

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

STATE OF ALASKA

THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:

Robert M. Pickett, Chairman
Stephen McAlpine
Rebecca L. Pauli
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) U-16-064
Approval to Establish Depreciation Rates)

In the Matter of the Tariff Revision Designated as)
TA357-121 Filed by the MUNICIPALITY OF)
ANCHORAGE d/b/a MUNICIPAL LIGHT &) U-17-008
POWER DEPARTMENT)

**MUNICIPAL LIGHT & POWER'S FIRST SUPPLEMENTAL RESPONSE TO
PROVIDENCE HEALTH & SERVICES' FOURTH REQUEST FOR DISCOVERY
(PHS-MLP-4)**

The Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P"), hereby provides its first supplemental response to the Providence Health & Services' ("PHS") fourth request for discovery. 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 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,

May 11, 2017
Page 1 of 17

fs\MLP\U-17-008\Discovery\PHS-MLP-4S-11-17

PHS-4 (1st Supp)

Date: 12/08/17 Exh # H-112
Regulatory Commission of Alaska
U-16-097 By: BP U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

1 REDACTED

2

3

4

5

6

7

8

9

10

11 **Interrogatory (No. PHS-MLP-4-61):** In response to PHS-MLP-1-67(b), ML&P
12 wrote, "ML&P does not segregate the cost of energy efficiency efforts and so the requested
13 information cannot be determined." Identify the accounting category at the greatest level of
14 detail from which ML&P's energy efficiency costs are not segregated, how that category relates
15 to the financial information presented in TA357-121, and state ML&P's expenses in that
16 category for each month of 2015 and 2016, and in total for each year from 2002 through 2016.

17 **Response:** See the document produced as MLP21724.

18 **Person(s) Supplying Information:** Mollie Morrison.

19

20

21 REDACTED

22

23

24

25

26