

FILED  
April 21, 2022  
INDIANA UTILITY  
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

APPLICATION OF INDIANAPOLIS POWER & LIGHT )  
COMPANY D/B/A AES INDIANA FOR APPROVAL OF )  
A FUEL COST FACTOR FOR ELECTRIC SERVICE )  
DURING THE BILLING MONTHS OF JUNE 2022 )  
THROUGH AUGUST 2022, IN ACCORDANCE WITH )  
THE PROVISIONS OF I.C. 8-1-2-42, AND CONTINUED )  
USE OF RATEMAKING TREATMENT FOR COSTS OF )  
WIND POWER PURCHASES PURSUANT TO CAUSE )  
NOS. 43485 AND 43740, AND AUTHORITY TO )  
RECOVER COSTS OF THE FUEL HEDGING PLAN )  
PURSUANT TO I.C. 8-1-2-42. )

CAUSE NO. 38703  
FAC-135

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

PUBLIC'S EXHIBIT NO. 2

TESTIMONY OF OUCC WITNESS  
MICHAEL D. ECKERT

April 21, 2022

Respectfully submitted,

OFFICIAL  
EXHIBITS

*Lorraine Hitz*  
\_\_\_\_\_  
Lorraine Hitz  
Attorney No. 18006-29  
Deputy Consumer Counselor

IURC  
PUBLIC'S 2  
EXHIBIT NO. \_\_\_\_\_  
5-12-22 DATE REPORTER

**TESTIMONY OF OUCC WITNESS MICHAEL D. ECKERT**  
**CAUSE NO. 38703 FAC-135**  
**INDIANAPOLIS POWER & LIGHT COMPANY D/B/A AES INDIANA**

**I. INTRODUCTION**

1 **Q: Please state your name, business address, and employment capacity.**

2 A: My name is Michael D. Eckert, and my business address is 115 W. Washington St.,  
3 Suite 1500 South, Indianapolis, Indiana 46204. I am employed by the Indiana  
4 Office of Utility Consumer Counselor ("OUCC") as the Director of the Electric  
5 Division. My qualifications are set forth in Appendix A of this document.

6 **Q: Have you previously testified before the Indiana Utility Regulatory**  
7 **Commission ("Commission")?**

8 A: Yes.

9 **Q: What is the purpose of your testimony in this cause?**

10 A: I discuss the following aspects of Indianapolis Power & Light Company's d/b/a  
11 AES Indiana's ("AES Indiana") application: 1) purchased power benchmark  
12 agreement approved in Cause No. 43414; 2) Ancillary Services Market ("ASM");  
13 3) bill analysis; 4) steam generation cost comparison; 5) actual cost of fuel  
14 (Mills/kWh) comparison; 6) coal contract analysis; 7) coal inventory; 8) Lakefield  
15 Wind Park ("Lakefield") and Hoosier Wind Power Project LLC ("Hoosier"); 9)  
16 coal price decrement; 10) unit commitment status; 11) hedging program; 12) the  
17 Eagle Valley Outage ("Eagle Valley"); 13) Root Cause Analysis ("RCA"); 14) sub-

1 docket request; and 15) variance request deferral. Ultimately, the OUCC  
2 recommends the Commission:

- 3 1. Approve, interim subject to refund, AES Indiana's proposed mitigated fuel cost  
4 factors as recalculated by OUCC witness Gregory T. Guerrettaz;
- 5 2. Require AES Indiana to provide a coal inventory update to the Commission in  
6 its next FAC filing;
- 7 3. Defer the investigation of both Eagle Valley forced outages and the related  
8 issues, energy and purchased power costs to the FAC-133 S1 sub-docket; and
- 9 4. Allow AES Indiana to continue to defer as a regulatory asset, without carrying  
10 costs, the fuel cost variance for the reconciliation period of May 2021 through  
11 January 2022 attributable to the Eagle Valley outage for potential recovery in a  
12 future FAC filing and pending the conclusion of the FAC 133 sub-docket.

13 **Q: Please describe the review and analysis you conducted in order to prepare**  
14 **your testimony.**

15 A: I read AES Indiana's prefiled testimony and prefiled application in this proceeding,  
16 its revised schedules, workpapers, and relevant Commission Orders. I also  
17 reviewed AES Indiana's responses to OUCC data requests ("DR") and pertinent  
18 sections of Title 8 of the Indiana Code and Title 170 of the Indiana Administrative  
19 Code. The OUCC performed its field audit via conference call and Microsoft Teams  
20 on Thursday, April 14, 2022 and Friday April 15, 2022. I attended the  
21 Commission's Technical Conference regarding Eagle Valley on Thursday, October  
22 21, 2021 and participated in meetings with other OUCC staff members and AES  
23 Indiana personnel in developing issues identified in this Cause.

