

FILED

SEP 10 2024

Missouri Public
Service Commission

FORMAL COMPLAINT FORM

Attach extra pages as necessary.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Adam Knight & Bridget Knight
(Your name here)

Complainant,

v.

File No.

(PSC fills this in)

Liberty Utilities
(Utility's name here)

Respondent,

FORMAL COMPLAINT

1. Complainant resides at:

[REDACTED]

(Address of complainant)

[REDACTED]

(City)

[REDACTED]

(State)

[REDACTED]

(Zip Code)

2. The utility service complained of was received at:

(a.) Complainant's address listed in paragraph 1.

b. A different address:

(Address where service is provided, if different from Complainant's address)

(City)

(State)

(Zip Code)

03/17
3. Respondent's address is:

1750 S. 15th Ave
(Address of complainant)

Ozark
(City)

MO
(State)

65721
(Zip Code)

4. Respondent is a public utility under the jurisdiction of the Missouri Public Service Commission.

5. The amount at issue is: \$ [REDACTED]
(If your complaint is about money state how much is in dispute here.)

6. Complainant now requests the following relief:

(Explain what you want the Commission to do: the specific results you are seeking in this complaint.)

I want Liberty to be held accountable for the damages caused by the open neutral issue. The technician who fixed the problem identified it as a problem on their side and that the fault was upstream of our meter and was due to either poor maintenance or improper installation.
I am seeking financial compensation for the damaged items, specifically the ones that were clearly destroyed, such as the oven, power supplies, and the carpet.
I am requesting the commission to review Liberty's policies regarding maintenance and installation practices, as well as their claims process, to ensure this type of incident is prevented in the future.
Overall, I am seeking a resolution that recognizes Liberty's responsibility in this incident and provides fair compensation.

7. The relief requested is appropriate because Respondent has violated a statute, tariff, or Commission regulation or order, as follows:

(Explain why the Commission should grant the relief you seek: the facts that constitute a violation of a statute, tariff, or Commission regulation or order.)

There are several reasons: 1) Failure to Provide Safe & Reliable Service: The incident with the open neutral wire resulted in dangerous fluctuations in our home's electrical system damaging appliances and creating safety hazards. 2) Improper Maintenance and Installation: The technician indicated that the open neutral likely resulted from poor maintenance or improper installation by Liberty. 3) Inadequate Response to Reported Issues: Initially, Liberty was reluctant to investigate the issue and attempted to deflect responsibility onto us, suggesting the problem was inside our house. This delay and misdirection

exacerbated the issue and led to further damage. 4) Inconsistent Claim Handling: Liberty's rejection of our claim was based on the assertion that we should have had a secondary ground, yet they are providing us service. The inconsistency in their service and claims process undermines their position and suggests negligence. 5) Safe Service: The admission by Liberty's technician of sparks and an improper conductor size further supports our claim that Liberty failed to meet the expectation of maintaining safe and reliable service.


8. The Complainant has taken the following steps to present this matter to


the Respondent:

(Please describe in detail what steps you have already taken to resolve this complaint.)


1) Initial Reporting: Called Liberty to report the power surges and requested someone be sent to investigate. 2) Interaction with Liberty's Technician: Once a technician arrived, I described in detail regarding the power surges and damage it was causing inside our house, including breakers tripping multiple times, the burning smell, and the damage to carpet. The technician inspected the power pole and breaker box but initially found no issues. He ultimately discovered an open neutral and confirmed it was on Liberty's side of service and advised us to file a claim with Liberty for damages. 3) Claim Submission: I submitted a detailed claim to Liberty, documenting the damaged items and their estimated costs. 5) Denial of Claim: Liberty denied my claim based on their assertion that the responsibility for damages due to an open neutral lies with the customer. The issue was on Liberty's side and should be covered them. In their determination letter, Liberty stated the failure of a secondary neutral connector was the cause of the incident. 6) Followup testing: After the claim denial, I engaged my Homeowner's insurance, which hired a company to assess the damage to any/all appliances lacking clear indication of destruction. They ruled out any unseen or unnoticed damaged appliances. 7) I have filed an informal complaint with the Commission, but Liberty again denied responsibility and the compensation for damages remains unresolved.

