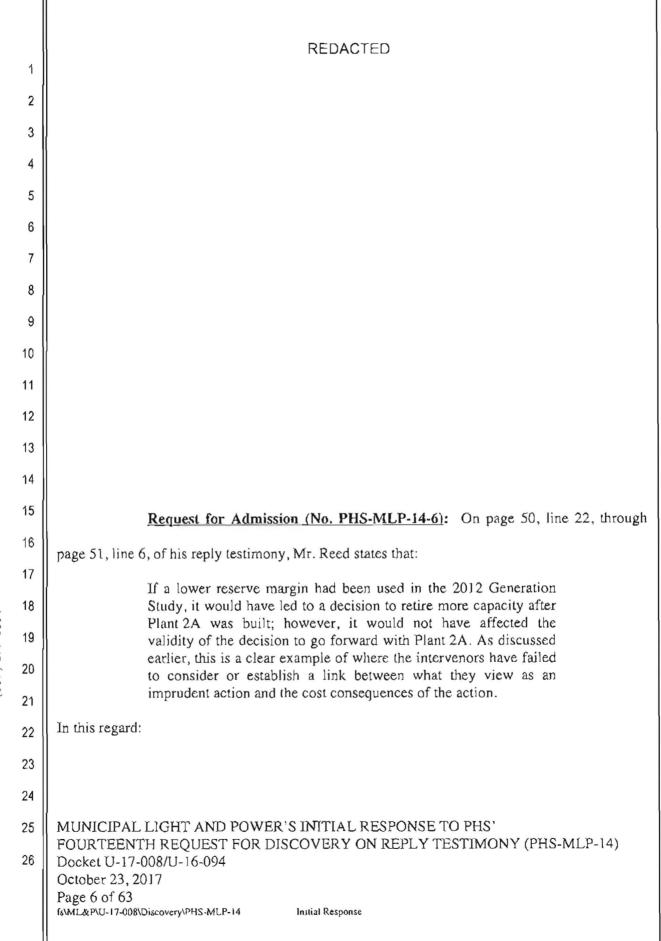
1	STATE OF ALASKA		
2			
3	THE REGULATORY COMMISSION OF ALASKA		
4	Before Commissioners: Stephen McAlpine, Chairman Rebecca L. Pauli		
5	Robert M. Pickett Norman Rokeberg Janís W. Wilson		
6	In the Matter of the Request Filed by the) MUNICIPALITY OF ANCHORAGE d/b/a)		
7	MUNICIPAL LIGHT & POWER DEPARTMENT for) U-16-094 Approval to Establish Depreciation Rates)		
8			
9	In the Matter of the Tariff Revisions, Designated as)		
10	TA357-121, filed by the MUNICIPALITY OF)U-17-008ANCHORAGE d/b/a MUNICIPAL LIGHT &)		
11	POWER DEPARTMENT)		
12	MUNICIPAL LIGHT AND POWER'S RESPONSE TO		
13	PROVIDENCE HEALTH & SERVICES' FOURTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-14)		
14	The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"),		
15			
16	hereby provides its initial response to Providence Health & Services' ("PHS"") fourteenth		
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 24	PRELIMINARY STATEMENT		
	Discovery in this docket is not complete. As discovery proceeds, facts,		
25 26	Date: 12-5-17 Exh # 77		
20	October 23, 2017 Page 1 of 63 IsVMLP/U-17-008\Discovery\PHS-MLP-14Reply\InitialResponse (907) 337-2221		

LAW DFFICES OF LAW DFFICES OF A PROFESSIONAL CORPORATION 255 E. FIREWEED LANE, SUITE 200 ANCHORAGE, ALASKA 99503-2025 (907) 277-1504



KEMPPEL, HUFFMAN, AND ELLIS a professional corporation 255 e. Fireweed lane, suite 200 anchorge, alaska 99503-2025

Admit that the 2012 Generation Study did not evaluate the amount of 1 (a) 2 ML&P's existing generating facilities that should be retired. If your response is anything other 3 than an unqualified admission, state what you believe the truth of the matter to be and the basis 4 for your belief, and identify any documents supporting your belief. 5 (b)Admit that the 2012 Generation Study did not evaluate any alternatives 6 regarding the amount of ML&P's existing generating facilities that should be retired. If your 7 response is anything other than an unqualified admission, state what you believe the truth of the 8 matter to be and the basis for your belief, and identify any documents supporting your belief. 9

(c) Admit that the 2012 Generation Study did not evaluate the effect that
retiring fewer of ML&P's existing generating facilities would have on the perceived need for
Plant 2A. If your response 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.

(d) Admit that the 2012 Generation Study did not evaluate the effect of retiring fewer of ML&P's existing generating facilities on the need for new generation and in what amount. If your response 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.

(e) Admit that the 2012 Generation Study did not evaluate any alternatives regarding reserve margins. If your response is anything other than an unqualified admission,

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MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS' FOURTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-14) Docket U-17-008/U-16-094 October 23, 2017 Page 7 of 63 fs/ML&P/U-17-008/Discovery/PHS-MLP-14 Joutial Response

KEMPFFL, HUFFMAN AND ELLIS A PROFESSIONAL CORPORATION 255 E. FIREWEED LANE, SUITE 200 ANCHORAGE, ALASKA 99503-2028 (907) 277-1604 state what you believe the truth of the matter to be and the basis for your belief, and identify any
documents supporting your belief.

(f) Admit that the 2012 Generation Study did not evaluate the effect of a
lower reserve margin on the need for Plant 2A. If your response 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.

8 (g) Admit that the 2012 Generation Study did not evaluate the effect of a
9 lower reserve margin on the need for new generation and in what amount. If your response is
10 anything other than an unqualified admission, state what you believe the truth of the matter to be
11 and the basis for your belief, and identify any documents supporting your belief.

(h) Admit that the 2012 Generation Study did not evaluate the appropriate
timing for adding Plant 2A. If your response 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.

(i) Admit that Mr. Reed does not know when or how ML&P chose N-2 as its target reserve margin for planning purposes. If your response 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) Admitted.
- (b) Admitted.
- (c) Admitted.

MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS'
 FOURTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-14)
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 Initial Response

KEMPPEL, HUFFMAN AND ELLIS A professional corporation 255 E. Fireweed Lank, Suite 200 anchorage, alaska 9503-2025 7

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	1	(d) Admitted.
	2	(e) Admitted.
	3	(f) Admitted.
	4	(g) Admitted.
	5	(h) Admitted.
	6	(i) Mr. Reed is aware that the N-2 reserve margin has been in use since
	7	before Mark Johnston became General Manager at ML&P, as indicated in Mr. Johnston's Reply
	8	Testimony at page 90. Mr. Reed is also aware that the N-2 reserve margin is discussed in the
	9	2009 IRP. Mr. Reed has not attempted to determine when ML&P's reserve margin was first
	11	implemented.
	12	Person(s) Supplying Information: Gary Saleba, John Reed.
	13	
	14	REDACTED
	15	
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	25	MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS'
	26	FOURTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-14) Docket U-17-008/U-16-094
		October 23, 2017 Page 9 of 63
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