

# **Exhibit MSD 56A**

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

### **MSD'S RESPONSE TO FIRST DISCOVERY REQUEST OF THE RATE COMMISSION**

#### **The Metropolitan St. Louis Sewer District Response**

**ISSUE: WASTEWATER RATE CHANGE PROCEEDING**

**WITNESS: THE METROPOLITAN ST. LOUIS SEWER DISTRICT**

**SPONSORING PARTY: RATE COMMISSION**

**DATE PREPARED: MARCH 13, 2019**

**Lashly & Baer, P.C.  
714 Locust Street  
St. Louis, Missouri 63101**

# Exhibit MSD 56A

## 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 )

### MARCH 8, 2019 FIRST DISCOVERY REQUEST OF THE RATE COMMISSION

#### 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"), Restated Operational Rule 3(7) and Procedural Schedule § 16 and § 17 of the Rate Commission of The Metropolitan St. Louis Sewer District ("Rate Commission"), The Metropolitan St. Louis Sewer District ("District") hereby responds to the March 8, 2019 First Discovery Request of The Rate Commission for additional information and answers regarding the Rate Change Notice dated March 4, 2019 (the "Rate Change Notice").

# Exhibit MSD 56A

## 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 )

### **FIRST DISCOVERY REQUEST OF THE RATE COMMISSION**

Pursuant to §§ 7.280 and 7.290 of the Charter Plan of the Metropolitan St. Louis Sewer District (the “Charter Plan”), Restated Operational Rule § 3(7) and Procedural Schedule §§ 16 and 17 of the Rate Commission of the Metropolitan St. Louis Sewer District (the “Rate Commission”), the Rate Commission requests additional information and answers from the Metropolitan St. Louis Sewer District (the “District”) regarding the Rate Change Proposal dated March 4, 2019 (the “Rate Change Proposal”).

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

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

# Exhibit MSD 56A

## FIRST DISCOVERY REQUEST

1. Please provide an electronic copy, in Microsoft Excel format, of the Detailed Capital Improvement and Replacement Program (“CIRP”) Project List (FY 21 – FY 24) identified as Appendix 7.2.2 in Section 7 of the Rate Proposal, Exhibit MSD 1.

**RESPONSE:** *This file has been provided as Exhibit MSD 56B – Appendix 7.2.2 Detailed WW CIRP Project List.*

2. Please provide an electronic copy, in Microsoft Excel format, of the Detailed CIRP Project List – Not Regulatory or Consent Decree (“CD”) Related, identified as Appendix 7.2.3 in Section 7 of the Rate Proposal, Exhibit MSD 1.

**RESPONSE:** *This file has been provided as Exhibit MSD 56C – Appendix 7.2.3 Detailed WW CIRP Project List – Not Regulatory or CD.*

3. Please provide an electronic copy, in Microsoft Excel format, of the Detailed CIRP Project List – Regulatory But Not CD Related, identified as Appendix 7.2.4 in Section 7 of the Rate Proposal, Exhibit MSD 1.

**RESPONSE:** *This file has been provided as Exhibit MSD 56D – Appendix 7.2.4 Detailed WW CIRP Project List – Regulatory but not CD.*

4. Regarding the “CIRP-Input” tab in the Rate Model, Exhibit MSD 52, please provide the following unlocked Microsoft excel files that are indicated to be the source files for the historical and projected CIRP inputs. Please include calculation of final values input into the model (e.g., engineering estimate, inflation, appropriation delay, and liquidation adjustments):

- (a) “WW CIRP3FY17 Oct 23 2017”;
- (b) “Updated with WW CIRP FY18 plus Oct 10 2017 - file from S. Winer”; and
- (c) The file indicated by the note: “Bart Provided FY19-FY40 update on 9/14/2018”

**RESPONSE:** *The following four files have been provided.*

- i. *Exhibit MSD 56E – 4-CIRP Adjustments 11.5.18. This file provides the calculation of final values input into the model.*
- ii. *Exhibit MSD 56F – 4a-WW CIRP3 FY17 Oct 23 2017.*

## Exhibit MSD 56A

- iii. *Exhibit MSD 56G – 4b-WW CIRP RC FY16 to FY18 Report Construction Engineering Aug 21 2018. This file is provided in place of, “WW CIRP FY18 plus Oct 10 2017.” The notation in Exhibit MSD 52, tab CIRP-Input cell U9 was not updated when the final numbers were inserted into the model.*
- iv. *Exhibit MSD 56H – 4c-WW CIRP RC Report Construction Engineering Nov 2 2018. The file indicated by the note in Exhibit MSD 42, tab CIRP-Input cell V9 is not the file that supports the numbers used in the final version of the Rate Model. The notation referenced was not updated when the final numbers were input. Additionally, these represent Engineering estimates before adjustments for inflation, delays (scorecard), and liquidations. Please refer to Exhibit MSD 56E – (4-CIRP Adjustments 11.5.18) to see how those adjustments cause the engineering estimate to change into the number seen in the Exhibit MSD 1.*

Respectfully submitted,



---

Susan M. Myers, General Counsel  
THE METROPOLITAN ST. LOUIS SEWER DISTRICT  
2350 Market Street  
St. Louis, Missouri 63103  
[smyers@stlmsd.com](mailto:smyers@stlmsd.com)  
Tel: (314) 768-6366  
Fax: (314) 768-6279

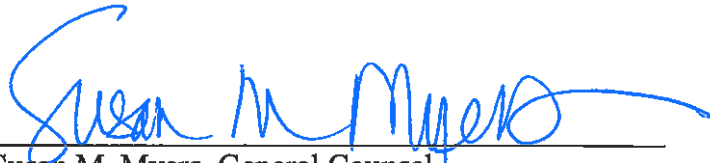
# Exhibit MSD 56A

## CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was sent by electronic transmission to Lisa O. Stump and Brian J. Malone, Lashly & Baer, P.C., on this 13th day of March, 2019.

Lisa O. Stump, Esq.  
Lashly & Baer, P.C.  
714 Locust Street  
St. Louis, MO 63101  
[lostump@lashlybaer.com](mailto:lostump@lashlybaer.com)

Brian J. Malone, Esq.  
Lashly & Baer, P.C.  
714 Locust Street  
St. Louis, MO 63101  
[bmalone@lashlybaer.com](mailto:bmalone@lashlybaer.com)



---

Susan M. Myers, General Counsel  
THE METROPOLITAN ST. LOUIS SEWER DISTRICT  
2350 Market Street  
St. Louis, Missouri 63103  
[smyers@stlmsd.com](mailto:smyers@stlmsd.com)  
Tel: (314) 768-6366  
Fax: (314) 768-6279