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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 INITIAL RESPONSE TO  
PROVIDENCE HEALTH & SERVICES' SEVENTEENTH REQUEST FOR DISCOVERY  
ON REPLY TESTIMONY (PHS-MLP-17)**

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

October 26, 2017

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Date: 12-1-17 Exh # H-51  
Regulatory Commission of Alaska  
U-16-094 By: APS U-17-008  
Northern Lights Realtime & Reporting, Inc.  
(907) 337-2221

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**Interrogatory (No. PHS-MLP-17-57):** At page 102, line 16, to page 103, line 12, of his reply testimony, Mr. Reed attempts to forecast future margins from economy energy sales attributable to Plant 2A. His analysis compares one quarter (Q2 2017) of sales with Plant 2A to the immediately preceding four quarters (Q2 2016 through Q1 2017). In this regard:

(a) Explain how Mr. Reed selected the quarters used as the basis for his analysis.

1 (b) Describe any quantitative analysis (such as, but not limited to, analysis of  
2 the statistical significance of his conclusions or the degree to which the data he relied on was  
3 representative of larger trends) performed by Mr. Reed or anyone else with respect to the five-  
4 quarter data set used as the basis for this analysis, or indicate that none was performed.

5 **Response:** (a) Q2 2017 was selected because it was the first quarter in  
6 which ML&P began dispatching Plant 2A in the manner it is expected to be used going forward.  
7 Q2 2016 through Q1 2017 were selected because they represent the most recent full year of  
8 operations prior to Q2 2017.

9  
10 (b) Mr. Reed reviewed several years of historical data for off-system sales to  
11 confirm that quantities and margins from off-system sales for the quarters selected were  
12 generally consistent with those of previous quarters. While quantities of off-system sales and  
13 profitability vary from quarter to quarter, there was no indication that the data selected were  
14 invalid or that there were significant trends that needed to be corrected for.

15 **Person(s) Supplying Information:** John Reed.

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25 MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS' SEVENTEENTH  
26 REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-17)

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

October 26, 2017

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