9/5/24
Date

 Bridget Knight
Signature of Complainant


Complainant's Phone Number

Adam Knight Bridget Knight
Complainant's Printed Full Name


Alternate Contact Number


Complainant's E-mail Address

Attach additional pages, as necessary. Attach copies of any supporting documentation. Do not send originals of any supporting documentation.

1638 K Hill Road Clever - Damage

From: David Lawrence [REDACTED]

To: [REDACTED]

Cc: [REDACTED]

Date: Wednesday, January 17, 2024 at 12:57 PM CST

Good afternoon Justin,

I'm reaching out to make you aware of a trouble call we had at [REDACTED] last Monday(1/8/24). The customer, Bridget Knight, reported blinking lights and surges to our customer service rep. We dispatched our lineman and upon arrival he found one of our neutral connections bad at a secondary carryover pole.

Ms. Knight has experienced some damage as a result of the bad connection that she would to file a claim on. I have copied her in this email and she can also be reached at [REDACTED].

Best,

David Lawrence | Liberty Utilities (Missouri) | Senior Area Manager, Line Operations
P: 417-625--5100 | C: 417-291-4186 | E: [REDACTED]
[REDACTED]

This message and any attachments contain confidential information and are solely for the intended recipient. If you are not the intended recipient, any dissemination, review, disclosure, forwarding, distribution, copying or reliance on the contents of this message is strictly prohibited. Please notify the sender immediately by email if you have received this message in error and delete this message immediately from your system.

Email from Senior
Area Manager of
Line Operations getting
me in touch w/ the
claims department.



Claim Documents
Sent to Liberty

CLAIM FORM

Claim No: _____

NOTE

This form shall not to be construed as an admission of liability whatsoever by or on behalf of **The Empire District Electric Company**, a Liberty Utilities company, its affiliates and its respective officers, directors, partners, shareholders, employees, agents, successors, administrators, executors and assigns. The sole purpose of this form is to gather information needed to conduct an investigation of an alleged claim and it is not an agreement for payment or settlement of any type of claim being sought. See additional Claim Policies attached.

Your Name Knight Bridget
 Last Name First Name

Mailing Address [REDACTED] [REDACTED]
 Number and Street Nearest Cross Street
 [REDACTED]
 City/Town State Zip

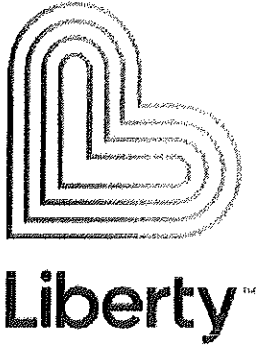
Email Address [REDACTED]

Business Name _____

Home Phone [REDACTED] Business Phone _____ Account Number [REDACTED]

Location of incident [REDACTED] [REDACTED]
 Number and Street Nearest Cross Street
 [REDACTED] [REDACTED]
 City/Town State

Date and time of loss January 8th, 2024 - approx. 10PM



CLAIM FORM

Claim No: _____

Briefly describe the events causing the damage/loss or personal injury. If known, include the name of Liberty Utilities employees or contractors involved.

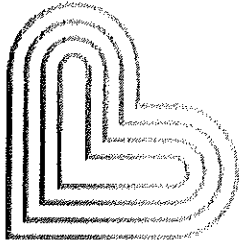
There were two or three periods of time on this date where the all electric powered lights, appliances, etc. were flashing and flickering. There were several instances where the breaker to the living room area tripped and turned everything off. Each time this happened, one of our power surge protector strips blew. Two of the surge protectors were fried, and we smelled electrical burning from these places, as well as from the motor in our reclining couch (which runs off of electric). One of the surge protectors had electricity blow through the back of it and it burned the carpet. When the dispatcher initially arrived he did not find a problem at the street lamp where all of the power to our house is ran through. After a second look he found the problem. While he was fixing the problem the flashing and flickering escalated and our stove ended up with error messages flashing across it.

List the items damaged: YOU MUST INCLUDE MAKE, MODEL NUMBER and DATE OF ORIGINAL PURCHASE and PURCHASE PRICE. Enclose a written repair bill or estimate for each damaged item. If items are not repairable, enclose a statement from a repairman stating the cost to repair would exceed the cost to replace, along with a copy of the original purchase receipt or a written estimate of the replacement cost. Depreciation is taken on replacement items.

