

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 Tariff Revision Designated as
TA285-4 Filed by ENSTAR NATURAL GAS
COMPANY, A DIVISION OF SEMCO ENERGY, } U-16-066
INC. }

**ENSTAR NATURAL GAS COMPANY'S
FOURTH SUPPLEMENTAL RESPONSE TO THE OFFICE OF THE
ATTORNEY GENERAL'S SECOND DISCOVERY REQUESTS (AG-2)**

Pursuant to 3 AAC 48.155 and 3 AAC 48.141-145, ENSTAR Natural Gas Company ("ENSTAR"), by and through its counsel, supplements its response to the Second Request for Discovery by the Attorney General ("RAPA"), as follows:

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 ENSTAR's current knowledge, information, and belief. Furthermore, these responses were prepared based on ENSTAR's good faith interpretation of the discovery requests and are subject to correction for inadvertent errors or omissions, if any.

1 privilege. Nothing contained in these responses is intended as, or shall in any way be
2 deemed, a waiver of any such privilege or protection, or any other applicable privilege
3 or doctrine.
4

5 7. ENSTAR objects to the instructions contained in RAPA's Second
6 Discovery Request to ENSTAR Natural Gas Company. In responding to the requests,
7 ENSTAR will abide by the Commission's discovery regulations and where applicable,
8 Alaska Rules of Civil Procedure.
9

10 8. ENSTAR objects to the requests for identification of answering and
11 hearing witnesses as part of the responses. Witness designation in this matter is not
12 required by the Commission's regulations or the Alaska Rules of Civil Procedure.
13 Further, it is too early in the proceedings to designate witnesses for certain topics and
14 some topics may be addressed by multiple witnesses. In accord with Commission
15 regulations, ENSTAR will identify individuals who supplied information for a
16 particular response where appropriate.
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19 **FOURTH SUPPLEMENTAL DISCOVERY RESPONSE**

20 **AG-ENSTAR-2-2.** Please state the capital structure (dollars and
21 percentages) of ENSTAR, SEMCO Energy Inc. ("SEMCO"), and AltaGas (including
22 short-term debt, long-term debt and common equity) for the period 2011-2015, and
23 2016 when it becomes available.
24

25 **Original Response:** ENSTAR objects to the question insofar as it
26

1 requests data on AltaGas prior to August 30, 2012. Information on AltaGas prior to
2 August 30, 2012 is not relevant because AltaGas did not acquire SEMCO Energy, Inc.
3 until that date. Subject to and without waiving this objection, responsive documents
4 are attached as ENS00493.
5

6 **Supplemental Response:** Subject to and without waiving the objections in
7 the Original Response, please also see the attached file labeled ENS07893 which
8 contains updated data for year 2016.
9

10 **Person(s) Supplying Information:** Mark A. Moses and Jillian Fan.
11

12 **AG-ENSTAR-2-3.** Please state the capital structure (dollars and
13 percentages) of each utility operation of SEMCO and AltaGas (including short-term
14 debt, long-term debt and common equity) as of the end of 2015, and as of the end of
15 2016, when it becomes available.
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17 **Original Response:** Please see ENS00494.
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19 **Supplemental Response:** Please also see the attached file labeled ENS07894
20 which contains updated data for year 2016.

21 **Person(s) Supplying Information:** Mark A. Moses and Jillian Fan.
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ENSTAR Natural Gas Company (ENSTAR) & Alaska Pipeline Company (APC), SEMCO Energy Inc. & AltaGas LTD.
Capital Structure as of December 31, 2016-2011
AG-2-2 Response Support

[illegible]

a. Intercompany Notes Payable to Affiliates

c. Includes current portion of Long-term Debt and Long-Term Capital

e. In CS millions