

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

Jim Moriarty,)	
)	
Complainant,)	
)	
v.)	<u>File No. WC-2025-0204</u>
)	
Missouri-American Water Company,)	
)	
Respondent.)	

RESPONSE TO REQUEST FOR RECONSIDERATION

COMES NOW Respondent Missouri-American Water Company (“MAWC” or “Company”), by and through the undersigned counsel, and for its *Response to Request for Reconsideration*, respectfully states to the Missouri Public Service Commission (“Commission”) as follows:

1. On November 5, 2025 (effective December 5, 2025), the Commission issued its *Report and Order* in this matter. Among other things, the *Report and Order* found that “Complainant [had] not shown that the Company violated any rule, regulation, statute, or order.” (R&O, p. 8). Therefore, the Complaint was denied.

2. On December 4, 2025, Mr. Moriarty filed his *Request for Consideration*.

3. Commission Rule 20 CSR 4240-2.160 states as follows as to reconsideration:

Motions for reconsideration of procedural and interlocutory orders may be filed within ten (10) days of the date the order is issued, unless otherwise ordered by the commission. Motions for reconsideration shall set forth specifically the ground(s) on which the applicant considers the order to be unlawful, unjust, or unreasonable. At any time before a final order is issued, the commission may, on its own motion, reconsider, correct, or otherwise amend any order or notice issued in the case.

4. The *Request for Reconsideration* is largely a restatement and further argument of the matters that were previously heard by the Commission. Nothing in the request specifically sets forth grounds on which the order would be found to be unlawful, unjust, or unreasonable or should change the Commission's denial of the Complaint.

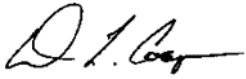
5. As stated in its *Brief*, MAWC has been appreciative of Mr. Moriarty's comments in regard to MyWater and has utilized those comments to improve the usage display features over the last year. The Company will continue to provide customers with the best information the Company can within technological limitations.

6. Mr. Moriarty's request should be denied because the Commission's decision was appropriately based on the evidence presented to it during the complaint process, including the hearing.

Wherefore, the Company requests the Commission issue its order denying the *Request for Reconsideration* and issue such further orders as it should find to be reasonable and just.

Respectfully submitted,

**BRYDON, SWEARENGEN
& ENGLAND, P.C.**

By: 
Dean L. Cooper Mo. Bar #36592
P. O. Box 456
Jefferson City, Missouri 65102-0456
Telephone: (573) 635-7166
Email: dcooper@brydonlaw.com

Timothy W. Luft, MBE #40506
Rachel Niemeier, MBE #56073
Jennifer Coleman, MBE #77721
**MISSOURI-AMERICAN WATER
COMPANY**
727 Craig Road
St. Louis, MO 63141
(314) 996-2279 (Tim)
(314) 996-2390 (Rachel)
timothy.luft@amwater.com
rachel.neimeier@amwater.com
Jennifer.coleman01@amwater.com

ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to all parties of record, this 15th day of December 2025.

