

Exhibit No: Exhibit RC 72
Issue: Wastewater Rate Change Proceeding
Witness: Nicole Young
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Rate Commission
Date Testimony Prepared: April 23, 2019

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

1 **Q1. Please state your names and business addresses.**

2 A. My name is Nicole Young. My local business address is 915 Olive Street, Suite 902, St.
3 Louis, Missouri 63101.

4 **Q2. By whom are you employed and in what capacity?**

5 A. I am the Managing Principal and a Lead Engineer with Lion CSG LLC.

6 **Q3. Please describe the firm of Lion CSG LLC.**

7 A. Lion CSG LLC (“Lion CSG”) is a civil infrastructure, environmental engineering, and
8 construction management firm. The majority of Lion CSG’s business is focused on
9 wastewater and stormwater.

10 **Q4. Please describe your educational background and work experience.**

11 A. I received a Bachelor of Science in Civil Engineering from Purdue University, a Masters of
12 Science in Environmental Engineering from Washington University in St. Louis, and a
13 Masters of Business Administration from Pennsylvania State University.

14 Starting at Dames & Moore in 1997, I performed environmental assessments across the
15 United States. In late 1998, I moved to Sverdrup to focus on wastewater engineering.
16 Sverdrup was purchased by Jacobs Engineering in 1999. From 1998 through 2004, I
17 focused on wastewater and stormwater projects including planning, engineering, and
18 construction management on projects from conveyance through treatment. I also provided
19 assistance on rate studies evaluating capital improvement programs, cost estimation, and
20 the financial analysis for rate setting. During my tenure at Jacobs, I spent several years
21 working on the Sverdrup, Kwame, Metcalf & Eddy project known as the SKME project,
22 which was the planning program for the MSD program that is currently being implemented.
23 Included in the SKME project was an evaluation and modeling of MSD’s system. From

1 2004 to 2007, I was the Operational Sales Manager for the European Division of Jacobs
2 Federal Operations. In 2007, I returned to St. Louis to refocus on providing infrastructure
3 solutions to the St. Louis region working for Camp, Dresser & McKee. Lion CSG was
4 started in May 2011 focused on providing wastewater services for clients in Missouri and
5 Illinois.

6 **Q5. Are you a registered Professional Engineer?**

7 A. Yes, I am a registered Professional Engineer in the state of Missouri and Illinois with
8 inactive registrations in Indiana and Tennessee. I am registered with the National Council
9 of Examiners for Engineering and Surveying, known as the NCEES.

10 **Q6. Do you belong to any professional organizations or committees?**

11 A. Yes. I am an honorary member of the Engineers' Club of St. Louis. For the St. Louis
12 Economic Development Partnership (known as "STL Partnership"), I serve on the Business
13 Retention and Expansion Committee, now known as StXL.

14 **Q7. Have you previously testified before the Rate Commission of the St. Louis
15 Metropolitan Sewer District?**

16 A. I testified before the commission in 2018 for the stormwater rate.

17 **Q8. Please describe your role in this proceeding?**

18 A. The scope of my assignment in this proceeding includes the review of the District's 2019
19 Wastewater Rate Proposal, to assist the Rate Commission to gain a better understanding of
20 the District's proposal, to advise the Rate Commission on the Capital Improvement and
21 Replacement Program (or "CIRP"), to assist legal counsel in the examination of witnesses,
22 and to prepare testimony and exhibits setting forth my findings and recommendations.

1 I believe it is my responsibility to advise the rate commission on the CIRP, and MSD
2 processes for wastewater projects.

3 The scope of my assignment is limited to relying on the record in this proceeding,
4 statements, data, information and reports provided by the District and intervenors and their
5 respective consultants and advisors as well as data and information available in the public
6 domain. I also rely on my over 20-years of experience in the wastewater industry working
7 on CIRP programs, setting prioritization for projects, working with wastewater projects,
8 and developing rate structures.

9 **Capital Improvement & Replacement Program**

10 **Q9. Has the District taken the appropriate steps in identifying CIRP projects?**

11 A. Having reviewed the information provided on the consent decree, the amendment to the
12 consent decree, the Sanitary Sewer Overflow Control Master Plan, CSO Long Term
13 Control Plan, other regulatory issues, and asset management, I believe the projects in the
14 program are appropriate.

15 **Q10. Are the District's cost estimates for projects sufficient for the proposed projects?**

16 A. I believe the District's cost estimates were completed in accordance with common practice
17 for this phase of the program. The District has a long history of historical bid prices, which
18 provides a good basis for cost estimation.

19 **Q11. Are the matters contained herein true, correct, and complete to the best of your
20 knowledge and belief?**

21 A. Yes.

22 **Q12. Does this conclude your testimony?**

23 A. Yes.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was sent by electronic transmission to Janice Fenton, Office Associate Senior, Metropolitan St. Louis Sewer District; Susan Myers, Counsel for the Metropolitan St. Louis Sewer District; and Brandon Neuschafer, Counsel for the Missouri Industrial Energy Consumers, on this 23rd day of April, 2019.

Ms. Janice Fenton
Office Associate Senior
Metropolitan St. Louis Sewer District
2350 Market Street
St. Louis, Missouri 63103
jfenton@stlmsd.com

Ms. Susan Myers
General Counsel
Metropolitan St. Louis Sewer District
2350 Market Street
St. Louis, Missouri 63103
smyers@stlmsd.com

Brandon W. Neuschafer
Kamilah Jones
Bryan Cave, LLP
211 North Broadway, Suite 3600
St. Louis, Missouri 63102
bwneuschafer@bclplaw.com
kami.jones@bclplaw.com

*Attorneys for Missouri Industrial
Energy Consumers*



Brian J. Malone