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STATE OF ALASKA

THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:

Stephen McAlpine, Chairman
Rebecca L. Pauli
Robert M. Pickett
Norman Rokeberg
Janis W. Wilson

In the Matter of the Request Filed by the)
MUNICIPALITY OF ANCHORAGE d/b/a)
MUNICIPAL LIGHT & POWER DEPARTMENT for)
Approval to Establish Depreciation Rates)

U-16-094

In the Matter of the Tariff Revision Designated as)
TA357-121 Filed by the MUNICIPALITY OF)
ANCHORAGE d/b/a MUNICIPAL LIGHT &)
POWER DEPARTMENT)

U-17-008

**MUNICIPAL LIGHT AND POWER'S RESPONSE TO THE
ATTORNEY GENERAL'S FIRST REQUEST FOR DISCOVERY ON
REPLY TESTIMONY (AG-MLP-R1)**

The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"), hereby responds to the Office of the Attorney General, Regulatory Affairs & Public Advocacy Section's ("AG's") first request for discovery on reply testimony. All responses to discovery are prepared by ML&P in consultation with counsel. Witnesses at hearing will be available for cross-examination on their testimony. Documents produced in response to these requests will also be stored an electronic document management sharefile site accessible with login credentials that have been or will be provided as requested to the counsel, analysts, and consultants for the AG, ANTHC, ENSTAR, FEA, JLP, and PHS.

October 17, 2017

Page 1 of 23

Is: MLP\U-17-008\Discovery\AG-R1\10-17-17

AG-MLP-R1

Date: 11/20/17 Exh # H-4
Regulatory Commission of Alaska
By: CPT u-16-094
u-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

AG-ML&P-R1-15. Refer to the Prefiled Reply Testimony of Robert S. Mudge at Q/A 15 that states in part: "Mr. Garrett acknowledges this fact in his response to discovery questions, stating that 'ML&P's analysis of the RSP demonstrates that the utility is financially indifferent on a present value basis as between the RSP and DOC approaches.'"

(a) Admit that ML&P is financially indifferent whether or not its Rate Stabilization Plan is authorized by the Commission.

(b) If the response to subpart (a) is anything other than an unqualified admission of the truth of the matter asserted, state what ML&P believes the truth of the matter to be.

Response: (a) Admitted, in the sense that the present-value cost of Plant 2A is the same pursuant to the Rate Stabilization Plan as under traditional DOC ratemaking.

(b) See response to (a).

Person(s) Supplying Information: Robert Mudge.

MUNICIPAL LIGHT AND POWER'S RESPONSE TO THE ATTORNEY GENERAL'S
FIRST REQUEST FOR DISCOVERY ON REPLY TESTIMONY (AG-MLP-R1)

Docket U-17-008/U-16-094

October 17, 2017

Page 21 of 23

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DATED this 17th day of October 2017, at Anchorage, Alaska.

KEMPEL, HUFFMAN AND ELLIS, P.C.
Counsel for Municipality of Anchorage
d/b/a Municipal Light and Power Department

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MUNICIPAL LIGHT AND POWER'S RESPONSE TO THE ATTORNEY GENERAL'S
FIRST REQUEST FOR DISCOVERY ON REPLY TESTIMONY (AG-MLP-RI)

Docket U-17-008/U-16-094

October 17, 2017

Page 22 of 23

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