

OFFICIAL
EXHIBITS

FILED
July 21, 2023
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 SEPTEMBER 2023 THROUGH)
NOVEMBER 2023, IN ACCORDANCE WITH)
THE PROVISIONS OF I.C. 8-1-242, AND)
CONTINUED USE OF RATEMAKING)
TREATMENT FOR COSTS OF WIND POWER)
PURCHASES PURSUANT TO CAUSE NOS.)
43485 AND 43740, AND CONTINUED)
RECOVERY OF THE COSTS OF THE FUEL)
HEDGING PLAN PURSUANT TO I.C. 8-1-2-42.)

CAUSE NO. 38703
FAC-140

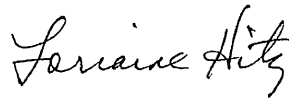
IURC
PUBLIC'S
EXHIBIT NO. 1
8-9-23 AT
DATE REPORTER

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

PUBLIC'S EXHIBIT NO. 1

PRE-FILED TESTIMONY OF OUCC WITNESS
GREGORY T. GUERRETTAZ

July 21, 2023



Lorraine Hitz
Attorney No. 18006-29
Deputy Consumer Counselor

OFFICE OF UTILITY CONSUMER COUNSELOR
Pre-Filed Testimony of Gregory T. Guerrettaz, CPA
Review of Fuel Cost Adjustment
CAUSE NO. 38703 FAC-140

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

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

2 **A:** My name is Gregory T. Guerrettaz. I am a CPA and a Municipal Advisor. My office is
3 located at 2680 East Main Street, Suite 223, Plainfield, Indiana 46168. My qualifications
4 are attached to this testimony as Appendix A.

5 **Q: What is the purpose of your testimony in this Cause?**

6 **A:** I will give an opinion concerning the relief requested by Indianapolis Power & Light
7 Company (“IPL”, “Applicant” or “AES Indiana”) in its Application for Approval of Fuel
8 Cost Charge, filed on June 16, 2023, as discussed in AES Indiana’s direct testimony. My
9 testimony will discuss:

10 Whether AES Indiana has calculated the fuel cost element of the proposed fuel cost
11 adjustment in conformity with the requirements of Ind. Code § 8-1-2-42;

12 Whether the fuel costs paid by AES Indiana, when compared to fuel costs recovered
13 by AES Indiana for the quarter ended April 30, 2023, resulted in a variance which was used
14 to calculate the fuel cost adjustment for the quarter ended November 30, 2023, in
15 conformity with the requirements of I.C. § 8-1-2-42;

16 Whether the level of net operating income experienced by AES Indiana for the
17 twelve months ended April 30, 2023 was greater than that granted in IPL’s rate case

1 proceedings, Cause No. 45029, as well as applicable ECCRA and Transmission,
2 Distribution and Storage System Improvement Charge Property ("TDSIC") Orders; and

3 Whether the fuel cost adjustment for the quarter ended April 30, 2023 has been
4 properly applied in conformity with the requirements of Cause Nos. 38703-FAC 137 and
5 138.

6 **Q: To the extent you do not address a specific item in your testimony, should it be**
7 **construed to mean you agree with Petitioners' proposals?**

8 **A:** No. My silence on any topics, issues, or items Petitioner proposes does not indicate my
9 approval of these topics, issues or items. Rather, the scope of my testimony is limited to
10 the specific topics discussed herein.

11 **Q: Please explain Schedule A.**
12

13 **A:** Schedule A presents the components that comprise AES Indiana's proposed fuel cost
14 adjustment factor and shows how the components are used in the calculation. The fuel cost
15 element of the proposed fuel cost adjustment contains more than AES Indiana's actual fuel
16 costs. For example, this calculation includes AES Indiana's power purchases, MISO
17 charges and credits, and ASM charges.

18 Schedule A also demonstrates that the fuel cost paid by AES Indiana, when
19 compared to the fuel costs recovered from AES Indiana's customers for the quarter ended
20 April 30, 2023, resulted in a variance that was used to calculate the fuel cost adjustment
21 for the quarter ending November 30, 2023. As filed by AES, Schedule A has multiple line
22 items to arrive at the variance factor. The following components have been used to
23 calculate the combined variance as shown on this schedule:

1 A) the current variance from FAC 140 of (\$25,461,310); and

2 B) the impact of the FAC 133 S1 deferred amount of \$20,518,476 over 24 months
3 at a rate of \$2,564,810 per quarter.

4 These combined variances total (\$22,896,500), which AES Indiana is requesting be spread
5 over the three months in FAC 140. Once the forecasted cost of 37.435 Mills per KWh is
6 added to the (7.599), the total requested amount is 29.836 Mills per KWh. Subtracting the
7 base cost of fuel of 32.938 results in a factor of (3.102) Mills/KWh.

8 **Q: So this factor is a negative, or a credit?**

9 **A:** Yes. AES has not had a negative factor since FAC 132, where the OUCC proposed a credit.

10 **Q: Does the OUCC have an opinion regarding the projections used by AES Indiana for**
11 **fuel costs and sales of power for the quarter ending November 30, 2023?**

12 **A:** Yes. The OUCC performed a detailed review of AES Indiana's estimation model during
13 the audit. The forecast is affected by the following items:

14 A) Daily changes in the price of natural gas;

15 B) Daily changes of power prices for the MISO market;

16 C) Recent hedges put into place;

17 D) AES Indiana's coal inventory; and

18 E) Gas transportation contracts.

19 Based on the OUCC's analysis and what appeared during the audit to be only a small
20 change in commodity pricing, the OUCC is recommending the F+S of 37.435 Mills/KWh
21 as detailed in this report on Schedule A be approved.

22 **Q: What components did the OUCC use for the recommended factor?**

1 **A:** First, the OUCC worked with AES to update the commodity prices for power and natural
2 gas. Once the prices were updated by AES, the OUCC then conducted an extensive review
3 of all factors affecting the proposed F+S for the forecasted period.

4 **Q: Please explain Schedules B and B-1.**

5 **A:** Schedule B compares AES Indiana's actual electric net operating income applicable to
6 jurisdictional retail sales for the twelve months ending April 30, 2023 (as adjusted for
7 rounding), to IPL's authorized electric net operating income per the Commission's Order
8 in Cause No. 45029, as adjusted for all applicable Qualified Pollution Control Property
9 ("QPCP") proceedings under Cause Nos. 42170-ECRs, 45264, and TDSIC Orders.
10 Schedule B-1 depicts AES Indiana's cumulative over- or under- earnings for each fuel cost
11 adjustment for the relevant period calculated.

