

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: MICHAEL P. GORMAN  
BRUBAKER & ASSOCIATES, 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 Michael P. Gorman, Brubaker & Associates, Inc. (“Brubaker”) regarding the Rate Change Proposal dated May 10, 2011 (the “Rate Change Proposal”).

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

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

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

1. Please provide all material, in all forms, to support Mr. Gorman's statement on page 6, line 20 and 21 of his rebuttal testimony that asserts "the MSD service area continues to recover from the global economic recession?"
2. Please provide a copy, in all forms, of the "Summary of Commentary on the Current Economic Conditions by the Federal Reserve Bank" publication referenced on page 7, lines 20 through 27 and page 8, lines 1 and 2 of Mr. Gorman's rebuttal testimony.
3. Please provide a copy, in all forms, of the *Blue Chip Economic Indicator* publication referenced on page 10, line 3 of Mr. Gorman's rebuttal testimony.
4. Please provide a copy, in all forms, of the "Bond Buyer 25 - Year Revenue Bond Index" referenced on page 14, line 21 of Mr. Gorman's rebuttal testimony.



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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  
2350 Market Street  
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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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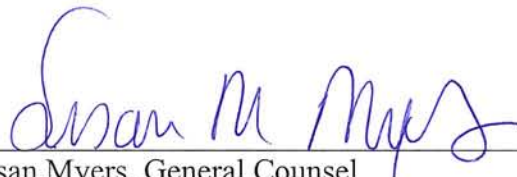
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