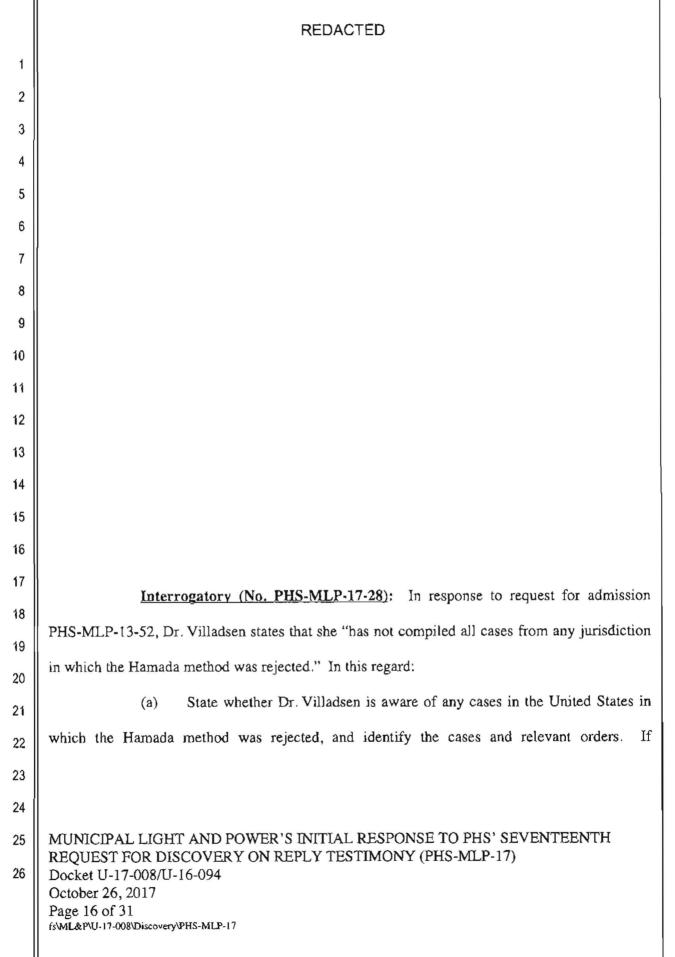
1	STATE OF ALASKA
2	THE REGULATORY COMMISSION OF ALASKA
3	
4	Before Commissioners: Stephen McAlpine, Chairman Rebecca L. Pauli
5	Robert M. Pickett Norman Rokeberg
6	Janis W. Wilson In the Matter of the Request Filed by the)
200	MUNICIPALITY OF ANCHORAGE d/b/a)
7	MUNICIPAL LIGHT & POWER DEPARTMENT for)U-16-094Approval to Establish Depreciation Rates)
8)
9	In the Matter of the Tariff Revisions, Designated as) TA357-121, filed by the MUNICIPALITY OF) U-17-008
10	ANCHORAGE d/b/a MUNICIPAL LIGHT &) POWER DEPARTMENT)
11	
12	MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO
13	PROVIDENCE HEALTH & SERVICES' SEVENTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-17)
14	The Municipality of Anchorage d/b/a Municipal Light and Power ("ML&P"),
15	hereby provides its initial response to Providence Health & Services' ("PHS'") seventeenth
16	
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
24	Discovery in this docket is not complete. As discovery proceeds, facts,
25	
26	October 26, 2017 Page 1 of 31 fsWMLP\U-17-008\Discovery\PHS-MLP-17UnitialResponse Northern Lights Realtime & Reporting, Inc. (907) 337-2221

LAW OFFICES OF LAW OFFICES OF A PROFESSIONAL CORPORATION 255 E. FIREWELANCS 9503-2025 ANCHORAGE, ALASKA 99503-2025 (907) 277-1604



KEMPPEL, HUFFMAN AND ELLIS A PROFESSIONAL CORPORATION 255 E FIREWED LUNE, SUITE 200 ANCHORAGE, ALASKA 99503-2025 (907) 277-1604

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Dr. Villadsen is aware of, but cannot identify, a particular case, then identify the jurisdiction in which the case was adjudicated.

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AND ELLIS

KEMPPEI

A PROFESSIONAL CORPORATION 255 E. FIREWEED LANE, SUITE 200 ANCHORAGE, ALASKA 99503-2025 (b) State whether Dr. Villadsen is aware of any cases in the United States in which the Hamada method was adopted, and identify the cases and relevant orders. If Dr. Villadsen is aware of, but cannot identify, a particular case, then identify the jurisdiction in which the case was adjudicated.

Dr. Villadsen is aware that the Illinois Commerce **Response:** (a) 8 Commission in the past has declined accepting a specific version of the Hamada method for a 9 specific company and circumstance. In Docket Nos. 99-0121/0134 the Illinois Commerce 10 Commission stated: "The Commission concludes that while the Hamada equation may be useful 11 for measuring the relative cost of capital over a range of capital structures, it may not be 12 13 appropriate for estimating a specific cost of capital for ratemaking purposes." Dr. Villadsen 14 continues to be puzzled as to why it is appropriate for measuring the relative cost of capital over 15 a range of capital structures, but not for setting the cost of capital for the utility in question.

(b) Please see response to Request PHS-MLP-13-53.

Person(s) Supplying Information: Bente Villadsen.

REDACTED

 MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS' SEVENTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-17)
Docket U-17-008/U-16-094 October 26, 2017 Page 17 of 31 fs\ML&PU-17-008\Discovery\PHS-MLP-17