

**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                         )

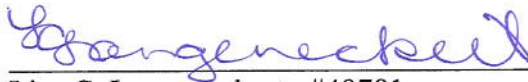
**Second Discovery Request of Barnes Jewish Hospital to MSD**

1. In MSD Exhibit 1, Table 3-8, page 3-14, and MSD Exhibit 1, Table 3-9, the total CIRP for FY2013-FY2016 is \$1.006 billion. In MSD Exhibit 9B, page 2, line 10, Mr. Brian Hoelscher states that “the size of the CIRP reflected in the Rate Proposal is over \$1.0 billion over the four fiscal years 2013-2016”. In MSD Exhibit 9B1 and MSD Exhibit 50A, the amount of the CIRP for FY2013 – FY2016 is \$884.7 million.
  - A) Please explain why Mr. Hoelscher defined the CIRP as “over \$1.0 billion” in his testimony and how that compares to the \$884.7 million in MSD Exhibits 9B1 and 50A.
  - B) Please explain in detail the process that MSD used to derive the CIRP amounts in Table 3-8 and MSD Exhibits 9B1 and 50A.
  
2. MSD Exhibit 50 Response, 2-2.3 states “Exhibit MSD 50A may be used to link the CD to rate proposal tables (sic) 3-8, page 3-14, line 12 and table 3-9 page 3-15 of the Rate Proposal.” Please explain how these may be “linked” when the amounts are not the same, in total or for each fiscal year.
  
3. In MSD Exhibit 18A4, the Total Inflated Cash Expenses for CIRP for FY2013-FY2016 is \$971.6 million. The Total 2010 Cash Expense is \$884.7 million in 2010\$.
  - A) Please explain why MSD used a 3% inflation factor.
  - B) Please explain why the appropriated amount for CIRP varies from the total inflated cash amount by \$35.3 million (\$1,006 million less \$971.6 million).
  
4. In MSD Exhibit 9B, page 5, lines 11 – 14, Mr. Hoelscher states that “because of this economic condition, the District was receiving bids for capital work that in some cases was 40% below traditional costs. This created additional funds which could be used to complete projects beyond the original program budget.” Please provide the amount of the additional funds that became available due to economic conditions.

5. In MSD Exhibit 9B, page 5, Mr. Hoelscher explains that during the FY2008-FY2012 period, MSD had to fund the construction of disinfection facilities. The cost of this construction was not anticipated at the time MSD filed its Rate Proposal for the FY2008-FY2012 period. What was the additional cost to complete the construction of the disinfection facilities?
6. In MSD Exhibit 50A, several projects over the period FY2013 –FY2016 are designated as either “supplemental appropriation” or “supplemental.” Please explain what each term means.

DATED: AUGUST 11, 2011

SANDBERG PHOENIX & VON GONTARD, P.C.



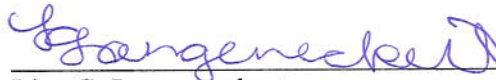
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Attorneys for Barnes-Jewish Hospital

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 11th day of August, 2011.



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Lisa C. Langeneckert