II. EAGLE VALLEY COMBINED-CYCLE GAS TURBINE ("CCGT")  
OUTAGE

1 **Q: Is AES Indiana's Eagle Valley Generating Station ("Eagle Valley") still in a**  
2 **forced outage?**

3 A: No. Eagle Valley was successfully restarted and achieved full load on March 14.  
4 Eagle Valley then completed the required MISO capacity test with both gas turbines  
5 and steam turbine at full load on March 15. After some testing and tuning, Eagle  
6 Valley was released for full load dispatch on March 18, 2022.

7 **Q: Have the issues related to the two forced outages been resolved?**

8 A: No. The Eagle Valley issues regarding the forced outages on April 25, 2021 and  
9 November 10, 2021 have not been resolved. These issues and the related cost  
10 recovery have been deferred to the sub-docket established in 38703 FAC-133. AES  
11 Indiana proposes to address the issues of the forced outages, energy and purchased  
12 power costs in the FAC 133 sub-docket.<sup>1</sup>

13 **Q: Has AES Indiana provided the OUCC the RCA's associated with each forced**  
14 **outage?**

15 A: No. AES Indiana has provided the OUCC with the RCA for the April 25, 2021  
16 outage and intends to provide the OUCC with the RCA for the November 10, 2021  
17 forced outage by the end of April 2022.

18 **Q: What treatment is AES Indiana proposing for its variances?**

19 A: AES Indiana is requesting authority to continue to defer as a regulatory asset,  
20 without carrying costs, the fuel cost variance (\$35,168,380) for the reconciliation  
21 period of May 2021 through January 2022 attributable to the Eagle Valley outage  
22 for potential recovery in a future FAC filing and pending the conclusion of the FAC

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<sup>1</sup> See AES Indiana's Witness Bigalbal's testimony, pp. 2-3.

1 133 sub-docket. In addition, IPL is requesting recovery of 50.0% (\$34,140,968) of  
2 the uncollected portion (\$68,281,936) of the FAC 133 – FAC 135 variances not  
3 attributed to the Eagle Valley.

4 **Q: Did AES Indiana provide a chart that shows 1) total variance; 2) variance**  
5 **attributable to Eagle Valley; and 3) non-outage variances for FAC 133, 134,**  
6 **and 135?**

7 A: Yes. IPL Witness Coklow's Chart 1 on page 7 of her testimony shows these  
8 variance amounts by FAC. The OUCC is not opposing IPL's allocation of  
9 variances at this time but will review these variance calculations and allocations in  
10 the FAC 133 sub-docket proceeding.

11 **Q: What fuel factor is AES Indiana requesting?**

12 A: AES Indiana is requesting that the Commission authorize the Company to place  
13 into effect a reduced fuel factor of \$0.013673 per kWh, on an interim basis subject  
14 to reconciliation and true-up in a future FAC filing, or pending resolution of the  
15 Eagle Valley outage sub-docket established in FAC 133.<sup>2</sup> The mitigated factor of  
16 \$0.013673 is \$0.008184 lower than the unmitigated factor of \$0.021857, which  
17 lowers the bill of an average customer using 1,000 kWh by \$8.19.

18 **Q: What is the OUCC's recommendation regarding the Eagle Valley outage?**

19 A: The OUCC recommends the Commission consider both Eagle Valley forced outage  
20 and the related issues, energy and purchased power costs in FAC-133 S1 sub-docket  
21 to allow for a more detailed examination of costs and issues associated with both  
22 Eagle Valley outages. Additionally, the OUCC recommends the Commission make

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<sup>2</sup> See AES Indiana's Witness Coklow's testimony, p. 5.

1 the rates in this Cause interim subject to refund, to reflect any cost recovery changes  
2 resulting from the decisions on the Eagle Valley outages and the RCAs.

3 **Q: Did the Commission accept the recommendation to “make the rates in this**  
4 **Cause interim subject to refund, pending the outcome of such subdocket” in**  
5 **Cause No. 38703 FAC-133?**

6 A: Yes. On page 10 of its Order, the Commission stated:

7 As indicated above, Applicant did not object to the OUCC’s motion  
8 to establish a subdocket. The Commission has previously found  
9 creation of a subdocket is appropriate where summary FAC  
10 proceedings do not lend themselves to sufficient record  
11 development. *Application of Duke Energy Ind., LLC*, Cause No.  
12 38707 FAC 111, 2017 WL 1632308, at \*8 (IURC April 26, 2017).  
13 We agree with the OUCC that, based on the facts in this  
14 circumstance, such a review of the Eagle Valley CCGT forced  
15 outage discussed above is best accomplished outside the statutory  
16 time constraints of the FAC summary proceeding. Accordingly, the  
17 Commission finds a subdocket should be created in this proceeding  
18 to examine the impact of the Eagle Valley CCGT extended outage  
19 on fuel costs, and the recovery of such fuel costs herein are interim  
20 subject to refund pending the outcome of such subdocket.