12 **Q: Has AES Indiana earned a level of net operating income greater than that authorized**
13 **by the Commission?**

14 **A:** No. As shown on Schedule B, AES Indiana had jurisdictional net operating income for the
15 twelve months ending April 30, 2023 that was less than that granted in Cause No. 45029,
16 as adjusted for applicable ECR and TDSIC Causes. The "Excess (Under) Earnings for the
17 Relevant Period" as shown on Schedule B-1 shows the Sum of Differentials for the relevant
18 period as a positive \$74,624,218, which has accumulated through the FAC proceedings of
19 FAC 121 through FAC 140. It is important to note that AES has filed a base rate case as of
20 this FAC filing.

21 **Q: Has the fuel cost adjustment for the quarter ending April 30, 2023, been accurately**
22 **applied in conformity with the requirements of Cause No. 38703-FAC 135?**

23 **A:** Yes. The fuel cost adjustment approved by the Commission in Cause Nos. 38703-FAC
24 137 and 138 was the amount applied to AES Indiana's customers for the period approved.

1 **Q: Please explain Schedule C.**

2 **A:** Schedule C compares AES Indiana's pro forma operating expenses approved by the
3 Commission in Cause No. 45029 with the actual operating expenses incurred by AES
4 Indiana for the twelve months ending April 30, 2023. The purpose of this calculation is to
5 determine whether AES Indiana had actual decreases in other operating expenses which
6 could be used to offset increases in AES Indiana's fuel cost. As can be seen on Schedule
7 C, AES Indiana did not have decreases in other operating costs that could be used to offset
8 fuel cost increases.

9 **Q: Please explain Schedules D and E.**

10 **A:** Schedule D sets forth the total fuel cost, in Mills, for the period January 2019 through April
11 2023. Schedule E graphically depicts the results of Schedule D for the period January 2019
12 through April 2023.

13 **Q: Does the OUCC have any comments regarding the purchased power benchmark**
14 **agreement approved in Cause No. 43414; Ancillary Services Market ("ASM"); bill**
15 **analysis; steam generation cost comparison; actual cost of fuel (Mills/KWh)**
16 **comparison; coal inventory; Lakefield Wind Park ("Lakefield") and Hoosier Wind**
17 **Power Project LLC ("Hoosier"); coal price decrement; unit commitment status; the**
18 **Hedging Program; and implementation of the Cause No. 38703 FAC 133 S1 (Eagle**
19 **Valley) Settlement?**

20 **A:** OUCC Witness Michael Eckert will provide testimony on these issues.

21 **Q: Please explain Schedule F.**

22 **A:** Schedule F is the comparison of actual fuel costs and estimated fuel costs for this FAC
23 period and includes transmission loss adjustments.

24 **Q: Please explain Schedule G.**

25 **A:** Schedule G reflects the proposed and historical fuel cost adjustment factors.

26 **Q: Please explain Schedule H.**

27 **A:** Schedule H is the schedule setting forth the MISO – Cost Flow Through in this FAC.

1 **Q: Please explain Schedule I.**

2 **A:** Schedule I is the schedule setting forth all MISO charge types by month.

3 **Q: Did AES Indiana include the fuel cost and fuel revenue associated with sales from its**
4 **public electric vehicle charging stations in this FAC?**

5 **A:** Yes. The amounts accounted for as fuel costs are reflected on Attachment NHC-1,
6 Schedule 4.

7 **Q: What was AES Indiana's weighted average deviation for the reconciliation period?**

8 **A:** The weighted average deviation for the reconciliation period is 22.26%.

9 **Q: How will AES Indiana's proposed factor affect the average residential customer?**

10 **A:** An average residential customer using 1,000 KWh per month will experience a decrease
11 of \$5.96, or 5.11% with the proposed mitigated factor.

12 **Q: Is AES Indiana's coal inventory within its target levels?**

13 **A:** ~~Yes.~~ ^{No.} AES Indiana is currently above its target levels.

14 **Q: Should AES Indiana provide an update to the OUCC on coal inventory changes in**
15 **the next FAC?**

16 **A:** Yes. The OUCC has an on-going request for AES Indiana's coal inventory levels and coal
17 transportation issues.

18 **Q: Is AES Indiana seeking to recover any purchased power costs incurred in February,**
19 **March and April 2023 that are in excess of the Daily Benchmarks?**

20 **A:** Yes. AES Indiana is seeking to recover \$218,267 of purchased power costs in excess of
21 the applicable Purchased Power Daily Benchmarks in FAC 140. Mr. Eckert provides
22 testimony on this recoverable amount.

23 **Q: What information does the OUCC continue to review in FAC audits?**

24 **A:** The FAC is impacted by ever-changing generation costs, the generation mix, MISO market
25 offer components, MISO instructions, purchased power costs in the MISO market and
26 other items.

1 **Q: Did AES Indiana discuss and address its fuel hedging policy with the OUCC?**

2 **A:** Yes. AES Indiana discussed its natural gas hedging policy and walked the OUCC through
3 the structure of its hedges. The process appears to be coming together to provide a hedge
4 against higher prices in the next two years. There was a \$15,147,799 cost associated with
5 the hedging program resulting from AES's after-the-fact hedging program evaluation,
6 which increased the cost of fuel by that amount.

7 **Q: What other additional items came up during the audit?**

8 **A:** Numerous items were discussed during the audit. Coal and transportation contracts have
9 been firmed up for the next several years. During the audit, AES informed the OUCC there
10 was a metering issue affecting this FAC's actual MWHs. The issue was found after the
11 FAC was filed and did not appear to affect the fuel cost or the "F" in this FAC. AES will
12 file a revised exhibit once the total impact is determined. AES is currently resettling with
13 MISO and believes impact will be immaterial to the factor as a whole, but AES does not
14 have an estimate of the impact as of the OUCC's filing date. It is the OUCC's opinion that
15 the credit factor as filed should be approved. Additional items covered during the audit
16 were the excess congestion payment received by AES, which will be factored into the next
17 FAC, 141. Additionally, the results of the Financial Transmission Rights (FTR) and
18 Auction Revenue Rights (ARR) auction were discussed. AES provided the OUCC with a
19 detailed presentation and answered a lot of questions.

