

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE VERIFIED)
PETITION OF INDIANA MICHIGAN POWER)
COMPANY FOR APPROVAL OF) CAUSE NO. 46097
MODIFICATIONS TO ITS INDUSTRIAL)
POWER TARIFF – TARIFF I.P.)

VERIFIED PETITION

Indiana Michigan Power Company (I&M or Company) hereby petitions the Indiana Utility Regulatory Commission (Commission) for approval of certain modifications to I&M's Industrial Power Tariff – Tariff I.P. In support of this Petition, I&M represents and shows the following:

I&M's Corporate Status

1. I&M, a wholly-owned subsidiary of American Electric Power Company, Inc. (AEP), is a corporation organized and existing under the laws of the State of Indiana, with its principal offices at Indiana Michigan Power Center, Fort Wayne, Indiana.

2. I&M is engaged in, among other things, rendering electric service in the States of Indiana and Michigan. I&M owns and operates plant and equipment within the States of Indiana and Michigan that are in service and used and useful in the generation, transmission, distribution, and furnishing of such service to the public. I&M has maintained and continues to maintain its properties in a reliable state of operating condition.

3. I&M provides electric service to approximately 482,000 retail customers in

northern and east-central Indiana and approximately 133,000 retail customers in southwestern Michigan. I&M's Indiana service area covers approximately 3,200 square miles. In Indiana, I&M provides retail electric service in the following counties: Adams, Allen, Blackford, DeKalb, Delaware, Elkhart, Grant, Hamilton, Henry, Howard, Huntington, Jay, LaPorte, Madison, Marshall, Miami, Noble, Randolph, St. Joseph, Steuben, Tipton, Wabash, Wells, and Whitley. In addition, I&M serves customers at wholesale in the States of Indiana and Michigan. I&M's electric system is an integrated and interconnected entity that operates within Indiana and Michigan.

I&M's "Public Utility" Status

4. I&M is a "public utility" under Ind. Code § 8-1-2-1. I&M is subject to the jurisdiction of this Commission in the manner and to the extent provided by the Public Service Commission Act, as amended, and other pertinent laws of the State of Indiana.

5. I&M is also subject to the jurisdiction of the Michigan Public Service Commission and the Federal Energy Regulatory Commission (FERC) as to electric service provided by I&M to retail customers in Michigan and to wholesale customers, respectively.

6. I&M's transmission system is under the functional control of PJM Interconnection, L.L.C., a FERC-approved regional transmission organization (RTO), and is used for the provision of open access non-discriminatory transmission service pursuant to PJM's Open Access Transmission Tariff on file with the FERC. As a member of PJM, charges and credits are billed to AEP and allocated to I&M for functional operation of the transmission system, management of the PJM markets including the assurance of a

reliable system, and general administration of the RTO. I&M must also adhere to the federal reliability standards developed and enforced by the North American Electric Reliability Corporation (NERC), which is the electric reliability organization certified by the ERC to establish and enforce reliability standards for the bulk power system. ReliabilityFirst (RF) is one of eight NERC Regional Entities and is responsible for overseeing regional reliability standard development and enforcing compliance. I&M's transmission facilities are wholly located within the RF region.

7. I&M's property is classified in accordance with the Uniform System of Accounts (USOA) as prescribed by the FERC and adopted by this Commission.

Relief Sought

8. In this proceeding, I&M requests approval to update its Industrial Power Tariff – Tariff I.P. to incorporate certain terms to accommodate large load customers whose contract demands exceeds 150 MW or is reasonably expected to grow to exceed 150 MW at one or more aggregated premises. These modifications, also referred to as “Large Load Terms” in this filing, include: 1) A contract term for an initial period of twenty (20) years and provisions to address assignment of rights or delegations of obligations under the Contract; 2) A Contract Termination Fee that would only apply should there be a permanent closure during the contract term; 3) Provisions that allow a customers to reduce its contract capacity by up to twenty (20) percent during the contract term; 4) A ninety (90) percent monthly minimum billing demand; and 5) An increased minimum amount of collateral to be provided by the customer.

