

1 STATE OF ALASKA

2 THE REGULATORY COMMISSION OF ALASKA

3 Before Commissioners:

Stephen McAlpine, Chairman
Rebecca L. Pauli
Robert M. Pickett
Norman Rokeberg
Janis W. Wilson

4 In the Matter of the Request Filed by the)
5 MUNICIPALITY OF ANCHORAGE d/b/a)
6 MUNICIPAL LIGHT & POWER DEPARTMENT for)
7 Approval to Establish Depreciation Rates)
8 _____)

U-16-094

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

U-17-008

14 MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO
15 PROVIDENCE HEALTH & SERVICES' EIGHTEENTH REQUEST FOR DISCOVERY
16 ON REPLY TESTIMONY (PHS-MLP-18)

17 The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"),
18 hereby provides its initial response to Providence Health & Services' ("PHS") eighteenth
19 request for discovery on reply testimony. All responses to discovery are prepared by ML&P in
20 consultation with counsel. Witnesses at hearing will be available for cross-examination on their
21 testimony. Documents produced in response to these requests will also be stored in an electronic
22 document management sharefile site accessible with login credentials that have been or will be
23 provided as requested to the counsel, analysts, and consultants for PHS, AG, ANTHC, ENSTAR,
24 FEA, and JLP.

25 PRELIMINARY STATEMENT

26 Discovery in this docket is not complete. As discovery proceeds, facts,

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Date: 12-5-17 Exh # H-84
Regulatory Commission of Alaska
U-16-094 By: APS U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

Request for Admission (No. PHS-MLP-18-9): On page 3, lines 16-22, of his
reply testimony, Mr. Saleba states that:

The 2009 IRP included a detailed technical appendix that not only
provided annualized total cost and \$/MWh for each resource
considered, but also provided the assumptions related to heat rate,
fixed and variable O&M costs, capacity factor, capital costs and
integration costs for each resource evaluated. This data was then
summarized on an annualized basis for each resource with tables
showing annual MWH, annual capital costs, annual fixed O&M
costs, annual variable O&M costs, annual fuel costs, annual
non-carbon environmental adders, and annual carbon adders for
the period 2012 through 2035.

In this regard:

(a) Admit that to the best of their knowledge, ML&P and its consultants
deleted all copies of the annual production cost data for *each* ML&P generating unit included in
the production cost modeling results summarized in the annualized total system cost information
for each thermal generating resource scenario (Appendix E, Tables E-14 through E-22 of the
2009 IRP).

(b) Admit that to the best of their knowledge, ML&P and its consultants
deleted all copies of the annual generation data for *each* ML&P generating unit included in the
production cost modeling results summarized in the annualized total system cost information for
each thermal generating resource scenario (Appendix E, Tables E-14 through E-22 of the 2009
IRP).

(c) Admit that to the best of their knowledge, ML&P and its consultants
deleted all copies of the annual heat rate performance data for *each* ML&P generating unit
included in the production cost modeling results summarized in the annualized total system cost

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1 information for each thermal generating resource scenario (Appendix E, Tables E-14 through E-
2 22 of the 2009 IRP).

3 (d) Admit that in the absence of the cost data summarized in the annualized
4 total cost for each resource, the Commission cannot verify EES's annualized total costs.

5 (e) Admit that the \$/MWh data summarized in the annualized \$/MWh for
6 each resource was deleted by EES.

7 (f) Admit that in the absence of the \$/MWh data summarized in the
8 annualized \$/MWh for each resource, the Commission cannot verify EES's annualized \$/MWh
9 figures.

10 (g) Admit that the MWh data summarized in the annualized MWh for each
11 resource was deleted by EES.

12 (h) Admit that in the absence of the MWh data summarized in the annualized
13 MWh for each resource, the Commission cannot verify EES's annualized MWh figures.

14 (i) Admit that the capital cost data summarized in the annualized capital costs
15 for each resource was deleted by EES.

16 (j) Admit that in the absence of the capital cost data summarized in the
17 annualized capital costs for each resource, the Commission cannot verify EES's annualized
18 capital cost figures.

19 (k) Admit that the fixed O&M cost data summarized in the annualized fixed
20 O&M costs for each resource was deleted by EES.

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1 (l) Admit that in the absence of the fixed O&M cost data summarized in the
2 annualized fixed O&M costs for each resource, the Commission cannot verify EES's annualized
3 fixed O&M cost figures.

4 (m) Admit that the variable O&M cost data summarized in the annualized
5 variable O&M costs for each resource was deleted by EES.

6 (n) Admit that in the absence of the variable O&M cost data summarized in
7 the annualized variable O&M costs for each resource, the Commission cannot verify EES's
8 annualized variable O&M cost figures.

9 (o) Admit that the fuel cost data summarized in the annualized fuel costs for
10 each resource was deleted by EES.

11 (p) Admit that in the absence of the fuel cost data summarized in the
12 annualized fuel costs for each resource, the Commission cannot verify EES's annualized fuel
13 cost figures.

14 If your response to any subpart of this request for admission is anything other than
15 an unqualified admission, state what you believe the truth of the matter to be and the basis for
16 your belief, and identify any documents supporting your belief.

17 **Response:** (a) ML&P admits that if the referenced data, information, or
18 calculations existed at one time in the form stated or implied and was used as source data for the
19 2009 IRP, it has not been located.

