

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-16-064
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 SECOND SUPPLEMENTAL RESPONSE TO
PROVIDENCE HEALTH & SERVICES' THIRD REQUEST FOR DISCOVERY
(PHS-MLP-3)

The Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P"), hereby provides its second supplemental response to Providence Health & Services' ("PHS") third 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 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: 12/12/17 Exh # H-137
Regulatory Commission of Alaska
U-16-094 By: BP U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

documents or information protected by the attorney-client privilege or the work product privilege. Nothing contained in these responses is intended as, or shall in any way be deemed, a waiver of any such privilege or protection, or any other applicable privilege or doctrine.

7. ML&P objects to the instructions contained in PHS's Third Request for Discovery to the extent they conflict with, are inconsistent with, or exceed the requirements of discovery under the Regulatory Commission of Alaska's ("RCA" or "Commission") rules.

8. ML&P objects to the requests for identification of person Supplying Information to the requests. All responses are provided by ML&P in consultation with counsel. In accord with Commission regulations, ML&P will identify the individuals who supplied information for a particular response where appropriate.

DISCOVERY RESPONSES

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Request for Production (No. PHS-MLP-3-17): Produce ML&P's Puffin dispatch model and the excel scenario model developed by FFS as electronic files (as defined in instructions above).

Response: See documents produced as MLP19522 to MLP19640. Note that the folder labeled "MLP19640 Puffin Program Unnumbered Electronic Files" contains 113 electronic program files that have not been numbered.

Person(s) Supplying Information: Ken Langford.

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MUNICIPAL LIGHT & POWER'S SECOND SUPPLEMENTAL RESPONSE TO
PHS' THIRD REQUEST FOR DISCOVERY (PHS-MLP-3)

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