

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

AUGUST 5, 2011 SECOND DISCOVERY REQUEST  
OF THE METROPOLITAN ST. LOUIS SEWER DISTRICT

ISSUE: WASTEWATER RATE CHANGE PROPOSAL

WITNESS: BILLIE S. LaCONTE  
DRAZEN CONSULTING GROUP, INC.

SPONSORING PARTY: METROPOLITAN ST. LOUIS SEWER DISTRICT

DATE PREPARED: AUGUST 5, 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 )

**AUGUST 5, 2011 SECOND DISCOVERY REQUEST  
OF THE METROPOLITAN ST. LOUIS SEWER DISTRICT**

Pursuant to §§ 7.280 and 7.290 of the Charter Plan of the Metropolitan St. Louis Sewer District (the “Charter Plan”), Operational Rule 3(2) and Procedural Schedule §§ 1, 14, 15 and 17 of the Rate Commission of the Metropolitan St. Louis Sewer District (“Rate Commission”), the Metropolitan St. Louis Sewer District (“District”) requests additional information and answers from Billie S. LaConte, Drazen Consulting Group, Inc. (“Drazen”) regarding the Rate Change Proposal dated May 10, 2011 (the “Rate Change Proposal”).

Drazen is requested to amend or supplement the responses to this Discovery Request, if Drazen obtains information upon the basis of which (a) Drazen knows that a response was incorrect when made, or (b) the Drazen knows that the response, though correct when made, is no longer correct.

The following Discovery Request is deemed continuing so as to require Drazen to serve timely supplemental answers if Drazen obtains further information pertinent thereto between the time the answers are served and the time of the Prehearing Conference.

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1. On page 7, lines 4 through 6, of Ms. LaConte's rebuttal testimony, she references Brian Hoelscher's statement "due to economic conditions, the District will be receiving bids for capital work that in some cases were 40% below traditional cost." On page 7, lines 7 and 8, Ms. LaConte further references Mr. Hoelscher's statement "current economic conditions were not assumed to be in place during the current proposed rate study period." Based on these statements, on page 7, lines 8 and 9, Ms. LaConte concludes the cost of District's CIRP may be overstated "which could lead to higher-than-necessary rate increases." Is Ms. LaConte's conclusion based on current economic conditions remaining unchanged through FY16? Are there any economic factors outside the District's control which could change prior to FY16? If so, how, in Ms. LaConte's opinion would these factors impact the cost of the District's CIRP?



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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 5th 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](mailto:jfenton@stlmsd.com)

**SECRETARY OF RATE COMMISSION:** Ms. Nancy Bowser  
Secretary of Rate Commission  
Metropolitan St. Louis Sewer District  
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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 and Exhibits were emailed to:

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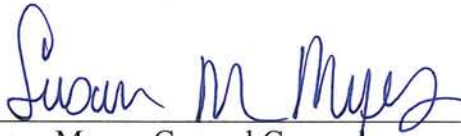
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