

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

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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

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

U-17-008

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13 **MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO**
PROVIDENCE HEALTH & SERVICES' NINETEENTH REQUEST FOR DISCOVERY
14 **ON REPLY TESTIMONY (PHS-MLP-19)**

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

23 **PRELIMINARY STATEMENT**

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

26
Date: 11-28-17 **Exh #** H-20
Regulatory Commission of Alaska
U-16-094 **By:** APS U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

November 3, 2017

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REDACTED

Request for Admission (No. PHS-MLP-19-56): At page 103, lines 3-4,

Mr. Reed suggests that a purported increase in economy energy sales in Q2 2017 “can be attributable to ML&P having more efficient generation available for sale.” In this regard:

(a) Admit that ML&P and its consultants have performed no analysis to demonstrate that there is a causal relationship between Plant 2A and increased economy energy sales, rather than merely a correlation.

(b) Admit that ML&P and its consultants have performed no analysis to demonstrate even a correlation between Plant 2A and increased economy energy sales, with the exception of Mr. Reed’s analysis of the five quarters from the Q2 2016 through Q2 2017.

(c) Admit that ML&P could have seen a comparable increase in economy energy sales without Plant 2A.

(d) Admit that ML&P and its consultants have no evidence or analysis to contradict the possibility that a comparable increase in economy energy sales would have occurred without Plant 2A.

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

Response: (a) Denied. See response to PHS-MLP-18-5.

MUNICIPAL LIGHT AND POWER’S INITIAL RESPONSE TO PHS’ NINETEENTH
REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-19)

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

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(b) Denied. See response to PHS-MLP-18-5.

(c) Admitted.

(d) ML&P objects to this request for admission because it is overly broad and unclear. Plant 2A was operating in Q2 2017 and ML&P's off-system sales did increase. In order to contradict the possibility, however remote, that the increase in sales could be attributable to some other factor, ML&P and its consultants would need to analyze every possible scenario. Moreover, while subpart (c) asks whether the sales increase *could* be attributable to some factor other than Plant 2A, subpart (d) asks whether the sales increase *would* be attributable to some other factor other than Plant 2A but fails to specify the conditions under which this hypothesis would be tested.

Person(s) Supplying Information: John Reed.

REDACTED

