

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANAPOLIS)
POWER & LIGHT COMPANY D/B/A AES)
INDIANA PURSUANT TO IND. CODE 8-1-2.5-)
5 AND 8-1.2.5-6 FOR THE COMMISSION TO)
DECLINE TO EXERCISE JURISDICTION)
OVER AND APPROVE AN ALTERNATIVE) CAUSE NO. 45584
REGULATORY PLAN FOR THE OFFERING)
OF A CLEAN ENERGY SUBSCRIPTION)
OPTION WITH FLAT MONTHLY BILLING)
FOR RESIDENTIAL CUSTOMERS ("AES)
INDIANA PLUS SUBSCRIPTION"))

PETITIONER'S RESPONSE
TO COMMISSION DOCKET ENTRY DATED NOVEMBER 22, 2021

Indianapolis Power & Light Company d/b/a AES Indiana, by counsel, hereby submits its attached response to the Indiana Utility Regulatory Commission's Docket Entry dated November 22, 2021, marked as AES Indiana Docket Response Attachment A. Included with the attached response is an excel file marked as AES Indiana Docket Response Attachment B.

Respectfully submitted,

Teresa Morton Nyhart

IURC
PETITIONER'S 4
EXHIBIT NO. 1-12-22
DATE REPORTER

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OFFICIAL
EXHIBITS

Attorneys for INDIANAPOLIS POWER & LIGHT
COMPANY D/B/A AES INDIANA

Indianapolis Power & Light Company d/b/a AES Indiana
Cause No. 45584
Response to Docket Entry Dated November 22, 2021
AES Indiana Docket Response Attachment B

FILED
29-Nov-21
INDIANA UTILITY
REGULATORY COMMISSION

usage adder (at cap) 4%
 Program fee (at cap) 10%

Year

Ajusted with Rate Case Base charge for bill below 325 KWH/Month:

Ajusted with Rate Case Base charge for bill above 325 KWH/Month:

month

Ajusted with Rate Case Base rate for first 500 KWH per KWH

Ajusted with Rate Case charge for usage over 500 KWH per KWH

Ajusted with Rate Case charge for usage over 1000 KWH (RH and RC rate type) per KWH

Adjusted quarterly FAC per KWH

Adjusted annual DSM per KWH

Adjusted annual CAP per KWH

Adjusted annual OSS per KWH

Adjusted annual RTO per KWH

Adjusted annual ECR per KWH

Adjusted annual TDSIC per KWH

Adjusted annual Green Power per KWH

Customer 1
 (500 kWh / month)

Monthly kWh Usage
 Base Charge
 Usage Charge
Total AES Indiana Tariff Charge
 with usage adder (KWh)
 Total bill with usage adder
 Base Charge
 Usage Tariffs
 Total with Program Fee
 Subscription Offer

Difference from Usage Adder
 Difference from Program Fee
Difference from Usage Adder and Program Fee

Customer 2
 (1500 kWh / month)

Monthly kWh Usage
 Base Charge
 Usage Charge
Total AES Indiana Tariff Charge
 with usage adder (KWh)
 Total bill with usage adder
 Base Charge
 Usage Tariffs
 Total with Program Fee
 Subscription Offer

Difference from Usage Adder

Difference from Program Fee

Difference from Usage Adder and Program Fee

Customer 3
(2000 kWh / month)

Monthly kWh Usage

Base Charge

Usage Charge

Total AES Indiana Tariff Charge

with usage adder (KWh)