21 **Q: Should the rates in Cause No. 38703 FAC 133 and FAC 134 still remain interim**  
22 **subject to refund pending the outcome of the sub-docket?**

23 A: Yes.

### III. PURCHASED POWER OVER THE BENCHMARK

24 **Q: Is the purchased power over the benchmark treatment controlled by the**  
25 **Commission’s Cause No. 43414 Order?**

26 A: Yes. On April 23, 2008, the Commission issued its Cause No. 43414 Final Order  
27 approving a joint Settlement Agreement and ordering AES Indiana and Vectren  
28 South to file testimony in each FAC regarding any purchased power, including the  
29 volume, cost, and reasons for purchases. The Settlement Agreement provides a  
30 mechanism by which AES Indiana may recover purchased power costs that exceed  
31 the benchmark. After reviewing the Cause No. 43414 Settlement Agreement and

1 AES Indiana's testimony and workpapers in the current proceeding, it is my opinion  
2 AES Indiana followed the guidelines and procedures that were established in Cause  
3 No. 43414.

4 **Q: Did you review AES Indiana's workpapers to determine if AES Indiana**  
5 **calculated its purchased power costs that exceed the benchmark correctly?**

6 A: Yes. I also reviewed AES Indiana's daily plant logs for the generating stations that  
7 were off-line on the days AES Indiana incurred purchased power over the  
8 benchmark.

9 **Q: How does your calculation of purchased power over the benchmark compare**  
10 **to AES Indiana's calculation?**

11 A: I calculated the same amount of purchased power cost in excess of the benchmark  
12 as AES Indiana, following the procedures established in Cause No. 43414. AES  
13 Indiana's purchased power cost that exceeded the benchmark of \$2,487,937 is  
14 recoverable.<sup>3</sup>

15 **Q: Were actual natural gas and purchased power prices higher than the forecast**  
16 **for this historical FAC period?**

17 A: Yes.<sup>4</sup>

18 **Q: Does the OUCC have concerns that IPL met all the requirements of the**  
19 **Purchased Power Over The Benchmark Order in Cause No. 43414?**

20 A: Yes. While I have determined that IPL performed the calculation of the purchased  
21 power over the benchmark correctly, the OUCC is concerned that IPL did not  
22 determine if the Eagle Valley outage (as discussed above) was a result of  
23 "imprudence, malfeasance, nonfeasance, or other inappropriate acts." Specifically,

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<sup>3</sup> See AES Indiana's Exhibit DJ-2, Column labeled "Amount Above Daily Benchmark."

<sup>4</sup> See AES Indiana's Witness Jackson's testimony, p. 7.

1 the Settlement in Cause No. 43414 that established the over-the-benchmark  
2 methodology in Section I(c)(3) states:

3 3. After application of section (c)(1), if the sum of unplanned full  
4 forced outages, qualifying environmental derates, partial outages,  
5 and qualifying scheduled maintenance outages total 11 % or more  
6 of the utility's seasonal generating fleet capacity, this condition is  
7 considered as a special condition whereby purchases made to  
8 account for such outages which exceed the benchmark shall be  
9 recovered. In addition, any power purchases made to account for  
10 environmental derates are recoverable.

11  
12 To quantify this, determine the total MW of unplanned full forced  
13 outages, qualifying environmental derates, partial outages, and  
14 qualifying scheduled maintenance outages for each generating unit  
15 in the particular hour.  
16

17 *a. An unplanned full forced outage is defined as a complete outage*  
18 *due to mechanical or electrical equipment failure, which is not*  
19 *the result of imprudence, malfeasance, nonfeasance, or other*  
20 *inappropriate acts.<sup>5</sup>*

21 Emphasis added.

22 **Q: What does the OUCC recommend?**

23 A: The OUCC recommends that final resolution of the recoverability of the \$2,487,937  
24 in purchased power over the benchmark in this FAC proceeding be deferred to the  
25 FAC-133 sub-docket proceeding. In addition, the OUCC recommends that final  
26 resolution of the recoverability of the amounts in FAC-133 (\$1,198,183) and FAC-  
27 134 (\$1,183,609) be deferred to the FAC-133 sub-docket proceeding.

#### IV. ASM

28 **Q: Is AES Indiana's calculation of ASM charges consistent with the**  
29 **Commission's Cause No. 43426 Order?**

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<sup>5</sup> *Joint Petition of Indianapolis Power & Light*, Cause No. 43414, Final Order, Exhibit 1, Exhibit A, pp. 1 - 2 (Ind. Util. Regul. Comm'n Apr. 23, 2008).



