's Summit, MO 64082

1. Respondent, Raytown Water Co.
(company name)

of Raytown, MO
(location of company), is a public utility under the

jurisdiction of the Public Service Commission of the State of Missouri.

2. As the basis of this complaint, Complainant states the following facts:

Approximately January of this year, we began receiving higher than normal water bills from Raytown Water Co. for our rental property located at 10101-07 E. 67th St. Prior to January, 2010, normal bills for the previous year averaged \$80-\$90/month. Upon notification by Raytown Water Co. that our usage reading was abnormally high, we immediately inspected all water-related items for leaks with our maintenance supervisor, Brad Richardson. No leaks of any kind were present. The problem of the faulty meter continued to worsen until Raytown Water Co. finally pulled the meter and replaced it. We are attaching our correspondence to MPSC dated 4/8/10 which outlines the details of our dispute.

3. The Complainant has taken the following steps to present this complaint to the Respondent:

We have asked Raytown Water Co. to adjust our billings from the first quarter of this year to a normal usage charge, due to the fact that we never had any leaks at the property and the problem was resolved immediately upon replacement of the faulty meter.

WHEREFORE, Complainant now requests the following relief:

We are asking for our incorrect bills from the first quarter of this year be reduced to our normal usage amount of approximately \$90/month. We cannot afford to pay \$1,000 for water we did not use, and it is very clear that the meter was the problem. Our current water bill is \$95.23

6-2-10

Date

Mike & Carol Medlin

Signature of Complainant

Attach additional pages, as necessary.
Attach copies of any supporting documentation.

Mike & Carol Medlin
1905 SW Sampson Rd.
Lee's Summit, MO 64082

April 8, 2010

MO Public Service Commission
Attn: Cecilia

Re: Faulty Meter

To Whom it May Concern:

We are writing to you regarding Raytown Water Co.'s claim that we have used an excessive amount of water over the past 3 months. We think the evidence will show that the problem was progressive, and was due to Raytown Water Co.'s faulty meter, and not due to any leaks on our property.

We began our investigation on 2/25/10, after receiving a phone call from Raytown Water Co. stating we had excessive water usage.

You are in receipt of Raytown Water Co.'s following bills, which we believe will show that the meter continued to worsen as time went on:

3 days usage, prior to new meter	609	\$310.00
(this would have equated to \$3,100 in 30 days)		
Meter read 2/23/10	1,426	\$732.36
Meter read 1/20/10	335	\$183.30
Meter read 12/23/09	250	\$140.52
Meter read 11/19/09	140	\$ 85.00
Meter read 10/23/09	140	\$ 87.00

This information shows the problem beginning around the first of this year. May through November, 2009, usage seemed average and within normal range. We immediately contacted our maintenance supervisor, Brad Richardson. Brad and property owner, Mike Medlin, inspected all water-related fixtures and items in and around the property. No problems of any kind were found. The meter was not moving, and the leak detector on the meter was not moving, showing there were no issues.

Raytown Water Co. then changed out the meter, and the problem was immediately solved.

Mike Medlin read the meter on Friday, 3/26/10, which showed 6,390 gallons used in a 3-week period, totaling approximately (at \$5 per/thousand) \$32.

When sending information to the Commission, Raytown Water Co., for whatever reason, sent the information in such a way as to mix the usage readings from 3 days before the meter was changed out with 3 weeks usage readings from the new meter. This made it appear that there was still a problem, but there were no problems.

On 3/26/10, Cecilia from MPSC told Carol Medlin that there was obviously still a problem at the property, which there was not. The problem was that Raytown Water Co. had sent the billing information to the Commission in such a deceitful way that it distorted the clear evidence that the problem was immediately resolved when the new meter was installed.

Regardless of how the meter checked out, where it was checked out, by whom the meter was checked out, the meter was and is the only thing that has ever been changed, repaired, or had any bearing upon this problem being resolved.

Raytown Water Co. has lost all credibility with the Medlin's due to the fact that it was, and is, such solid evidence that the problem was resolved by Raytown Water Co. with the replacement of the faulty meter. Raytown Water Co. has been very deceptive with the information provided to the MPSC, very rude to the Medlin's by field crews, and now the office staff is refusing to provide information

pertaining to dates and gallons used during the 3 days prior to the replacement of the meter that was mixed in with the remainder of the cycle. This is where the solid evidence lies. If the MPSC would please continue the investigation, you will find the problem was solved immediately upon meter being replaced. No other work was performed.

The Medins have requested that Raytown Water Co. break down this distorted information to give the Commission a clear view of where the problem lies.

We are a small family-owned residential rental company who cannot afford to pay this astronomical amount. These incorrect bills have the potential to financially devastate us.

We look forward to your response.

Sincerely,

Mike & Carol Medlin

Mike & Carol Medlin

April 12, 2010

Brad Richardson
409 Cass
Cleveland, MO 64734

To: MPSC

Re: Mike & Carol Medlin/Raytown Water Co.

I am the Maintenance Supervisor at Corinth Place Apartments, a 280-unit complex in Prairie Village, KS. For the past 8 years, I have also handled maintenance/plumbing issues for Mike and Carol Medlin for their residential rental properties. I have over 20 years of experience in the industry, to include apartment maintenance and residential plumbing.

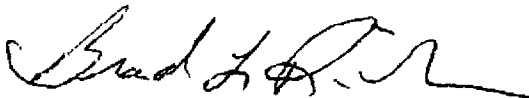
For 5 years, I maintained the water plant for the small city of Freeman, MO, at which time I held a Class C water license. I have extensive knowledge of appliance repair, electrical, and HVAC. I hold an EPA universal license.

On February 26, 2010, I received a call that the Medlin's had been informed by Raytown Water Company that their building located at 10101-07 E. 67th St, Raytown, MO, was showing extremely high water usage. I met Mr. Medlin at the property that day and did a thorough check of all water-related items, both inside and outside the building. Nothing was running, and no drips or leaks of any kind could be detected. A dye test was performed on all toilets. No toilet leaks were detected.

I then checked the meter, and neither the leak detector nor the numbers were moving.

Since my inspection showed no problems, and the problem was resolved with replacement of the meter, my opinion would be that the only possible issue was that the meter was malfunctioning. I may be contacted at 816-673-9868 if you need to speak with me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad Richardson', with a stylized, flowing script.

Brad Richardson