Total bill with usage adder

Base Charge

Usage Tariffs

Total with Program Fee

Subscription Offer

Difference from Usage Adder

Difference from Program Fee

Difference from Usage Adder and Program Fee

	2021	2022	2022	2022	2022
\$	12.50	\$ 12.50	\$ 12.50	\$ 12.50	\$ 12.50
\$	17.00	\$ 17.00	\$ 17.00	\$ 17.00	\$ 17.00
Dec	Jan	Feb	Mar	Apr	
	\$0.1065	\$0.1065	\$0.1065	\$0.1065	\$0.1065
	\$0.0908	\$0.0908	\$0.0908	\$0.0908	\$0.0908
	\$0.0781	\$0.0781	\$0.0781	\$0.0781	\$0.0781
	\$0.0054	\$0.0054	\$0.0054	\$0.0054	\$0.0054
	\$0.0050	\$0.0052	\$0.0052	\$0.0052	\$0.0052
	\$0.0011	\$0.0011	\$0.0011	\$0.0011	\$0.0011
	\$0.0010	\$0.0010	\$0.0010	\$0.0010	\$0.0010
	\$0.0001	\$0.0001	\$0.0001	\$0.0001	\$0.0001
	\$0.0002	\$0.0002	\$0.0002	\$0.0002	\$0.0002
	\$0.0013	\$0.0013	\$0.0013	\$0.0013	\$0.0013
	\$0.0030	\$0.0030	\$0.0030	\$0.0030	\$0.0030
	454	526	466	426	385
	\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
	\$48.34	\$64.76	\$49.60	\$45.34	\$41.04
	\$65.34	\$81.76	\$66.60	\$62.34	\$58.04
	472	547	485	443	401
	\$67.27	\$84.03	\$68.58	\$64.15	\$59.68
	\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
	\$50.27	\$67.03	\$51.58	\$47.15	\$42.68
	\$74.00	\$92.43	\$75.44	\$70.57	\$65.65
	\$83.67				
Monthly \$ Difference	Annual \$ Difference	% Difference			
	\$2.15	\$25.75	2.9%		
	\$7.61	\$91.28	10.3%		
	\$9.75	\$117.03	13.2%		
	1362	1579	1398	1278	1156
	\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
	\$154.78	\$178.56	\$158.96	\$145.98	\$132.88
	\$171.78	\$195.56	\$175.96	\$162.98	\$149.88
	1417	1642	1454	1329	1203
	\$177.66	\$202.39	\$182.00	\$168.50	\$154.88
	\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
	\$160.66	\$185.39	\$165.00	\$151.50	\$137.88
	\$195.43	\$222.63	\$200.20	\$185.35	\$170.37
	\$212.82				
Monthly \$ Difference	Annual \$ Difference	% Difference			

\$6.49	\$77.83
\$19.35	\$232.17
\$25.83	\$309.99

3.5%
10.3%
13.8%

1816	2105	1864	1704	1542
\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
\$203.76	\$235.47	\$209.32	\$192.02	\$174.55
\$220.76	\$252.47	\$226.32	\$209.02	\$191.55
1889	2190	1938	1772	1604
\$228.60	\$261.57	\$234.38	\$216.39	\$198.22
\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
\$211.60	\$244.57	\$217.38	\$199.39	\$181.22
\$251.46	\$287.73	\$257.82	\$238.02	\$218.04
\$274.65				

Monthly \$ Difference	Annual \$ Difference	% Difference
\$8.65	\$103.77	3.6%
\$24.97	\$299.61	10.4%
\$33.62	\$403.38	13.9%

	2022		2022		2022		2022		2022
\$	12.50	\$	12.50	\$	12.50	\$	12.50	\$	12.50
\$	17.00	\$	17.00	\$	17.00	\$	17.00	\$	17.00
May	Jun		Jul		Aug		Sep		
	\$0.1065		\$0.1065		\$0.1065		\$0.1065		\$0.1065
	\$0.0908		\$0.0908		\$0.0908		\$0.0908		\$0.0908
	\$0.0781		\$0.0781		\$0.0781		\$0.0781		\$0.0781
	\$0.0054		\$0.0054		\$0.0054		\$0.0054		\$0.0054
	\$0.0052		\$0.0052		\$0.0052		\$0.0052		\$0.0052
	\$0.0011		\$0.0011		\$0.0011		\$0.0011		\$0.0011
	\$0.0010		\$0.0010		\$0.0010		\$0.0010		\$0.0010
	\$0.0001		\$0.0001		\$0.0001		\$0.0001		\$0.0001
	\$0.0002		\$0.0002		\$0.0002		\$0.0002		\$0.0002
	\$0.0013		\$0.0013		\$0.0013		\$0.0013		\$0.0013
	\$0.0030		\$0.0030		\$0.0030		\$0.0030		\$0.0030
	373		535		687		696		623
	\$17.00		\$17.00		\$17.00		\$17.00		\$17.00
	\$39.72		\$65.64		\$82.12		\$83.06		\$75.21
	\$56.72		\$82.64		\$99.12		\$100.06		\$92.21
	388		556		714		724		648
	\$58.31		\$84.95		\$102.09		\$103.07		\$94.90
	\$17.00		\$17.00		\$17.00		\$17.00		\$17.00
	\$41.31		\$67.95		\$85.09		\$86.07		\$77.90
	\$64.14		\$93.45		\$112.30		\$113.37		\$104.39
	1119		1604		2061		2087		1869
	\$17.00		\$17.00		\$17.00		\$17.00		\$17.00
	\$128.87		\$181.22		\$230.66		\$233.48		\$209.92
	\$145.87		\$198.22		\$247.66		\$250.48		\$226.92
	1164		1668		2143		2171		1944
	\$150.71		\$205.16		\$256.57		\$259.50		\$235.00
	\$17.00		\$17.00		\$17.00		\$17.00		\$17.00
	\$133.71		\$188.16		\$239.57		\$242.50		\$218.00
	\$165.78		\$225.68		\$282.23		\$285.45		\$258.50

