



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

Kwame Raoul
ATTORNEY GENERAL

September 16, 2025

VIA EMAIL

Kenneth Jones
Illinois American Water Company
Kenneth.Jones@amwater.com

RE: Meeting Follow Up and Ongoing Investigation

Dear Ken,

This correspondence serves as a follow-up to our meeting on August 28, 2025 ("Meeting"). We appreciate you taking the time to meet with our office and representatives from the Village of Homer Glen ("Homer Glen") and look forward to continuing to work with you to resolve the critical billing issues we discussed.

As part of our ongoing investigation, the Office of the Illinois Attorney General (the "AG") seeks the following information from Illinois American Water Company ("Illinois American" or the "Company") and requests that the Company take certain actions to address customer concerns in Homer Glen.

Water Usage and Billing

1. Referring to Illinois American Exhibit 1.06, Exs. C and C1, in docket no. 25-0273 which identifies water usage for the Southwest Suburban Service District:
 - a. Please provide Homer Glen's water usage for calendar years 2021 through 2024.
2. Referring to docket no. 05-0681/06-0094/06-0095 (consol.) and consistent with the reports filed by the Company therein:
 - a. Please provide a report concerning high bills for the time period of September 1, 2024, to present. In this report, please list all Homer Glen accounts identified as having a high bill contact and the resulting action taken; and
 - b. Please provide a report concerning the consecutive estimated bills for the time period of September 1, 2024, to present. In this report, please list all Homer Glen accounts with three or more consecutive estimates, all estimate service orders or letters issued, and the outcome of all service orders or other investigation(s).

3. We ask that the Company establish a policy that when a customer complains about high volume water usage, or Illinois American identifies a higher than historical bill, that the customer is apprised in writing of the procedure in place to investigate the water usage, which would include at minimum: (a) a Field Service visit; (b) the customer's right to dispute that a leak or leaks exist within their home; (c) the customer's right to have the water meter tested for accuracy by Illinois American if a licensed plumber, retained by the customer, inspects the property and finds no internal water leak(s); (d) the preservation of the water meter throughout the testing process; and (e) the customer's right to send the water meter at issue to a professional testing facility of the customer's choice to test the meter's accuracy.

Meters

1. During the Meeting, Illinois American stated it is in the process of exchanging meters in Homer Glen from AMR to AMI meters:
 - a. Please identify the total number of AMR meters in Homer Glen that need to be changed over to AMI meters;
 - b. Does Illinois American use fixed network AMI or cellular AMI?
 - c. How often does the Company read AMR meters?
 - d. How often does the Company read AMI meters?
 - e. Does the Company use data from its meters to identify unusual water-use patterns?
 - i. If yes, please provide an explanation of the Company's process for identifying unusual consumption.
2. Identify under what circumstances the Company would issue an estimated bill for a customer with an AMI meter.
3. Under what circumstances does the Company issue an estimated bill for a customer with an AMR meter?
4. Please refer to the stipulation entered in docket no. 05-0681/06-0094/06-0095 (consol.):
 - a. Identify the rate at which Illinois American estimates its meter reads in Homer Glen and whether this percentage has increased or decreased since 2023.
5. Please provide a log and/or report concerning the number of meters in Homer Glen that were tested for accuracy for the time period of September 1, 2024, to present.
 - a. In the same log/report, please confirm whether, pursuant to Section 600.350, the Company provided each customer with the results of the meter test. 83 Ill. Adm. Code § 600.350.
6. It is our understanding that AMI meters capture and transmit more data than AMR meters, and that the Company's MyWater portal allows customers to track water usage based off the data transmitted from the AMI meters:

- a. Please explain the data capture and transmission capabilities of the Company’s AMI meters?
- b. Please confirm that the MyWater portal relies on metering AMI data to provide information to consumers.
- c. We obtained a snapshot from a customer’s MyWater portal which notes a “continuous” leak:

Interval End Time	Interval Reading	Interval Consumption	Reverse Flow	Leak
12/07/2024 00:51	487381.2	129.3		Continuous
12/07/2024 01:51	487512.0	130.8		Continuous
12/07/2024 02:51	487640.7	128.7		Continuous
12/07/2024 03:51	487767.4	128.7		Continuous
12/07/2024 04:51	487893.5	126.1		Continuous
12/07/2024 05:51	488026.2	132.7		Continuous
12/07/2024 06:51	488187.1	160.9		Continuous
12/07/2024 07:51	488320.3	133.2		Continuous
12/07/2024 08:51	488471.0	150.7		Continuous
12/07/2024 09:51	488619.9	148.9		Continuous
12/07/2024 10:51	488769.4	149.5		Continuous
12/07/2024 11:51	488916.3	146.9		Continuous
12/07/2024 12:51	489066.3	150.0		Continuous
12/07/2024 13:51	489212.8	146.5		Continuous
12/07/2024 14:51	489345.2	132.4		Continuous
12/07/2024 15:51	489535.3	190.1		Continuous
12/07/2024 16:51	489673.1	137.8		Continuous
12/07/2024 17:51	489812.1	139.0		Continuous
12/07/2024 18:51	489972.7	160.6		Continuous
12/07/2024 19:51	490105.7	133.0		Continuous
12/07/2024 20:51	490256.7	151.0		Continuous
12/07/2024 21:51	490408.3	151.6		Continuous
12/07/2024 22:51	490548.4	140.1		Continuous
12/07/2024 23:51	490690.9	142.5		Continuous

Please identify what other types of leaks or other potential responses may be logged under the “Leak” column in a customer’s MyWater portal.

- d. According to the Company’s website, customers may sign up to receive emergency and non-urgent alerts by email, phone, and text. Please identify the types of emergency and non-urgent alerts customers may sign up to receive in their MyWater portal.
 - i. Can the Company provide leak detection or high usage notifications to customers with AMI and/or AMR meters?
 1. If yes, does the Company provide leak detection or high usage notifications to customers with AMI and/or AMR meters?
 - a. If a customer’s MyWater portal showed a continuous leak, as illustrated above, would the Company send a notification to the customer about the continuous leak?

Customer Complaints

1. Please confirm whether the Company is following the Commission Complaint Process pursuant to Section 280.230.
 - a. Specifically, please state (yes/no) whether the Company advises the complainant of the right to escalate informal complaints to the Commission pursuant to 83 Ill. Adm. Code §280.230(h). If not, please explain why.
 - b. Are customers protected from disconnection while their complaints are heard at the ICC if they have filed an informal complaint?

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2. We ask that the Company set up a specialty group/customer service representative(s) dedicated to handling calls from the Homer Glen service area and that this group or person keep a daily log to record, at minimum: (a) the customer's information; (b) the nature of the complaint; (c) the date when the complaint was referred to a department or departments within Illinois American; (d) the department or departments' name receiving the referral; (e) record of the action taken by Illinois American related to complaint; and (f) the final disposition of the complaint.
3. We ask that the Company schedule a town hall meeting in Homer Glen to speak directly with residents about their concerns and advise them of their options to avoid high bill surprises and their options when receiving a bill for unusually high usage.

Cyber Attack

1. Please advise as to the result of any and all investigations into the October 2024 cyber attack on American Water and the potential impacts on: (1) customer billing; (2) customer account information; (3) water meter data; and (4) customer usage in general, and specific to (i) data retrieval, (ii) data storage, and (iii) meter reading.

We ask that you please respond to these requests by October 3, 2025. Thank you for your prompt attention to these matters.

Sincerely,
/s/ Susan Satter
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