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1 STATE OF ALASKA

2 THE REGULATORY COMMISSION OF ALASKA

3 Before Commissioners: Stephen McAlpine, Chairman
4 Rebecca L. Pauli
5 Robert M. Pickett
6 Norman Rokeberg
7 Janis W. Wilson

8 In the Matter of the Request Filed by the)
9 MUNICIPALITY OF ANCHORAGE d/b/a)
10 MUNICIPAL LIGHT & POWER DEPARTMENT for) U-16-094
11 Approval to Establish Depreciation Rates)
12)

13 In the Matter of the Tariff Revisions, Designated as)
14 TA357-121, filed by the MUNICIPALITY OF) U-17-008
15 ANCHORAGE d/b/a MUNICIPAL LIGHT &)
16 POWER DEPARTMENT)
17)

18 **MUNICIPAL LIGHT AND POWER'S SECOND SUPPLEMENTAL RESPONSE TO**
19 **PROVIDENCE HEALTH & SERVICES' TWELFTH REQUEST FOR DISCOVERY**
20 **ON REPLY TESTIMONY (PHS-MLP-12)**

21 The Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P"),
22 hereby provides its second supplemental response to Providence Health & Services' ("PHS")
23 twelfth request for discovery on reply testimony. All responses to discovery are prepared by
24 ML&P in consultation with counsel. Witnesses at hearing will be available for
25 cross-examination on their testimony.

26 **PRELIMINARY STATEMENT**

Discovery in this docket is not complete. As discovery proceeds, facts,
information, evidence, documents, and other matters may be discovered which are not set forth
in these responses, but which may be responsive to these discovery requests. The following
responses are complete based on ML&P's current knowledge, information, and belief.

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ts\MLP\U-17-008\Discovery\PHS-MLP-12Reply\2nd Supplement

Date: 11/30/17 Exh # H-28
Regulatory Commission of Alaska
U-16-094 By: [Signature] U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

1 7. ML&P objects to the instructions contained in PHS's Twelfth Request for
2 Discovery on Reply Testimony to the extent they conflict with, are inconsistent with, or exceed
3 the requirements of discovery under the Regulatory Commission of Alaska's ("RCA" or
4 "Commission") rules.

5 8. ML&P objects to the requests for identification of person Supplying
6 Information to the requests. All responses are provided by ML&P in consultation with counsel.
7 In accord with Commission regulations, ML&P will identify the individuals who supplied
8 information for a particular response where appropriate.
9

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11 DISCOVERY RESPONSES ON REPLY TESTIMONY

12 ...

13 IV. EXISTING SYSTEM

14 Interrogatory (No. PHS-MLP-12-25): State the forced outage hours, net
15 capacity factor, net heat rate, net generation, and non-fuel O&M and capital expenditures for
16 Plant 2A for each month since it commenced commercial operations.

17 Initial Response: See the documents produced as MLP34131 to MLP34190
18 for forced outage hours, net capacity factor, net heat rate, and net generation. ML&P does not
19 track non-fuel O&M by unit. There have been no additional capital expenditures since Plant 2A
20 was placed in service.
21

22 Person(s) Supplying Information: Anna Henderson.
23

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25 MUNICIPAL LIGHT AND POWER'S SECOND SUPPLEMENTAL RESPONSE TO
26 PHS' TWELFTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-12)
Docket U-17-008/U-16-094

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1 **First Supplemental Response:** Plant 2A data was not tracked until February
 2 2017; see below for Plant 2A forced outage hours, net capacity factor, net heat rate and net
 3 generation for February through August of 2017.

Month	Plant MWh	Heat Rate	Capacity Factor	Forced Outage Hours		
				Unit 9	Unit 10	Unit 11
February	47306	8.40	61%	2.5	79.25	3.75
March	64276	7.68	75%	0	72.5	0
April	48064	7.55	58%	0	138	0
May	48808	7.96	57%	0	31	0
June	68029	7.64	82%	0	0	0
July	73075	7.50	85%	0	0	0
August	80181	7.39	94%	0	0	0

10 **Person(s) Supplying Information:** Eugene Ori.

12 **Second Supplemental Response:** See below for September 2017 data for
 13 Plant 2A forced outage hours, net capacity factor, net heat rate and net generation:

Month	Plant MWh	Heat Rate	Capacity Factor	Forced Outage Hours		
				Unit 9	Unit 10	Unit 11
September	21630	8.02	26%	0	0	0

17 **Person(s) Supplying Information:** Eugene Ori.

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