1493	2138	2748	2783	2492
\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
\$169.21	\$239.02	\$304.93	\$308.69	\$277.27
\$186.21	\$256.02	\$321.93	\$325.69	\$294.27
1552	2224	2858	2894	2592
\$192.66	\$265.26	\$333.81	\$337.72	\$305.05
\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
\$175.66	\$248.26	\$316.81	\$320.72	\$288.05
\$211.93	\$291.79	\$367.20	\$371.49	\$335.56

	2022		2022		
\$	12.50	\$	12.50		
\$	17.00	\$	17.00		
Oct		Nov			
	\$0.1065		\$0.1065		
	\$0.0908		\$0.0908		
	\$0.0781		\$0.0781		
	\$0.0054		\$0.0054		
	\$0.0052		\$0.0052		
	\$0.0011		\$0.0011		
	\$0.0010		\$0.0010		
	\$0.0001		\$0.0001		
	\$0.0002		\$0.0002		
	\$0.0013		\$0.0013		
	\$0.0030		\$0.0030		
				Annual total	Average monthly
456	373		6,000	500	
\$17.00	\$17.00	\$	204.00	\$	17.00
\$48.55	\$39.69	\$	683.05	\$	56.92
\$65.55	\$56.69	\$	887.05	\$	73.92
474	388		6,240	520	
\$67.49	\$58.28	\$	912.81	\$	76.07
\$17.00	\$17.00	\$	204.00	\$	17.00
\$50.49	\$41.28	\$	708.81	\$	59.07
\$74.24	\$64.11	\$	1,004.09	\$	83.67
				Annual total	Average monthly
1368	1119		18,000	1,500	
\$17.00	\$17.00	\$	204.00	\$	17.00
\$155.75	\$128.78	\$	2,039.84	\$	169.99
\$172.75	\$145.78	\$	2,243.84	\$	186.99
1423	1163		18,720	1,560	
\$178.67	\$150.62	\$	2,321.67	\$	193.47
\$17.00	\$17.00	\$	204.00	\$	17.00
\$161.67	\$133.62	\$	2,117.67	\$	176.47
\$196.53	\$165.68	\$	2,553.83	\$	212.82

		Annual total	Average monthly
1824	1491	24,000	2,000
\$17.00	\$17.00	\$ 204.00	\$ 17.00
\$205.05	\$169.09	\$ 2,688.38	\$ 224.03
\$222.05	\$186.09	\$ 2,892.38	\$ 241.03
1897	1551	24,960	2,080
\$229.94	\$192.54	\$ 2,996.15	\$ 249.68
\$17.00	\$17.00	\$ 204.00	\$ 17.00
\$212.94	\$175.54	\$ 2,792.15	\$ 232.68
\$252.93	\$211.80	\$ 3,295.76	\$ 274.65

usage adder (DSM assumption)

2%

Program fee (at cap)

10%

Year

Ajusted with Rate Case

Base charge for bill below 325 KWH/Month:

Ajusted with Rate Case

Base charge for bill above 325 KWH/Month:

month

Ajusted with Rate Case

Base rate for first 500 KWH

per KWH

Ajusted with Rate Case

charge for usage over 500 KWH

per KWH

Ajusted with Rate Case

charge for usage over 1000 KWH (RH and RC rate type)

per KWH

Adjusted quarterly

FAC

per KWH

Adjusted annual

DSM

per KWH

Adjusted annual

CAP

per KWH

Adjusted annual

OSS

per KWH

Adjusted annual

RTO

per KWH

Adjusted annual

ECR

per KWH

Adjusted annual

TDSIC

per KWH

Adjusted annual

Green Power

per KWH

Customer 1
(500 kWh / month)

Monthly kWh Usage

Base Charge

Usage Charge

Total AES Indiana Tariff Charge

with usage adder (KWh)

Total bill with usage adder

Base Charge

Usage Tariffs

Total with Program Fee

Subscription Offer

Difference from Usage Adder

Difference from Program Fee

Difference from Usage Adder and Program FeeCustomer 2
(1500 kWh / month)

Monthly kWh Usage

Base Charge

Usage Charge

Total AES Indiana Tariff Charge

with usage adder (KWh)

Total bill with usage adder

Base Charge

Usage Tariffs

Total with Program Fee

Subscription Offer

Difference from Usage Adder and Program Fee

Customer 3
(2000 kWh / month)

Monthly kWh Usage

Base Charge

Usage Charge

Total AES Indiana Tariff Charge

with usage adder (KWh)

