

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,

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Date: 12-5-17 Exh # H-87
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-17-15): At pages 3-4 of his reply testimony,

Mr. Saleba describes the availability or unavailability of certain data with respect to the 2009
IRP and 2012 Generation Study. In this regard:

(a) State all input data assumptions to the Puffin Model used for Scenarios 4
and 7 and the Base Case of the 2009 IRP.

(b) State all input data assumptions (e.g., energy and demand, generating unit
outage rates and heat rate information, unit fuel costs, variable O&M costs, etc.) for each model
used for the 2012 Generation Study analyses of Plan 1 and Plan 2.

(c) Explain why the forecasted annual generation level of SPP was 423,000
MWh for each year of the analyses of Scenarios 4 and 7 and the Base Case of the 2009 IRP.

(d) State the system average heat rate for thermal generation for each year for
Table E-16, Table E-20 and Table E-21 of the 2009 IRP.

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1 **Response:** (a) EES does not know the input assumptions to the Puffin
2 model.

3 (b) The energy and demand can be found in the 2012 load forecast document.
4 Generating unit outage rates, heat rate information, unit fuel cost and variable O&M is not
5 available.

6 (c) The assumption was provided by ML&P based on the knowledge of SPP
7 at the time.

8 (d) Not available. Table 14 provides the average annual heat rate for each
9 scenario.
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11 **Person(s) Supplying Information:** Gary Saleba.

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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)

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