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

21 **A:** The OUCC recommends:

22 1) The Commission approve the AES Indiana's proposed fuel cost charge of (3.102) Mills
23 per KWh; 2) AES Indiana continue to use its commitment model and provide the results to

1 the OUCC in each FAC; and 3) AES Indiana update the OUCC on any strategies developed
2 for hedging natural gas, and track the costs or benefits over the life of the program.

3 **Q: Does this conclude your pre-filed testimony?**

4 **A:** Yes.

Appendix A - Qualifications of Gregory T. Guerrettaz

Q: Please state your name, title, and business address.

A: My name is Gregory T. Guerrettaz. I am a CPA. My office is located at 2680 East Main Street, Suite 223, in Plainfield, Indiana 46168.

Q: By whom are you employed and what is your position?

A: Gregory T. Guerrettaz, CPA is a wholly owned subsidiary of Financial Solutions Group, Inc. (Formed in 1998) which is registered with the Securities and Exchange Commission (SEC), effective January 1, 2011. I am employed as President of Financial Solutions Group, Inc. ("FSG Corp."), a public finance and utility rate consulting firm.

Q: Please summarize your educational and professional qualifications.

A: I received a Bachelor's degree in Accounting from Indiana University. During my employment, I have attended and spoken at numerous seminars on governmental accounting and finance throughout the United States. I continue to maintain all requirements under Continuing Professional Education.

Q: How long have you been employed by FSG Corp., and in what capacities?

A: I founded FSG Corp. in 1998 and am employed as the President of the company. FSG Corp.'s practice is split about 50% utility and 50% finance related. I have been responsible for numerous projects, including utility rate engagements, cost of capital analyses and rate of return, utility financial analyses, utility business valuations, other projects related to a variety of utility issues and preparation of electric trackers for utilities in the State of Indiana.

1 I have pre-filed written, and given oral, testimony to the Indiana Utility Regulatory
2 Commission on a variety of issues over the years including, but not limited to, revenue
3 requirement calculations, accounting methodology and related areas, utility historical and
4 pro-forma financial information, cost of capital analysis, rate structure and cost of service
5 issues, issuance of both long and short-term debt, utility operating information, utility
6 trackers and a variety of other utility related issues.

7 I prepare activity-based budgets and assist communities in the preparation of both
8 short and long-range plans for all types of entities. I have served as Financial Advisor for
9 over two billion dollars of tax-exempt and taxable securities. FSG Corp. is registered with
10 the Security and Exchange Commission (SEC) and the Municipal Security Rulemaking
11 Board (MSRB), and currently I hold a Series 50 and 54 license as a Municipal Advisor and
12 Chief Compliance Officer.

13 **Q: Please state your experience prior to joining FSG Corp.**

14 **A:** I was employed for 8 years with a national accounting firm in Indianapolis. I was a partner
15 in that firm for 4 years and, for 4 years was a partner in a partnership between that firm and
16 Municipal Consultants, Inc. Prior to that, Municipal Consultants, Inc. employed me for 7
17 years (4 of those as a shareholder) until the partnership and eventual merger with the
18 national accounting firm. While at Municipal Consultants, Inc., I reviewed, prepared and
19 analyzed over 900 FAC filings by various electric utilities. I also testified numerous times,
20 over the seven years, regarding the earnings and return tests. Preceding my time with
21 Municipal Consultants, Inc., I worked for 3 years as a Staff Accountant for the Accounting
22 Department of the Public Service Commission of Indiana, now known as the Indiana

1 Utility Regulatory Commission. In this position, I prepared and presented testimony in
2 major electric and water cases. I have performed utility reviews since 1981. I have also
3 performed a variety of feasibility and cost-of-service studies for cities and counties
4 throughout Indiana.

5 I am a Certified Public Accountant, licensed in the State of Indiana, and am a
6 member of the American Institute of Certified Public Accountants and the Indiana CPA
7 Society. I am an Associate Member of the Association of Indiana Counties and the Indiana
8 Association of Cities and Towns. I have served as the Chairman of the Indiana CPA
9 Utilities Committee in the past.

**OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT**

Indianapolis Power & Light Company

Cause No. 38703-FAC 140

Calculation of Proposed Fuel Cost Adjustment Factor

Requested by AES

| | | <u>Mills/KWh</u> |
|--|-----------------|------------------|
| Average projected fuel cost for quarter including September 2023, October 2023 and November 2023 (F+S | Total | <u>37.435</u> |
| | Variance | |
| Current Period Variance | \$ (25,461,310) | -8.450 |
| FAC 133 S1 Settlement Costs to be recovered over 24 months | \$ 2,564,810 | <u>0.851</u> |
| Total Request by AES | | <u>29.836</u> |
| Less: Base cost of fuel | | <u>32.938</u> |
| Proposed FAC AES | | <u>(3.102)</u> |

**OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 140**

**Comparison of Authorized Return
with Actual Net Operating Income (in \$000's)**

Actual Twelve Months Ending April 30, 2023

| | |
|-------------------------------------|--------------------------|
| Jurisdictional Operating Revenue | \$ 1,865,169 |
| Jurisdictional Operating Expense | <u>1,673,324</u> |
| Jurisdictional Net Operating Income | <u><u>\$ 191,845</u></u> |

Per Cause No. 45029

| | |
|---|---------------------------|
| Jurisdictional Net Operating Income | <u>\$ 220,076</u> |
| Adjustments for Cause No. 42170-ECR35 and ECR36 | <u>\$ 2,388</u> |
| Adjustments for Cause No. 45264 TDISC-3 Combined | <u>\$ 5,219</u> |
| Adjustments for Cause No. 45264 TDISC-5 Combined | <u>\$ 10,685</u> |
| Adjusted Jurisdictional Net Operating Income Total | <u><u>\$ 238,368</u></u> |
| Over (Under) | <u><u>\$ (46,523)</u></u> |

