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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 ) U-16-094  
Approval to Establish Depreciation Rates )  
\_\_\_\_\_ )

In the Matter of the Tariff Revision Designated as )  
TA357-121 Filed by the MUNICIPALITY OF )  
ANCHORAGE d/b/a MUNICIPAL LIGHT & ) U-17-008  
POWER DEPARTMENT )  
\_\_\_\_\_ )

**MUNICIPAL LIGHT & POWER'S RESPONSE TO THE**  
**ATTORNEY GENERAL'S SECOND REQUEST FOR DISCOVERY (AG-MLP-2)**

The Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P"), hereby responds to the Office of the Attorney General, Regulatory Affairs & Public Advocacy Section's ("AG's") second 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 on 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 the AG, ANTHC, ENSTAR, FEA, JLP, and PHS.

Date: 12-7-17 Exh # H-101  
Regulatory Commission of Alaska  
U-16-094 By: PK U-17-008  
Northern Lights Realtime & Reporting, Inc.  
(907) 337-2221

May 19, 2017  
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AG-MLP-2

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

**AG-ML&P-2-11.**

Refer to the Prefiled Direct Testimony of Mark A. Johnston at Q/A 33 that states in part: "The EMP projects the issuance of \$192 million in taxable revenue bonds to be sold in 2017, which is to satisfy the outstanding balance of the Commercial Paper program."

(a) Does the \$192 million represent debt from the construction of Plant 2A?

(b) If the response to subpart (a) is affirmative, is there any portion of the \$192 million that is not debt from construction of Plant 2A?

MUNICIPAL LIGHT & POWER'S RESPONSE TO THE  
ATTORNEY GENERAL'S SECOND REQUEST FOR DISCOVERY (AG-MLP-2)

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

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[sAM].&[U-17-008]DiscoveryAG-2015-19-17

1 (c) Has the \$192 million in bonds been sold as of the date ML&P responds to  
2 this discovery request?

3 (d) If the response to subpart (c) is positive, state the date and provide a copy  
4 of the bond.

5 (e) If the response to subpart (c) is negative, refer to Order U-17-008(7) at 7,  
6 showing a hearing in this docket to begin November 27, 2017. Does ML&P contend that the  
7 \$192 million in bonds will be sold before November 27, 2017?

8 (f) Compare the Prefiled Direct Testimony of Eugene A. Ori at Q/A 17 that  
9 states in part: "The total cost of the project [Plant 2A] is expected to be \$314 million and final  
10 costs should come at or below that amount."

11 For the debt above \$192 million for Plant 2A, will ML&P also be selling bonds for  
12 that amount?

13 (g) If the response to subpart (f) is negative, explain why ML&P will not be  
14 selling bonds for that debt.

15 (h) If the response to subpart (f) is affirmative, state the amount, when the  
16 bonds will be sold, and produce a copy of the bond.

17 **Response:** (a) Yes.

18 (b) Yes..

19 (c) No.

20 (d) N/A

21 (e) To the best of ML&P's knowledge, yes.

22 (f) ML&P already issued bonds in 2014 for the balance.

23 MUNICIPAL LIGHT & POWER'S RESPONSE TO THE  
24 ATTORNEY GENERAL'S SECOND REQUEST FOR DISCOVERY (AG-MLP-2)  
25 Docket U-17-008/U-16-094  
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1 (g) N/A

2 (h) Please see documents produced as MLP21800 to MLP21971.

3 Person(s) Supplying Information: Mollie Morrison.  
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25 MUNICIPAL LIGHT & POWER'S RESPONSE TO THE  
26 ATTORNEY GENERAL'S SECOND REQUEST FOR DISCOVERY (AG-MLP-2)

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