

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

**SEPTEMBER 19, 2011 RESPONSE TO THE FOURTH DISCOVERY REQUEST
OF BARNES JEWISH HOSPITAL TO MSD**

METROPOLITAN ST. LOUIS SEWER DISTRICT RESPONSE

ISSUE: WASTEWATER RATE CHANGE PROPOSAL

WITNESS: METROPOLITAN ST. LOUIS SEWER DISTRICT

SPONSORING PARTY: BARNES JEWISH HOSPITAL

DATE PREPARED: SEPTEMBER 19, 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)

**SEPTEMBER 19, 2011 RESPONSE TO THE FOURTH DISCOVERY REQUEST
OF BARNES JEWISH HOSPITAL**

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 response to the Fourth Discovery Request of Barnes Jewish Hospital, Dated September 8, 2011, regarding the Rate Change Notice dated May 10, 2011 (the “Rate Change Notice”).

Metropolitan St. Louis Sewer District Response

1. Please provide the date that Ms. Vanda reviewed the Black & Veatch electronic rate model with all formulas intact, including: (a) the approximate amount of time she spent reviewing the full model; (b) the portions of the model that she reviewed with the approximate amount of time spent on each portion; (c) the location at which she reviewed the model.

RESPONDER: Jeanne Vanda Answer

**RESPONSE: I have not reviewed the Black & Veatch electronic rate model
with all formulas intact.**

- a. **Not applicable.**

- b. A representative of PFM reviewed extracted portions of the model related to debt service in an excel spreadsheet format. These extracted portions have previously been provided to all parties in hard copy found in exhibit MSD 4A & MSD 5. The PFM representative never had access to the Black & Veatch electronic rate model with all formulas intact. The PFM representative relayed relevant information to me at my request. I did not spend any time reviewing this portion of the Model.
- c. Not applicable.

2. Please provide any updates to any prior responses to the First, Second, and Third Discovery Requests of BJH to MSD.

RESPONDER: Janice Zimmerman, MSD Director of Finance

RESPONSE: There are no prior responses of MSD which have been updated in any material respect at this time. MSD will supplement any prior response if it learns that a response in any material respect is incorrect or incomplete and if the additional or corrective information has not otherwise been made known to the other parties during the discovery process, technical conferences or in writing.

3. As an ongoing request, please provide any additional updates to the First, Second, and Third Discovery Requests of BJH to MSD Staff, should MSD Staff responses change, through the close of the discovery period in this matter.

RESPONDER: Janice Zimmerman, MSD Director of Finance

RESPONSE: There are no prior responses of MSD which have been updated in any material respect at this time. MSD will supplement any prior response if it learns that a response in any material respect is incorrect or incomplete and if the additional or corrective information has not otherwise been made known to the other parties during the discovery process, technical conferences or in writing.



Susan Myers, General Counsel
METROPOLITAN ST. LOUIS SEWER DISTRICT
2350 Market Street
St. Louis, Missouri 63103
smyers@stlmsd.com
Tel: (314) 768-6200
Fax: (314) 768-6372

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 19th day of September, 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 and Exhibits were emailed to:

RATE COMMISSION LEGAL COUNSEL: Lisa O. Stump, Esq.
Lashly & Baer, P.C.
714 Locust Street
St. Louis, MO 63101
lostump@lashlybaer.com

RATE COMMISSION CONSULTANT: Mr. William Stannard
President
Raftelis Financial Consultants, Inc.
3013 Main Street
Kansas City, MO 64108
wstannard@raftelis.com

COVIDIEN: Mr. Randy Meyer
Utility Manager
Covidien
3600 North 2nd Street
St. Louis, MO 63147
Randy.Meyer@covidien.com

ROBERT A. MUELLER: Mr. Robert A. Mueller
16 Ladue Crest Lane
St. Louis, MO 63124
ramreco@sbcglobal.net

BARNES JEWISH HOSPITAL: Ms. Lisa Langeneckert
Sandberg, Phoenix and VonGontard P.C.
One City Centre, Suite 1500
St. Louis, MO 63101
llangeneckert@sandbergphoenix.com

**MISSOURI INDUSTRIAL ENERGY
CONSUMERS:**

John Kindschuh, Esq.
Bryan Cave, LLP
211 N. Broadway, Suite 3600
St. Louis, MO 63102
John.kindschuh@bryancave.com

Diana M. Vuylesteke, Esq.
Bryan Cave, LLP
211 N. Broadway, Suite 3600
St. Louis, MO 63102
dmvuylesteke@bryancave.com

**AARP & CONSUMERS COUNCIL OF
MISSOURI:**

John B. Coffman, LLC
Attorney at Law
871 Tuxedo Blvd.
St. Louis, MO 63119
john@johncoffman.net



Susan Myers, General Counsel
METROPOLITAN ST. LOUIS SEWER DISTRICT
2350 Market Street
St. Louis, Missouri 63103
(E) smyers@stlmsd.com;
(T) (314) 768-6200; (F) (314) 768-6372