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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 FIRST SUPPLEMENTAL 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"), hereby provides its first supplemental response to Providence Health & Services' ("PHS") nineteenth 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. 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,

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Date: 12-1-17 Exh # H-47
Regulatory Commission of Alaska
U-16-094 By: ADS U-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

Request for Admission (No. PHS-MLP-19-84): MLP19711 is an email dated

December 13, 2011, from Mr. Ori to a number of ML&P employees, including Dan Helmick, Bruce Aspray, and Robert Reagan. The text says "For your files..." (ellipsis in original), and the email contains two attachments: A spreadsheet titled "MLP Repowering Plans Matrix w-wo PPA - rev d.xlsx" and a PowerPoint presentation titled "FINAL Repowering Presentation.pptx."

In this regard:

(a) Admit that the PowerPoint presentation is the presentation given to the Anchorage Assembly by Mr. Ori and Mr. Posey on December 9, 2011.¹

¹ See also MLP19647, email from Mr. Ori to Anchorage Municipal Manager George Vakalis on December 19, 2011, discussing the December 9 presentation.

MUNICIPAL LIGHT AND POWER'S FIRST SUPPLEMENTAL RESPONSE TO PHS' NINETEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-19)
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1 (b) Admit that the spreadsheet attached to MLP19711 is the basis of the
2 figures on Slides 7 and 16 of the PowerPoint presentation also attached to MLP19711.

3 (c) Admit that the columns titled "N-2" in the spreadsheet attached to
4 MLP19711 (tab "Current" cells P27 to P50 and tab "New" cells F27 to F50) and the lines in the
5 figures in that spreadsheet labeled "Maintenance Contingency" or "N-2 Reserve Contingency"
6 are calculated without inclusion of any operating reserve or reserve capacity requirement.

7 (d) Admit that Mr. Ori's December 9, 2011, presentation to the Anchorage
8 Assembly assumed capacity planning to meet an N-2 contingency, but not at the same time as
9 meeting ML&P's operating reserve or reserve capacity margin.

10 (e) Admit that removing the "maximum operating reserves" from Mr. Ori's
11 Table 5 yields a total capacity need 40 MW lower than calculated by Mr. Ori without any other
12 changes to the assumptions or calculations.

13 (f) Admit that, to meet ML&P's 2015 gross system peak, the change
14 described in (e) reduces ML&P's capacity need from Mr. Ori's stated 360.8 MW to 320.8 MW.

15 (g) Admit that combining a dispatch order-based calculation of N-2 as
16 described in PHS-MLP-19-78(h) above and the exclusion of operating reserves or reserve
17 capacity as described in subpart (f) of this request yields a total capacity need for ML&P's 2015
18 gross system peak of 285.1 MW, rather than the 360.8 calculated by Mr. Ori. (To the extent that
19 you do not admit PHS-MLP-19-78(h), assume the correctness of that calculation as a
20 hypothetical for purposes of this request).

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24 MUNICIPAL LIGHT AND POWER'S FIRST SUPPLEMENTAL RESPONSE TO PHS'
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(h) Admit that ML&P and its consultants are not aware of any analysis developed by ML&P or its consultants for the purpose of planning to meet future capacity requirements, calculated a capacity requirement based on meeting an N-2 contingency at the same time as fulfilling operating reserve or reserve capacity requirements.

(i) Admit that ML&P and its consultants are not aware of any instance other than page 23 of Mr. Ori's direct testimony in which any analysis calculated a capacity requirement for ML&P based on meeting an N-2 contingency at the same time as fulfilling operating reserve or reserve capacity requirements.

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; however, the calculated N-2 reserve margin was based on Units 6/7 at 107.3 MW and unit 8 at 85 MW for a total of 192.3 MW, which exceeds the reserve margin set forth in Table 5 of Mr. Ori's testimony of 191 MW, consisting of maximum operating reserves of 40 MW, N-1 contingency of 77.3 MW, and N-2 contingency of 74.4

(d) Admitted; however, the calculated N-2 reserve margin was based on Units 6/7 at 107.3 MW and unit 8 at 85 MW for a total of 192.3 MW, which exceeds the reserve margin set forth in Table 5 of Mr. Ori's testimony of 191 MW, consisting of maximum operating reserves of 40 MW, N-1 contingency of 77.3 MW, and N-2 contingency of 74.4

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(e) Admitted.

(f) Admitted.

(g) Admitted.

(h) Admitted.

(i) Admitted.

Person(s) Supplying Information: Eugene Ori.

Request for Production (No. PHS-MLP-19-85): Please produce all documents identified in response to the preceding request for admission.

Response: Not applicable.

Person(s) Supplying Information: Eugene Ori.

REDACTED

MUNICIPAL LIGHT AND POWER'S FIRST SUPPLEMENTAL RESPONSE TO PHS'
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