

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)
Approval to Establish Depreciation Rates)

U-16-064

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

U-17-008

**MUNICIPAL LIGHT & POWER'S FIRST SUPPLEMENTAL RESPONSE TO
PROVIDENCE HEALTH & SERVICES' FIFTH REQUEST FOR DISCOVERY
(PHS-MLP-5)**

The Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P"), hereby provides its first supplemental response to the Providence Health & Services' ("PHS") fifth 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. 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,

June 20, 2017

Page 1 of 10

fs\MLP\U-17-008\Discovery\PHS-MLP-5\6-20-17

1st Supplement

Date: 12-7-17 Exh # H-109
Regulatory Commission of Alaska
U-16-044 By: JK U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

REDACTED

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Request for Production (No. PHS-MLP-5-22): In PHS-MLP-1-57, PHS-MLP-1-58, and PHS-MLP-1-61, Providence asked for electronic spreadsheets and calculations related to various aspects of the planning that led to construction of Plant 2A. In its responses to each of MUNICIPAL LIGHT & POWER'S FIRST SUPPLEMENTAL RESPONSE TO PHS' FIFTH REQUEST FOR DISCOVERY (PHS-MLP-5) Docket U-17-008/U-16-094 June 20, 2017 Page 5 of 10

fs\ML&PU-17-008\Discovery\PHS-MLP-5\6-20-17

1 those requests, ML&P indicated that it “understands” that potentially responsive documents
2 “were deleted by EES Consulting in its ordinary course of business years prior to
3 commencement of this docket.” Produce all EES documents and communications (including,
4 but not limited to, emails) related to document retention, deletion, destruction, or the like
5 applicable at the time EES deleted each document potentially responsive to PHS-MLP-1-57,
6 PHS-MLP-1-58, and PHS-MLP-1-61.

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8 **Response:** There are no documents responsive to this request.

9 **Person(s) Supplying Information:** Anne Falcon.

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25 MUNICIPAL LIGHT & POWER'S FIRST SUPPLEMENTAL RESPONSE TO
26 PHS' FIFTH REQUEST FOR DISCOVERY (PHS-MLP-5)

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

June 20, 2017

Page 6 of 10

fs\ML&PU-17-008\Discovery\PHS-MLP-5\6-20-17

