

1 STATE OF ALASKA

2 THE REGULATORY COMMISSION OF ALASKA

3 Before Commissioners:

Stephen McAlpine, Chairman  
Rebecca L. Pauli  
Robert M. Pickett  
Norman Rokeberg  
Janis W. Wilson

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5  
6 In the Matter of the Request Filed by the )  
MUNICIPALITY OF ANCHORAGE d/b/a )  
7 MUNICIPAL LIGHT & POWER DEPARTMENT for )  
Approval to Establish Depreciation Rates )  
8 )

U-16-094

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

U-17-008

12 **MUNICIPAL LIGHT AND POWER'S SECOND SUPPLEMENTAL RESPONSE TO**  
13 **PROVIDENCE HEALTH & SERVICES' ELEVENTH REQUEST FOR DISCOVERY**  
14 **ON REPLY TESTIMONY (PHS-MLP-11)**

15 The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"),  
16 hereby provides its second supplemental response to Providence Health & Services' ("PHS")  
17 eleventh request for discovery on reply testimony. All responses to discovery are prepared by  
18 ML&P in consultation with counsel. Witnesses at hearing will be available for  
19 cross-examination on their testimony. Documents produced in response to these requests will  
20 also be stored in an electronic document management sharefile site accessible with login  
21 credentials that have been or will be provided as requested to the counsel, analysts, and  
22 consultants for PHS, AG, ANTHC, ENSTAR, FEA, and JLP.

23 **PRELIMINARY STATEMENT**

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25 Discovery in this docket is not complete. As discovery proceeds, facts,

26 October 10, 2017

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Date: 12/08/17 Exh # 14-120  
Regulatory Commission of Alaska  
U-16-094 By: BP U-17-008  
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**Interrogatory (No. PHS-MLP-11-33):** At pages 10 through 14 of Mr. Johnston's reply testimony, he says that he could find no record of any customer appearing at any of various public meetings of the ML&P Commission, ML&P Board of Directors, and Anchorage Assembly to discuss the 2009 IRP, 2012 Generation Study, SPP approvals, and Plant 2A approvals. What conclusion does ML&P draw from the fact that none of its roughly 30,000 customers appeared to comment at any of these years of public meetings?

**Response:** ML&P objects to this request to the extent it is vague and ambiguous and calls for speculation. Without waiving those objections, ML&P has not "drawn any conclusions" from the fact that to the best of Mr. Johnston's knowledge, PHS, FEA, ANTHC, or other customers did not appear at publicly noticed public meetings to provide comment or input regarding ML&P's generation planning.

MUNICIPAL LIGHT AND POWER'S SECOND SUPPLEMENTAL RESPONSE TO  
PHS' ELEVENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-11)  
Docket U-17-008/U-16-094

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**Person(s) Supplying Information:** Mark Johnston.

DATED this 10th day of October 2017, at Anchorage, Alaska.

KEMPEL, HUFFMAN AND ELLIS, P.C.  
Counsel for Municipality of Anchorage  
d/b/a Municipal Light and Power Department

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