

**BEFORE THE RATE COMMISSION  
OF THE METROPOLITAN ST. LOUIS SEWER DISTRICT**

For Consideration of a Wastewater Rate     )  
Change Proposal by the Rate                    )  
Commission of the Metropolitan                )  
St. Louis Sewer District                         )

**Barnes Jewish Hospital Response  
to First Data Request of MSD**

**Question**

1. Does the Consultant perform utility rate design consulting work? Please provide a list of all clients for which this type of consulting work was performed since 2002.
  - 1a. Please indicate the type of rate design development performed for each client and indicate if the client provides natural gas, electric, water/wastewater combined and/or stand alone wastewater.
  - 1b. Please indicate the type of rate analysis and review performed for each client and indicate if the client provides natural gas, electric, water/wastewater combined and/or stand alone wastewater.
  - 1c. Please indicate which clients listed are currently managing capital project programs or similar initiatives and the dollar size of each program.
  - 1d. Please indicate which clients listed have issued bonds, total outstanding bonds to date, anticipated dollar size of future issuances through June 30, 2016 and breakdown by types of bonds (general obligation, revenue, State or Federal bond programs).

## **Response**

1a-b. Ms. LaConte has presented testimony or provided analysis for utilities or utility customers in various cases, including electric, natural gas, oil, water, wastewater and stormwater rate cases. In this capacity, she has developed and analyzed revenue requirement issues, class cost of service studies and rate design issues. Attachment A provides a list of the cases she has worked on since 2002.

1c-d. Clients managing capital project programs and issuing bonds include the City of Edmonton's Sanitary Service and Drainage Service Utilities. The amount of the outstanding bonds to date or anticipated dollar size of future issuances through June 30, 2016, is not available, as the work was performed in 2006 and 2008.

## **Question**

2. Please describe the tools and methods used by Drazen to design wastewater rates. Please describe how these tools and methods were used by Ms. LaConte to analyze the basic requirements and assumptions utilized in MSD's May 10, 2011 Rate Proposal (Exhibit MSD 1).

## **Response**

Ms. LaConte has designed a long-term financial model and a class cost of service model to design wastewater and stormwater rates for the City of Edmonton, Alberta's Sanitary Sewer and Drainage Utilities.

Ms. LaConte did not use these models to analyze the basic requirements and assumptions utilized in MSD's May 10, 2011 Rate Proposal.

## **Question**

3. Please provide all analyses performed to support your findings and recommendations as stated in your rebuttal testimony, Page 9, Lines 20 and 21, Page 10, Lines 1 through 4. Provide all paper and electronic copies, related correspondence, documents, agreements, e-mails, and/or other communications related to this analysis.

## **Response**

Ms. LaConte used information contained in MSD's Filings and Exhibits to support her findings and recommendations.

## **Question**

4. On Page 4, Line 3 of Ms. LaConte's Rebuttal Testimony, she states an increase in CIRP expenditures of \$1.0 billion over the period FY2013-FY2016. Please provide Ms. LaConte's basis for this statement.

## **Response**

1. MSD Exhibit 9B, Page 2, Line 10.
2. MSD Exhibit 1, Page 3-14, Table 3-8, Line 12
3. MSD Exhibit 1, Page 3-15, Table 3-9, Line 9
4. MSD Wastewater Rate Proposal Preview, April 8, 2011, DRAFT, Pages 3 and 5.

## **Question**

5. Please describe Ms. LaConte's experience representing clients, developing and facilitating credit presentations with the major rating agencies Moody's, Fitch, Standard & Poors and Eagan Jones.

- 5a. Please provide a list of these clients indicating the dollar size of presented bond issuance and resulting bond ratings.
- 5b. Please indicate the key issues focused on by the rating agencies during the lists client credit presentations and their impacts in the resulting bond ratings.

## **Response**

5a-b. Ms. LaConte does not provide this service for clients.

**Question**

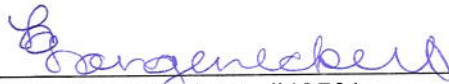
6. Describe Ms. LaConte's experience in handling the issuance of bonds for clients. Please provide a list of these clients and Ms. LaConte's involvement in the issuance of these bonds.

- 6a. Please describe Ms. LaConte's role in the issuance of bonds for each of the listed clients.
- 6b. Please describe Ms. LaConte's experience with the underwriting of bonds.
- 6c. Please describe Ms. LaConte's experience in the development of bond feasibility studies including your involvement in such studies for the clients listed.

**Response**

6a-c. Ms. LaConte does not provide this service for clients.

SANDBERG PHOENIX & VON GONTARD, P.C.



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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused a copy of the foregoing to be served on the Secretary of the Rate Commission and all persons on the official service list of record in this matter on this 12th day of August, 2011.



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Lisa C. Langeneckert