

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

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

U-16-094

9 In the Matter of the Tariff Revision Designated as)
TA357-121 Filed by the MUNICIPALITY OF)
10 ANCHORAGE d/b/a MUNICIPAL LIGHT &)
POWER DEPARTMENT)

U-17-008

12 PROVIDENCE HEALTH AND SERVICES' FIRST SUPPLEMENTAL RESPONSE TO
13 MUNICIPAL LIGHT & POWER'S SECOND SET OF DISCOVERY REQUESTS
14 (MLP-PHS-2)

15 Providence Health & Services (Providence) supplements its responses to Municipal Light
16 & Power's (ML&P) Second Set of Discovery Requests as follows. Providence will supplement
17 this response consistent with conversations between counsel for Providence and ML&P.

18 GENERAL OBJECTIONS

19 1. Providence objects to the production or creation of documents,
20 calculations, and analyses that do not exist. A document is not within a party's "possession,
21 custody, or control" if it does not exist.

22 2. Providence objects to each and every discovery request insofar as it is
23 vague, ambiguous, overly broad, unduly burdensome, or uses terms that are subject to multiple
24 interpretations but are not properly defined or explained for purposes of these discovery requests.

Providence First Supplemental Response to MLP-PHS-2
August 18, 2017

Docket U-17-008/U-16-094
Page 1 of 23

4831-3600-1101v.3 0027208-000088

Date: 12-18-17 Exh # H-180
Regulatory Commission of Alaska
U-16-094 & U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

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REDACTED

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12 **MLP-PHS-2-115:** If not previously provided, please produce all work papers
13 for Exhibit RB-5 and Figures 1 and 2.

14 **Response:** Figure 1 is a bar graph attached as Ex. RB-5 to Mr. Beam's
15 prefiled testimony in Docket U-13-184. The bar graph is derived from a series of arithmetic
16 calculations based on the rate increases expected at that time, with Providence total electricity
17 bill for 2012 as a starting point. Produced herewith as PHS000729 is an earlier file related to
18 Figure 1. Providence is unable to locate the final Excel file. Figure 2 is based on Providence's
19 actual electricity bills from 2012 through May 2017. The spreadsheets that contain the data used
20 in generating Figure 2 are produced herewith confidentially as PHS000730 to PHS000731.

21 **Person(s) Supplying Information:** Richard Beam
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