CEMPPEL, HUFFMAN AND ELLIS A PROFESSIONAL CORPORATION 255 E. FIREWED LANE, SUITE 200 ANCHORAGE, ALASKA 99503-2025 (907) 277-1604

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	Ś	U-17-008
ANCHORAGE d/b/a MUNICIPAL LIGHT &)	
POWER DEPARTMENT)	

MUNICIPAL LIGHT AND POWER'S INITIAL 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 initial 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,

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Regulatory Commission of Alaska

V 16-094By: U-17-008

Northern Lights Realtime & Reporting, Inc.

(907) 337-2221

KEMPPEL, HUFFMAN AND ELLIS A PROFESSIONAL CORPORATION 255 E. FIREWED LANE, SUITE 200 ANCHORAGE, ALASKA 99563-2025 (907) 277-1604

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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' MINETEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-19)

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Response: (a) Alaska Railbelt Standards require ML&P "Each Load-Serving Entity and/or Generation Owner shall provide, or contract for, Regulating Reserve, Spinning Reserve and Non-Spinning Reserve as required by Section R2 of this Standard equal to or greater than the Operating Reserve Obligation of the entity." ML&P would be required to purchase available generation equivalent to its obligation. If generation was not available or could not be obtained, the Railbelt Grid could become unstable and require utilities to initiate load shedding protocols.

- (b) Alaska Railbelt Standard AKRES-001-1(B)(R2.1).
- (c) See response to (b).

Person(s) Supplying Information: Mark Johnston.

REDACTED

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

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