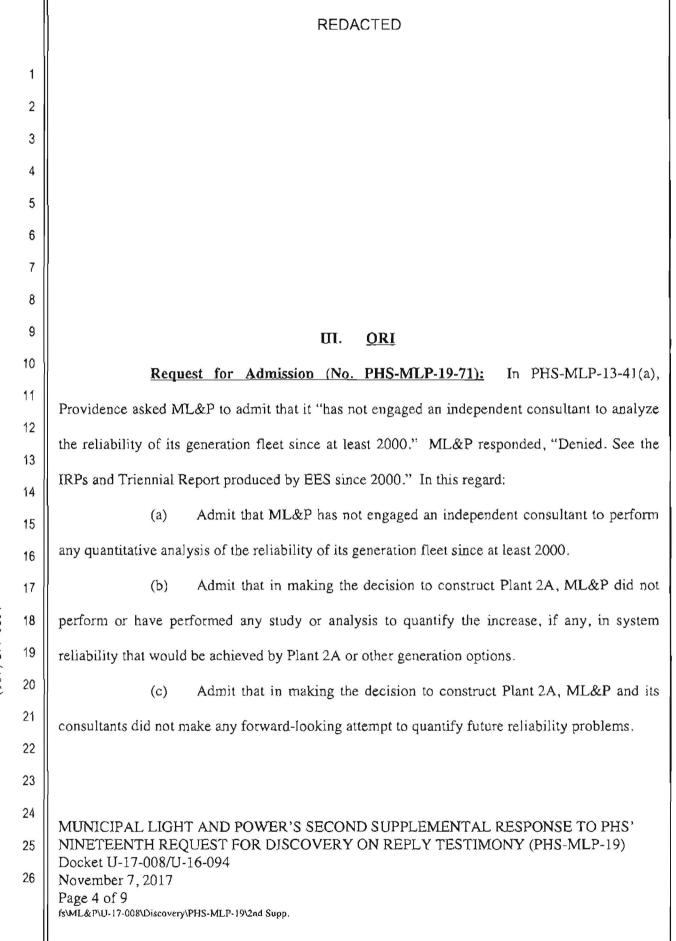
1	STATE OF ALASKA		
2			
	THE REGULATORY COMMISSION OF ALASKA		
3 4	Before Commissioners: Stephen McAlpine, Chairman Rebecca L. Pauli Robert M. Pickett		
5	Norman Rokeberg Janis W. Wilson		
6	In the Matter of the Request Filed by the) MUNICIPALITY OF ANCHORAGE d/b/a)		
7	MUNICIPAL LIGHT & POWER DEPARTMENT for) U-16-094		
8	Approval to Establish Depreciation Rates)		
9)		
10	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 &)		
11	POWER DEPARTMENT		
12			
13	<u>MUNICIPAL LIGHT AND POWER'S SECOND SUPPLEMENTAL RESPONSE TO</u> <u>PROVIDENCE HEALTH & SERVICES' NINETEENTH REQUEST FOR DISCOVERY</u>		
14	ON REPLY TESTIMONY (PHS-MLP-19)		
15	The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"),		
16	hereby provides its second supplemental response to Providence Health & Services' ("PHS"")		
17	nineteenth request for discovery on reply testimony. All responses to discovery are prepared by		
18	ML&P in consultation with counsel. Witnesses at hearing will be available for		
19	cross-examination on their testimony. Documents produced in response to these requests will		
20	also be stored in an electronic document management sharefile site accessible with login		
21	credentials that have been or will be provided as requested to the counsel, analysts, and		
22 23	consultants for PHS, AG, ANTHC, ENSTAR, FEA, and JLP.		
	PRELIMINARY STATEMENT		
24 25	Discovery in this docket is not complete. As discovery proceeds, facts,		
26	Date: 12-1-17 Exh # H-49 Begulatory Commission of Alasha		
~~	November 8, 2017Regulatory Commission of AlaskaNovember 8, 2017 $\mathcal{U} - 16-094$ Page 1 of 9Northern Lights Realtime & Reporting, Inc.		
ĺ	fs/MLP/U-17-008\Discovery\PHS-MLP-19\2nd Supp. (907) 337-2221		

KEMPPEL, HUFFMAN AND ELLIS a professional corporation 255 E. FIREWEED LANE, SUITE 200 ANCHORAGE, ALASKA 99503-2025 (907) 277-1604

I



	1 2 3 4 5 6 7	 (d) Admit that in making the decision to construct Plant 2A, ML&P did not perform or have performed any analysis of the economic cost to the ML&P's customers or the Anchorage economy of ML&P outages of electric service to customers. If your response to any subpart of this request for admission 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, including each such study or analysis.
	8 9 10 11 12	Response: (a) Admitted. (b) Admitted. (c) Admitted. (d) ML&P admits that it did not undertake a formal analysis to quantify "the
J.I.S	13 14 15	economic cost to the ML&P's customers or the Anchorage economy of ML&P outages of electric service to customers." <u>Person(s) Supplying Information</u> : Eugene Ori, Anna Henderson.
Law OFFICES OF KEMPPEL, HUFFMAN AND ELL A PROFESSIONAL CORPORATION 255 E. FIREWEED LANE, SUITE 200 ANCHORAGE, ALASKA 99503-2025 (907) 277-1604	16 17 18 19 20 21 22	REDACTED
K	23 24 25 26	MUNICIPAL LIGHT AND POWER'S SECOND SUPPLEMENTAL RESPONSE TO PHS' NINETEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-19) Docket U-17-008/U-16-094 November 7, 2017 Page 5 of 9 fsYML&P/U-17-008/Discovery/PHS-MLP-19/2nd Supp.