

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)
8)

U-16-094

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10 In the Matter of the Tariff Revisions, Designated as)
TA357-121, filed by the MUNICIPALITY OF)
ANCHORAGE d/b/a MUNICIPAL LIGHT &)
11 POWER DEPARTMENT)
12)

U-17-008

13 MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO
14 PROVIDENCE HEALTH & SERVICES' FIFTEENTH REQUEST FOR DISCOVERY
15 ON REPLY TESTIMONY (PHS-MLP-15)

16 The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"),
17 hereby provides its initial response to Providence Health & Services' ("PHS") fifteenth request
18 for discovery on reply testimony. All responses to discovery are prepared by ML&P in
19 consultation with counsel. Witnesses at hearing will be available for cross-examination on their
20 testimony.

21 PRELIMINARY STATEMENT

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

26 October 24, 2017

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Date: 11-28-17 Exh # H-23
Regulatory Commission of Alaska
U-16-094 By: APS U-17-008
Northern Lights Realtime & Reporting, Inc.
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Request for Admission (No. PHS-MLP-15-9): Anna Henderson filed testimony

in Docket U-16-060/U-16-073 (the "BRU Docket"), dated November 4, 2016, and admitted at hearing on July 24, 2017. Her testimony included Exhibit ACH-2, ML&P's analysis of its Gas Fund revenue requirement and gas transfer price (ML&P's internal cost of gas from its ownership interest in the Beluga River Unit gas field, abbreviated GTP). Ms. Henderson's Ex.

MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS' FIFTEENTH
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Initial Response

1 ACH-2 from the BRU Docket includes forecasted GTP values under two scenarios: one in which
2 ML&P defers some revenue from gas sales to third parties for future customer benefit (the
3 “deferral scenario”) and one in which all such gas sales revenue is returned to ratepayers with
4 minimal delay (the “no-deferral scenario”). With respect to these forecasts:

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

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

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

16 If your response to any subpart of this request for admission is anything other than
17 an unqualified admission, state what you believe the truth of the matter to be and the basis for
18 your belief, and identify any documents supporting your belief.
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20 **Response:** (a) Admitted.

21 (b) Admitted.

22 (c) Admitted.

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25 MUNICIPAL LIGHT AND POWER’S INITIAL RESPONSE TO PHS’ FIFTEENTH
26 REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-15)

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Initial Response

Person(s) Supplying Information: Anna Henderson.

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Initial Response