All of the electronics/appliances were negatively impacted by the constant surges. All that were plugged in when this happened now have a degraded life span. I will need the carpet, stove, and blown surge protectors replaced. I would also like to know what your company will be covering considering the the degraded lifespan of all of my electronics/appliances.

I am currently working on getting a quote to replace the carpet. I bought this house with the stove in it, so I do not have the original paperwork. This is a Whirlpool 30-in Glass Top - 5 burners 4.2-cu ft / 2.5-cu Free Standing Double Oven Electric Range.

Pictures of damage are attached. We hired an electrician to make sure there was no unseen damage at our outlets etc. I will provide the cost of this once received from the electric company, for reimbursement.



Liberty™

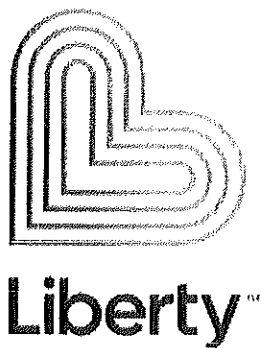
CLAIM FORM

Claim No: _____

INSURANCE COMPANY NAME: Nationwide POLICY NUMBER: _____

Have you made a claim for this loss with your insurance carrier? No, but I have been in touch with them to ensure this is handled properly.

Claimant's Signature Bridget Knight Date 02/06/24



CLAIM FORM

Claim No: _____

POLICY

In acknowledgment of your claim for alleged damages against Liberty Utilities, please complete, sign and return this form to:

**Liberty Utilities
Utility Specialist
602 S. Joplin Avenue
Joplin, MO 64801**

PROVISION OF THIS FORM IS NOT AN AGREEMENT TO PAY FOR DAMAGES

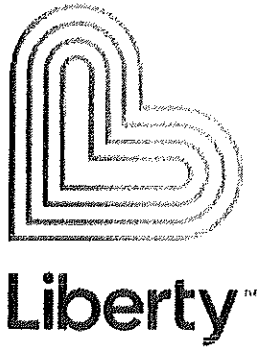
A Liberty Utilities' Claims Representative will contact you within **five (5) business days** after receiving your completed Claim Form and W9 Form as well as any evidence you may have for the purpose of an investigation. If Liberty Utilities does not receive these documents within **sixty (60) days**, Liberty Utilities will consider this claim closed.

Liberty Utilities will not reimburse for injuries, damages, or losses due to service interruptions or service defects (1) induced by wind, ice, lightning, floods, storms and other such phenomena; or (2) arising from causes beyond our control. Such claims are not individually investigated and are rejected under the premise that they are associated with events or conditions that are beyond the Company's control.

With the exception of weather related claims, each matter is investigated to determine underlying facts. In cases where Liberty Utilities acknowledges responsibility, claim payments will be made only to the properly identified owners of the damaged property. Payments will not be made to contractors or other agents of the customer engaged in the inspection or repair of damaged property unless directly hired by Liberty Utilities for the purpose of conducting any approved repairs.

Claims relating to damages, injuries, interruptions of service or voltage irregularities which result from acts of third parties, such as contractor dig ups or motor vehicle pole hits, are not paid by Liberty Utilities.

Claimants are required to furnish original repair bills or repair estimates as supporting proof of damages and losses alleged. A final decision will not be rendered until such bills and estimates have been received. Requests for such proof shall not be construed as an agreement to pay a claim.



CLAIM FORM

Claim No: _____

Liberty Utilities does not engage in the repair of property of others allegedly damaged due to its operation nor will it inspect damaged appliances or goods for the purpose of determining the nature or extent of damage. **Such inspections and repairs must be performed by contractors or agents of the claimant's choice unless the claimant consents in writing to a contractor selected by Liberty Utilities. Liberty Utilities does not recommend contractors or repair agencies.**

Liberty Utilities may inspect or appraise damaged property for the purpose of determining fair and reasonable value. Payments will be made based on actual cash value. Waiver of inspection does not constitute agreement as to the fair and reasonable value of the damaged property. Spoiled food, medicine or other perishable merchandise should not be held for inspection but should be inventoried, listed and disposed of according to good sanitary practice.

Claimants have a common law duty to limit damages and minimize losses. Damages arising from a claimant's failure to make repairs and minimize losses will not be reimbursed.

