

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 Revisions, 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 INITIAL RESPONSE TO  
PROVIDENCE HEALTH & SERVICES' FIFTEENTH REQUEST FOR DISCOVERY  
ON REPLY TESTIMONY (PHS-MLP-15)**

The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"), hereby provides its initial response to Providence Health & Services' ("PHS") fifteenth 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.

**PRELIMINARY STATEMENT**

Discovery in this docket is not complete. As discovery proceeds, facts, information, evidence, documents, and other matters may be discovered which are not set forth in these responses, but which may be responsive to these discovery requests. The following responses are complete based on ML&P's current knowledge, information, and belief.

October 24, 2017

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Date: 12-4-17 Exh # 73  
Regulatory Commission of Alaska  
U-16-094 By: LE U-17-008  
Northern Lights Realtime & Reporting, Inc.  
(907) 337-2221

REDACTED

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7 **Request for Admission (No. PHS-MLP-15-47):** On page 23, lines 8-13, of his  
8 reply testimony, Mr. Saleba states that: "Rather than choosing an arbitrary classification  
9 between energy and demand, ML&P's load factor was selected as the preferred methodology as  
10 it reflects how ML&P's generation resources are utilized by ML&P's customers (i.e. the higher  
11 the system load factor, the more baseload energy producing generation is needed, and the more  
12 reserve capacity is needed)." Admit that the load factor method is used only by Mr. Saleba. If  
13 your response is anything other than an unqualified admission, state what you believe the truth of  
14 the matter to be and the basis for your belief, and identify any documents supporting your belief.

15 **Response:** Denied. As noted in Mr. Saleba's Direct Testimony at A59, both  
16 Avista Energy and Idaho Power use the load factor method.

17 **Person(s) Supplying Information:** Gary Saleba.  
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25 MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS' FIFTEENTH  
26 REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-15)

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Initial Response