





## **FIFTH DISCOVERY REQUEST**

1. In his rebuttal testimony on behalf of Intervenor Missouri Industrial Energy Consumers (“MIEC”), Michael Gorman proposes to defer certain programs until after the FY 2023 – FY2024 period. See Ex MIEC 73, pgs. 16-17. Specifically, he identifies the following projects as eligible to be deferred: Wastewater solids combustion boiler; Wastewater plant repair; and Capacity Expansion. Please state whether deferring these projects until after FY 2024 poses risks to the District, and/or would risk non-compliance with the Consent Decree, state or federal laws, or regulations.

**RESPONSE:**

2. Please identify any projects in the CIRP scheduled for FY 2023 – FY 2024 that could be deferred until after FY 2024 that would not jeopardize compliance with the Consent Decree, state or federal laws, or regulations.

**RESPONSE:**

3. Please describe in detail the District’s methodology used to develop cost estimates for projects in the CIRP.

**RESPONSE:**

4. Please provide any unit costs the District used to develop cost estimates for projects in the CIRP.

**RESPONSE:**

5. Please provide detailed scope and cost-estimate information for the following projects in the CIRP:

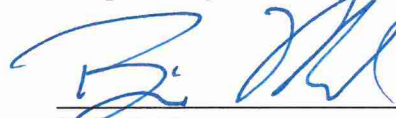
- a. 12106 (See Ex. MSD 1, p. 7-26);
- b. 12472 (See Ex. MSD 1, p. 7-36);
- c. 13033 (See Ex. MSD 1, p. 7-20);
- d. 12248 (See Ex. MSD 1, p. 7-26); and
- e. 12255 (See Ex. MSD 1, p. 7-69).

**RESPONSE:**

6. The Rate Change Proposal reflects increases in Compliance Charges and Extra Strength Surcharges equal to Operations and Maintenance escalation, not the across the board revenue increases used to set Base and Volume charges. What analytical evidence and/or policy rationale did the District use to increase Compliance Charges & Extra Strength Surcharges at a different rate than Base and Volume charges?

**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 Janice Fenton, Office Associate Senior, Metropolitan St. Louis Sewer District; Susan Myers, Counsel for the Metropolitan St. Louis Sewer District, on this 14<sup>th</sup> day of May, 2019.

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