

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

Amanda BoClair,)	
)	
Complainant,)	
)	Case No. WC-2015-0074
v.)	SMALL FORMAL COMPLAINT
)	
Missouri-American Water Company,)	
)	
Respondent.)	

MISSOURI-AMERICAN WATER COMPANY’S ANSWER

COMES now Respondent Missouri-American Water Company (“MAWC”) and for its Answer to the Complaint of Amanda BoClair (“BoClair”), states as follows:

1. On September 22, 2014, BoClair with a mailing address of 9546 Cote Brillante Ave, St. Louis, Missouri 63114, 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 BoClair’s Complaint, MAWC admits that it a public utility under the jurisdiction of the Public Service Commission of the State of Missouri.
4. In response to the allegations of paragraph 2 of the Complaint, MAWC states that MAWC’s first record of contact from Ms. BoClair regarding discontinuance of service for 8240 Albin was in February 2014.
5. MAWC sent BoClair disconnection notices for the 8240 Albin account on August 22, 2013, August 29, 2013 and November 13, 2013, all prior to her request for a discontinuance of service and prior to her request for new service at the 9546 Cote Brillante Avenue address.
6. MAWC discontinued service to 8240 Albin on February 12, 2014 and started service at 9546 Cote Brillante Avenue per BoClair’s request, as of February 12, 2014. The 8240 Albin outstanding

account balance at that time was \$2,561.11 and the last payment received on the 8240 Albin account was a \$40 payment on September 13, 2013.

7. On March 18, 2014 MAWC transferred the outstanding 8240 Albin balance of \$2,561.11 to BoClair's active account at 9546 Cote Brillante Avenue.

8. MAWC thereafter sent BoClair additional disconnection notices for the 9546 Cote Brillante Avenue account on May 15, July 23, July 30, and September 11 in 2014, for both the transferred balance as well as current charges.

9. On August 6, 2014 BoClair paid \$680 towards her total outstanding balance, which included the transferred balance as well as current charges, leaving BoClair's current balance at \$2,016.37.

10. On October 6, 2014 MAWC received from Staff, a copy of BoClair's final bill from Laclede Gas that showed service ending at the 8240 Albin address on November 25, 2013.

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

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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
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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 3rd day of November, 2014 to:

Office General Counsel
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