

**Metropolitan St. Louis Sewer District  
Wastewater Rate Change Proposal**

**MIEC's Second Set of Data Requests to MSD**

<b><u>Item No.</u></b>	<b><u>Description</u></b>
2-1.	The MIEC's Discovery Request 1-1 dated June 7, 2011 requested MSD to provide an electronic copy, with formulas intact, of the May 10, 2011 MSD Wastewater Rate Proposal drafted by Black & Veatch. On June 17, 2011, MSD responded to MIEC 1-1, but MSD did not provide an electronic copy of the proposal as requested. The MIEC's request for the electronic copy of the May 10, 2011 MSD Wastewater Rate Proposal is renewed. Please provide the electronic copy of this document to the MIEC as soon as possible.
2-2.	During the Technical Conference for the District Testimony and Rate Setting Documents, Brian Hoelscher testified that there are projects, such as the expansion of the ash lagoon, that are listed in Exhibit 9B1 that are not specifically listed in the Consent Decree. Please identify and describe any projects, including but not limited to the expansion of the ash lagoon, that are listed in Exhibit 9B1 that are not required by the Consent Decree. (See Exhibit MSD 17, Testimony of Brian Hoelscher, page 89, lines 19 – 25 and page 90, lines 1 – 18).
2-3.	During the Technical Conference for District Testimony and Rate Setting Documents, Brian Hoelscher testified that MSD has additional projects available "in the queue waiting to go" if MSD can complete more projects for a specified amount of money. (See Exhibit MSD 17, Testimony of Brian Hoelscher, page 95, lines 4 – 5). <ul style="list-style-type: none"> <li>(a) Please identify and describe all of the extra project(s) that are "in the queue waiting to go" and have been awarded because an extra amount of revenue was available to fund the additional project(s).</li> <li>(b) Please state whether any of these extra project(s) are included in the capital projects listed in the Black &amp; Veatch rate study. If affirmative, please identify the year and amount of the extra project capital item.</li> </ul>
2-4.	During the Technical Conference for District Testimony and Rate Setting Documents, Karl Tyminski testified that MSD has submitted numerous applications for State Revolving Fund loans. Please identify and describe the status of all of the applications that MSD has submitted to the State Revolving Fund Loans. (See Exhibit MSD 17, Testimony of Karl Tyminski, page 118, lines 13 – 22).
2-5.	Please provide a copy of any documents prepared by Butcher & Mark and/or PFM, MSD's financial advisors, evaluating the feasibility study prepared by Black and Veatch. (See Exhibit MSD 17, Testimony of Karl Tyminski, page 132, lines 18 – 25 and page 133, lines 1 – 3).

2-6. During the Technical Conference for District Testimony and Rate Setting Documents, Jan Zimmerman testified that she would provide information regarding MSD's anticipated environmental compliance costs for non-residential customers for 2011. Please provide MSD's anticipated environmental compliance costs for non-residential customers for 2011, 2012, 2013, 2014, 2015, and 2016, and provide any supporting documents, analyses, or reports discussing the same. (See Exhibit MSD 17, Testimony of Jan Zimmerman, page 156, lines 6 – 15).

2-7. During the Technical Conference for District Testimony and Rate Setting Documents, Jan Zimmerman testified that MSD attempts to recover its compliance costs from each customer tier level. What portion of MSD's costs are recovered from each customer tier level (i.e., Tiers 1 – 5)? (See Exhibit MSD 17, Testimony of Jan Zimmerman, page 156, lines 16 – 25).

2-8. What portion of the SEP is associated with MSD's two taxing subdistricts, the Lower Meramec River Basin and the Missouri River Bottom? (See Exhibit MSD 17, Testimony of Jan Zimmerman, page 159, lines 19 – 25).

2-9. What is the amount of the ad valorem tax revenue collected in the Lower Meramac River Basin and the Missouri River Bottom subdivisions prior to 2008? (See Exhibit MSD 17, Testimony of Jan Zimmerman, page 160, lines 4 – 13).

2-10. During the Technical Conference for District Testimony and Rate Setting Documents, Keith Barber references a NACWA survey. Please provide a complete copy of this NACWA survey and any supporting documents, analyses, or reports discussing the same. (See Exhibit MSD 17, Testimony of Keith Barber, page 214, lines 16-17; and page 217, lines 7 – 9).

2-11. During the Technical Conference for District Testimony and Rate Setting Documents, Keith Barber references a bond feasibility report. Please provide a complete copy of this bond feasibility report and any supporting documents, analyses, or reports discussing the same. If the bond feasibility report is still in draft form, please provide copies of all drafts. (See Exhibit MSD 17, Testimony of Keith Barber, page 251, lines 14-16).