

1 STATE OF ALASKA

2 THE REGULATORY COMMISSION OF ALASKA

3 Before Commissioners:

Stephen McAlpine, Chairman
Rebecca L. Pauli
Robert M. Pickett
Norman Rokeberg
Janis W. Wilson

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6 In the Matter of the Request Filed by the)
MUNICIPALITY OF ANCHORAGE d/b/a)
7 MUNICIPAL LIGHT & POWER DEPARTMENT for)
Approval to Establish Depreciation Rates)

U-16-094

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9 In the Matter of the Tariff Revisions, Designated as)
TA357-121, filed by the MUNICIPALITY OF)
10 ANCHORAGE d/b/a MUNICIPAL LIGHT &)
POWER DEPARTMENT)
11)

U-17-008

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

15 The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"),
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 PRELIMINARY STATEMENT

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25 Discovery in this docket is not complete. As discovery proceeds, facts,

26 October 23, 2017

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Date: 12-4-17 Exh # H-68
Regulatory Commission of Alaska
U-16-094 By: LR U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

REDACTED

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Request for Admission (No. PHS-MLP-14-84): Admit that Mr. Saleba's load factor method has never been used by the Alaska Commission to set rates. 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: Denied. Mr. Saleba's firm recently completed a negotiated rate settlement for Alaska Power Company where the COSA filed in the Application factor used the load factor methodology. See Matter U-16-078. Because this case was settled, there was not a Commission decision officially approving the COSA, however, the rates proposed were set using the results of the COSA as a basis. Rates were not proposed to be exactly equal to the COSA results as other rate design principles were used in developing proposed rates. However, the COSA was used to decide the level of rate increases proposed for the various rate groups and customer classes.

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

Person(s) Supplying Information: Gary Saleba.

REDACTED

