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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
TA285-4 Filed by ENSTAR NATURAL GAS
COMPANY, A DIVISION OF SEMCO ENERGY,
INC.

Docket No. U-16-066

MATANUSKA ELECTRIC ASSOCIATION, INC. ("MEA")'S SUPPLEMENTAL RESPONSE
TO ENS-MEA-2-8 AND ENS-MEA-2-9 PURSUANT TO U-16-066(17)

GENERAL OBJECTIONS

MEA objects to these discovery requests to the extent that they seek information beyond the scope of the applicable discovery rules and Alaska Rules of Civil Procedure. MEA objects to these requests to the extent that they seek information that is available in the public domain.

MEA objects to each and every discovery request insofar as they are vague, ambiguous, overly broad, unduly burdensome or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these discovery requests. Any and all answers of MEA in response to these discovery requests will be provided subject to, and without waiving, this objection.

MEA objects to each and every discovery request insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

1 MEA objects to providing information to the extent such information already is a matter
2 of public record before this Regulatory Commission of Alaska ("Commission") or is otherwise
3 available as a matter of public record. ENSTAR is not entitled to require other parties to
4 gather information that is equally available accessible to it.
5

6 DISCOVERY REQUESTS

7 ENSTAR-MEA-2-8: Is MEA in any way alleging a violation of an Alaska statute or law in its
8 testimony in this case, including in Mr. Izzo's discussion on page 14, lines 12-17? If the answer
9 is in the affirmative, please describe with specificity the activity that has created the violation
10 and the statutes or laws that are being violated.

11 Response:

12 This discovery request is objected to as calling for a legal conclusion.

13 Supplemental Response:

14 MEA is not aware of any specific statutory violation by ENSTAR at this time.

15 Person(s) Who Supplied Information:

16 Anthony M. Izzo
17

18
19 ENSTAR-MEA-2-9: Is MEA in any way alleging a violation of a Commission regulation in its
20 testimony in this case, including in Mr. Izzo's discussion on page 14, lines 12-17? If the answer
21 is in the affirmative, please describe with specificity the activity that has created the violation
22 and the regulations that are being violated.

23 Response:

24 This discovery request is objected to as calling for a legal conclusion. MEA is not responsible
25 for the interpretation or enforcement of Commission regulations governing ENSTAR.
26

1 Supplemental Response:

2 MEA is not aware of any specific violation of a Commission regulation by ENSTAR at this time.

3 Person(s) Who Supplied Information:

4 Anthony M. Izzo

6 DATED this 8th day of June, 2017

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