

1 STATE OF ALASKA

2 THE REGULATORY COMMISSION OF ALASKA

3 Before Commissioners:

Stephen McAlpine, Chairman  
Rebecca L. Pauli  
Robert M. Pickett  
Norman Rokeberg  
Janis W. Wilson

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6 In the Matter of the Request Filed by the )  
MUNICIPALITY OF ANCHORAGE d/b/a )  
7 MUNICIPAL LIGHT & POWER DEPARTMENT for )  
Approval to Establish Depreciation Rates )  
8 )

U-16-094

9 In the Matter of the Tariff Revisions, Designated as )  
10 TA357-121, filed by the MUNICIPALITY OF )  
ANCHORAGE d/b/a MUNICIPAL LIGHT & )  
11 POWER DEPARTMENT )  
12 )

U-17-008

13 **MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO**  
14 **PROVIDENCE HEALTH & SERVICES' NINETEENTH REQUEST FOR DISCOVERY**  
15 **ON REPLY TESTIMONY (PHS-MLP-19)**

16 The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"),  
17 hereby provides its initial response to Providence Health & Services' ("PHS") nineteenth  
18 request for discovery on reply testimony. All responses to discovery are prepared by ML&P in  
19 consultation with counsel. Witnesses at hearing will be available for cross-examination on their  
20 testimony. Documents produced in response to these requests will also be stored in an electronic  
21 document management sharefile site accessible with login credentials that have been or will be  
22 provided as requested to the counsel, analysts, and consultants for PHS, AG, ANTHC, ENSTAR,  
23 FEA, and JLP.

24 **PRELIMINARY STATEMENT**

25 Discovery in this docket is not complete. As discovery proceeds, facts,  
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November 3, 2017

Page 1 of 55

fs\MLP\U-17-008\Discovery\PHS-MLP-19\InitialResponse

Date: 12-1-17 Exh # 11-48  
Regulatory Commission of Alaska  
U-16-094 By: AOS U-17-008  
Northern Lights Realtime & Reporting, Inc.  
(907) 337-2221

1 REDACTED

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17 **Interrogatory (No. PHS-MLP-19-76):** At page 30, lines 15-16, of his reply  
18 testimony, Mr. Ori concludes that Plant 2A “has increased ML&P’s reliability.” Explain, in as  
19 much concrete detail as possible, what ML&P means by “reliability”:

20 (a) In the context of evaluating generation resources.

21 (b) In its mission of providing electric service to its customers more generally.

22 **Response:** (a) In the context of evaluating generation resources, reliability  
23 is the likelihood or probability that electric service to utility customers will be interrupted due to

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25 MUNICIPAL LIGHT AND POWER’S INITIAL RESPONSE TO PHS’ NINETEENTH  
26 REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-19)

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

November 3, 2017

Page 48 of 55

fs\ML&PU-17-008\Discovery\PHS-MLP-19

1 a failure of the infrastructure that serves those customers, including but not necessarily limited to  
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.

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25 MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS' NINETEENTH  
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Docket U-17-008/U-16-094

November 3, 2017

Page 49 of 55

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