1 A: Yes. AES Indiana's proposed ratemaking treatment for the ASM charge types is  
2 consistent with the Commission's approved ratemaking treatment in its Cause No.  
3 43426 Phase II Order, dated June 30, 2009.

V. BILL ANALYSIS

4 **Q: Have you calculated the bill impact on a typical residential customer's bill**  
5 **using 1,000 kWhs at AES Indiana's proposed rate and compared that to the**  
6 **same typical customer's bill using the currently approved rate?**

7 A: Yes, I did, and I arrived at the same numbers as AES Indiana witness Natalie Herr  
8 Coklow, using AES Indiana's original forecast. An average residential customer  
9 using 1,000 kWh will experience an increase of \$6.25 or 5.08%.

10 **Q: Have you calculated the bill impact on a typical residential customer's bill**  
11 **using 500, 1,000, 1,500, and 2,000 kWhs using AES Indiana's proposed rate of**  
12 **\$0.013673 and then compared it to the same typical customer's bill using the**  
13 **currently approved rate?**

14 A: Yes, I did, as reflected in the table below. Table 1 below demonstrates the  
15 comparison using the AES Indiana's proposed rate.

Consumption	Bill at Proposed FAC	Bill at Current FAC	Dollar Inc/(Dec)	% Increase/ (Decrease)
500	\$77.06	\$73.94	\$3.12	4.23%
1,000	\$129.27	\$123.02	\$6.25	5.08%
1,500	\$181.49	\$172.11	\$9.38	5.45%
2,000	\$233.70	\$221.19	\$12.51	5.66%

16 **Q: What assumptions did you make in this calculation?**

17 A: In making this calculation, I did not include any dollar amount for other trackers,  
18 nor did I include taxes. Therefore, this calculation reflects the proposed change to  
19 the FAC factor and AES Indiana's base rates.

1 **Q: Have you provided a calculation of a typical customer's bill using 1,000 kWh**  
2 **as of April 2022?**

3 A: Yes. See Attachment MDE-3. A typical residential customer using 1,000 kWh as  
4 of April 2022 will pay \$132.04, excluding taxes. This amount consists of \$115.60  
5 in base charges that were set in AES Indiana's last rate case (Cause No. 45029),  
6 (\$7.42) in FAC charges, and \$9.02 in non-FAC tracker charges (DSM, ECR,  
7 Capacity, OSS, TDSIC, & RTO).

8 **Q: Why do the FAC charges register as a charge of \$7.42 in the answer above,**  
9 **when your chart above shows an increase to 1,000 kw/month customers of**  
10 **\$6.25?**

11 A: The April 2022 bill uses an FAC factor of \$0.007418, which was authorized in  
12 Cause No. 38703 FAC-134 for the billing months of March 2022, April 2022, and  
13 May 2022. The table above calculates the increase in a customer's bill from the  
14 current authorized FAC (134) factor of \$0.007418 to the proposed FAC factor of  
15 \$0.013673 in this proceeding (135). Therefore, a customer using 1,000 kWh will  
16 see an increase of \$6.25.

#### **VI. ACTUAL COST OF FUEL (MILLS/KWH) COMPARISON**

17 **Q: Did you do a comparison of the actual monthly cost of fuel (Mills/kWh) for the**  
18 **five Indiana electric IOUs?**

19 A: Yes. AES Indiana's actual monthly cost of fuel (including wind and solar)  
20 (mills/kWh) is higher than the other Indiana electric IOUs (see Attachment MDE-  
21 2).

**VII. STEAM GENERATION COST COMPARISON**

1 **Q: Did you do a comparison of steam generation costs for Indiana's five electric**  
2 **investor-owned utilities ("IOUs")?**

3 A: Yes, I did. AES Indiana's steam generation costs are comparable to the other  
4 Indiana electric IOUs (See Attachment MDE-2).

**VIII. LAKEFIELD AND HOOSIER**

5 **Q: Did AES Indiana update the Commission on locational marginal prices**  
6 **("LMPs") at Lakefield and Hoosier wind farms?**

7 A: Yes. AES Indiana witness David Jackson provided testimony on this issue.<sup>6</sup> AES  
8 Indiana offers Lakefield and Hoosier into the day-ahead market to mitigate the  
9 impact of negative LMPs in real-time.

**IX. COAL INVENTORY**

10 **Q: What is AES Indiana's current coal inventory?**

11 A: AES Indiana's current coal inventory is within AES Indiana's target levels (25-50  
12 days).

13 **Q: Is AES Indiana actively trying to manage its coal purchases and coal**  
14 **inventory?**

15 A: Yes. AES Indiana indicated in discussions with the OUCC that it is actively looking  
16 at options<sup>7</sup> to address its coal inventory.

