

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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Date: 12-4-17 Exh # H-58
Regulatory Commission of Alaska
U-16-094 By: JL U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

REDACTED

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

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Request for Admission (No. PHS-MLP-14-76): Admit that artificially lower rates tend to cause the subsidized customers to increase consumption of energy based on incorrect price signals. If your response is anything other than an unqualified admission, state

MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS'
FOURTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-14)
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1 what you believe the truth of the matter to be and the basis for your belief, and identify any
2 documents supporting your belief.

3 **Response:** Admitted.

4 **Person(s) Supplying Information:** Gary Saleba.

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

