

STATE OF ALASKA

THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:

Stephen McAlpine, Chairman
Rebecca L. Pauli
Robert M. Pickett
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-16-094

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

U-17-008

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

The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"), hereby provides its initial response to Providence Health & Services' ("PHS") fifteenth request for discovery on reply testimony. 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.

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 in these responses, but which may be responsive to these discovery requests. The following responses are complete based on ML&P's current knowledge, information, and belief.

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Date: 12-4-17 Exh # H-66
Regulatory Commission of Alaska
U-16-094 By: LR U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

Request for Admission (No. PHS-MLP-15-27): On page 22, lines 17-20, of his reply testimony, Mr. Saleba states that: “The load factor methodology used by ML&P is a cost-causation methodology that recognizes that system load factor influences a utility’s production plant investment decisions.” In this regard:

- (a) Admit that the phrase “load factor” does not appear in the 2009 IRP.
- (b) Admit that the phrase “load factor” does not appear in the 2012 Generation Study.
- (c) Admit that the phrase “load factor” does not appear in the prefiled testimony or exhibits of any ML&P witness in this proceeding other than Mr. Saleba.
- (d) Admit that the phrase “load factor” does not appear in any of the documents shared with the ML&P Commission, ML&P Board, or the Anchorage Assembly in the course of seeking the approval of those bodies with respect to Plant 2A.

If your response to any subpart of this request for admission is anything other than an unqualified admission, state what you believe the truth of the matter to be and the basis for your belief, and identify any documents supporting your belief.

Response: (a) Admitted.

(b) Admitted.

(c) Admitted.

(d) The documents shared with the referenced entities speak for themselves.

Person(s) Supplying Information: Gary Saleba.

MUNICIPAL LIGHT AND POWER’S INITIAL RESPONSE TO PHS’ FIFTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-15)

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Initial Response