Total bill with usage adder

Base Charge

Usage Tariffs

Total with Program Fee

Subscription Offer

Difference from Usage Adder

Difference from Program Fee

Difference from Usage Adder and Program Fee

	2021		2022		2022		2022		2022
\$	12.50	\$	12.50	\$	12.50	\$	12.50	\$	12.50
\$	17.00	\$	17.00	\$	17.00	\$	17.00	\$	17.00
Dec		Jan		Feb		Mar		Apr	
	\$0.1065		\$0.1065		\$0.1065		\$0.1065		\$0.1065
	\$0.0908		\$0.0908		\$0.0908		\$0.0908		\$0.0908
	\$0.0781		\$0.0781		\$0.0781		\$0.0781		\$0.0781
	\$0.0054		\$0.0054		\$0.0054		\$0.0054		\$0.0054
	\$0.0050		\$0.0052		\$0.0052		\$0.0052		\$0.0052
	\$0.0011		\$0.0011		\$0.0011		\$0.0011		\$0.0011
	\$0.0010		\$0.0010		\$0.0010		\$0.0010		\$0.0010
	\$0.0001		\$0.0001		\$0.0001		\$0.0001		\$0.0001
	\$0.0002		\$0.0002		\$0.0002		\$0.0002		\$0.0002
	\$0.0013		\$0.0013		\$0.0013		\$0.0013		\$0.0013
	\$0.0030		\$0.0030		\$0.0030		\$0.0030		\$0.0030
	454		526		466		426		385
	\$17.00		\$17.00		\$17.00		\$17.00		\$17.00
	\$48.34		\$64.76		\$49.60		\$45.34		\$41.04
	\$65.34		\$81.76		\$66.60		\$62.34		\$58.04
	463		537		475		434		393
	\$66.30		\$82.89		\$67.59		\$63.24		\$58.86
	\$17.00		\$17.00		\$17.00		\$17.00		\$17.00
	\$49.30		\$65.89		\$50.59		\$46.24		\$41.86
	\$72.93		\$91.18		\$74.35		\$69.57		\$64.74
	\$82.49								
Monthly \$ Difference	Annual \$ Difference		% Difference						
	\$1.07	\$12.88	1.5%						
	\$7.50	\$89.99	10.1%						
	\$8.57	\$102.87	11.6%						
	1362	1579	1398	1278	1156				
	\$17.00	\$17.00	\$17.00	\$17.00	\$17.00				
	\$154.78	\$178.56	\$158.96	\$145.98	\$132.88				
	\$171.78	\$195.56	\$175.96	\$162.98	\$149.88				
	1389	1611	1426	1303	1180				
	\$174.72	\$198.98	\$178.98	\$165.74	\$152.38				
	\$17.00	\$17.00	\$17.00	\$17.00	\$17.00				
	\$157.72	\$181.98	\$161.98	\$148.74	\$135.38				
	\$192.19	\$218.88	\$196.87	\$182.31	\$167.62				
	\$209.25								
Monthly \$ Difference	Annual \$ Difference		% Difference						

\$3.24	\$38.91
\$19.02	\$228.28
\$22.27	\$267.19

1816	2105	1864	1704	1542
\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
\$203.76	\$235.47	\$209.32	\$192.02	\$174.55
\$220.76	\$252.47	\$226.32	\$209.02	\$191.55
1853	2148	1901	1738	1573
\$224.68	\$257.02	\$230.35	\$212.70	\$194.89
\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
\$207.68	\$240.02	\$213.35	\$195.70	\$177.89
\$247.15	\$282.72	\$253.39	\$233.97	\$214.38
\$269.89				

Monthly \$ Difference	Annual \$ Difference	% Difference
\$4.32	\$51.88	1.8%
\$24.54	\$294.43	10.2%
\$28.86	\$346.31	12.0%

	2022		2022		2022		2022		2022
\$	12.50	\$	12.50	\$	12.50	\$	12.50	\$	12.50
\$	17.00	\$	17.00	\$	17.00	\$	17.00	\$	17.00
May	Jun		Jul		Aug		Sep		
	\$0.1065		\$0.1065		\$0.1065		\$0.1065		\$0.1065
	\$0.0908		\$0.0908		\$0.0908		\$0.0908		\$0.0908
	\$0.0781		\$0.0781		\$0.0781		\$0.0781		\$0.0781
	\$0.0054		\$0.0054		\$0.0054		\$0.0054		\$0.0054
	\$0.0052		\$0.0052		\$0.0052		\$0.0052		\$0.0052
	\$0.0011		\$0.0011		\$0.0011		\$0.0011		\$0.0011
	\$0.0010		\$0.0010		\$0.0010		\$0.0010		\$0.0010
	\$0.0001		\$0.0001		\$0.0001		\$0.0001		\$0.0001
	\$0.0002		\$0.0002		\$0.0002		\$0.0002		\$0.0002
	\$0.0013		\$0.0013		\$0.0013		\$0.0013		\$0.0013
	\$0.0030		\$0.0030		\$0.0030		\$0.0030		\$0.0030
	373		535		687		696		623
	\$17.00		\$17.00		\$17.00		\$17.00		\$17.00
	\$39.72		\$65.64		\$82.12		\$83.06		\$75.21
	\$56.72		\$82.64		\$99.12		\$100.06		\$92.21
	381		545		701		710		635
	\$57.52		\$83.80		\$100.61		\$101.56		\$93.55
	\$17.00		\$17.00		\$17.00		\$17.00		\$17.00
	\$40.52		\$66.80		\$83.61		\$84.56		\$76.55
	\$63.27		\$92.18		\$110.67		\$111.72		\$102.91
	1119		1604		2061		2087		1869
	\$17.00		\$17.00		\$17.00		\$17.00		\$17.00
	\$128.87		\$181.22		\$230.66		\$233.48		\$209.92
	\$145.87		\$198.22		\$247.66		\$250.48		\$226.92
	1142		1636		2102		2129		1906
	\$148.29		\$201.69		\$252.12		\$254.99		\$230.96
	\$17.00		\$17.00		\$17.00		\$17.00		\$17.00
	\$131.29		\$184.69		\$235.12		\$237.99		\$213.96
	\$163.12		\$221.86		\$277.33		\$280.49		\$254.06

