

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

Page 1 of 37

fs\MLP\U-17-008\Discovery\PHS-MLP-15\InitialResponse

Date: 12-4-17 Exh # H-67
Regulatory Commission of Alaska
U-16-094 By: SR U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

REDACTED

Request for Admission (No. PHS-MLP-15-39): On page 23, lines 8-13, of his

reply testimony, Mr. Saleba states that: "Rather than choosing an arbitrary classification between energy and demand, ML&P's load factor was selected as the preferred methodology as it reflects how ML&P's generation resources are utilized by ML&P's customers (i.e. the higher the system load factor, the more baseload energy producing generation is needed, and the more reserve capacity is needed)." With respect to each of the following studies, admit that the study discusses neither ML&P's system load factor nor the load factor of any subset of customers:

MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS' FIFTEENTH
REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-15)

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

October 24, 2017

Page 29 of 37

fs\ML&PU-17-008\Discovery\PHS-MLP-15

Initial Response

- 1 (a) The 2008 load forecast.
2 (b) The 2009 IRP.
3 (c) The 2012 load forecast.
4 (d) The 2012 Generation Study.

5 If your response to any subpart of this request for admission is anything other than
6 an unqualified admission, state what you believe the truth of the matter to be and the basis for
7 your belief, and identify any documents supporting your belief.
8

- 9 **Response:** (a) Admitted.
10 (b) Admitted.
11 (c) Admitted.
12 (d) Admitted.

13 **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)

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

October 24, 2017

Page 30 of 37

f:\ML&PU-17-008\Discovery\PHS-MLP-15

Initial Response

