

REDACTED

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Request for Admission (No. PHS-MLP-14-6): On page 50, line 22, through

page 51, line 6, of his reply testimony, Mr. Reed states that:

If a lower reserve margin had been used in the 2012 Generation Study, it would have led to a decision to retire more capacity after Plant 2A was built; however, it would not have affected the validity of the decision to go forward with Plant 2A. As discussed earlier, this is a clear example of where the intervenors have failed to consider or establish a link between what they view as an imprudent action and the cost consequences of the action.

In this regard:

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 6 of 63

fs\ML&PU-17-008\Discovery\PHS-MLP-14

Initial Response

LAW OFFICES OF
KEMPEL, HUFFMAN AND ELLIS
A PROFESSIONAL CORPORATION
255 E. FIREWEED LANE, SUITE 200
ANCHORAGE, ALASKA 99503-2025
(907) 277-1604

1 (a) Admit that the 2012 Generation Study did not evaluate the amount of
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
10 retiring fewer of ML&P's existing generating facilities would have on the perceived need for
11 Plant 2A. If your response is anything other than an unqualified admission, state what you
12 believe the truth of the matter to be and the basis for your belief, and identify any documents
13 supporting your belief.

14 (d) Admit that the 2012 Generation Study did not evaluate the effect of
15 retiring fewer of ML&P's existing generating facilities on the need for new generation and in
16 what amount. If your response is anything other than an unqualified admission, state what you
17 believe the truth of the matter to be and the basis for your belief, and identify any documents
18 supporting your belief.

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

1 state what you believe the truth of the matter to be and the basis for your belief, and identify any
2 documents supporting your belief.

3 (f) Admit that the 2012 Generation Study did not evaluate the effect of a
4 lower reserve margin on the need for Plant 2A. If your response is anything other than an
5 unqualified admission, state what you believe the truth of the matter to be and the basis for your
6 belief, and identify any documents supporting your belief.

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

11 (h) Admit that the 2012 Generation Study did not evaluate the appropriate
12 timing for adding Plant 2A. If your response is anything other than an unqualified admission,
13 state what you believe the truth of the matter to be and the basis for your belief, and identify any
14 documents supporting your belief.

15 (i) Admit that Mr. Reed does not know when or how ML&P chose N-2 as its
16 target reserve margin for planning purposes. If your response is anything other than an
17 unqualified admission, state what you believe the truth of the matter to be and the basis for your
18 belief, and identify any documents supporting your belief.

19 Response: (a) Admitted.

20 (b) Admitted.

21 (c) Admitted.

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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 8 of 63

fs\ML&PU-17-008\Discovery\PHS-MLP-14

Initial Response

- 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
- 10 implemented.
- 11

12 **Person(s) Supplying Information:** Gary Saleba, John Reed.

13 REDACTED

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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