17 **Q: Should AES Indiana update the Commission on its coal inventory?**

18 A: Yes. AES Indiana should also update the Commission in future FAC proceedings  
19 on its 2022 projected coal burn and coal purchases.

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<sup>6</sup> See AES Indiana's Witness Jackson's testimony, pp. 16-17.

<sup>7</sup> *Id.*, pp. 32-35.

**X. HEDGING PROPOSAL**

1 **Q: Did AES Indiana file the results of its natural gas hedging program?**

2 A: Yes. Mr. Jackson provided the results of its natural gas hedging program. AES  
3 Indiana did not transact any financial hedges in August 2021, September 2021, and  
4 October 2021.<sup>8</sup>

5 **Q: Did AES Indiana provide additional information regarding its natural gas**  
6 **hedging program?**

7 A: Yes. AES Indiana provided information in the testimony of Mr. Jackson<sup>9</sup> and  
8 during the FAC audit.

9 **Q: What does the OUCC recommend regarding AES Indiana's natural gas**  
10 **hedging proposal?**

11 A: The OUCC recommends the Commission require AES Indiana to:

- 12 1) Continue to file the results of its natural gas hedging program in each  
13 subsequent FAC filing; and  
14 2) Provide analysis of the facts and circumstances as they existed at the time  
15 the transactions at issue were entered into in future FAC proceedings.

**XI. PURCHASED POWER HEDGING**

16 **Q: Did IPL hedge purchased power during this FAC period?**

17 A: Yes. Due to the loss of the generating capacity of Eagle Valley, AES Indiana  
18 customers were exposed to price risk during the summer when higher temperatures

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<sup>8</sup> See AES Indiana's Witness Jackson's testimony, p. 45.

<sup>9</sup> *Id.*, p. 46.

1 created periods of high-priced peak power. In addition, the fall can experience  
2 either hotter or colder periods which can create periods of higher priced peak  
3 power. In recognition of the continued outage, AES Indiana hedged blocks of  
4 purchased power to mitigate increased costs.

5 **Q: Is the OUCC opposing the purchased power hedges?**

6 A: No.

## XII. UNIT COMMITMENT STATUS

7 **Q: Does the OUCC review AES Indiana's unit commitment status during its FAC**  
8 **audit?**

9 A: Yes. The OUCC generally reviews AES Indiana's unit commitment status and Mr.  
10 Guerrettaz's testimony details some of the analysis done by the OUCC during its  
11 FAC audit. In general, the OUCC's FAC audit process has focused more on the  
12 cost of fuel and the cost of purchased power.

13 **Q: Did AES Indiana provide an update on the commitment of the Petersburg**  
14 **Generating Station Units ("Petersburg Units")?**

15 A: Yes. Mr. Jackson provided sixteen (16) pages of testimony updating the  
16 Commission on the Petersburg Units' status.<sup>10</sup>

17 **Q: What is the status of the Petersburg Units and when were they last called on**  
18 **by MISO to produce power?**

19 A: As of April 14, 2022, the status of the Peterburg Units and the last time MISO called  
20 on each of the Petersburg Units is shown below:

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<sup>10</sup> See AES Indiana's Witness Jackson's testimony, pp. 17-32.

1

Generating Units	Last Date Called on by MISO	Online/Offline	Offer Status
Petersburg Unit 1			Retired
Petersburg Unit 2	April 12, 2022	Offline	Outage
Petersburg Unit 3	April 14, 2022	Online	Economic
Petersburg Unit 4	April 14, 2022	Online	Economic

2 **Q: Should AES Indiana continue to update the Commission on AES Indiana's**  
3 **Petersburg Units' commitment status?**

4 A: Yes.

### XIII. RECOMMENDATIONS

5 **Q: What does the OUCC recommend in this proceeding?**

6 A: The OUCC recommends the Commission:

- 7 1) Approve, interim subject to refund, the AES Indiana's proposed  
8 mitigated fuel cost factor as recalculated by Mr. Guerrettaz;
- 9 2) Allow AES Indiana to recover, interim subject to refund, its total  
10 purchased power over the benchmark in the amount of \$2,487,937;
- 11 3) Defer final resolution of the recoverability of the FAC-133  
12 (\$1,198,183) and FAC-134 (\$1,183,609) purchased power over the  
13 benchmark to the FAC-133 sub-docket proceeding;
- 14 4) Require AES Indiana to continue to file the results of its natural gas  
15 hedging program in each FAC;
- 16 5) In future FAC proceedings, require AES Indiana to provide analysis  
17 of the facts and circumstances as they existed at the time any  
18 hedging transactions were entered into;
- 19 6) Require AES Indiana in future FAC proceedings to provide the  
20 Commission its revised hedging program (natural gas and purchased  
21 power), if revised;
- 22 7) Require AES Indiana in future FAC proceedings to update the  
23 Commission on its 2022 projected coal burn and coal purchases;
- 24 8) Require AES Indiana to update the Commission on the Petersburg

