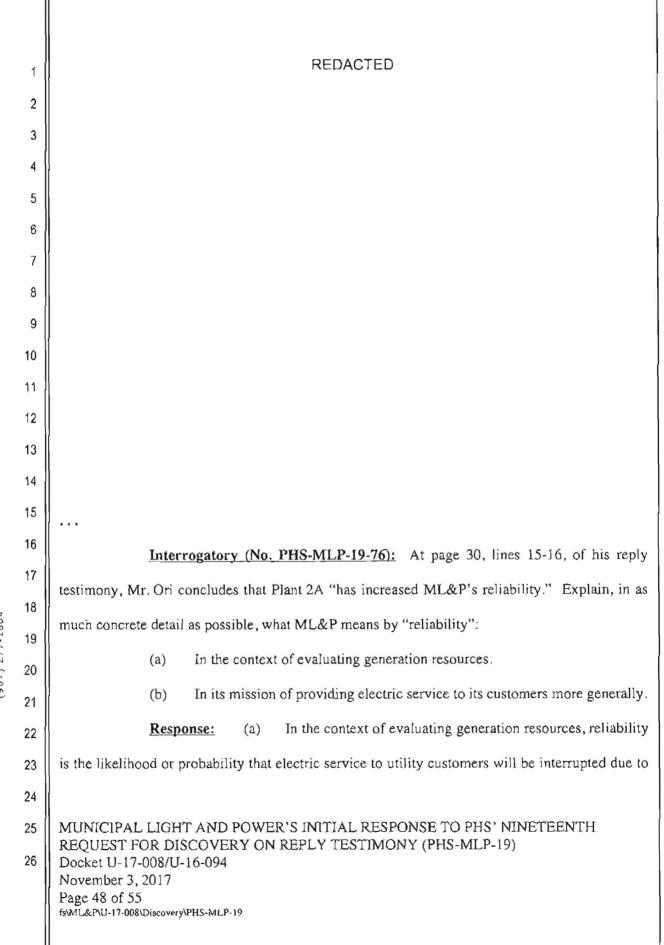
1	<u>STATE OF ALASKA</u>		
2	THE REGULATORY COMMISSION OF ALASKA		
3 4 5	Before Commissioners: Stephen McAlpine, C Rebecca L. Pauli Robert M. Pickett Norman Rokeberg Janis W. Wilson	hairman	
6 7 8	In the Matter of the Request Filed by the) MUNICIPALITY OF ANCHORAGE d/b/a) MUNICIPAL LIGHT & POWER DEPARTMENT for) Approval to Establish Depreciation Rates)		
9 10 11) In the Matter of the Tariff Revisions, Designated as TA357-121, filed by the MUNICIPALITY OF ANCHORAGE d/b/a MUNICIPAL LIGHT & POWER DEPARTMENT		
12 13 14 15	MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PROVIDENCE HEALTH & SERVICES' NINETEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-19) The Municipality of Anchorage d/b/a Municipal Light and Power ("ML & P")		
16	hereby provides its initial response to Providence Health & Services' ("PHS"") nineteenth		
17	request for discovery on reply testimony. All responses to discovery are prepared by ML&P in		
18	consultation with counsel. Witnesses at hearing will be available for cross-examination on their		
19	testimony. Documents produced in response to these requests will also be stored in an electronic		
20	document management sharefile site accessible with login credentials that have been or will be		
21	provided as requested to the counsel, analysts, and consultants for PHS, AG, ANTHC, ENSTAR,		
22	FEA, and JLP.		
23	PRELIMINARY STATEMENT		
24 25	Discovery in this docket is not complete. As discovery proceeds, facts,		
26	November 3, 2017 Page 1 of 55 (s\MLP\U-17-008\Discovery\PHS-MLP-19\UnitialResponse Northern Lights Realtime & Reporting (907) 337-2221	aska .008	

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a failure of the infrastructure that serves those customers, including but not necessarily limited to 1 2 generation assets. 3 (b) In the context of ML&P's mission of providing electric service to its 4 customers, reliability is the likelihood or probability that electric service to ML&P's customers 5 will be interrupted for any reason. 6 Person(s) Supplying Information: Eugene Ori. 7 . . . 8 9 REDACTED 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS' NINETEENTH **REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-19)** 26 Docket U-17-008/U-16-094 November 3, 2017 Page 49 of 55 Is\ML&P\U-17-008\Discovery\PHS-MLP-19

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