Liberty Utilities contractors are responsible for their own operations and carry mandatory liability insurance. Claims relating to contractor activities will be referred to the contractor and its insurer for processing. Liberty Utilities will assist our customers in the resolution of contractor claims.

Claims for damages arising from interruption or irregularities in electric or water service are considered under the terms and conditions of the tariff for Electric/Water Service which is on file with and approved by the Missouri Public Service Commission.

Customers are cautioned not to withhold payment of utility bills pending a decision on claims filed. This practice could lead to a deterioration of the customer's credit rating and could ultimately result in a collection action including the discontinuance of service.

Tyler's Carpet of Neosho

BID (Materials & Service)



Phone (417) 451-2712 Fax: (417) 451-2713

Email

Website tylerscarpetmo.com

TO: Adam & Bridget Knight



Job Description	Job Site	Date
replace carpet & pad bedroom	Clever	2/9/24

QUANTITY	DESCRIPTION	UNIT PRICE	LINE TOTAL
1.00	Tuftex Terra Nova carpet & 8# pad	\$ [REDACTED]	\$ [REDACTED]
SUBTOTAL			\$ [REDACTED]
SALES TAX			[REDACTED]
MATERIALS TOTAL			\$ [REDACTED]

QUANTITY	DESCRIPTION	CHARGES	LINE TOTAL
1.00	Install materials above	\$ [REDACTED]	\$ [REDACTED]
SERVICE SUBTOTAL			\$ [REDACTED]
TOTAL			\$ [REDACTED]

INVOICE

Today's Date

2/5/24

Invoice No.

Date completed

FITCH ELECTRIC L.L.C.

(417) 889-8008

BILL TO

JOB NAME

Adam Knight

Description of work

Checked service voltage. Tightened breakers. Checked receptacles and replaced one.

Qty.	Description of material	Price	Per	Price ext.
1	Recept.			

LABOR CHARGES

Total material

\$

Hours

Mechanic

Per Hour Charge

Labor ext.

Total labor

\$

2 Chuck

\$

\$

Invoice total

\$

INVOICE

Today's Date

Date completed

FITCH ELECTRIC L.L.C.

2/13/24

Invoice No.

(417) 889-8008

BILL TO

JOB NAME

Adam Knight

Description of work

Added surge protector to main panel.

Qty.

Description of material

Price Per

Price ext.

1

QO2175SB surge protector

ea

LABOR CHARGES

Total material

Hours

Mechanic

Per Hour Charge

Labor ext.

Total labor

1.5

Chuck

\$

\$

\$

Invoice total

\$

1357

Scotty Rogers

CUSTOMER'S ORDER NO.	DEPARTMENT	DATE
		2-28-24
NAME		
A. Paul Knight		
ADDRESS		
[REDACTED]		
CITY, STATE, ZIP		
[REDACTED]		

SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT.	MDSE. RETD.	PAID OUT
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QUANTITY	DESCRIPTION	PRICE	AMOUNT
1	Test for high ampere High utility over found to be high amp draw tripped breaker out		
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15	Paid w/ Fall service call		
16			
17			
18			

RECEIVED BY

Excel Document
listing damages
and estimated costs.

This was submitted
to Liberty with the
claim form.

Room / Space	Product / Service	Description	Reimbursement Reason	Reimb. Cost
Bedroom	Carpet	Quote Provided: See email attachment "Carpet Bid - Tyler's Carpet.pdf"	Power strip blew upon power surge, burning a hole in the carpet	
Kitchen	Oven	Model: WGE 745C0FS Whirlpool - 6.7 cu ft Self-Cleaning Freestanding Double Oven Electric Convection Range	Oven display threw error codes upon surges; smelled of electrical burning; damage discovered by electrician (ref. to [redacted])	
Living Room	Power Strip	Tripp Lite Super 6 Deluxe Strip 6-Outlet 6' Cord with Tel 1050 Joules	Power strip blew upon power surge	
Bedroom	Power Strip	Belkin BE106000-10 10 Feet 6 Outlets 720 Joules	Power strip blew upon power surge	
NA	Electrician Inspection	Copy of Bill Provided: See email attachment "Electrician Bill #1 - 02.05.24.pdf"	Electrician required to inspect outlets and electrical box to determine any damages or hazards	
NA	Electrician Service	Copy of Bill Provided: See email attachment "Electrician Bill #2 - 02.13.24.pdf"	Electrician service to install surge protector to main panel to avoid future incidents / damages	
NA	Electrician Inspection	Copy of Bill Provided: See email attachment "Electrician Bill #3 - 02.28.24.pdf"	2nd opinion obtained from electrician following incident; damage to oven discovered	
NA	Missed Work / Income	Union Mason - 5 hours of missed work at an hourly pay of 60 / hr.	Meeting with electricians to allow inspection / service / discuss findings	
Total				

