

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

**PROVIDENCE'S SECOND SUPPLEMENTAL RESPONSE TO ML&P'S SECOND SET  
OF DISCOVERY REQUESTS (MLP-PHS-2)**

Providence Health & Services (Providence) provides its second supplemental responses  
to Municipal Light & Power's (ML&P) Second Set of Discovery Requests as follows.

**GENERAL OBJECTIONS**

1. Providence objects to the production or creation of documents,  
calculations, and analyses that do not exist. A document is not within a party's "possession,  
custody, or control" if it does not exist.

2. Providence objects to each and every discovery request insofar as it is  
vague, ambiguous, overly broad, unduly burdensome, or uses terms that are subject to multiple  
interpretations but are not properly defined or explained for purposes of these discovery requests.  
Any and all answers Providence provides in response to these discovery requests will be  
provided subject to, and without waiving, this objection.

Providence Second Supplemental Response to MLP-PHS-2  
August 25, 2017

4812-5034-9901v 5 0027208-000088

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Date: 12/18/2017 Exh # 182  
Regulatory Commission of Alaska  
U-16-094 By: [Signature] U-17-008  
Northern Lights Realtime & Reporting, Inc.  
(907) 337-2221

REDACTED

MLP-PHS-2-143: Mr. Beam responded to a question on Page 37, lines 2 to 2, stating "... ML&P has not utilized stakeholder involvement procedures in the development of its IRPs," the planning documents that ML&P largely relies on for its decisions to build Plant 2A."

(a) Please describe the instances, in the last 15 years, where PHS has participated in "the development of" the IRP by any of the other 27 utilities serving PHS. The description should, at a minimum, identify the utility and the year of participation.

(b) For each instance identified in response to (a), please:

- (i) state the issues raised by PHS regarding each IRP.
- (ii) describe the resolution of each issue raised by PHS.
- (iii) Please provide all documents, analysis, input, or communications provided by the utility during the process.
- (iv) Please provide documents, analysis, input, or communications that PHS provided to the utility during the process.
- (v) Please provide a copy of the final IRP.

Response: Providence objects to these requests on the grounds that they are overly broad, unduly burdensome, and neither relevant nor likely to lead to the discovery of admissible evidence. Without waiving those objections, Providence responds as follows:

1 ML&P presents a unique set of circumstances that have necessitated Providence's direct  
2 involvement in its regulatory proceedings. Those circumstances include a large Providence  
3 facility faced with a near-doubling of rates over a short period, and the fact that no other large  
4 commercial or industrial customers could be relied upon to protect Providence's interests in  
5 those proceedings. If ML&P had included stakeholder involvement in its IRP processes leading  
6 to the decision to build Plant 2A, with full disclosure of the potential rate increases at stake,  
7 Providence almost certainly would have participated, particularly if it had been disclosed that  
8 ML&P did not intend to seek the Commission's advance approval of that decision.

9 With respect to the other utilities serving Providence, this combination of circumstances  
10 does not exist. In those instances, the Providence facilities are often relatively small, the  
11 expected rate increases are relatively small, and/or there are many other large commercial and  
12 industrial customers (often acting jointly as advocacy groups) that have the resources to actively  
13 participate in IRPs and ratemaking proceedings. It is not cost-effective for Providence to  
14 participate directly in IRPs and/or ratemaking proceedings in those situations.

15 Person(s) Supplying Information: Richard Beam

16  
17 DATED this 25th day of August 2017, at Anchorage, Alaska.

18 DAVIS WRIGHT TREMAINE LLP  
19 Attorneys for Providence Health & Services

20 /s/ Jon S. Dawson

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