1493	2138	2748	2783	2492
\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
\$169.21	\$239.02	\$304.93	\$308.69	\$277.27
\$186.21	\$256.02	\$321.93	\$325.69	\$294.27
1522	2181	2803	2838	2542
\$189.44	\$260.64	\$327.87	\$331.70	\$299.66
\$17.00	\$17.00	\$17.00	\$17.00	\$17.00
\$172.44	\$243.64	\$310.87	\$314.70	\$282.66
\$208.38	\$286.70	\$360.66	\$364.87	\$329.63

	2022		2022		
\$	12.50	\$	12.50		
\$	17.00	\$	17.00		
Oct		Nov			
	\$0.1065		\$0.1065		
	\$0.0908		\$0.0908		
	\$0.0781		\$0.0781		
	\$0.0054		\$0.0054		
	\$0.0052		\$0.0052		
	\$0.0011		\$0.0011		
	\$0.0010		\$0.0010		
	\$0.0001		\$0.0001		
	\$0.0002		\$0.0002		
	\$0.0013		\$0.0013		
	\$0.0030		\$0.0030		
				Annual total	Average monthly
	456		373	6,000	500
	\$17.00		\$17.00	\$ 204.00	\$ 17.00
	\$48.55		\$39.69	\$ 683.05	\$ 56.92
	\$65.55		\$56.69	\$ 887.05	\$ 73.92
	465		380	6,120	510
	\$66.52		\$57.49	\$ 899.93	\$ 74.99
	\$17.00		\$17.00	\$ 204.00	\$ 17.00
	\$49.52		\$40.49	\$ 695.93	\$ 57.99
	\$73.17		\$63.24	\$ 989.92	\$ 82.49
				Annual total	Average monthly
	1368		1119	18,000	1,500
	\$17.00		\$17.00	\$ 204.00	\$ 17.00
	\$155.75		\$128.78	\$ 2,039.84	\$ 169.99
	\$172.75		\$145.78	\$ 2,243.84	\$ 186.99
	1395		1141	18,360	1,530
	\$175.71		\$148.20	\$ 2,282.75	\$ 190.23
	\$17.00		\$17.00	\$ 204.00	\$ 17.00
	\$158.71		\$131.20	\$ 2,078.75	\$ 173.23
	\$193.28		\$163.02	\$ 2,511.03	\$ 209.25

		Annual total	Average monthly
1824	1491	24,000	2,000
\$17.00	\$17.00	\$ 204.00	\$ 17.00
\$205.05	\$169.09	\$ 2,688.38	\$ 224.03
\$222.05	\$186.09	\$ 2,892.38	\$ 241.03
1861	1521	24,480	2,040
\$225.99	\$189.32	\$ 2,944.27	\$ 245.36
\$17.00	\$17.00	\$ 204.00	\$ 17.00
\$208.99	\$172.32	\$ 2,740.27	\$ 228.36
\$248.59	\$208.25	\$ 3,238.69	\$ 269.89

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 29th day of November, 2021, by email transmission, or United States Mail, first class, postage prepaid to:

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Attorneys for INDIANAPOLIS POWER & LIGHT COMPANY
D/B/A AES INDIANA

Data Request IURC DR 1 - 1

Please explain how Uplight, Inc. was selected as the vendor responsible for offering the AES Indiana PLUS Subscription program to participating customers. Were other potential companies or vendors considered?

Response:

AES Indiana wants to provide a flat bill, no true-up offering to its customers to provide an option for those wanting the convenience of such a program. A challenge posed by the conventional approach to a flat bill is the reduction or elimination of an appropriate price signal that encourages customers to consume energy efficiently.¹ The conventional flat bill offering also does not address customer interest in being served through clean energy. AES Indiana also wanted to provide a digital experience for its customers to modernize the engagement platform with customers. Doing so is responsive to consumers' increasing interest in being served digitally and through a subscription.² This modernized "flat bill" offering would be voluntary and offered as an alternative to the Company's "standard tariff rate".