Room / Space	Product	Make	Model #	Description	Replacement Reason	Repl. Cost
Attic	Heating & Air System				DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
Utility Room	Well Control Box				DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
Ground	Well			Estimated Replacemet	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
Garage	Xbox One	Microsoft			DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	TV	TCL	75QM850G	75" Clas QM8 Series Mini-LED QLED 4K UHD Smart Google TV	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Sound Bar	JBL	Bar 500	JBL Bar 500: 5.1 Channel Soundbar with MultiBeam and Dolby Atmos	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Garage Door Opener	LiftMaster	41AC050-2M	LiftMaster Garage Door Opener 41AC050-2M Receiver Logic Board	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Water Softener	Whirlpool	WHESFC	Whirlpool WHESFC Water Softener with Filter / Hybrid Water Softener	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Water Heater	AO Smith	E6-5H45DV	Signature 100 50-Gallons Tall 4500-Watt Double Element Electric Water Heater	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Refrigerator	Whirlpool	W2RXNMMWL00	Whirlpool Top-Mount Refrigerator 2.8 cu ft.	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
Laundry Room	Washer	Maytag	MWV7232HW	Maytag Smart Capable 5.3-cu ft High Efficiency Impeller Smart Top-Load Washer	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Dryer	Maytag	MED6230HW	Maytag Smart Capable 7.4-cu ft Smart Electric Dryer	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
Kitchen	Microwave	LG	MK2030NST	LG Countertop Microwave Trim Kit (Stainless Steel)	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Dishwasher	Maytag	MD8959SKZ	Maytag Top Control 24-in Built-In Dishwasher With Third Rack	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Refrigerator	Whirlpool	WRF535SWHZ	Whirlpool 25.2-cu ft French Door Refrigerator with Ice Maker	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
Living Room	TV	Samsung	QN85QN90CAFXZA	85" Class QN90C Neo QLED 4K UHD Smart Tizen TV	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Laptop	Dell	P137G	Dell Latitude 5420 14" Intel Core i7-1165G7 2.8GHZ 16GB RAM 256GB NVME	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Laptop	Dell	15" 5540	Dell Latitude 5540 Laptop with 13th Gen Intel Core Processor	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Monitor 1	Dell	P2219H	Dell 21.5" Flat Panel Monitor	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Monitor 2	Dell	P2219H	Dell 21.5" Flat Panel Monitor	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Sound Bar	JBL	JBLBAR31BLKAM	JBL - 3.1-Channel Soundbar System with 10" Wireless Subwoofer and Digital Am	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Couch 1	Aria	(UPC) 635178320089	Aria Power Recliner Sofa w/ Power Head Rest - Steve Silver Co.	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Couch 2	Aria	(UPC) 635178320089	Aria Power Recliner Sofa w/ Power Head Rest - Steve Silver Co.	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Recliner	Aria	(UPC) 635178147529	Aria Power Glider Recliner with Power Head Rest - Steve Silver Co.	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
Bedroom	TV	Vizio	V555-J01	Vizio V-Series 55" Class 4K UHD HDR LED Smart TV	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
	Piano Keyboard	Yamaha	PSREW310	PSREW310 76-Key Touch Sensitive Portable Keyboard with PA130 Power Adapt	DEGRADED ELECTRONICS/APPLIANCES - Strong Power Surges occurred for 3+ hrs causing fire hazard	
Total						

Form submitted to Liberty with the damage claim form to provide estimated costs for the damaged items.

Top Section = items clearly destroyed during the electrical surges.

Bottom Section = items plugged in during the electrical surges, but unclear if any damage was caused. After Liberty denied our claim, we got our Homeowners Insurance involved. They hired a company to specifically test these items for damage. All of these items tested as not being damaged.



