

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 Request Filed by the)
MUNICIPALITY OF ANCHORAGE d/b/a)
MUNICIPAL LIGHT & POWER DEPARTMENT for) U-16-094
Approval to Establish Depreciation Rates)

In the Matter of the Tariff Revision Designated as)
TA357-121 Filed by the MUNICIPALITY OF)
ANCHORAGE d/b/a MUNICIPAL LIGHT &) U-17-008
POWER DEPARTMENT)

**MUNICIPAL LIGHT & POWER'S EIGHTH SUPPLEMENTAL RESPONSE TO
PROVIDENCE HEALTH & SERVICES' FIRST REQUEST FOR DISCOVERY
(PHS-MLP-1)**

The Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P"), hereby provides its eighth supplemental response to Providence Health & Services' ("PHS") first request for discovery. 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. There are no documents produced with this supplemental response.

DISCOVERY RESPONSES

Interrogatory (No. PHS-MLP-1-67): Page ES-4 of ML&P's 2009 Integrated Resource Plan (IRP), Ex. 15 at 10, states that: "load reductions due to energy efficiency programs are achieved slowly over time" and recommends a preferred scenario including

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Date: 12-17-17 Exh # 14-146
Regulatory Commission of Alaska
U-16-094 By: PL U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

1 "Pursue energy efficiency measures that are cost-effective at levels discussed below." Figure 8b
2 in the 2009 IRP, Ex. 15 at 39, indicates over 20 MW of capacity available to ML&P through
3 conservation acquisition at levelized costs of less than \$600/kW (in 2012 dollars). In this regard:

4 (a) Describe all steps that ML&P has undertaken since 1995 to achieve load
5 reductions through energy efficiency or conservation programs.

6 (b) For each year since 1995, please provide the amount that ML&P has spent
7 as part of its energy efficiency programs.

8 (c) For each year since 1995, please provide the amount of load reduction that
9 ML&P has achieved through its energy efficiency programs.

10 (d) If ML&P has not implemented the IRP recommendation to pursue cost
11 effective energy efficiency measures, why not?

12 (e) Does ML&P have any reason to doubt the 2009 IRP's above-cited
13 conclusions based on facts as they existed at the time of that study? If so, explain.

14 (f) Does ML&P believe circumstances changed between completion of the
15 2009 IRP and the preparation of the 2012 Generation Study with respect to the 2009 IRP's
16 conclusions regarding energy efficiency? If so, explain.

17 (g) Does ML&P believe circumstances have changed since preparation of the
18 2012 Generation Study that would call into doubt the 2009 IRP's conclusions regarding energy
19 efficiency? Why or why not? If so, explain.

20 Response: (a) ML&P objects to this request as overbroad and unduly
21 burdensome. Without waiving the foregoing objections, ML&P's energy efficiency measures

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1 include:

2 **Informational services:** ML&P offers its commercial and residential customers
3 free, year-round energy-efficiency information programs. The commercial customer program is
4 called positiveENERGY. It includes a bi-monthly eNewsletter, positiveENERGY focusing on
5 energy-related, technology or business subjects. Each bulletin provides links to additional data
6 and online tools on the subject presented, including various calculators, free tips and guides on
7 environmental, regulatory, materials/machining, manufacturing and processes topics. ML&P's
8 positiveENERGY service also includes access to researchers, engineers and development experts
9 who answer general questions, help with product assessments, and provide troubleshooting.
10 Commercial customers can also visit ML&P's website to receive personalized information about
11 lowering energy costs and increasing efficiency.
12

13 The residential program, called POWERSMART, includes online tools to help
14 people save on their energy bills, tips for reducing energy consumption, and a library of
15 resources. POWERSMART also has a do-it-yourself home energy assessment that allows
16 customers to perform a self-audit and spot opportunities to reduce their energy use.
17

18 ML&P has provided energy conservation and efficiency tips to customers via
19 printed bill inserts on an annual basis since 2013. These bill inserts also provide links to the
20 positiveENERGY and POWERSMART programs on the ML&P website.

21 **Website:** ML&P's website offers portals to the positiveENERGY and
22 POWERSMART sites. It also has information about state and federal resources, including links
23 to information about financial assistance.
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1 **Community events and partnerships:** ML&P provides energy conservation and
2 efficiency materials at community events and exhibits. These events include: the Renewable
3 Energy Alaska Project ("REAP") energy fair and other REAP community events, the JBER air
4 show, Municipality of Anchorage Community Council presentations, Mountain View Street Fair,
5 Anchorage Home Show, Anchorage Downtown Partnership meetings, Commonwealth North
6 meetings, Anchorage Chamber of Commerce presentations, and other events. In 2015 ML&P
7 began offering free LED bulbs as promotional items during public events.

8
9 ML&P partners with the Anchorage School District to promote energy efficiency
10 through an annual district-wide art calendar contest featuring fourth and fifth grade student art
11 depicting energy efficiency and conservation tips. Calendars are distributed to the schools,
12 customers and the public.

13 **Power Pledge Challenge:** ML&P partners with the Anchorage School District,
14 Chugach Electric Association, Matanuska Electric Association, Alaska Energy Authority, and
15 REAP in the Power Pledge Challenge. The Power Pledge Challenge gives youth greater
16 awareness of how they use energy and the importance of using energy wisely at home and at
17 school. Classroom teachers invite Power Pledge partners to their classrooms for an interactive
18 presentation on energy efficiency and conservation. Students completing an online power pledge
19 make their classes eligible for prizes.

20
21 **LED Project:** ML&P is replacing all 4,000 high pressure sodium (HPS) street
22 and trail fixtures in its service area to networked light emitting diode (LED) fixtures. The LED
23 fixtures will use almost 40 percent less power than the HPS fixtures and save approximately
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three million kilowatt hours annually. Crews started installing LED light fixtures mid-February 2017 and all non-decorative street lights will be converted to LED by the end of 2017.

Kill-a-Watt Program: In the spring of 2017 ML&P began a Kill-a-Watt meter loan program for residential customers. Residential customers may borrow meters for two weeks to a month to measure energy usage by household appliances and electronics to determine which items use excessive power and identify ways to cut back on consumption and save money.

Extensive documentation of ML&P's energy efficiency measures was produced in response to Request PHS-MLP-85 (Third Supplement).

(b) ML&P objects to this request as overbroad and unduly burdensome. Without waiving the foregoing objections, ML&P does not segregate the cost of energy efficiency efforts and so the requested information cannot be determined.

(c) ML&P objects to this request because it is overbroad, unduly burdensome, and poses a question that cannot be answered.

(d) N/A.

(e) No.

(f) No.

(g) No.

Person(s) Supplying Information: Julie Harris.

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