AES Indiana's objective is to develop a voluntary offering that addressed clean energy, energy efficiency and customer desire for a mobile interaction and to do so in a way that safeguarded interests of the non-participants and protected the company from potential loss.

When exploring flat bill options, AES Indiana found that the fixed bill or flat bill electricity rate design concept is offered through 1) regulated utility in a vertically integrated market; 2) through bill pay agents or brokers that operate without regard to whether a state is fully regulated or retail choice; and 3) through retail suppliers in deregulated markets.³

1. Examples of regulated utilities is discussed in AES Indiana's response to IURC DR 1-2.
2. Bill pay agents or brokers include Cirro Energy⁴, Inspire Energy⁵, and Arcadia Power⁶.
3. Retail suppliers include Spark Energy⁷ and NOCO⁸.

¹ Fixed Bill+ Making Rate Design Innovation Work for Consumers, Electricity, Providers and the Environment, Working Paper June 2020, The Brattle Group, at pp. 3, 9.

(https://brattlefiles.blob.core.windows.net/files/19251_fixedbill_working_paper_brattle_june_2020.pdf).

² AES Indiana Witness Schroder Direct Testimony, IURC CN 45584, p. 8 Lines 11-13.

³ Fixed Bill+ Making Rate Design Innovation Work for Consumers, Electricity, Providers and the Environment, Working Paper June 2020, The Brattle Group, at pp. 14-15.

(https://brattlefiles.blob.core.windows.net/files/19251_fixedbill_working_paper_brattle_june_2020.pdf).

⁴ https://www.cirroenergy.com/en_US/lp/simply-flat.

⁵ <https://www.inspirecleanenergy.com/answer-center/#inspire-plans>.

⁶ <https://www.arcadia.com> – Arcadia offers bundled agency services for customers, including a flat-rate green power program.

⁷ <https://www.sparkenergy.com/for-home/fixed-price-energy-plan/>.

⁸ <http://www.noco.com/home-energy/electric/>.

All three types of electricity service providers are exploring alternative ways to price electricity that may better align with both consumer preferences and the needs of the power system.⁹

While the agency/broker model was explored as part of the development research, this construct is a competing option, not a model that could be implemented by the utility. That being said, the availability of this unregulated alternative, is another reason that underpins AES Indiana's interest in updating its voluntary customer offerings and customer engagement experience.

No vendors were identified that offered the desired utility offered product (i.e. offer via mobile app, integrate clean energy and energy efficiency, safeguard non-participants and company, and have potential to expand digital engagement as customer interests and technology evolves (e.g. demand response).

The Company next looked at how it might develop this concept. Offering solely through the utility is challenging because AES Indiana does not maintain all the subject matter expertise in analytics, computer systems design, customer engagement and related technical services needed to develop the new product. The Company's resources are necessarily focused on the ongoing provision of retail service and facilities and not on the development of innovative new products. When additional subject matter expertise is necessary, the Company generally contracts with vendors for the additional support.

Because the desired service offering was not available in the market, it was necessary for the Company to find a partner to collaborate with in the development of the desired service.

At the time, Uplight, Inc. ("Uplight") was already an integrated vendor working on the Company's DSM initiatives following a competitive solicitation undertaken with the Company's DSM Oversight Board. As stated in Witness Schroder's direct testimony (QA15) Uplight currently manages AESIndianamarketplace.com and is a provider of AES Indiana sponsored DSM programs. Uplight had also been engaged by AES Indiana to develop, maintain and roll out the mobile application. Both engagements reflect the unique experience of this industry services provider.

Uplight was founded in 2019 and is an energy industry leader in end-to-end customer-centric technology solutions. Uplight was born from the merger of Tendril and Simple Energy, and the acquisitions of FirstFuel, EEme and EnergySavvy.

Uplight's expertise includes the use of advanced customer and energy analytics for customer engagement; innovation, demand management and energy efficiency; and attaining decarbonization goals. Uplight partners with more than 80 of the world's leading electric and gas utilities. Uplight's personnel include software engineers, customer success and implementation

⁹ Fixed Bill+ Making Rate Design Innovation Work for Consumers, Electricity, Providers and the Environment, Working Paper June 2020, The Brattle Group, at pp. 5-6.
(https://brattlefiles.blob.core.windows.net/files/19251_fixedbill_working_paper_brattle_june_2020.pdf).

experts, data/behavioral scientists, and consumer and user experience (UX) and /user interface (UI) experts.¹⁰

Because Uplight had the desired energy industry, customer engagement, analytics and digital solutions expertise as well as Company specific experience, AES Indiana explored a joint development agreement with Uplight to develop the innovative flat fee subscription program. As Uplight is an affiliate, this agreement was developed in compliance with the affiliate cost standard and filed with the Commission. The model that was developed enables the Company to safeguard non-participants as well as itself from potential financial loss.