Alexis Rogers

Program Administrator

March 18, 2024

Via Electronic Mail Only

Bridget Knight
[REDACTED]

Re: Claim Number [REDACTED]
Claimant: Bridget Knight
Location: [REDACTED]
Date of Loss: 1/8/2024
Amount: [REDACTED]

Liberty Denial
Letter

Dear Bridget,

This letter is the formal response of Liberty Utilities ("Liberty" or the "Company") to your claim for losses incurred due to an electrical incident on January 8th, 2024.

We have completed our investigation into this claim. Liberty has determined that, on the date of loss, a component of the transformer (a secondary neutral connector) at the incident location failed. As a result of the incident, the electrical system at the loss location was energized with full 240-volt power, which can cause damage to electrical items.

Electrical components can fail due to wear and tear, which the Company cannot prevent. In the event that a neutral fails, the customer should have a secondary ground on their property (for example, at the meter box) to prevent damage. Therefore, if an incident occurs on the line, the secondary ground ensures the appliances and systems are still energized at 120 volts rather than the full 240 volts.

The National Electric Code states as follows:

"250.24 Grounding Services

(a) Grounding Neutral. Alternating-current services that are supplied from a grounded electrical system from the utility must have the grounded (neutral) conductor connected to a grounding electrode of the specified in 250.52 in accordance with Part III or Article 250 in accordance with (1) through (5). See 250.24(C)".

Additionally, Liberty's Specifications for Electric Installations states, in part, as follows:

"6.3 Grounding Methods

6.3.1 The Company shall not be liable for damage to the property of the customer resulting from unbalanced voltage conditions due to the opening of a neutral service conductor".

Liberty does not offer protection against this type of incident. Customers carry the burden of protecting their property against potential damage of this nature.

The Company shall use reasonable diligence in providing a regular and uninterrupted supply of electric, but in case the supply of electric is interrupted by reason of strike, riot, invasion, storm, fire, accident, breakdown, unexpected or prolonged increase in usage, legal process, state or municipal interference, or any cause beyond its control, the Company shall not be liable for damages to the Customer for interruption in the service due to any of the causes aforesaid.

The Company is not liable for this incident, and therefore is not responsible for the damages incurred. For the aforementioned reasons, Liberty respectfully denies your claim. No language in this letter should be construed as waiving any rights of Liberty Utilities.

If you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

Alexis Rogers

Re: PSC Informal Complaint [REDACTED]

From: [REDACTED]

To: [REDACTED]

Date: Friday, June 14, 2024 at 10:42 AM CDT

Hi, Max

Please see below answers and additional attachments.

Yahoo Mail: Search, Organize, Conquer

On Thu, Jun 13, 2024 at 3:11 PM, Young, Max
[REDACTED] wrote:

Hello,

I wanted to get in contact with you regarding the informal complaint that you brought to the Public Service Commission. I just have some questions so I can get a clearer picture of what happened. I'm going to give you a call here in a bit but I wanted to ask the bulk of the questions here in an email. Once I hear a response from you I am going to request information from Liberty and have them answer a bunch of questions based on what you tell me and questions I have. This will take about 7-10 business days. When I hear back I will give you a call and summarize what their response is.

How many times did your breakers trip in your house?

Between 3-5 times.

Did the electrician replace a surge protector within your breaker panel? (Electrician Bill #2)

No, we had him install this as a precaution so that we did not end up in this situation again

Were the surge protectors that were blow the style that plugs into a regular wall outlet?

Yes.

What were the two power supplies for that were damaged?

One was used to have my computer equipment plugged into and the other was for a TV.

Can you elaborate on how power is ran through a street lamp? Is the main function a street lamp or is it just a utility pole with a light on it?

The tech that came out described it as a power pole. It would be a utility pole with a light on it. The power for our property first comes through the power pole and is then fed to our house.

What was your interaction with the service tech? Did a group of linemen come out right away to fix the issue or was it an individual person? Typically they would disconnect the house from service before conducting any repairs that might affect your home. It does not sound like this is the case. Can you confirm that they kept service on during the attempted repair that further damaged your appliances? I know you spoke about this in your complaint I just wanted to know if there was any more to it. Also, what did the service tech that eventually fixed the issue say that caused

Email w/ PSC agent
during informal
complaint process.