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1 (b) ML&P admits that if the referenced data, information, or calculations
2 existed at one time in the form stated or implied and was used as source data for the 2009 IRP, it
3 has not been located.

4 (c) ML&P admits that if the referenced data, information, or calculations
5 existed at one time in the form stated and was used as source data for the 2009 IRP, it has not
6 been located.

7 (d) Denied. The cost components of the total annual costs are provided in the
8 referenced tables. ML&P admits, however, that to the extent that detailed source data or
9 calculations for the modeled results of the 2009 IRP are not available, the Commission can
10 conclude that ML&P's decision to build Plant 2A was within the range of reasonable actions of
11 utility managers based on the totality of evidence in this proceeding, without necessarily
12 "verifying" results through examination of each and every item of source data or calculation used
13 in the 2009 IRP.

14 (e) Denied. The \$/MWH can be calculated as the total cost divided by MWH
15 provided in the referenced tables. ML&P admits, however, that to the extent that detailed source
16 data or calculations for the modeled results of the 2009 IRP are not available, the Commission
17 can conclude that ML&P's decision to build Plant 2A was within the range of reasonable actions
18 of utility managers based on the totality of evidence in this proceeding, without necessarily
19 "verifying" results through examination of each and every item of source data or calculation used
20 in the 2009 IRP.

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(f) Denied. The \$/MWH can be calculated as the total cost divided by MWH provided in the referenced tables. ML&P admits, however, that to the extent that detailed source data or calculations for the modeled results of the 2009 IRP are not available, the Commission can conclude that ML&P's decision to build Plant 2A was within the range of reasonable actions of utility managers based on the totality of evidence in this proceeding, without necessarily "verifying" results through examination of each and every item of source data or calculation used in the 2009 IRP.

(g) ML&P admits that to the extent that detailed source data or calculations for the modeled results of the 2009 IRP are not available, the Commission can conclude that ML&P's decision to build Plant 2A was within the range of reasonable actions of utility managers based on the totality of evidence in this proceeding, without necessarily "verifying" results through examination of each and every item of source data or calculation used in the 2009 IRP.

(h) ML&P admits that to the extent that detailed source data or calculations for the modeled results of the 2009 IRP are not available, the Commission can conclude that ML&P's decision to build Plant 2A was within the range of reasonable actions of utility managers based on the totality of evidence in this proceeding, without necessarily "verifying" results through examination of each and every item of source data or calculation used in the 2009 IRP.

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1 (i) ML&P admits that if the referenced data, information, or calculations
2 existed at one time in the form stated or implied and was used as source data for the 2009 IRP, it
3 has not been located.

4 (j) Denied. The total project capital costs for each scenario is provided in
5 Tables E-1 to E-8. The assumptions regarding variable O&M and Fixed O&M costs are
6 provided in Table E-12. ML&P admits, however, that to the extent that detailed source data or
7 calculations for the modeled results of the 2009 IRP are not available, the Commission can
8 conclude that ML&P's decision to build Plant 2A was within the range of reasonable actions of
9 utility managers based on the totality of evidence in this proceeding, without necessarily
10 "verifying" results through examination of each and every item of source data or calculation used
11 in the 2009 IRP.

12 (k) ML&P admits that if the referenced data, information, or calculations
13 existed at one time in the form stated or implied and was used as source data for the 2009 IRP, it
14 has not been located.

15 (l) Denied. The assumptions regarding fixed O&M costs are provided in
16 Table E-12. ML&P admits, however, that to the extent that detailed source data or calculations
17 for the modeled results of the 2009 IRP are not available, the Commission can conclude that
18 ML&P's decision to build Plant 2A was within the range of reasonable actions of utility
19 managers based on the totality of evidence in this proceeding, without necessarily "verifying"
20 results through examination of each and every item of source data or calculation used in the 2009
21 IRP.

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1 (m) ML&P admits that if the referenced data, information, or calculations
2 existed at one time in the form stated or implied and was used as source data for the 2009 IRP, it
3 has not been located.

4 (n) Denied. The assumptions regarding variable O&M costs are provided in
5 table E-12. ML&P admits, however, that to the extent that detailed source data or calculations
6 for the modeled results of the 2009 IRP are not available, the Commission can conclude that
7 ML&P's decision to build Plant 2A was within the range of reasonable actions of utility
8 managers based on the totality of evidence in this proceeding, without necessarily "verifying"
9 results through examination of each and every item of source data or calculation used in the 2009
10 IRP.
11

12 (o) ML&P admits that if the referenced data, information, or calculations
13 existed at one time in the form stated or implied and was used as source data for the 2009 IRP, it
14 has not been located.

15 (p) Denied. The 2009 study provides fuel cost, MWH generated from
16 thermal units, and heat rate. In addition, the report (on page 60 of 260 exhibit 15) provides the
17 methodology used to calculate the blended natural gas price forecast. ML&P admits, however,
18 that to the extent that detailed source data or calculations for the modeled results of the 2009 IRP
19 are not available, the Commission can conclude that ML&P's decision to build Plant 2A was
20 within the range of reasonable actions of utility managers based on the totality of evidence in this
21 proceeding, without necessarily "verifying" results through examination of each and every item
22 of source data or calculation used in the 2009 IRP.
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Person(s) Supplying Information: Gary Saleba.

Request for Production (No. PHS-MLP-18-10): Please produce all documents identified in response to the preceding request for admission.

Response: Not applicable.

Person(s) Supplying Information: Gary Saleba.

REDACTED

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