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# STATE OF ALASKA

## THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:	Stephen McAlpine, Chairman
	Rebecca L. Pauli
	Robert M. Pickett
	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 Revisions, Designated as	)
TA357-121, filed by the MUNICIPALITY OF	) U-17-008
ANCHORAGE d/b/a MUNICIPAL LIGHT &	)
POWER DEPARTMENT	)
	)

# MUNICIPAL LIGHT AND POWER'S FIRST SUPPLEMENTAL RESPONSE TO PROVIDENCE HEALTH & SERVICES' NINETEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-19)

The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"), hereby provides its first supplemental response to Providence Health & Services' ("PHS"") nineteenth request for discovery on reply testimony. 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. Documents produced in response to these requests will also be stored in an electronic document management sharefile site accessible with login credentials that have been or will be provided as requested to the counsel, analysts, and consultants for PHS, AG, ANTHC, ENSTAR, FEA, and JLP.

## PRELIMINARY STATEMENT

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

November 7, 2017 Page 1 of 29 fs\MLP\U-17-008\Discovery\PHS-MLP-19\1st Supp.

Regulatory/Commission of Alaska U-16-094 By: Northern Lights Realtime & Reporting, Inc. (907) 337-2221

### B. Prudence

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November 7, 2017

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Request for Admission (No. PHS-MLP-19-58): At page 97, lines 8-18, Mr. Reed describes an expected decrease in ML&P's system heat rate (i.e., an increase in fuel efficiency) due to Plant 2A. Admit that the expected system heat rate with Plant 2A of 7.674 Mcf/MWh assumes that Plant 2A runs at or near to its maximum output. If your response is anything other than an unqualified admission, state what you believe the truth of the matter to be and the basis for your belief, and identify any documents supporting your belief.

> Response: With the exception of planned outages, admitted.

Person(s) Supplying Information: Jeff Warner.

### REDACTED

MUNICIPAL LIGHT AND POWER'S FIRST SUPPLEMENTAL RESPONSE TO PHS' NINETEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-19) Docket U-17-008/U-16-094