

STATE OF ALASKA

THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:

Robert M. Pickett, Chairman
Rebecca L. Pauli
Stephen McAlpine
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-16-064

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

U-17-008

MUNICIPAL LIGHT & POWER'S RESPONSE TO
PROVIDENCE HEALTH & SERVICES' FIFTH REQUEST FOR DISCOVERY
(PHS-MLP-5)

The Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P"), hereby responds to the Providence Health & Services' ("PHS") fifth 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 in 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, information, evidence, documents, and other matters may be discovered which are not set forth

June 19, 2017

Page 1 of 30

fs\MLP\U-17-008\Discovery\PHS-MLP-5\6-19-17

Date: 12-6-17 Exh # 495
Regulatory Commission of Alaska
4-16-094 By: JS 4-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

REDACTED

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Interrogatory (No. PHS-MLP-5-10): In response to PHS-MLP-1-50 (5th supp.
p. 4), ML&P stated that it “has not been able to locate documentation or underlying data for the
MUNICIPAL LIGHT & POWER’S RESPONSE TO
PHS’ FIFTH REQUEST FOR DISCOVERY (PHS-MLP-5)
Docket U-17-008/U-16-094
June 19, 2017

gas price forecasts used in the 2009 IRP or the 2012 generation study.” In response to PHS-MLP-4-22 (1st supp. pp. 5-6), ML&P produced documents identified as the gas price forecasts used in those studies as spreadsheets MLP21706 and MLP21707, respectively. With respect to these requests and responses:

(a) Identify each person responsible for preparing the natural gas price forecasts and their respective role.

(b) Identify the sources of all data and assumptions contained in the referenced spreadsheets.

(c) Explain why ML&P “has not been able to locate documentation or underlying data for” those forecasts, with the exception of the two referenced spreadsheets.

Response: (a) See response to PHS-MLP-4-31.

(b) Except as indicated in the referenced spreadsheets, ML&P has no information responsive to this request.

(c) ML&P objects to this request as not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, the documents produced as MLP21706 to MLP21707, respectively, comprise underlying data and documentation for the natural gas price forecasts used in the 2009 IRP and the 2012 Generation Study.

Person(s) Supplying Information: Anna Henderson.

REDACTED