9. I&M seeks to make the proposed IP Tariff modifications effective upon

issuance of the Commission's order on the merits in this proceeding.

Applicable Law

10. I&M considers the provisions of the Public Service Commission Act, as amended, including Ind. Code §§ 8-1-2-38, 39, 42, 46 and 61, among others, are, or may be, applicable to the subject matter of this Petition.

Procedural and Other Matters

11. I&M is filing its case-in-chief contemporaneous with its Petition, including direct testimony of one witness, Andrew J. Williamson, I&M Director of Regulatory Services, his attachments (including clean and redline copies of the tariff), and workpapers.

12. I&M will publish notice of this filing in accordance with Ind. Code § 8-1-2-61 and submit proofs of publication once they become available.

13. In accordance with 170 IAC 1-1.1-9(a)(8), I&M will work with the Indiana Office of Utility Consumer Counselor (OUCC) and any intervenors to come to agreement on a proposed procedural schedule and associated terms and will file any such agreement in this Cause. I&M contemplates the following schedule:

Day 0	Fri. July 19, 2024	I&M Petition & Filing of case-in-chief
Day 63	Fri. Sep 20, 2024	OUCC and any intervenors filing of respective case-in-chief
Day 91	Fri. Oct 18, 2024	I&M's rebuttal
Day 102-105	One day Oct 29- Nov 1,	Evidentiary hearing

	2024	
Day 108	Mon. Nov 4, 2024	I&M proposed order/post hearing brief
Day 123	Tues. Nov 19, 2024	OUCC and any intervenor proposed order/brief
Day 131	Wed. Nov 27, 2024	I&M reply brief
Day 173	Wed. Jan 8, 2025	Target Order Date

Other Terms:

Service: The parties will provide same day service of filings via email, hand delivery or large file transfer.

Discovery: Discovery is available to all parties and shall be conducted on an informal basis. Any response or objection to a discovery request shall be made within ten calendar days of the receipt of such request until the OUCC/Intervenor prefiling date. Thereafter, any response or objection to a discovery request shall be made within five calendar days of the receipt of such request. Any discovery communication received after noon on a Friday or state holiday, or after 5:00 pm on any other day shall be deemed to have been received on the following business day. There will be blackout dates for discovery from August 31, 2024 through Monday, September 2, 2024. Dates designated as “blackout dates” shall not be included in determining the number of days provided for responding to a discovery request.

Request for Technical Conference

14. I&M proposes that a technical conference be held on or around the week of August 19-23, 2024 so as to provide an opportunity for IURC staff, the OUCC, and any intervenors to gain a better understanding of the relief requested herein.

Petitioner’s Authorized Representatives

15. The names and address of I&M’s attorneys in this matter who are duly authorized to accept service of papers in this Cause on behalf of I&M are:

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WHEREFORE, I&M respectfully requests the Commission to promptly publish notice, make such investigation and hold such hearings as are necessary and advisable, and thereafter make and enter an order in this Cause:

- (i) authorizing and approving the requested modifications to I&M Indiana's Industrial Power Tariff – I.P. Tariff, as set forth in the testimony and attachments of I&M;
- (ii) authorizing and approving the requested modifications become effective upon issuance of the Commission's order on the merits in this Cause; and
- (iii) granting to I&M such other and further relief in the premises as may be appropriate and proper.

Dated this 19th day of July 2024.

INDIANA MICHIGAN POWER COMPANY

A handwritten signature in blue ink that reads "Andrew Williamson". The signature is written in a cursive, flowing style.

By _____
Andrew Williamson
Director Regulatory Services

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Attorneys for INDIANA MICHIGAN POWER COMPANY

VERIFICATION

I, Andrew Williamson, Director, Regulatory Services for Indiana Michigan Power Company, affirms under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information and belief.

Dated: July 19, 2024.

A handwritten signature in blue ink that reads "Andrew Williamson". The signature is written in a cursive style with a large initial 'A'.

Andrew Williamson
Director of Regulatory Services

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Verified Petition was served this 19th day of July 2024, via electronic delivery on the following:

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