

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: 12/15/17 Exh # 173  
Regulatory Commission of Alaska  
u-16-094 By: BP u-17-008  
Northern Lights Realtime & Reporting, Inc.  
(907) 337-2221

REDACTED

Request for Admission (No. PHS-MLP-17-23): In response to request for admission PHS-MLP-13-50, Dr. Villadsen could neither admit nor deny that “the Commission has never approved a return on equity that was calculated using the Hamada method.” In this regard: Ad

(a) Admit that Dr. Villadsen is not aware of any case in which the Commission has approved a return on equity that was calculated using the Hamada method.

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

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1 (b) Admit that ML&P is not aware of any case in which the Commission has  
2 approved a return on equity that was calculated using the Hamada method.

3 If your response to any subpart of this request for admission is anything other than  
4 an unqualified admission, state what you believe the truth of the matter to be and the basis for  
5 your belief, and identify each case and order in which the Commission approved a return on  
6 equity that was calculated using the Hamada method.

7 **Response:** (a) Admitted.

8 (b) Admitted.

9 **Person(s) Supplying Information:** Bente Villadsen and Anna Henderson.

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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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