OUCC REVIEW OF FUEL COST ADJUSTMENT

Indianapolis Power & Light Company
Cause No. 38703-FAC 140

Excess (Under) Earnings for Relevant Period

| Item No. | FAC No. | Reporting Pd. | Determined Return | Authorized Return | Differential |
|---|---------|---------------|----------------------|----------------------|----------------------|
| 1 | 140 | 4/30/2023 | \$ 191,845,000 | \$ 238,368,000 | \$ (46,523,000) |
| 2 | 139 | 1/31/2023 | 196,482,000 | 234,714,000 | (38,232,000) |
| 3 | 138 | 10/31/2022 | 203,266,000 | 231,914,000 | (28,648,000) |
| 4 | 137 | 7/31/2022 | 215,542,000 | 230,102,000 | (14,560,000) |
| 5 | 136 | 4/30/2022 | 223,712,000 | 228,291,000 | (4,579,000) |
| 6 | 135 | 1/31/2022 | 227,360,000 | 226,529,000 | 831,000 |
| 7 | 134 | 10/31/2021 | 226,080,000 | 224,682,000 | 1,398,000 |
| 8 | 133 | 7/31/2021 | 219,585,000 | 223,889,000 | (4,304,000) |
| 9 | 132 | 04/30/2021 | 232,893,000 | 223,097,000 | 9,796,000 |
| 10 | 131 | 01/31/2021 | 227,171,000 | 222,310,000 | 4,861,000 |
| 11 | 130 | 10/31/2020 | 229,881,000 | 221,451,000 | 8,430,000 |
| 12 | 129 | 07/31/2020 | 242,467,000 | 221,368,000 | 21,099,000 |
| 13 | 128 | 04/30/2020 | 236,917,000 | 221,285,000 | 15,632,000 |
| 14 | 127 | 01/31/2020 | 234,075,000 | 221,201,000 | 12,874,000 |
| 15 | 126 | 10/31/2019 | 230,875,000 | 218,710,000 | 12,165,000 |
| 16 | 125 | 07/31/2019 | 229,431,000 | 206,716,000 | 22,715,000 |
| 17 | 124 | 04/30/2019 | 217,179,000 | 194,654,170 | 22,524,830 |
| 18 | 123 | 01/31/2019 | 212,078,000 | 182,107,612 | 29,970,388 |
| 19 | 122 | 10/31/2018 | 201,730,000 | 172,128,000 | 29,602,000 |
| 20 | 121 | 07/31/2018 | 190,971,000 | 171,399,000 | 19,572,000 |
| Sum of Differential for Relevant Period | | | | | <u>\$ 74,624,218</u> |

OFFICE OF UTILITY CONSUMER COUNSELOR
 REVIEW OF FUEL COST ADJUSTMENT
 Indianapolis Power & Light Company
 Cause No. 38703-FAC 140

Comparison of Pro-Forma Operating Expense
 with Actual Operating Expense
 (000's Omitted)

Actual Twelve Months Ending April 30, 2023

| | |
|---------------------------------------|-------------------|
| Total Operating Expense | \$ 1,673,324 |
| Less: Fuel Costs | <u>828,316</u> |
| Operating Expense Excluding Fuel Cost | <u>\$ 845,008</u> |

Per Cause No. 45029

| | |
|---------------------------------------|-------------------|
| Total Operating Expense | \$ 1,176,060 |
| Less: Fuel Costs | <u>436,216</u> |
| Operating Expense Excluding Fuel Cost | <u>\$ 739,844</u> |

| | |
|--------------|--------------------------|
| Over (Under) | <u><u>\$ 105,164</u></u> |
|--------------|--------------------------|

OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 140

**Actual Cost of Fuel to Generate Electricity and
the Actual Cost of Fuel Included in the Cost of Purchased Power**

| Line No. | Description | January 2019 | February 2019 | March 2019 | April 2019 | May 2019 | June 2019 | July 2019 | August 2019 | September 2019 | October 2019 | November 2019 | December 2019 |
|-----------------------------|---|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| KWH Source (000's) : | | | | | | | | | | | | | |
| 1. | Coal Generation | 770,207 | 686,760 | 609,764 | 478,816 | 458,862 | 724,120 | 789,818 | 757,758 | 769,213 | 856,262 | 928,065 | 927,979 |
| 2. | Nuclear Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 3. | Hydro Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 4. | Other Generation - Internal Combustion | 20 | 18 | 21 | 23 | 10 | 11 | 22 | 16 | 21 | 8 | 15 | 5 |
| 5. | Gas Generation | 540,187 | 463,083 | 500,822 | 386,005 | 446,217 | 520,853 | 687,668 | 644,957 | 580,973 | 574,081 | 503,730 | 543,891 |
| Purchases through MISO: | | | | | | | | | | | | | |
| 6. | Wind Purchase Power Agreement Purchases | 77,865 | 63,944 | 84,775 | 78,799 | 69,525 | 51,012 | 44,188 | 36,827 | 62,428 | 87,732 | 83,809 | 84,592 |
| 7. | Non-Wind PPA Market Purchases | 43,724 | 24,321 | 86,364 | 110,442 | 87,872 | 21,733 | 34,678 | 5,545 | 20,264 | 197 | 10,246 | 6,473 |
| 8. | Other | 8 | 6 | 11 | 22 | 31 | 34 | 30 | 44 | 34 | 26 | 26 | 11 |
| 9. | Purchased Power other than MISO | 7,137 | 8,356 | 9,668 | 14,770 | 13,659 | 15,459 | 19,167 | 18,310 | 16,369 | 14,009 | 9,054 | 6,648 |
| LESS: | | | | | | | | | | | | | |
| 10. | Energy Losses and Company Use | 74,812 | 64,295 | 64,408 | 52,410 | 56,613 | 60,207 | 74,746 | 68,228 | 63,636 | 54,511 | 59,893 | 65,043 |
| 11. | Inter-System Sales through MISO | 69,387 | 80,189 | 119,240 | 118,968 | 43,667 | 234,050 | 200,045 | 211,938 | 282,634 | 534,597 | 439,388 | 382,950 |
| 12. | Inter-System Sales other than MISO | - | - | - | - | - | - | - | - | - | - | - | - |
| 13. | Non-Jurisdictional Retail Sales | - | - | - | - | - | - | - | - | - | - | - | - |
| 14. | Sales (\$) | <u>1,294,949</u> | <u>1,102,004</u> | <u>1,107,777</u> | <u>897,499</u> | <u>975,896</u> | <u>1,038,965</u> | <u>1,300,780</u> | <u>1,183,291</u> | <u>1,103,032</u> | <u>943,207</u> | <u>1,035,664</u> | <u>1,121,606</u> |
| Fuel Cost \$ (F) : | | | | | | | | | | | | | |
| 15. | Coal Generation | \$ 16,696,294 | \$ 14,706,645 | \$ 13,722,596 | \$ 10,424,270 | \$ 10,401,513 | \$ 15,713,388 | \$ 16,230,872 | \$ 15,236,020 | \$ 15,669,695 | \$ 17,031,501 | \$ 19,211,506 | \$ 17,862,410 |
| 16. | Nuclear Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 17. | Hydro Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 18. | Other Generation - Internal Combustion | 2,992 | 2,712 | 3,242 | 4,947 | 1,595 | 1,759 | 4,203 | 2,526 | 3,094 | 1,154 | 2,470 | 780 |
| 19. | Gas Generation | 14,983,451 | 10,813,630 | 12,383,862 | 8,412,722 | 9,206,214 | 10,560,348 | 13,774,871 | 12,347,535 | 11,272,816 | 9,653,971 | 10,285,132 | 10,162,980 |
| 20. | Financial Hedges Gains/Losses & Trans. Fees | - | - | - | - | - | - | - | - | - | - | - | - |
| Purchases through MISO: | | | | | | | | | | | | | |
| 21. | Wind Purchase Power Agreement Purchases | 6,113,708 | 4,802,582 | 6,768,046 | 6,048,356 | 5,409,411 | 3,942,332 | 3,335,474 | 2,838,063 | 4,652,850 | 6,778,041 | 6,648,508 | 6,587,935 |
| 22. | Non-Wind PPA Market Purchases | 2,176,397 | 632,183 | 2,965,688 | 3,002,418 | 2,159,779 | 445,025 | 831,948 | 99,556 | 702,619 | 3,865 | 243,780 | 122,784 |
| 23. | Other | 225 | 192 | 314 | 700 | 827 | 924 | 813 | 1,169 | 913 | 706 | 687 | 297 |
| 24. | MISO Components of Cost of Fuel | 1,344,091 | 816,947 | (206,912) | 2,740,064 | 49,393 | 655,668 | 1,109,015 | 858,330 | 1,791,027 | 1,294,798 | 1,446,196 | 1,266,124 |
| 25. | Purchased Power other than MISO | 933,770 | 1,224,752 | 1,510,746 | 2,265,633 | 2,171,605 | 2,549,657 | 3,211,065 | 2,947,222 | 2,597,391 | 2,252,739 | 1,397,289 | 873,619 |
| LESS: | | | | | | | | | | | | | |
| 26. | Inter-System Sales through MISO | 1,204,084 | 1,378,211 | 2,015,320 | 1,973,918 | 683,448 | 3,831,213 | 3,377,524 | 3,469,006 | 4,441,529 | 8,021,192 | 7,494,076 | 6,151,467 |
| 27. | Inter-System Sales other than MISO | - | - | - | - | - | - | - | - | - | - | - | - |
| 28. | Non-Jurisdictional Retail Sales | - | - | - | - | - | - | - | - | - | - | - | - |
| 29. | Transmission Losses | 219,757 | 214,951 | 222,738 | 153,443 | 90,769 | 273,022 | 359,847 | 321,204 | 371,880 | 311,351 | 409,395 | 327,432 |
| 30. | Lakefield PPA Adjustment | 136,211 | 47,132 | 102,456 | 166,441 | 63,516 | 146,258 | 192,921 | 95,630 | 277,465 | 520,486 | 407,456 | 300,163 |
| 31. | Purchased Power in Excess | 98,057 | - | - | - | - | - | - | - | - | - | - | - |
| 32. | Total Fuel Costs (F) | <u>\$ 40,592,819</u> | <u>\$ 31,359,349</u> | <u>\$ 34,807,068</u> | <u>\$ 30,605,308</u> | <u>\$ 28,562,604</u> | <u>\$ 29,618,608</u> | <u>\$ 34,567,969</u> | <u>\$ 30,444,581</u> | <u>\$ 31,599,531</u> | <u>\$ 28,163,746</u> | <u>\$ 30,924,641</u> | <u>\$ 30,097,867</u> |
| 33. | Fuel Cost per KWH (in Mills) F/S | <u>\$ 31.347</u> | <u>\$ 28.457</u> | <u>\$ 31.421</u> | <u>\$ 34.101</u> | <u>\$ 29.268</u> | <u>\$ 28.508</u> | <u>\$ 26.575</u> | <u>\$ 25.729</u> | <u>\$ 28.648</u> | <u>\$ 29.860</u> | <u>\$ 29.860</u> | <u>\$ 26.835</u> |

SCHEDULE D
(Continued)

OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 140

Actual Cost of Fuel to Generate Electricity and
the Actual Cost of Fuel Included in the Cost of Purchased Power

