

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

**MSD'S SECOND DISCOVERY REQUEST
TO INTERVENER MIEC**

ISSUE: WASTEWATER RATE CHANGE PROCEEDING

WITNESS: MISSOURI INDUSTRIAL ENERGY CONSUMERS

SPONSORING PARTY: RATE COMMISSION

DATE PREPARED: MAY 14, 2019

**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)

MSD’S SECOND DISCOVERY REQUEST

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 MSD requests additional information and answers from Missouri Industrial Energy Consumers (“MIEC”) regarding the Rate Change Proposal dated March 4, 2019 (the “Rate Change Proposal”).

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

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

SECOND DISCOVERY REQUEST

1. Please provide any updated or revised rate model that you will use and/or rely upon for surrebuttal testimony. Please provide a summary of changes from your original rate model.

RESPONSE:

Respectfully submitted,



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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., Brandon W. Neuschafer and Kamilah Jones, Bryan Cave Leighton Paisner on this 14th day of Mar 2019.

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