1 Units' commitment status in future FAC proceedings;

2 9) Defer the investigation of both Eagle Valley forced outages and the  
3 related issues, energy and purchased power costs to the FAC-133 S1  
4 sub-docket;

5 10) Determine the rates in Cause No. 38703 FAC 133 and FAC 134  
6 remain interim subject to refund pending the outcome of the sub-  
7 docket; and

8 11) Allow AES Indiana to continue to defer as a regulatory asset,  
9 without carrying costs, the fuel cost variance for the reconciliation  
10 period of May 2021 through January 2022 attributable to the Eagle  
11 Valley outage for potential recovery in a future FAC filing and  
12 pending the conclusion of the FAC 133 sub-docket.

13 **Q: Does this conclude your testimony?**

14 **A:** Yes, it does.

**APPENDIX A**

**QUALIFICATIONS OF MICHAEL D. ECKERT**

1   **Q:   Please describe your educational background and experience.**

2   A:   I graduated from Purdue University in West Lafayette, Indiana in December 1986,  
3       with a Bachelor of Science degree, majoring in Accounting. I am licensed in the  
4       State of Indiana as a Certified Public Accountant. Upon graduation, I worked as a  
5       Field Auditor with the Audit Bureau of Circulation in Schaumburg, Illinois until  
6       October 1987. In December 1987, I accepted a position as a Staff Accountant with  
7       the OUCC. In May 1995, I was promoted to Principal Accountant and in December  
8       1997, I was promoted to Assistant Chief Accountant. As part of the OUCC's  
9       reorganization, I accepted the position of Assistant Director of its  
10      Telecommunications Division in July 1999. From January 2000 through May 2000,  
11     I was the Acting Director of the Telecommunications Division. During an OUCC  
12     reorganization, I accepted a position as a Senior Utility Analyst and in September  
13     2017, I was promoted to Assistant Director of the Electric Division. In February  
14     2022, I was promoted to the Director of the Electric Division.   As part of my  
15     continuing education, I have attended the National Association of Regulatory  
16     Utility Commissioners' ("NARUC") two-week seminar in Lansing, Michigan. I  
17     attended NARUC's Spring 1993 and 1996 seminars on system of accounts. In  
18     addition, I attended several CPA sponsored courses and the Institute of Public  
19     Utilities Annual Conference in December 1994 and December 2000.





