

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)
Approval to Establish Depreciation Rates)

U-16-094

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

U-17-008

**MUNICIPAL LIGHT AND POWER'S SECOND SUPPLEMENTAL 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 second supplemental 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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Date: 12-1-17 Exh # H-49
Regulatory Commission of Alaska
U-16-094 By: APS U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

REDACTED

III. ORI

Request for Admission (No. PHS-MLP-19-71): In PHS-MLP-13-41(a), Providence asked ML&P to admit that it “has not engaged an independent consultant to analyze the reliability of its generation fleet since at least 2000.” ML&P responded, “Denied. See the IRPs and Triennial Report produced by EES since 2000.” In this regard:

(a) Admit that ML&P has not engaged an independent consultant to perform any quantitative analysis of the reliability of its generation fleet since at least 2000.

(b) Admit that in making the decision to construct Plant 2A, ML&P did not perform or have performed any study or analysis to quantify the increase, if any, in system reliability that would be achieved by Plant 2A or other generation options.

(c) Admit that in making the decision to construct Plant 2A, ML&P and its consultants did not make any forward-looking attempt to quantify future reliability problems.

MUNICIPAL LIGHT AND POWER’S SECOND SUPPLEMENTAL RESPONSE TO PHS’
NINETEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-19)
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(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.

Response: (a) Admitted.

(b) Admitted.

(c) Admitted.

(d) ML&P admits that it did not undertake a formal analysis to quantify "the economic cost to the ML&P's customers or the Anchorage economy of ML&P outages of electric service to customers."

Person(s) Supplying Information: Eugene Ori, Anna Henderson.

REDACTED

