

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

Roger Dale Barber,)	
)	
Complainant,)	
)	
v.)	Case No. WC-2025-0334
)	
Liberty Utilities (Missouri Water) LLC)	
d/b/a Liberty,)	
)	
Respondent.)	

LIBERTY’S ANSWER TO COMPLAINT

COMES NOW Liberty Utilities (Missouri Water) LLC d/b/a Liberty (“Liberty” or the “Company”), and for its Answer to the Complaint of Roger Dale Barber, Liberty respectfully states as follows to the Missouri Public Service Commission (the “Commission”):

1. On June 17, 2025, Mr. Barber filed the Complaint with the Commission, disputing the date his water meter was exchanged and the meter readings after the exchange.
2. The Commission issued a *Notice of Complaint and Order Directing Answer* on June 23, 2025, directing Liberty to file an answer herein by July 23, 2025.
3. Liberty admits the factual allegations contained in paragraphs 1-4 of the Complaint.
4. In January of 2024, Mr. Barber’s original meter (MW88101969) was removed and replaced with meter MW93538775. At that time, the original meter ending in 1969 had a read of 2343.78 gallons.
5. Mr. Barber contacted Liberty on March 12, 2024, and stated his water meter was not working properly.
6. On April 17, 2024, a Liberty technician verified Mr. Barber’s meter ending in 8775 was working properly and showed a reading of 5475.31 gallons.

7. On April 22, 2024, Mr. Barber contacted the Company again and requested a meter test. Due to Mr. Barber's concerns, his meter ending in 8775 was removed from the residence and replaced with meter MW95738958 on April 23, 2024. The meter exchange details of April 23, 2024, however, were not updated in Liberty's customer information system, and the meter ending in 8775 remained assigned to the property despite being removed in the field and sent off for testing.

8. On May 5, 2024, the meter ending in 8775 tested within normal limits by Midwest Meter Inc. The meter ending in 8958 remained installed on the premises but was not logged in Liberty's customer information system and was not connected for automated reads. Mr. Barber's meter was read properly and regularly, however.

9. Liberty became aware of the incorrect meter information on Mr. Barber's account in April of 2025, the Company updated the data to reflect that the meter ending in 8958 is at the residence of Mr. Barber, and the meter was connected for automated reads. The meter ending in 8958 had a read of 30324 gallons on April 28, 2025.

10. Once the updates of the correct meter information were entered into Liberty's customer information system, the previous invoices which showed both meters (8775 and 8958) having usage were cancelled. Correct bills for those timeframes were issued on July 2, 2025. All late fees associated with the May and June invoices were reversed (credited to Mr. Barber).

11. Liberty believes it has fully assisted Mr. Barber and has properly billed him for his water usage.

12. Liberty denies all allegations of the Complaint not specifically admitted herein.

WHEREFORE, Liberty respectfully requests that the Commission dismiss or deny the Complaint and grant such additional relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Diana C. Carter

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 23rd day of July, 2025, with notification of the same being sent to all counsel of record. This filing was also sent by electronic transmission and/or ordinary mail to all parties/counsel of record.

/s/ Diana C. Carter