

STATE OF ALASKA

THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:

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

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

U-16-064

In the Matter of the Tariff Revision Designated as)
TA357-121 Filed by the MUNICIPALITY OF)
ANCHORAGE d/b/a MUNICIPAL LIGHT &)
POWER DEPARTMENT)

U-17-008

MUNICIPAL LIGHT & POWER'S RESPONSE TO
PROVIDENCE HEALTH & SERVICES' EIGHTH REQUEST FOR DISCOVERY
(PHS-MLP-8)

The Municipality of Anchorage d/b/a Municipal Light & Power ("ML&P"), hereby responds to the Providence Health & Services' ("PHS") eighth request for discovery. 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, information, evidence, documents, and other matters may be discovered which are not set forth

June 30, 2017

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PHS-MLP-8

Date: 11/30/17 Exh # A-31
Regulatory Commission of Alaska
U-16-094 By: (S) U-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

REDACTED

Request for Production (No. PHS-MLP-8-7): Produce all documents and communications evidencing any efforts by ML&P to evaluate potential for reduction of system peak demand through interruptible tariffs or demand-side management programs prior to initiating its plan to construct Plant 2A.

Response: ML&P objects to this request as overbroad and unduly burdensome. Without waiving the foregoing objections, ML&P does not believe that there are any documents responsive to this request.

Person(s) Supplying Information: Anna Henderson

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