

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

Gene Koverman,)	
)	
Complainant,)	
)	Case No. WC-2014-0118
v.)	SMALL FORMAL COMPLAINT
)	
Missouri-American Water Company,)	
)	
Respondent.)	

ANSWER OF MISSOURI-AMERICAN WATER COMPANY

COMES now Respondent Missouri-American Water Company ("MAWC") and for its Answer to the Complaint of Gene Koverman ("Koverman"), states as follows:

1. On October 30, 2013, Koverman with a mailing address of 725 Judson Manor Drive, St. Louis, Missouri, 63141, filed a complaint against MAWC (the "Complaint").
2. Any allegation not specifically admitted herein by MAWC is denied.
3. In response to the allegations of paragraph 1 of Koverman's Complaint, MAWC admits that it a public utility under the jurisdiction of the Public Service Commission of the State of Missouri.
4. MAWC further notes that its principal location is at 727 Craig Road, St. Louis, Missouri 63141.
5. In response to the allegations of paragraph 2 of the Complaint, MAWC states that it investigated Koverman's complaint of a high bill on August 6, 2013. On that date, Koverman's meter read 3,190 units, which was in line with the billed read of 3,145 units on July 15. Further, MAWC's technician noted that there was both intermediate and slow movement on the meter, indicative of a leak. Koverman indicated to MAWC's technician that he had a leaking toilet but that he would not be repairing it at that time.¹

6. On August 6, 2013 during MAWC's site visit Koverman requested that MAWC change out his meter, which it did. Koverman did not request at that time for the old meter to be tested, therefore the meter was not tested, and is not available for testing now. The new meter that was installed in August 2013 was tested by the manufacturer prior to installation and passed within all regulatory requirements.

7. Further, although multi-unit dwellings are generally not eligible for courtesy adjustments, MAWC offered Koverman a courtesy adjustment in good faith in the amount of \$250.00, which was the difference in usage between the old removed meter and the newly installed meter. Koverman declined to accept the adjustment.

8. MAWC denies that it overcharged Complainant or that it owes him any adjustment to his past bills. The Company is not aware of the reasons for any changes in Complainant's usage but denies it is related to the meter it replaced.

9. The following attorney should be served with all pleadings in this case:

Timothy W. Luft #40506
Vice President Legal and Secretary
622 Craig Road
St. Louis, MO 63141
(314) 966-2279
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WHEREFORE, Missouri-American Water Company respectfully requests that the Missouri Public Service Commission dismiss the Complaint with prejudice at Complainants' cost.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

By: /s/ Timothy W. Luft
Timothy W. Luft, MO Bar 40506
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was filed electronically and served either electronically or mailed postage prepaid the 26th day of November, 2013 to:

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/s/ Timothy W. Luft

ⁱ Depending on the water pressure in a home, a running toilet can leak up to 1 gallon of water per minute, which adds up to 1,440 gallons of water in a single day.