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STATE OF ALASKA

THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:		Stephen McAlpine, Chairman Rebecca L. Pauli
		Robert M. Pickett
		Norman Rokeberg
		0
		Janis W. Wilson
In the Matter of the Request Filed by the)	
MUNICIPALITY OF ANCHORAGE d/b/a)	
MUNICIPAL LIGHT & POWER DEPARTMENT for)	U-16-094
Approval to Establish Depreciation Rates)	
)	
In the Matter of the Tariff Revisions, Designated as)	
TA357-121, filed by the MUNICIPALITY OF	\ \ \	U-17-008
	,	0-17-008
ANCHORAGE d/b/a MUNICIPAL LIGHT &)	
POWER DEPARTMENT)	
)	

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

The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"), hereby provides its initial response to Providence Health & Services' ("PHS") fourteenth 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,

October 23, 2017 Page 1 of 63 fs\MLP\U-17-008\Discovery\PHS-MLP-14Reply\InitialResponse Regulatory Commission of Alaska U-16-094 By: XR Northern Lights Realtime & Reporting, Inc. (907) 337-2221

LAW OFFICES OF KEMPPEL, HUFFMAN AND ELLIS A FROFESSIONAL CORPORATION 2SS E. FIREWEED LANE, SUITE 200 ANCHORAGE, ALASKA 99503-2025 (907) 277-1604

REDACTED

Responsibility method, as described in the 1973 NARUC Manual, the following steps are taken:

- a. First, one classifies 100% of the capacity-related production cost as demand.
- b. Second, one takes 100% of the demand costs and allocates it based on a peak demand method (e.g., 12 CP).

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

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Initial Response

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: Admitted.

Person(s) Supplying Information: Gary Saleba.

REDACTED

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

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