

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

The Office of the Public Counsel, at al.     )  
COMPLAINANT,                                     )

v.   )

Case No. WC-2014-0138, et al.

Missouri-American Water Company,     )  
RESPONDENT.                                     )

**CONSOLIDATED ANSWER OF MISSOURI-AMERICAN WATER COMPANY**

**COMES NOW** Missouri-American Water Company (MAWC or Company) and, pursuant to 4 CSR 240-2.070, and the Commission's Order Consolidating Cases and Granting Extensions of Time, respectfully states the following to the Missouri Public Service Commission (Commission) as its Consolidated Answer:

1. MAWC admits that it is a public utility subject to the jurisdiction of the Commission, as provided by law.
2. Billing issues unique to the residents of Stonebridge Village, Branson West, Missouri, have been identified related to a software conversion that occurred in May 2013. Several residents of Stonebridge Village and the Office of the Public Counsel (Public Counsel) have filed formal complaints with the Commission concerning these billing issues.
3. Attached hereto as **Appendix A** is a document describing the nature of the billing issues.
4. On November 8, 2013, MAWC Representatives met with the Stonebridge Village Property Owners Association Board of Directors in order to further identify and discuss the Stonebridge residents' billing concerns.

5. On November 21, 2013, representatives of MAWC, the Commission Staff and the Public Counsel participated in a public meeting, in Stonebridge Village, Branson, Missouri, to generally discuss the billing issues.

6. On November 22, 2013, the Commission issued its Order Consolidating Cases and Granting Extensions of Time, thereby consolidating several complaint cases (Complaints) associated with the same general subject matter. The Order further directed MAWC to file a consolidated answer by December 13, 2013.

7. MAWC has implemented an email address and a telephone number that are reserved specifically for Stonebridge Village residents to contact MAWC with questions regarding recent bills. MAWC is also able to provide explanations for the corrected invoices customers are now receiving.

8. Representatives of MAWC will be taking appointments for face-to-face meetings to take place in Stonebridge Village on December 17, 18, and 19, 2013, for the purpose of answering individual customer questions.

9. As previously stated in MAWC's Status Report, filed on November 27, 2013, MAWC will also be performing an individual audit of every subdivision bill and then creating a clear and concise statement for each customer as to the customer's account and the customer's current balance.

10. MAWC suggests that the most constructive approach to the Complaints will be to allow time for the audits and statements to be completed and provided to customers before a procedural schedule is set in regard to the Complaints. MAWC has kept, and will keep, Staff and Public Counsel informed and involved in these efforts. MAWC would be amenable to a status report requirement that continues during this audit and statement process.

## **AFFIRMATIVE DEFENSES**

11. Further answering and, in the alternative, as an affirmative defense, MAWC states that in some instances the Complaints fail to state a claim upon which relief may be granted in that the Complainant is not a party authorized to bring a complaint concerning just and reasonable rates.

12. Further answering and, in the alternative, as an affirmative defense, MAWC states that in some instances the Complaints fail to state a claim upon which relief may be granted in that the Complaint does not allege a violation of any provision of law or of any rule or order or decision of the Commission.


13. Further answering and, in the alternative, as an affirmative defense, MAWC states that in some instances the Complaints fail to state a claim upon which relief may be granted in that the Complaint requests relief that is beyond the Commission's jurisdiction.

14. Further answering and, in the alternative, as an affirmative defense, MAWC states that it has acted in accordance with its tariffs and applicable statutes and regulations.

15. Except as expressly admitted in this answer, MAWC denies each and every allegation contained in the Complaints.

**WHEREFORE**, having answered and set forth its affirmative defenses, Missouri-American Water Company prays the Commission consider this Consolidated Answer and grant such relief as the Commission deems reasonable and just.

Respectfully submitted,



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ATTORNEYS FOR MISSOURI-AMERICAN  
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## Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by U.S. Mail, postage prepaid, or by electronic mail to the following on this 13<sup>th</sup> day of December, 2013:

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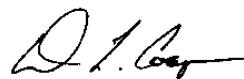
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