

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE VERIFIED)
PETITION OF INDIANAPOLIS POWER &)
LIGHT FOR APPROVAL OF DEMAND SIDE)
MANAGEMENT (DSM) PLAN, INCLUDING)
ENERGY EFFICIENCY (EE) PROGRAMS,)
AND ASSOCIATED ACCOUNTING AND)
RATEMAKING TREATMENT, INCLUDING) CAUSE NO. 45370
TIMELY RECOVERY, THROUGH IPL'S)
EXISTING STANDARD CONTRACT RIDER)
NO. 22, OF ASSOCIATED COSTS)
INCLUDING PROGRAM OPERATING)
COSTS, NET LOST REVENUE, AND)
FINANCIAL INCENTIVES.)

JOINT MOTION FOR APPROVAL OF AGREED INTERIM RELIEF

Petitioner Indianapolis Power & Light Company ("Petitioner" or "IPL"), by counsel and on behalf of the Indiana Office of Utility Consumer Counselor ("OUCC") and the Citizens Action Coalition of Indiana, Inc. ("CAC"), collectively the "Parties", respectfully move the Commission for an order granting IPL interim authority to continue offering its current portfolio of demand-side management and energy efficiency ("DSM/EE") programs and associated accounting and ratemaking treatment as described below. In support of this Joint Motion, the Parties state as follows.

1. IPL's 2018-2020 DSM Plan, which was approved in Cause No. 44945, is set to expire on December 31, 2020 ("Current DSM Plan). The Parties stipulate and agree that the Commission should authorize IPL to continue the Current DSM Plan, including IPL Oversight Board ("OSB") oversight and the associated accounting and ratemaking (inclusive of program operating costs, net lost revenue and financial incentives), as authorized in Cause No. 44945 on an interim basis pending issuance of a final order in this Cause. The Parties stipulate and agree

that Commission approval of the request to extend the Current DSM Plan on an interim basis will also extend the timely cost recovery via IPL's Standard Contract Rider No. 22. The Parties further agree that the savings goals during the interim month-to-month period will be based on the 2020 savings goals approved in Cause No. 44945.

2. The Parties agree that amounts authorized during the interim period remain subject to later reconciliation based on EM&V and actual revenue received and expenses incurred through subsequent Standard Contract Rider No. 22 reconciliation adjustment proceedings or as otherwise ordered by the Commission in Cause No. 45370.

3. This request is supported by the attached affidavit of Zachary Elliot showing that approval of this interim relief will avoid interrupting IPL's DSM programs at the end of 2020 should a final order approving the next DSM plan not be issued prior to year-end. The interim relief is reasonable because shutting the programs down could cause customer and vendor confusion and other inefficiencies and costs associated with ramping programs up and down and could also result in reduced customer participation in IPL's DSM/EE programs, reducing any resulting energy and demand savings.

4. The 2018-2020 DSM Plan was approved over the OUCC's objections. The OUCC notes its agreement to the interim relief set forth herein is without waiver of any objections previously made by the OUCC in Cause No. 44945. The Parties agree that approval of this Joint Motion shall be without waiver of any position any Party, including IPL, may take with respect to the proposed DSM Plan pending approval in this Cause.

5. The jointly proposed interim relief requested in this motion is similar to the interim authority to extend DSM/EE programs approved by the Commission for other utilities.

See, e.g., Re Ind. Mich. Power Co., Cause No. 45285, Interim Order (IURC Dec. 27, 2019); *Re Duke Energy Ind., LLC*, Cause No. 43955 DSM-8, Prehearing Conference and Interim Order, (IURC Dec. 17, 2019).

6. This Joint Motion is not filed for purposes of delay and the Parties request the Commission promptly approve the interim relief requested herein.

WHEREFORE, the Parties hereby respectfully request that the Commission conduct such hearing as may be necessary or appropriate and thereafter:

1. Grant this Joint Motion for authority for IPL to continue to offer the Current DSM Plan, including associated cost recovery, as approved in Cause No. 44945; and
2. Grant all other appropriate relief.

Agreed to and respectfully submitted on behalf of
the foregoing,



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Attorneys for:
INDIANAPOLIS POWER & LIGHT COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 22nd day of May, 2020, by email transmission, hand delivery or United States Mail, first class, postage prepaid to:

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**Affidavit Supporting Interim Extension CN 4537017297817.2.docx**

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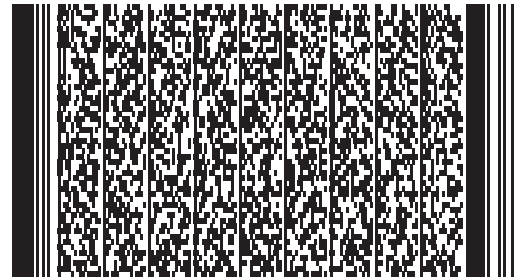
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E-Signature Summary**E-Signature 1: Zachary Elliot (ZE)**

May 21, 2020 06:37:34 -8:00 [A90D292B403E] [64.210.39.254]
zac.elliott@aes.com (Principal) (Personally Known)

E-Signature Notary: Shanna Bowman (SB)

May 21, 2020 06:37:34 -8:00 [C2CCCED24377] [64.210.39.254]
shanna.bowman@aes.com
I, Shanna Bowman, did witness the participants named above electronically sign this document.