The questions answered
in this email provide
a lot more detail
regarding the electrical
incident.

this? I'm going to ask Liberty what they officially think happened but I just want to see if it matches with what they initially told you.

I went on the Liberty site to report an incident. Someone from Liberty called and upon describing the issue they tried to state that it's probably an issue in the house. My husband had to forcefully explain that we need someone to come out because we don't believe the issue is inside the house because it was affecting several rooms and multiple lights/breakers. She seemed reluctant but sent a tech out. There was only one person that came out to investigate. He came out and inspected the power pole outside then the meter on the house outside. Then he came to the door to talk to us about what was going on. He said he didn't find any issues on their side. We explained to him what had happened including the breakers flipping off, the power supplies burning up, the hole in the carpet, and the electrical burning smell. He then asked us if he could take a look at our breaker box and we were glad to let him.

He seemed concerned once he got in the house (I believe he could smell the electrical burning). Once he checked our electrical box he said he didn't see anything that would concern him and said he would go check the power pole again. When he was checking the power pole, the lights in our house began to magnify, flicker, and go crazy. That's when the incident with the stove happened. The service tech came back to the house and explained that he found the problem. He was wiggling wires at the power pole and that's when he discovered the open neutral. He saw the lights going crazy in the house and it was confirmation to him that this was the issue. He explained that this is on Liberty's side since the power pole feeds our meter. We told him what happened with the oven during the incident and he said that we should submit a claim to Liberty and that they would take care of the damages since the issue was found on their side. He said we shouldn't have a problem with the claim because the issue is very clearly their responsibility. He then explained that he would go fix the open neutral and that we should be good after that. Neither my husband or I can clearly remember whether the power was turned off before he headed back to the power pole. I believe I recall him stating he would have to turn the power off before and back on after, but my husband isn't sure because we know he didn't come back inside before and after fixing it. If there is a way for them to turn it off outside then I'm convinced he did turn it off and back on because he fixed it and left. The only reason I remember him coming back to the door before fixing it was to explain what was going on and give us a heads up about disconnecting the power. I wish I could confirm that detail more clearly for you.

What was their reasoning for rejecting your claim?

It seems based on their letter that they are stating when an open neutral fails and causes damages the customer is responsible for any damages that occur inside the house and that we are responsible for preventing this by having a secondary ground on our property (for example at the meter).

The tech that told us to submit the claim was clear that because the issue was upstream of our meter Liberty was responsible and that open neutral wires happen because of a lack of maintenance or improper installation to begin with. The tech told us that he believes it was improperly installed to begin with and that repairs are not done proactively on their end like they should be. Below is a quote from their determination letter.

"We have completed our investigation into this claim. Liberty has determined that, on the date of loss, a component of the transformer (a secondary neutral connector) at the incident location failed. As a result of the incident, the electrical system at the loss location was energized with full 240-volt power, which can cause damage to electrical items. Electrical components can fail due to wear and tear, which the Company cannot prevent. In the event that a neutral fails, the customer should have a secondary ground on their property (for example, at the meter box) to prevent damage. Therefore, if an incident occurs on the line, the secondary ground ensures the appliances and systems are still energized at 120 volts rather than the full 240 volts."

Please note that the amount on the determination form is high. I would like to explain. Please see my attached excel document that was included in the claim to Liberty. I listed the clearly damaged items at the top with the cost totalled. Then I listed all appliances and electronics that had the potential to be damaged by the surges. I was asking Liberty how we can test these or what can be done because if they were damaged then it needed to be made right. I believe they saw the total for everything and just found a way to deny the claim. When we were forced to submit this to our homeowners insurance they hired a company called Strike Check to come out and test everything that was plugged in to determine if there was any degradation to the items. Upon testing they determined that there was no other damage besides the items that were specifically called out and pictured. Liberty should have paid for a company to do this so that we could have settled on what needed to be done about everything else. Instead they just found a way to deny the entire claim including the items which were obviously destroyed/damaged (oven, power supplies, carpet).

I have attached pictures of the damage in case this is useful as I don't believe I originally attached them. I also attached their determination letter in case that wasn't originally included.

Feel free to call me if you have any questions.

Thank you,



Max Young

Assistant Engineer

Missouri Public Service Commission

573-522-1420



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