AES Indiana  
Cause No. 38703 FAC-135

Steam Generation Cost Comparison

Month	Year	Duke Energy	Indiana Michigan Power	Indianapolis Power & Light	NIPSCO	ConocoPhillips South	Month	Year	Duke Energy	Indiana Michigan Power	Indianapolis Power & Light	NIPSCO	ConocoPhillips South
January	2007	**	\$17,170	\$13,258	\$19,628	\$20,067	July	2014	26,952	23,416	27,969	26,762	
February	2007		16,302	13,658	19,596	20,069	August	2014	27,390	28,445	28,231	25,763	
March	2007		17,037	13,241	19,639	19,883	September	2014	21,997	30,773	28,230	26,197	
April	2007		17,769	13,683	19,540	20,585	October	2014	25,738	32,170	27,248	26,417	
May	2007		18,673	13,579	20,843	20,707	November	2014	26,728	24,532	28,011	25,478	
June	2007		16,973	14,096	20,389	20,182	December	2014	25,605	23,527	26,574	26,039	
July	2007		17,916	14,094	21,661	20,429	January	2015	27,191	23,497	25,752	27,287	
August	2007		19,025	14,530	20,498	20,422	February	2015	26,269	24,232	25,913	26,293	
September	2007		20,209	14,002	20,295	19,849	March	2015	22,549	24,195	25,525	26,750	
October	2007		20,572	14,038	20,777	20,904	April	2015	22,438	23,437	24,555	26,463	
November	2007		26,158	13,596	20,928	20,652	May	2015	25,270	23,325	25,308	25,994	
December	2007		20,936	13,583	21,147	21,612	June	2015	27,006	25,561	26,773	26,904	
January	2008		19,527	14,241	20,253	20,948	July	2015	26,312	23,672	26,544	26,387	
February	2008		20,362	14,706	22,090	21,970	August	2015	24,397	23,601	27,554	25,480	
March	2008		23,903	15,223	22,098	20,854	September	2015	17,891	23,741	26,131	26,380	
April	2008		20,990	14,687	22,363	22,476	October	2015	25,405	23,667	26,135	26,346	
May	2008		22,972	15,028	22,700	22,579	November	2015	24,520	23,089	29,840	27,464	
June	2008		23,708	15,694	22,885	22,903	December	2015	26,001	28,690	22,179	29,998	
July	2008		23,512	15,753	22,269	21,947	January	2016	26,382	22,756	29,902	28,590	
August	2008		26,033	16,174	22,720	21,701	February	2016	24,782	24,789	29,464	28,292	
September	2008		26,369	16,089	22,392	21,398	March	2016	12,691	23,912	29,439	29,261	
October	2008		28,047	16,990	20,222	21,922	April	2016	24,150	23,508	29,110	27,242	
November	2008		26,882	16,446	21,422	21,192	May	2016	24,981	23,653	28,551	27,164	
December	2008		25,630	16,200	22,406	21,476	June	2016	25,364	22,978	25,862	26,213	
January	2009		25,582	16,107	25,922	25,786	July	2016	25,592	24,093	26,559	26,252	
February	2009		24,000	15,711	28,132	28,839	August	2016	26,126	23,881	25,866	26,767	
March	2009		20,815	15,782	26,784	29,188	September	2016	26,854	23,757	26,956	25,976	
April	2009		23,918	15,672	26,647	30,698	October	2016	25,295	25,603	27,421	25,344	
May	2009		21,705	15,793	26,114	33,507	November	2016	23,525	23,745	27,014	25,014	
June	2009		23,730	15,295	26,048	32,740	December	2016	25,324	24,034	26,265	26,114	
July	2009		22,364	15,113	26,327	32,846	January	2017	24,234	23,289	26,796	25,785	
August	2009		20,489	15,247	25,707	33,152	February	2017	25,272	23,028	26,318	26,177	
September	2009		19,544	14,968	25,708	34,242	March	2017	18,832	21,687	27,503	25,618	
October	2009		22,783	15,046	25,820	31,128	April	2017	24,427	23,770	28,401	26,435	
November	2009		22,076	14,985	26,323	33,328	May	2017	24,615	23,800	29,785	25,270	
December	2009		22,543	15,117	27,094	33,067	June	2017	24,941	22,189	28,828	24,834	
January	2010		21,322	15,724	27,370	31,800	July	2017	24,333	22,378	27,586	25,042	
February	2010		20,569	17,057	26,853	32,762	August	2017	24,583	23,027	26,420	25,339	
March	2010		22,576	18,453	25,518	32,732	September	2017	24,531	23,494	25,583	26,558	
April	2010		22,109	18,843	26,032	33,361	October	2017	20,555	24,385	24,418	26,092	
May	2010		22,244	19,988	25,762	34,854	November	2017	24,661	23,090	27,061	26,360	
June	2010		22,853	20,389	27,820	32,529	December	2017	23,847	23,840	25,733	26,961	
July	2010		24,191	20,687	32,402	33,720	January	2018	23,180	22,415	26,382	26,764	
August	2010		23,663	21,080	26,834	33,480	February	2018	25,057	22,815	28,280	26,907	
September	2010		24,650	20,705	26,115	34,401	March	2018	20,209	22,083	26,959	26,656	
October	2010		22,395	21,082	26,942	34,857	April	2018	24,048	21,120	27,127	25,571	
November	2010		22,491	21,118	26,585	35,410	May	2018	23,933	22,590	24,337	26,095	
December	2010		22,659	20,555	28,795	35,591	June	2018	25,669	21,705	24,064	26,096	
January	2011		20,956	20,753	27,896	35,043	July	2018	25,526	21,817	25,030	25,669	
February	2011		22,068	21,425	28,394	35,582	August	2018	24,755	22,268	27,141	25,227	
March	2011		24,766	21,651	29,036	36,068	September	2018	26,052	21,867	26,613	25,425	
April	2011		23,263	22,169	29,308	37,562	October	2018	18,367	21,395	26,252	25,825	
May	2011		23,302	21,442	28,825	35,813	November	2018	24,338	23,050	25,631	25,805	
June	2011		23,935	22,420	29,311	35,859	December	2018	25,841	21,380	24,654	26,235	
July	2011		24,189	22,527	29,875	36,551	January	2019	27,252	21,678	26,527	26,319	
August	2011		23,782	23,009	29,334	35,493	February	2019	28,353	21,415	27,631	26,192	
September	2011		23,088	22,088	27,931	36,721	March	2019	22,088	22,505	25,570	24,653	
October	2011		23,970	22,163	27,925	37,020	April	2019	26,536	21,771	24,720	24,620	
November	2011		23,311	22,263	26,660	38,509	May	2019	27,450	22,668	25,581	25,981	
December	2011		21,902	22,376	26,644	38,877	June	2019	28,017	21,700	24,427	25,731	
January	2012		21,278	21,584	26,283	37,727	July	2019	25,638	20,550	24,218	24,456	
February	2012		21,571	22,496	24,679	36,060	August	2019	26,093	20,107	23,645	24,936	
March	2012		26,117	21,941	24,520	25,741	September	2019	26,601	20,371	23,086	24,475	
April	2012		21,401	23,745	24,526	26,097	October	2019	26,979	19,891	24,856	25,012	
May	2012		21,419	23,965	25,157	26,037	November	2019	27,029	20,701	24,098	24,902	
June	2012		22,167	22,958	26,526	25,572	December	2019	27,624	19,249	23,921	25,989	
July	2012		22,455	25,210	27,584	25,854	January	2020	39,156	20,278	24,143	24,714	
August	2012		22,751	24,524	27,429	26,735	February	2020	27,154	19,399	25,026	25,625	
September	2012		21,266	23,399	26,974	28,336	March	2020	15,799	18,525	25,307	26,131	
October	2012		21,222	23,124	26,595	28,630	April	2020	25,067	(0.211)	26,145	27,705	
November	2012		22,161	22,904	25,797	28,008	May	2020	27,314	37,614	30,549	26,225	
December	2012		22,868	22,894	25,730	29,143	June	2020	27,210	19,931	27,363	25,008	
January	2013		24,306	23,140	28,319	29,340	July	2020	27,938	19,821	24,607	24,803	
February	2013		25,587	22,911	27,123	28,796	August	2020	27,166	20,531	23,200	25,164	
March	2013		25,487	22,800	27,074	28,431	September	2020	28,022	19,618	23,573	25,349	
April	2013		24,394	23,318	28,563	29,049	October	2020	0.507	24,045	24,194	25,057	
May	2013		26,229	22,910	28,938	28,567	November	2020	28,331	20,884	24,650	25,508	
June	2013		26,294	24,314	28,394	28,089	December	2020	0.000	19,269	27,295	24,803	
July	2013		25,817	23,734	28,072	28,025	January	2021	120.491	19,069	26,999	25,073	
August	2013		25,693	24,479	27,054	28,219	February	2021	28,541	19,566	28,005	25,814	
September	2013		23,863	23,218	26,685	28,022	March	2021	43,462	19,445	26,299	25,180	
October	2013		26,216	23,472	26,844	27,719	April	2021	32,723	19,814	26,911	25,023	

