

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

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

U-16-094

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

U-17-008

13 **MUNICIPAL LIGHT AND POWER'S FIRST SUPPLEMENTAL AND ERRATA**
14 **RESPONSE TO PROVIDENCE HEALTH & SERVICES' THIRTEENTH REQUEST**
15 **FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-13)**

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

24 **PRELIMINARY STATEMENT**

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

26 October 17, 2017

Page 1 of 11

fs\MLP\U-17-008\Discovery\PHS-MLP-13

1st Supp & Errata

Date: 12/08/17 Exh # H-116
Regulatory Commission of Alaska
U-16-094 By: JP U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

LAW OFFICES OF
KEMPEL, HUFFMAN AND ELLIS
A PROFESSIONAL CORPORATION
255 E. FIREWEED LANE, SUITE 200
ANCHORAGE, ALASKA 99503-2025
(907) 277-1604

REDACTED

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

...

20

21

Request for Admission (No. PHS-MLP-13-43): On page 45, lines 5-7, of his

22

reply testimony, Mr. Reed states that: "The weather is extreme and utilities are not

23

24

MUNICIPAL LIGHT AND POWER'S FIRST SUPPLEMENTAL AND ERRATA RESPONSE
TO PHS' THIRTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY
(PHS-MLP-13)

25

26

Docket U-17-008/U-16-094

October 17, 2017

Page 8 of 11

1 interconnected to nearly the same degree that they are in other markets. As a result, reserve
2 margins are appropriately higher in Alaska than elsewhere.” In that regard:

3 (a) Admit that ML&P has not sustained a customer service outage due to
4 transmission system related outages over the last ten years. If your response is anything other
5 than an unqualified admission, state what you believe the truth of the matter to be and the basis
6 for your belief, and identify any documents supporting your belief.

7 (b) Admit that ML&P has not engaged an independent consultant to perform
8 an analysis of its reserve margin needs since at least 1990. If your response is anything other
9 than an unqualified admission, state what you believe the truth of the matter to be and the basis
10 for your belief, and identify any documents supporting your belief.

11 (c) Admit that no independent consultant has performed an analysis of the
12 reserve margin needs of Railbelt utilities since at least 1990. If your response is anything other
13 than an unqualified admission, state what you believe the truth of the matter to be and the basis
14 for your belief, and identify any documents supporting your belief.

15 (d) Admit that Mr. Reed did not perform an analysis of ML&P’s reserve
16 margin needs in conjunction with his testimony in this proceeding. If your response is anything
17 other than an unqualified admission, state what you believe the truth of the matter to be and the
18 basis for your belief, and identify any documents supporting your belief.

19 **Response:** (a) See prior responses to Request PHS-MLP-11-26 and errata
20 response to Request PHS-MLP-2-50.

21 (b) Denied. See the 2009 IRP.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

(c) Denied. See the 2010 Railbelt IRP.

(d) Admitted.

Person(s) Supplying Information: Anna Henderson, John Reed.

...

DATED this 17th 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

By: /s/ Paul J. Jones
Dean D. Thompson, AK Bar No. 9810049
Paul J. Jones, AK Bar No. 9411107
Jonathon D. Green, AK Bar No. 1611091
255 E. Fireweed Lane, Suite 200
Anchorage, Alaska 99503
Telephone: (907) 277 1604
Facsimile: (907) 276 2493
E-mail: ddt@khe.com
pjj@khe.com
jdg@khe.com

MUNICIPAL LIGHT AND POWER'S FIRST SUPPLEMENTAL AND ERRATA RESPONSE
TO PHS' THIRTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY
(PHS-MLP-13)

Docket U-17-008/U-16-094

October 17, 2017

Page 10 of 11