

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

U-17-008

13 MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO
14 PROVIDENCE HEALTH & SERVICES' NINETEENTH REQUEST FOR DISCOVERY
15 ON REPLY TESTIMONY (PHS-MLP-19)

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

24 PRELIMINARY STATEMENT

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

26 November 3, 2017

Page 1 of 55

fs\MLP\U-17-008\Discovery\PHS-MLP-19\InitialResponse

Date: 12/08/17 Exh # 4-117
Regulatory Commission of Alaska
U-16-094 By: BP U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

REDACTED

...

IV. JOHNSTON

Interrogatory (No. PHS-MLP-19-87): At page 30, lines 1-2, of his reply testimony, Mr. Johnston testifies that "The effect of adding Plant 2A along with associated unit retirements needed to ensure N-2 reserve capacity" In PHS-MLP-02-021(e), Providence asked with regard to Mr. Ori's testimony, "Explain why operating reserves are included as a component of system capacity requirements and cannot be provided through capacity included in N-1 and N-2 contingency reserves," and ML&P (through Mr. Ori) responded, "In the event of an N-2 contingency, ML&P would still be responsible for meeting its operating reserve requirement." In this regard:

- (a) What would be the consequence to ML&P, monetary or otherwise, if it were unable to meet its operating reserve requirement during an N-2 contingency?
- (b) What is the basis for your response to (a)?
- (c) Identify any documents supporting your response to (a) or (b).

MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS' NINETEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-19)

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

November 3, 2017

Page 49 of 55

fs\ML&PU-17-008\Discovery\PHS-MLP-19

REDACTED