Indianapolis Power and Light Company  
Cause Number 38703 FAC 135

April 2022 Residential Customer Bill using 1,000kWh

Line No.	Description:	kWh	Rate	\$	% of Bill
1	Customer Charge			\$17.00	12.88%
2	Energy Charge (First 500 KWH per month)	500	\$0.106454	53.23	40.31%
3	Energy Charge (Second 500 KWH per month)	500	\$0.090752	45.38	34.37%
4	Fuel Charge	1,000	\$0.007418	7.42	5.62%
5	Demand Side Management Adjustment	1,000	\$0.005235	5.24	3.96%
6	ECR (NOX)	1,000	\$0.000196	0.20	0.15%
7	Capacity Adjustment	1,000	\$0.001116	1.12	0.85%
8	Off-System Sales Margin Sharing	1,000	\$0.001009	1.01	0.76%
9	Regional Transmission Organization Adjustment	1,000	\$0.000135	0.14	0.10%
9	Transmission, Distribution and Storage System Improvement Charge	1,000	\$0.001326	1.33	1.00%
10	Total Billing Amount (Excluding Taxes)			<u>\$132.04</u>	<u>100.00%</u>
11	Base Charge (Lines 1, 2, and 3)			\$115.60	87.55%
12	Non-FAC Trackers (Lines 5 & 6)			9.02	6.83%
13	FAC (Line 4)			7.42	5.62%
114	Total			<u>\$132.04</u>	<u>100.00%</u>

Note: Per Online tariffs as of April 20, 2022.

**AFFIRMATION**

I affirm, under the penalties for perjury, that the foregoing representations are true.

A handwritten signature in black ink, appearing to read "Michael D. Eckert". The signature is written in a cursive style with a large initial "M".

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By: Michael D. Eckert  
Assistant Director of the Electric Division  
Indiana Office of Utility Consumer Counselor

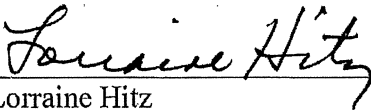
Cause No. 38703 FAC-135  
AES Indiana

Date: April 21, 2022

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing *Indiana Office of Utility Consumer Counselor Public's Exhibit No. 2, Testimony of OUCC Witness Michael D. Eckert* has been served upon the following parties of record in the captioned proceeding by electronic service on April 21, 2022.

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Jeffrey M. Peabody  
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Lorraine Hitz  
Deputy Consumer Counselor

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