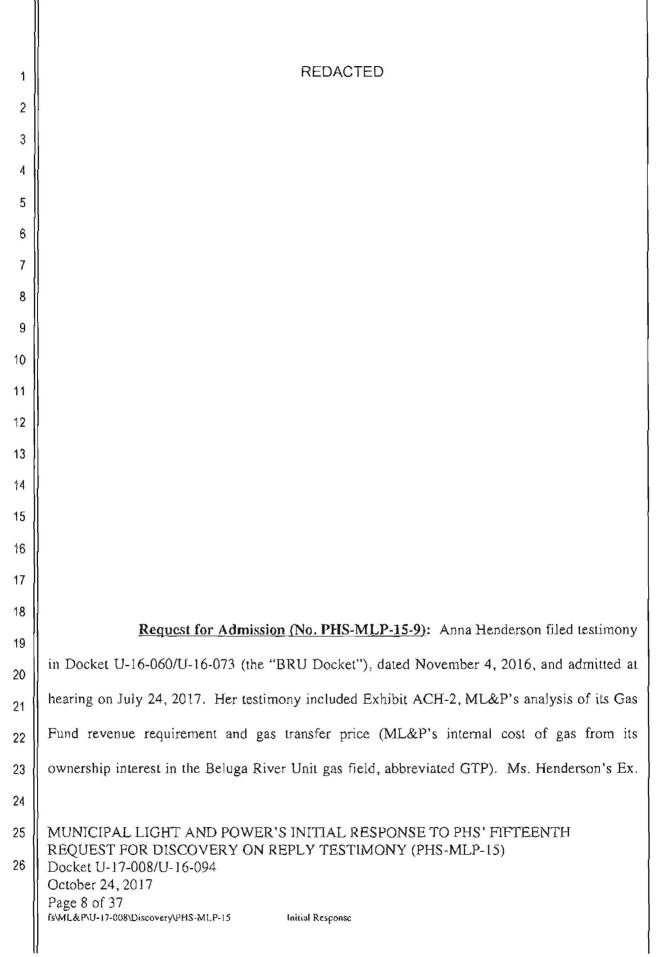
1	STATE OF ALASKA
2	THE REGULATORY COMMISSION OF ALASKA
3	
4	Before Commissioners: Stephen McAlpine, Chairman Rebecca L. Pauli
5	Robert M. Pickett Norman Rokeberg Janis W. Wilson
6	In the Matter of the Request Filed by the) MUNICIPALITY OF ANCHORAGE d/b/a)
7	MUNICIPAL LIGHT & POWER DEPARTMENT for) U-16-094
8	Approval to Establish Depreciation Rates)
9	In the Matter of the Tariff Revisions, Designated as)
10	TA357-121, filed by the MUNICIPALITY OF) U-17-008 ANCHORAGE d/b/a MUNICIPAL LIGHT &)
11	POWER DEPARTMENT
12	MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO
13	PROVIDENCE HEALTH & SERVICES' FIFTEENTH REQUEST FOR DISCOVERY
14	ON REPLY TESTIMONY (PHS-MLP-15)
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"") fifteenth request
17	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.
20	PRELIMINARY STATEMENT
21	Discovery in this docket is not complete. As discovery proceeds, facts,
22	information, evidence, documents, and other matters may be discovered which are not set forth
23	in these responses, but which may be responsive to these discovery requests. The following
24	responses are complete based on ML&P's current knowledge, information, and belief.
25	Date: <u>11-27-17</u> Exh # <u>H-23</u>
26	October 24, 2017 Page L of 37 fs\MLP\U-17-008\Discovery\PHS-MLP-15\UnitialResponse (907) 337-2221

KEMPPEL, HUPFMAN AND ELLIS a professional corporation 255 E. FIREWEED LANE, SUITE 200 ANCHORGE, ALASKA 99503-2025 ANCHORGE, ALASKA 99503-2025



KEMPPEL, Law offices of KEMPPEL, HUFFMAN AND ELLIS A professional corporation 255 E. FIREWEED LANE, SUITE 200 Anchorage, alaska 99503-2025 (907) 277-1604 ACH-2 from the BRU Docket includes forecasted GTP values under two scenarios: one in which ML&P defers some revenue from gas sales to third parties for future customer benefit (the "deferral scenario") and one in which all such gas sales revenue is returned to ratepayers with minimal delay (the "no-deferral scenario"). With respect to these forecasts:

(a) Admit that under both the deferral and no-deferral scenarios, Ex. ACH-2 from the BRU Docket projects no ML&P gas purchases from third parties in any year from 2020 through 2027.

9 (b) Admit that the gas volume projections in BRU Docket Ex. ACH-2 are 10 based on the NERA economic analysis of BRU acquisition, Ex. JJR-35 of Mr. Reed's reply 11 testimony in this docket.

(c) In the BRU Docket, in response to Providence's Request for Admission
No. PHS-MLP-52 (in Providence's third set of discovery requests), on February 21, 2017,
ML&P admitted that it "projects making no market purchases of gas before 2028." Admit that
ML&P and its consultants have no more up-to-date projection of the earliest year in which
ML&P will need to purchase gas from third parties after 2020.

If your response to any subpart of this request for admission 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.

<u>**Response</u>:** (a) Admitted.</u>

- (b) Admitted.
- (c) Admitted.

 MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS' FIFTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-15)
 Docket U-17-008/U-16-094

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Initial Response

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