

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

**METROPOLITAN ST. LOUIS SEWER DISTRICT AUGUST 4, 2011
SUPPLEMENTAL RESPONSE TO THE SECOND DISCOVERY REQUEST OF
MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Metropolitan St. Louis Sewer District Supplemental Response

ISSUE: WASTEWATER RATE CHANGE PROPOSAL

WITNESS: METROPOLITAN ST. LOUIS SEWER DISTRICT

SPONSORING PARTY: MISSOURI INDUSTRIAL ENERGY CONSUMERS

DATE PREPARED: AUGUST 4, 2011

**Metropolitan St. Louis Sewer District
2350 Market Street
St. Louis, Missouri 63103**

**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)

**METROPOLITAN ST. LOUIS SEWER DISTRICT AUGUST 4, 2011
SUPPLEMENTAL RESPONSE TO THE SECOND DISCOVERY REQUEST OF
MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Metropolitan St. Louis District Response

Pursuant to §§ 7.280 and 7.290 of the Charter Plan of the Metropolitan St. Louis Sewer District (the “Charter Plan”), Operational Rule 3(5) and Procedural Schedule §§ 17 (b)(i) and (ii) of the Rate Commission of the Metropolitan St. Louis Sewer District (“Rate Commission”), the Metropolitan St. Louis Sewer District (“District”) thereby submits this supplemental response to the Second Discovery Request of Missouri Industrial Energy Consumers, Prepared on July 1, 2011, regarding the Rate Change Notice dated May 10, 2011 (the “Rate Change Notice”).

METROPOLITAN ST. LOUIS SEWER DISTRICT AUGUST 4, 2011
SUPPLEMENTAL RESPONSE TO THE SECOND DISCOVERY REQUEST OF
MISSOURI INDUSTRIAL ENERGY CONSUMERS

Metropolitan St. Louis Sewer District Response

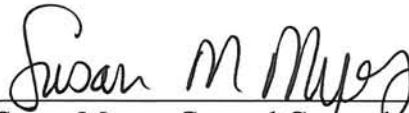
- 2-2. During the Technical Conference for the District Testimony and Rate Setting Documents, Brian Hoelscher testified that there are projects, such as the expansion of the ash lagoon, that are listed in Exhibit 9B 1 that are not specifically listed in the Consent Decree. Please identify and describe any projects, including but not limited to the expansion of the ask lagoon, that are listed in Exhibit 9B 1 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).

RESPONDER: Brian Hoelscher, MSD Director of Engineering

RESPONSE: Attached as exhibit MSD 50A is a detailed list of projects which are anticipated to be a part of the current Rate Proposal. This Exhibit, MSD 50A, should serve to supplement any response made by MSD to any discovery request previously made by any party related to planned projects as listed within said exhibit.

Please note the following regarding Exhibit MSD 50A:

1. The third column titled "CD Section/Para" references the appropriate paragraph of the consent decree (Exhibit MSD 49A) that relates to the specific project as listed.
2. The fourth column titled "CD Board Write-up Para" references the appropriate paragraph of Exhibit MSD 11A-32 (the Board Agenda Detail Sheet) that relates to that specific project as listed.
3. Exhibit MSD 50A may be used to link the CD to rate proposal tables 3-8, page 3-14, line 12 and table 3-9 page 3-15 line 9 of the Rate Proposal.



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4th Day of August, 2011:
An electronic copy of the foregoing instrument was emailed to the Secretary of the Rate Commission c/o jfenton@stlmsd.com

SECRETARY OF RATE COMMISSION: Ms. Nancy Bowser
Secretary of Rate Commission
Metropolitan St. Louis Sewer District
2350 Market Street
St. Louis, MO 63103-2555
robowser@swbell.net

At the request of Rate Commission Counsel, one paper original and associated Exhibits are held at the Rate Commission office for Commissioner review.

An electronic copy of the foregoing instrument was emailed and one paper copy and associated Exhibits were couriered to:

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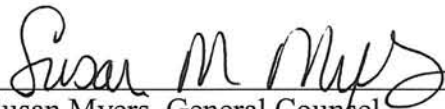
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