As discussed in Uplight's August 21, 2021 press release¹¹:

"Uplight is the first utility partner to offer a subscription-based customer experience allowing customers to pay the same amount each month. Plus provides customers with a new level of clarity into their gas and electricity usage. From digital, fixed subscription payments to energy usage information and savings incentives, the personalized solution connects customers to the right programs at the right time with easy-to-understand options to enroll in plans that work best for them. To create the personalized energy bundles, Plus uses customer-provided feedback on offer types, information on utility program eligibility, and innovative propensity modeling tailored to individual customers."

¹⁰ <https://uplight.com/about-us/>.

¹¹ <https://uplight.com/press/uplight-launches-plus-empowering-utility-customers-to-participate-in-the-clean-energy-transition-with-personalized-subscription-energy-bundles/>.

Data Request IURC DR 1 - 2

On page 29 of her testimony, Ms. Schroder states that Petitioner's proposed subscription offering has been available in neighboring areas for many years. She states that allowing Petitioner to offer the proposed program in accordance with the proposed ARP will level the playing field as customers choose where to live. Please provide examples of jurisdictions in which regulated utilities offer similar programs to the one proposed in this proceeding.

Response:

A general description of the market providers is provided in AES Indiana's response to IURC DR 1-1. Although not an exhaustive list, examples of regulated electric utility and energy cooperative offerings include:

- Alabama - Alabama Power – FlatBill Rate¹²
- Florida - Gulf Power – Residential/Commercial Fixed Rate¹³
- Georgia - Georgia Power – FlatBill¹⁴
- Georgia – Cobb Electric Cooperative- Even Bill¹⁵
- Indiana - Duke Energy Indiana – Your FixedBill¹⁶
- Indiana - Indiana Michigan Power – EZ Bill¹⁷
- Oklahoma – Oklahoma Gas & Electric – Guaranteed Flat Bill¹⁸
- Wisconsin - Madison Gas & Electric – Renewable Flat Bill¹⁹

¹² <https://www.alabamapower.com/residential/residential-pricing-and-rate-plans/flat-bill-rate.html>.

¹³ <https://www.gulfpower.com/content/dam/gulfpower/us/en/pdf/rates/business/flat-1.pdf>.

¹⁴ <https://www.georgiapower.com/residential/billing-and-rate-plans/pricing-and-rate-plans/flatbill.html>.

¹⁵ <https://cobbemc.com/content/even-bill>.

¹⁶ https://desitecoreprod-cd.azureedge.net/_media/pdfs/for-your-home/rates/electric-in/iurc-15/010-de-in-rider-20-fixed-bill.pdf?la=en&rev=3fc5fb054afe44e5bd0ec47f3358a40e.

¹⁷ <https://www.indianamichiganpower.com/account/bills/ezbill>.

¹⁸ <https://www.oge.com/wps/wcm/connect/8e8d52e5-2e96-4e4e-861e-d1ad79f93b67/3.40+-+R-GFB+Stamped+Approved.pdf?MOD=AJPERES&CACHEID=ROOTWORKSPACE-8e8d52e5-2e96-4e4e-861e-d1ad79f93b67-nPAYsE1>.

¹⁹ <https://www.mge.com/customer-service/for-homes/electric-rates/renewable-flat-bill>.

Data Request IURC DR 1 - 3

Please provide estimated customer bill impact projections for a hypothetical customer subscribed to the AES Indiana PLUS Subscription program using 500 kWh/month, 1500 kWh/month, and 2000 kWh/month with a breakdown regarding the calculation of the Program Fee and Usage Adder.

Response:

The Subscription Offer calculation for the hypothetical customer profiles would use the following input data from AES Indiana tariffs (month by month details are provided in AES Indiana Docket Response Attachment B):

- Residential Rate RS Customer Charge (\$12.50 for bills under 325kWh / \$17 for bills over 325kWh)
- Residential Rate RS Energy Charge
- Standard Contract Rider costs, including AES Indiana Standard Contract Rider 21, Green Power Initiative

For each hypothetical customer profile, a typical AES Indiana Residential customer load profile (see AES Indiana Docket Response Attachment B) is utilized to project monthly usage. This illustrates that in some months the subscription offer will cost more than their actual utility-calculated bill, and in other months the subscription offer will cost less than their actual utility-calculated bill. This program will offer bill certainty across the 12-month subscription.

The hypothetical calculation utilizes the maximum allowable usage adder of 4% for the 'basic bundle' (flat bill, 100% clean energy, no DSM), and a lowered usage adder of 2% for a customer enrolled in a 'DSM bundle' (basic bundle elements, but customer also elects DSM programs).

