1	<u>STATE OF ALASKA</u>
2	THE REGULATORY COMMISSION OF ALASKA
3	Before Commissioners: Robert M. Pickett, Chairman Stephen McAlpine
5	Rebecca L. Pauli Norman Rokeberg Janis W. Wilson
6	Janis w. wilson
7	In the Matter of the Request Filed by the ) MUNICIPALITY OF ANCHORAGE d/b/a )
8	MUNICIPAL LIGHT & POWER DEPARTMENT for U-16-094   Approval to Establish Depreciation Rates )
9	)
10	In the Matter of the Tariff Revision Designated as ) TA357-121 Filed by the MUNICIPALITY OF )
11	ANCHORAGE d/b/a MUNICIPAL LIGHT & ) U-17-008 POWER DEPARTMENT )
12	)
13	MUNICIPAL LIGHT & POWER'S INITIAL RESPONSE TO
14	PROVIDENCE HEALTH & SERVICES' NINTH REQUEST FOR DISCOVERY (PHS-MLP-9)
15	The Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P"),
16	hereby responds to Providence Health & Services' ("PHS"") ninth request for discovery. All
17 18	responses to discovery are prepared by ML&P in consultation with counsel. Witnesses at
19	hearing will be available for cross-examination on their testimony. Documents produced in
20	response to these requests will also be stored in an electronic document management sharefile
21	site accessible with login credentials that have been or will be provided as requested to the
22	counsel, analysts, and consultants for PHS, AG, ANTHC, ENSTAR, FEA, and JLP.
23	PRELIMINARY STATEMENT
24	Discovery in this docket is not complete. As discovery proceeds, facts,
25	information, evidence, documents, and other matters may be discovered which are not set forth
26	July 6, 2017 Page 1 of 29 IsVMLP-U-17-008/Discovery/PHS-MLP-9/Initial Response Date: 12/08/(12-Exh # 14-123 Regulatory Commission of Alaska U-16-09/ By: 99 Northern Lights Realtime & Reporting, Inc. (907) 337-2221

KEMPPEL, HUFFMAN AND ELLIS a professional corporation 255 E. FIREWEED LANE 99503-2025 ANCHORAGE, ALASKA 99503-2025 (907) 277-1604

	REDACTED
1	
2	
3	Request for Production (No. PHS-MLP-9-2): : The document starting at
4	MLP20285 is ML&P's records management program and procedures, dated July 28, 2016.
5	(a) Produce all such policies applicable at any time from January 1, 2009
6	through the present.
7 8	(b) The document has a non-functional (at least to DWT) link to ML&P's
9	"Record Retention Schedule (RRS)." Produce that document and all previous versions or
10	comparable policies in effect at any time from January 1, 2009 through the present.
11	(c) Produce each Records Destruction Authorization or similar document (see
12	MLP20289) applicable to any destroyed records related to Plant 2A, the 2009 IRP, the 2012
13	Generation Study, or ML&P's generation replacement program.
14	(d) Produce, in Excel export if available, all Infolinx data related to offsite
15	storage of records (see MLP20290 et seq.) related to Plant 2A, the 2009 IRP, the 2012
16	Generation Study, or ML&P's generation replacement program.
17	(e) Identify ML&P's "Document Control Administrator" (see MLP20286).
18	<b>Response:</b> (a) See documents produced as MLP26757 to MLP26778.
19	(b) See documents produced as MLP26779 to MLP26836.
20 21	(c) There are no documents responsive to this request.
22	(d) See the document produced as MLP26837.
23	(e) Shawn McTaggart, ML&P Systems Division.
24	Person(s) Supplying Information: Shawn McTaggart.
25	MUNICIPAL LIGHT & POWER'S INITIAL RESPONSE TO
26	PHS' NINTH REQUEST FOR DISCOVERY (PHS-MLP-9) Docket U-17-008/U-16-094
	July 6, 2017 Page 4 of 29
	fs\ML&P\U-17-008\Discovery\PHS-MLP-9\7-6-17

Law offices of KEMPPEL, HUFFMAN AND ELLJS a professional corporation 2SS E. FIREWEED LANE, SUITE 200 ANCHORAGE, ALASKA 99503-2025 (907) 277-1604