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

Mrs. Walter Schwab,	)	
Complainant,	)	
-vs-	)	Case No. WC-2008-0106
Missouri-American Water Company,	)	
Respondent.	)	

# ANSWER OF MISSOURI-AMERICAN WATER COMPANY TO THE FORMAL COMPLAINT

Missouri-American Water Company ("Missouri-American" or the "Company"), by and through its attorney, Mary G. Sullivan, for its answer to the Formal Complaint filed by Mrs. Walter L. Schwab, states:

- 1. Missouri-American is a corporation, incorporated under the laws of the State of Missouri with its principal office and place of business at 727 Craig Road, St. Louis, Missouri 63141. Missouri-American is a corporation in good standing. Missouri-American is a "water corporation" and a "public utility" as those terms are defined in Section 386.020 RSMo 2000, and is subject to the jurisdiction and supervision of the Commission as provided by law.
- 2. Missouri-American provides water and sanitary sewer service in several counties in Missouri, including service in St. Louis County, Missouri.
- Mrs. Walter L. Schwab has an account for water service for 3
   Godwin Lane, St. Louis, Missouri 63124.

- 4. As a regulated utility, Missouri-American provides water service in compliance with Commission regulations as well as its Commission approved tariffs for service.
- 5. Complainant asserts that the \$566.62 water bill that she received in the month of September 2007 for usage from June 1 to August 29, 2007 is "unreasonable and incorrect".
- 6. Complainant's account history for part of 2005, 2006 and 2007 is attached hereto as Exhibit A. The billing history on this account demonstrates that historically water usage has been higher during the months of July and August.
- 7. Complainant contacted Missouri-American after receipt of her September 2007 water bill and asked that her meter be inspected. Missouri-American reread the meter on September 7, 2007 and found the meter was in proper working order and with no indications of leaks on the customer service line. At the time the meter registered 927 which equated to 33 units of usage since the reading on August 29, 2007.
- 8. Complainant again contacted Missouri-American requesting another inspection. On September 24, 2007, Missouri-American reread the customer's meter and found it to be in proper working order with no indications of leaks on the customer service line. The meter registered 962 units or 35 units since the reading on September 7, 2007.
- 9. On September 24, 2007, Missouri-American did show the meter reading to a handyman working at the residence.

10. Missouri-American's representative did observe that there was a sprinkler system at this residence which may have attributed to a large amount of water usage during the dry months of July and August.

attributed to either an internal plumbing leak or leak on the customer service line. There was no indication of a leak when the meter was inspected on August 29, 2007, September 7, 2007 or September 24, 2007. If the customer has evidence that a leak existed and it has been repaired, it is the Company's policy to offer a one time credit to the customer for a high bill resulting from a leak.

12. Except as expressly stated herein, Missouri-American denies each and every allegation contained in the Complaint.

WHEREFORE, Respondent, Missouri-American Water Company requests that the Public Service Commission of the State of Missouri dismiss the Complaint with prejudice at Complainant's cost.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

Mary G. Sullivan, MBE #43030

Corporate Counsel 727 Craig Road St. Louis, MO 63141

Phone: (314) 996-2277

e-mail: mary.sullivan@amwater.com

#### VERIFICATION

Gina L. Myers, Network Operations Supervisor of Missouri-American
Water Company, being first duly sworn, deposes and states that she is familiar
with the facts stated in the Answer of Missouri-American Water Company to
Formal Complaint, that said facts are true and correct to the best of her
knowledge, information and belief.

SUBSCRIBED and SWORN to before me this 14 th day of November, 2007.

Notary Public

KAREN L. MORRIS
Notary Public - Notary Seal
STATE OF MISSOURI
Jefferson County
My Commission Expires: Feb. 18, 2008

#### CERTIFICATE OF SERVICE

I, Mary G. Sullivan, do hereby certify that copies of the attached Answer of Missouri-American Water Company to Formal Complaint have been served upon the following, via electronic mail and US mail postage paid, this 15th day of November, 2007:

Ms. Walter L. Schwab 3 Godwin Lane St. Louis, MO 63124 Lewis R. Mills Jr. P.O. Box 2230 200 Madison Street, Suite 650 Jefferson City, MO 65102

Secretary of the Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360 General Counsel's Office P.O. Box 360 200 Madison Street, Suite 800 Jefferson City, MO 65102

Mary G. Sullivar

Account Number 35-0050138-6
Customer Walter Schwab
Service Address 3 Godwin Ln

City St. Louis, MO 63124

### **Account History**

Usage	# Days	Daily Usa	ge Read	Read Date	Read Type	Bill Date	Bill	Payments	Balance
35	17	2.06	962	9/24/2007	Actual				
33	9	3.67	927	9/7/2007	Actual				
						9/17/2007		566.62	0.00
301	89	3.38	894	8/29/2007	Actual	9/4/2007	566.62		566.62
						6/19/2007		64.21	0
23	91	0.25	593	6/1/2007	Actual	6/6/2007	64.21		64.21
						3/20/2007		32.06	0
5	94	0.05	570	3/2/2007	Actual	3/7/2007	32.06		32.06
						12/12/2006		143.31	0
_69	88	0.78	565	11/28/2006	Actual	12/1/2006	143.31		143.31
		T				9/19/2006		362.86	0
197	91	2.16	496	9/1/2006	Manual	9/7/2006	362.86		362.86
		ŢŢ		1 1		6/20/2006		89.02	0
39	91	0.98	299	6/2/2006	Manual	6/9/2006	89.02		89.02
						3/21/2006		26.92	0
2	94	0.02	260	3/3/2006	Actual	3/8/2006	26.92		26.92
						12/13/2005		31.16	0
8	54	0.15	258	11/29/2005	Actual	12/1/2005	31.16		31.16
		T				10/25/2005		167.45	0
210	128	1.64	250	10/6/2005	Service	10/13/2005	372.35		167.45
		1.64	<del></del>	10/6/2005	<del> </del> -	<del>-  </del>	<del> </del>		
		0.15		11/29/2005	<del>                                     </del>	<del>                                      </del>		- <del></del>	<del>                                     </del>
		0.02		3/3/2006	1		<b>†</b>		1 1
	_	0.98		6/2/2006	<del>                                     </del>				<del>                                     </del>
	1	2.16		9/1/2006	<del>                                     </del>		<u> </u>		<del>                                     </del>
		0.78	·	11/28/2006	<del>                                     </del>	<del></del>	<del>                                     </del>	1	
		0.05		3/2/2007	<del> </del>	-	<del>-j</del>		<del>     </del>
		0.25		6/1/2007	<del> </del>  -		<del> </del>	<del>                                     </del>	1-1
		3.38	<del>-     -</del>	8/29/2007	<del>                                     </del>	<del></del>	<del> </del>		<del>                                     </del>
		3.67		9/7/2007	<del>                                     </del>		<del>                                     </del>	<del></del>	1
		2.06		9/24/2007	<del>                                     </del>	<del> </del>	<del> </del> -	<del></del>	

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