The hypothetical calculation utilizes the maximum allowable Program Fee of 10%.

For each hypothetical customer profile, see below for the annual cost for energy, usage adder, and program fee, as well as the Subscription Offer that would be presented to that customer. The calculations are for the basic bundle as well as for a customer enrolled in a DSM bundle. For the detailed calculations supporting the results presented below, see AES Indiana Docket Response Attachment B.

Customer 1: Average projected usage of 500kWh / month

Total Annual Charge on AES Indiana Tariff²⁰: \$887.05
Average Monthly Charge on AES Indiana Tariff: \$73.92
Range on AES Indiana Tariff: \$56.69 - \$100.06

Basic Subscription Bundle:

Total Annual Charge = \$1,004.09
Total Annual Usage Adder = \$25.75
Total Annual Program Fee = \$91.28

Monthly Subscription Offer = \$83.67
Average Monthly Usage Adder = \$2.15
Average Monthly Program Fee = \$7.61

Subscription DSM Bundle:

Total Annual Charge = \$989.92
Total Annual Usage Adder = \$12.88
Total Annual Program Fee = \$89.99

Monthly Subscription Offer = \$82.49
Average Monthly Usage Adder = \$1.07
Average Monthly Program Fee = \$7.50

²⁰ Assumes participation in AES Indiana Standard Contract Rider 21, Green Power Initiative at 100%.

Customer 2: Average projected usage of 1,500kWh / month

Total Annual Charge on AES Indiana Tariff²¹: \$2,243.84
Average Monthly Charge on AES Indiana Tariff: \$186.99
Range on AES Indiana Tariff: \$145.78 – \$250.48

Basic Subscription Bundle:

Total Annual Charge = \$2,553.83
Total Annual Usage Adder = \$77.83
Total Annual Program Fee = \$232.17

Monthly Subscription Offer = \$212.82
Average Monthly Usage Adder = \$6.49
Average Monthly Program Fee = \$19.35

Subscription DSM Bundle:

Total Annual Charge = \$2,511.03
Total Annual Usage Adder = \$38.91
Total Annual Program Fee = \$228.28

Monthly Subscription Offer = \$209.25
Average Monthly Usage Adder = \$3.24
Average Monthly Program Fee = \$19.02

²¹ Assumes participation in AES Indiana Standard Contract Rider 21, Green Power Initiative at 100%.

Customer 3: Average projected usage of 2,000kWh / month

Total Annual Charge AES Indiana Tariff²²: \$2,892.38
Average Monthly Charge AES Indiana Tariff: \$241.03
Range on AES Indiana Tariff: \$186.09 - \$325.69

Basic Subscription Bundle:

Total Annual Charge = \$3,295.76
Total Annual Usage Adder = \$103.77
Total Annual Program Fee = \$299.61

Monthly Subscription Offer = \$274.65
Average Monthly Usage Adder = \$8.65
Average Monthly Program Fee = \$24.97

Subscription DSM Bundle:

Total Annual Charge = \$3,238.69
Total Annual Usage Adder = \$51.88
Total Annual Program Fee = \$294.43

Monthly Subscription Offer = \$269.89
Average Monthly Usage Adder = \$4.32
Average Monthly Program Fee = \$24.54

²² Assumes participation in AES Indiana Standard Contract Rider 21, Green Power Initiative at 100%.

Data Request IURC DR 1 - 4

In rebuttal, Ms. Schroder discusses some of the benefits conferred upon Petitioner and Petitioner's customers by using an affiliate to offer the AES Indiana Plus Subscription program. Please further explain why Petitioner cannot or chose not to offer the proposed AES Indiana PLUS Subscription program directly to its customers and why Uplight, Inc. is the appropriate partner.

Response:

As discussed in the Response to IURC DR 1-1, the proposed subscription offering is a new and innovative concept. AES Indiana chose not to offer the proposed subscription itself for the following reasons:

- 1) The Company does not have the internal expertise to develop this innovative program alone.
- 2) Because this is a new product offering, a vendor solution for the product implementation was chosen because this approach allows the Company to test the design without incurring the cost to develop and maintain the in-house capability to implement the program just for AES Indiana.
- 3) Working with an industry vendor reduces the cost of the product development.
- 4) Working with this industry vendor safeguards non-participating customers and the Company from program costs and potential program loss. It also avoids the need for the costs and revenues to be booked below the line while advancing AES Indiana's goals of pursuing clean energy, energy efficiency, subscription offers and digital customer engagement.

Uplight, Inc. is the appropriate partner for this project because it is well qualified to undertake this work and is already integrated into and familiar with AES Indiana from Uplight's role in AES Indiana's DSM programs. This is further explained in the Company's Response to IURC DR 1-1.