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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 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 RESPONSE TO PROVIDENCE HEALTH & SERVICES' FOURTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-14)

The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"), hereby provides its initial response to Providence Health & Services' ("PHS"") fourteenth 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 in 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 PHS, AG, ANTHC, ENSTAR, FEA, and JLP.

# **PRELIMINARY STATEMENT**

Discovery in this docket is not complete. As discovery proceeds, facts,

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Regulatory Commission of Northern Lights Realtime & Reporting, Inc. (907) 337-2221

# LAW OFFICES OF KEMPPEL, HUFFMAN AND ELLIS A PROFFSSIONAL CORPORATION 255 E FIREWEED LANE, SUITE 200 ANCHORAGE, ALASKA 99503-2025 (907) 277-1604

# REDACTED

Request for Admission (No. PHS-MLP-14-72): Admit that cost-based rates are more efficient in that they ultimately tend to reduce the overall cost to the utility. If your response is anything other than an unqualified admission, state what you believe the truth of the matter to be and the basis for your belief, and identify any documents supporting your belief.

Response: Admitted that cost-based rates have the potential to reduce costs but may not necessarily reduce the overall cost to the utility.

Person(s) Supplying Information: Gary Saleba.

MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS'
FOURTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-14)

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Initial Response