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AFFIDAVIT OF ZACHARY ELLIOT

Zachary Elliot, upon his oath, deposes and states:

1. I am employed as Manager, Energy Efficiency Programs for Indianapolis Power & Light Company ("IPL" or "Petitioner") and am responsible for implementation of IPL's portfolio of Demand Side Management ("DSM") programs.
2. My business address is One Monument Circle, Indianapolis, Indiana 46204. I am over the age of eighteen (18) years and in all other respects competent to make the representations in this Affidavit.
3. As part of my job duties as Manager, Energy Efficiency Programs, I am familiar with and knowledgeable of IPL's administration and implementation of its current portfolio of DSM/EE programs for the calendar years 2018-2020, as previously approved by the Commission in its February 7, 2018 Order in Cause No. 44945 ("Current DSM Plan").



4. The purpose of my affidavit is to explain why the Commission should grant IPL authority to extend the Current DSM Plan, including oversight and the associated accounting and ratemaking (inclusive of program operating costs, net lost revenue and financial incentives) on an interim basis until a final Commission order is issued in the instant proceeding. IPL respectfully requests the Commission to issue a final Order in this Cause on or before December 16, 2020.

IPL's Current DSM Plan.

5. IPL's Current DSM Plan was approved by the Commission in Cause No. 44945. Following that approval, IPL has administered and implemented DSM programs in accordance with the 44945 Order.

6. The Commission approved an annual DSM/EE direct program operating cost budget for the 2020 DSM Plan Year of \$30.9 million. For the period of January 1, 2020 through March 31, 2020, IPL has incurred approximately \$6.8 million of the approved 2020 DSM Plan program budget. Currently, \$10.6 million of spending flexibility and prior period carry over funding is unallocated, which can be applied towards the interim relief being requested herein. Additionally, any 2020 program operating costs that go unspent in 2020 may also be applied.

Benefits of Extension.

7. The continued implementation of the Current DSM Plan is consistent with IPL's resource planning goals from its 2019 Integrated Resource Plan ("IRP").

8. Continuation of the Current DSM Plan program offerings pending a final Commission Order in this Cause will facilitate a transition to the DSM Plan ultimately approved for 2021 through 2023 and is therefore beneficial to IPL, its customers, and its program implementation vendors. Anticipated benefits include:



- (a.) Minimizing customer confusion about IPL's DSM offerings;
- (b.) Avoiding program interruptions and potential additional resulting costs;
- (c.) Helping maintain program momentum gained from prior year implementation efforts;
- (d.) Sustaining customer and marketplace interest and participation in DSM/EE programs; and
- (e.) Simplifying customer DSM/EE project planning across program years.

Interim Relief.

9. Assuming the interim period would commence January 1, 2021, IPL asks the Commission to allow IPL to continue implementation of its 2020 DSM programs as designed pursuant to the 44945 Order on a month-to-month basis until the Commission issues a final Order in Cause No. 45370. More specifically, IPL requests authorization of an average monthly budget of \$4.47 million inclusive of lost revenues and financial incentives, which reflects the average budgeted monthly spend for the Current DSM Plan for calendar year 2020. The savings goals during the interim month-to-month period will be based on the 2020 savings goals approved in Cause No. 44945.

10. During the interim period, IPL requests the Commission to authorize the same cost recovery authority as approved by the Commission in Cause No. 44945 for the Current DSM Plan, including recovery of direct and indirect program operating costs (including EM&V), net lost revenues, and financial incentives. However, that amount remains subject to later reconciliation based on EM&V and actual revenue received and expenses incurred through subsequent Standard Contract Rider No. 22 reconciliation adjustment proceedings or as otherwise ordered by the Commission in Cause No. 45370.



Conclusion.

11. Commission approval for IPL to continue to offer its Current DSM Plan programs, together with associated cost recovery approved in Cause No. 44945, on an interim basis pending a final Order approving IPL's DSM Plan in this Cause is beneficial and will facilitate cost effective energy efficiency and other DSM programs, and is consistent with IPL's annual savings goals approved in Cause No. 44945.

Further the Affiant sayeth nothing more.

Dated: 05/21/2020



Zachary Elliot



STATE OF OHIO)
COUNTY OF MONTGOMERY) SS:

Before me, the undersigned, a Notary Public in and for said County and State, appeared Zachary Elliot, who having been duly sworn upon his oath, attested that the foregoing statements are true to the best of his knowledge, information and belief.

05/21/2020
WITNESS my hand and seal this _____





 Signed on 2020/05/21 06:37:34 +8:00

Printed: Shanna Bowman