| Line No. | Description | January 2020 | February 2020 | March 2020 | April 2020 | May 2020 | June 2020 | July 2020 | August 2020 | September 2020 | October 2020 | November 2020 | December 2020 |
|-----------------------------|---|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| KWH Source (000's) : | | | | | | | | | | | | | |
| 1. | Coal Generation | 629,367 | 797,762 | 352,582 | (6,945) | 18,808 | 476,399 | 805,452 | 726,943 | 547,994 | 454,911 | 406,656 | 933,629 |
| 2. | Nuclear Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 3. | Hydro Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 4. | Other Generation - Internal Combustion | 17 | 15 | 17 | 19 | 10 | 14 | 9 | 15 | 20 | 12 | 12 | 27 |
| 5. | Gas Generation | 600,605 | 526,779 | 431,161 | 500,461 | 588,385 | 740,517 | 849,534 | 516,354 | 507,369 | 591,349 | 441,249 | 496,280 |
| Purchases through MISO: | | | | | | | | | | | | | |
| 6. | Wind Purchase Power Agreement Purchases | 72,777 | 85,331 | 73,840 | 75,404 | 53,913 | 43,584 | 37,037 | 47,741 | 43,136 | 41,895 | 58,893 | 57,207 |
| 7. | Non-Wind PPA Market Purchases | 72,562 | 4,162 | 256,736 | 315,833 | 269,846 | 45,347 | 7,222 | 69,716 | 45,799 | 28,264 | 103,272 | 7,736 |
| 8. | Other | 9 | 8 | 15 | 26 | 40 | 47 | 57 | 48 | 51 | 35 | 21 | 16 |
| 9. | Purchased Power other than MISO | 7,980 | 6,482 | 11,862 | 13,970 | 15,401 | 19,302 | 19,411 | 17,469 | 15,866 | 11,562 | 10,123 | 8,162 |
| LESS: | | | | | | | | | | | | | |
| 10. | Energy Losses and Company Use | 68,045 | 64,478 | 58,114 | 49,898 | 52,020 | 62,342 | 72,591 | 67,715 | 55,881 | 52,260 | 53,782 | 66,319 |
| 11. | Inter-System Sales through MISO | 153,446 | 255,982 | 76,391 | 41 | 1,732 | 188,768 | 390,262 | 140,735 | 144,700 | 176,874 | 42,072 | 295,848 |
| 12. | Inter-System Sales other than MISO | - | - | - | - | - | - | - | - | - | - | - | - |
| 13. | Non-Jurisdictional Retail Sales | - | - | - | - | - | - | - | - | - | - | - | - |
| 14. | Sales (\$) | <u>1,161,826</u> | <u>1,100,079</u> | <u>991,708</u> | <u>848,829</u> | <u>892,651</u> | <u>1,074,100</u> | <u>1,255,869</u> | <u>1,169,836</u> | <u>959,654</u> | <u>898,894</u> | <u>924,372</u> | <u>1,140,890</u> |
| Fuel Cost \$ (F) : | | | | | | | | | | | | | |
| 15. | Coal Generation | \$ 12,762,365 | \$ 15,475,847 | \$ 6,531,454 | \$ 1,463 | \$ 707,441 | \$ 9,495,157 | \$ 15,965,045 | \$ 14,925,058 | \$ 10,750,486 | \$ 10,938,210 | \$ 8,492,560 | \$ 17,990,480 |
| 16. | Nuclear Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 17. | Hydro Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 18. | Other Generation - Internal Combustion | 2,475 | 11,715 | 103,829 | 1,314 | 1,186 | 1,727 | 1,054 | 1,801 | 2,338 | 1,526 | 1,324 | 3,391 |
| 19. | Gas Generation | 10,437,380 | 10,554,048 | 7,777,162 | 7,195,834 | 8,730,098 | 11,584,612 | 14,338,159 | 10,123,756 | 7,974,287 | 10,643,545 | 8,518,400 | 10,042,131 |
| 20. | Financial Hedges Gains/Losses & Trans. Fees | - | - | - | - | - | - | - | - | - | - | - | - |
| Purchases through MISO: | | | | | | | | | | | | | |
| 21. | Wind Purchase Power Agreement Purchases | 5,599,074 | 6,620,038 | 6,349,109 | 6,152,717 | 5,388,452 | 5,502,919 | 2,234,272 | 3,812,773 | 4,767,733 | 5,807,100 | 7,957,840 | 6,157,677 |
| 22. | Non-Wind PPA Market Purchases | 1,674,294 | 90,525 | 4,840,437 | 6,000,682 | 5,084,625 | 753,861 | 176,328 | 1,600,695 | 792,037 | 511,042 | 2,297,255 | 131,614 |
| 23. | Other | 242 | 217 | 403 | 695 | 1,065 | 1,258 | 1,433 | 1,115 | 1,171 | 817 | 479 | 374 |
| 24. | MISO Components of Cost of Fuel | 1,228,608 | 817,713 | 735,285 | 812,239 | 542,060 | 597,545 | 922,538 | 36,436 | 490,558 | 673,875 | 974,731 | 789,238 |
| 25. | Purchased Power other than MISO | 1,079,064 | 835,271 | 1,718,351 | 2,119,067 | 2,391,097 | 3,051,478 | 3,020,823 | 2,640,812 | 2,600,977 | 1,910,708 | 1,431,699 | 1,066,322 |
| LESS: | | | | | | | | | | | | | |
| 26. | Inter-System Sales through MISO | 2,632,469 | 4,039,637 | 1,214,308 | 994 | 25,709 | 2,758,676 | 5,949,606 | 2,200,469 | 2,070,538 | 3,235,829 | 642,821 | 4,798,579 |
| 27. | Inter-System Sales other than MISO | - | - | - | - | - | - | - | - | - | - | - | - |
| 28. | Non-Jurisdictional Retail Sales | - | - | - | - | - | - | - | - | - | - | - | - |
| 29. | Transmission Losses | 168,228 | 270,901 | 67,041 | - | 6,112 | 194,868 | 346,961 | 213,296 | 175,576 | 239,449 | 80,282 | 325,137 |
| 30. | Lakefield PPA Adjustment | 60,051 | 295,414 | 93,247 | (376) | 1,669 | 102,739 | 238,979 | 168,077 | 56,282 | 108,245 | 30,154 | 117,481 |
| 31. | Purchased Power in Excess | - | - | - | - | - | - | - | - | - | - | - | - |
| 32. | Total Fuel Costs (F) | <u>\$ 29,922,754</u> | <u>\$ 29,799,422</u> | <u>\$ 26,681,434</u> | <u>\$ 22,283,393</u> | <u>\$ 22,812,534</u> | <u>\$ 27,932,274</u> | <u>\$ 30,124,106</u> | <u>\$ 30,560,604</u> | <u>\$ 25,077,191</u> | <u>\$ 26,903,300</u> | <u>\$ 28,921,031</u> | <u>\$ 30,940,030</u> |
| 33. | Fuel Cost per KWH (in Mills) F/S | <u>\$ 25.755</u> | <u>\$ 27.088</u> | <u>\$ 26.905</u> | <u>\$ 26.252</u> | <u>\$ 25.556</u> | <u>\$ 26.005</u> | <u>\$ 23.987</u> | <u>\$ 26.124</u> | <u>\$ 26.131</u> | <u>\$ 29.929</u> | <u>\$ 31.287</u> | <u>\$ 27.119</u> |

SCHEDULE D
(Continued)

OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 140

Actual Cost of Fuel to Generate Electricity and
the Actual Cost of Fuel Included in the Cost of Purchased Power

| Line No. | Description | January 2021 | February 2021 | March 2021 | April 2021 | May 2021 | June 2021 | July 2021 | August 2021 | September 2021 | October 2021 | November 2021 | December 2021 |
|-----------------------------|---|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| KWH Source (000's) : | | | | | | | | | | | | | |
| 1. | Coal Generation | 955,235 | 831,066 | 780,187 | 711,009 | 624,722 | 698,779 | 788,815 | 912,737 | 704,109 | 500,538 | 184,482 | 623,008 |
| 2. | Nuclear Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 3. | Hydro Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 4. | Other Generation - Internal Combustion | 16 | 17 | 15 | 10 | 14 | 12 | 12 | 9 | 9 | 2 | 19 | 15 |
| 5. | Gas Generation | 498,866 | 423,048 | 466,231 | 194,733 | 70,111 | 172,257 | 191,859 | 271,949 | 108,110 | 207,310 | 382,977 | 211,212 |
| Purchases through MISO: | | | | | | | | | | | | | |
| 6. | Wind Purchase Power Agreement Purchases | 48,251 | 42,148 | 34,729 | 44,667 | 36,481 | 35,842 | 27,171 | 30,060 | 44,287 | 38,539 | 59,790 | 74,863 |
| 7. | Non-Wind PPA Market Purchases | 1,533 | 45,941 | 8,101 | 118,780 | 230,274 | 256,927 | 244,777 | 126,699 | 215,195 | 289,542 | 427,674 | 226,904 |
| 8. | Other | 10 | 13 | 23 | 35 | 33 | 37 | 128 | 124 | 51 | 92 | 19 | 14 |
| 9. | Purchased Power other than MISO | 6,219 | 6,829 | 13,358 | 16,094 | 15,681 | 16,709 | 14,658 | 15,776 | 15,190 | 10,410 | 7,585 | 6,768 |
| LESS: | | | | | | | | | | | | | |
| 10. | Energy Losses and Company Use | 62,973 | 61,560 | 51,593 | 46,520 | 48,566 | 57,892 | 61,860 | 65,214 | 53,790 | 51,304 | 52,802 | 56,393 |
| 11. | Inter-System Sales through MISO | 253,049 | 117,416 | 275,234 | 156,900 | 2,710 | 12,844 | 17,611 | 39,146 | 6,714 | 16,288 | - | 10,527 |
| 12. | Inter-System Sales other than MISO | - | - | - | - | - | - | - | - | - | - | - | - |
| 13. | Non-Jurisdictional Retail Sales | - | - | - | - | - | - | - | - | - | - | - | - |
| 14. | Sales (\$) | <u>1,194,108</u> | <u>1,170,086</u> | <u>975,817</u> | <u>881,908</u> | <u>926,040</u> | <u>1,109,827</u> | <u>1,187,949</u> | <u>1,252,994</u> | <u>1,026,447</u> | <u>978,841</u> | <u>1,009,744</u> | <u>1,075,864</u> |
| Fuel Cost \$ (F) : | | | | | | | | | | | | | |
| 15. | Coal Generation | \$ 18,215,836 | \$ 16,261,039 | \$ 15,170,668 | \$ 14,088,080 | \$ 12,947,434 | \$ 14,566,015 | \$ 16,170,366 | \$ 18,506,946 | \$ 14,707,630 | \$ 10,865,067 | \$ 4,974,914 | \$ 14,770,615 |
| 16. | Nuclear Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 17. | Hydro Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 18. | Other Generation - Internal Combustion | 2,079 | 1,996 | 1,250 | 2,274 | 1,850 | 1,565 | 1,932 | 1,103 | 1,931 | 203 | 2,954 | 1,009 |
| 19. | Gas Generation | 10,576,392 | 23,585,279 | 10,256,313 | 5,642,310 | 3,812,298 | 8,382,253 | 9,964,055 | 14,459,213 | 8,234,683 | 13,977,551 | 24,572,739 | 15,481,539 |
| 20. | Financial Hedges Gains/Losses & Trans. Fees | - | - | - | - | - | (758,807) | (832,167) | (2,080,504) | (1,953,922) | (1,601,046) | - | 482,546 |
| Purchases through MISO: | | | | | | | | | | | | | |
| 21. | Wind Purchase Power Agreement Purchases | 5,647,543 | 4,595,633 | 6,072,044 | 5,851,366 | 4,406,203 | 3,369,274 | 2,478,097 | 3,111,966 | 4,894,700 | 4,953,401 | 7,929,986 | 7,483,356 |
| 22. | Non-Wind PPA Market Purchases | 52,443 | 2,469,000 | 136,619 | 2,982,658 | 6,861,548 | 8,564,046 | 8,991,144 | 5,095,128 | 9,512,983 | 17,335,847 | 27,481,782 | 9,524,139 |
| 23. | Other | 230 | 296 | 539 | 803 | 796 | 910 | 3,135 | 3,032 | 1,247 | 714 | 472 | 337 |
| 24. | MISO Components of Cost of Fuel | 1,070,150 | 2,259,360 | 609,901 | 472,209 | 887,341 | 947,011 | 1,316,000 | 1,194,277 | 1,637,668 | 1,181,362 | 7,081,450 | 2,546,715 |
| 25. | Purchased Power other than MISO | 812,041 | 968,863 | 2,153,696 | 2,539,973 | 2,474,999 | 2,744,086 | 2,487,989 | 2,541,299 | 2,463,525 | 1,703,176 | 1,225,785 | 1,112,262 |
| LESS: | | | | | | | | | | | | | |
| 26. | Inter-System Sales through MISO | 4,072,886 | 3,422,725 | 4,608,943 | 2,697,427 | 46,933 | 292,850 | 395,817 | 1,055,312 | 141,081 | 621,586 | - | 331,296 |
| 27. | Inter-System Sales other than MISO | - | - | - | - | - | - | - | - | - | - | - | - |
| 28. | Non-Jurisdictional Retail Sales | - | - | - | - | - | - | - | - | - | - | - | - |
| 29. | Transmission Losses | 408,345 | 306,663 | 256,504 | 161,095 | 9,799 | 60,408 | 87,000 | 227,063 | 32,517 | 25,713 | - | 40,793 |
| 30. | Lakefield PPA Adjustment | 100,644 | 51,489 | 84,538 | 111,306 | 6,116 | 13,128 | 35,132 | 58,681 | 19,532 | 42,006 | 69 | 10,114 |
| 31. | Purchased Power in Excess | - | - | - | - | - | - | - | - | - | - | - | - |
| 32. | Total Fuel Costs (F) | <u>\$ 31,794,839</u> | <u>\$ 46,360,589</u> | <u>\$ 29,451,045</u> | <u>\$ 28,609,845</u> | <u>\$ 31,329,621</u> | <u>\$ 37,449,967</u> | <u>\$ 40,062,602</u> | <u>\$ 41,491,404</u> | <u>\$ 39,307,315</u> | <u>\$ 47,726,970</u> | <u>\$ 73,270,013</u> | <u>\$ 51,020,315</u> |
| 33. | Fuel Cost per KWH (in Mills) F/S | <u>\$ 26.626</u> | <u>\$ 39.622</u> | <u>\$ 30.181</u> | <u>\$ 32.441</u> | <u>\$ 33.832</u> | <u>\$ 33.744</u> | <u>\$ 33.724</u> | <u>\$ 33.114</u> | <u>\$ 38.295</u> | <u>\$ 48.759</u> | <u>\$ 72.563</u> | <u>\$ 47.423</u> |

OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 140

Actual Cost of Fuel to Generate Electricity and
the Actual Cost of Fuel Included in the Cost of Purchased Power

| Line No. | Description | January 2022 | February 2022 | March 2022 | April 2022 | May 2022 | June 2022 | July 2022 | August 2022 | September 2022 | October 2022 | November 2022 | December 2022 |
|-----------------------------|---|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| KWH Source (000's) : | | | | | | | | | | | | | |
| 1. | Coal Generation | 913,115 | 752,607 | 730,680 | 613,375 | 265,468 | 483,778 | 723,699 | 839,897 | 632,407 | 576,299 | 649,657 | 856,858.00 |
| 2. | Nuclear Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 3. | Hydro Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 4. | Other Generation - Internal Combustion | 14 | 13 | 13 | 13 | 13 | 14 | - | 9 | 16 | 17 | 10 | 10.00 |
| 5. | Gas Generation | 273,678 | 184,977 | 325,985 | 508,885 | 501,819 | 542,023 | 627,869 | 640,237 | 562,029 | 563,713 | 561,573 | 535,332.00 |
| Purchases through MISO: | | | | | | | | | | | | | |
| 6. | Wind Purchase Power Agreement Purchases | 90,717 | 69,836 | 57,680 | 49,368 | 50,976 | 39,328 | 40,139 | 40,767 | 46,747 | 49,010 | 73,429 | 81,225.00 |
| 7. | Non-Wind PPA Market Purchases | 141,264 | 179,039 | 111,706 | 14,044 | 200,402 | 117,536 | 44,768 | 2,195 | 7,617 | 9,216 | 14,180 | 35,999.00 |
| 8. | Other | 280 | 244 | 335 | 349 | 336 | 413 | 384 | 430 | 439 | 418 | 366 | 204.00 |
| 9. | Purchased Power other than MISO | 7,292 | 8,141 | 11,533 | 11,513 | 13,903 | 16,210 | 15,226 | 12,294 | 10,846 | 12,183 | 7,683 | 9,525.00 |
| LESS: | | | | | | | | | | | | | |
| 10. | Energy Losses and Company Use | 66,608 | 56,881 | 52,505 | 45,506 | 48,773 | 55,967 | 61,696 | 59,058 | 49,512 | 43,491 | 47,679 | 59,547.00 |
| 11. | Inter-System Sales through MISO | 44,636 | 20,731 | 152,216 | 260,498 | 20,040 | 32,938 | 163,245 | 302,477 | 238,381 | 309,480 | 314,573 | 283,314.00 |
| 12. | Inter-System Sales other than MISO | - | - | - | - | - | - | - | - | - | - | - | - |
| 13. | Non-Jurisdictional Retail Sales | - | - | - | - | - | - | - | - | - | - | - | - |
| 14. | Sales (\$) | <u>1,315,116</u> | <u>1,117,245</u> | <u>1,033,211</u> | <u>891,543</u> | <u>964,104</u> | <u>1,110,397</u> | <u>1,227,144</u> | <u>1,174,294</u> | <u>972,208</u> | <u>857,885</u> | <u>944,646</u> | <u>1,176,292</u> |
| Fuel Cost \$ (F) : | | | | | | | | | | | | | |
| 15. | Coal Generation | \$ 23,001,892 | \$ 19,537,889 | \$ 19,250,722 | \$ 17,230,274 | \$ 7,918,875 | \$ 13,794,488 | \$ 19,241,352 | \$ 21,011,451 | \$ 15,316,693 | \$ 14,380,565 | \$ 15,817,346 | \$ 20,056,204 |
| 16. | Nuclear Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 17. | Hydro Generation | - | - | - | - | - | - | - | - | - | - | - | - |
| 18. | Other Generation - Internal Combustion | 2,203 | 2,481 | 1,584 | 1,471 | 2,123 | 892 | 264 | 3,872 | 1,911 | 10,006 | 1,729 | 1,570 |
| 19. | Gas Generation | 20,227,469 | 15,018,577 | 14,155,764 | 24,540,323 | 28,488,382 | 31,782,189 | 37,166,790 | 41,937,420 | 32,341,187 | 24,857,468 | 25,129,802 | 33,727,231 |
| 20. | Financial Hedges Gains/Losses & Trans. Fees | - | - | - | - | (1,292,165) | - | - | - | - | - | - | - |
| Purchases through MISO: | | | | | | | | | | | | | |
| 21. | Wind Purchase Power Agreement Purchases | 8,162,108 | 7,768,052 | 7,126,150 | 8,667,133 | 6,342,074 | 4,832,186 | 3,556,705 | 3,466,155 | 4,405,270 | 6,185,359 | 8,824,924 | 8,135,776 |
| 22. | Non-Wind PPA Market Purchases | 7,659,290 | 8,842,750 | 5,832,964 | 876,479 | 15,972,723 | 11,100,334 | 3,514,639 | 172,074 | 496,003 | 650,199 | 684,502 | 11,369,257 |
| 23. | Other | 6,673 | 5,829 | 7,996 | 9,489 | 9,738 | 11,924 | 11,060 | 12,396 | 12,978 | 12,576 | 11,037 | 6,194 |
| 24. | MISO Components of Cost of Fuel | 1,516,613 | (2,646,879) | (1,016,874) | 2,826,986 | 3,389,240 | 3,744,474 | 3,336,424 | 5,047,681 | 2,866,243 | 849,749 | 2,289,670 | 3,166,742 |
| 25. | Purchased Power other than MISO | 1,086,815 | 1,287,151 | 1,903,496 | 1,913,006 | 2,327,291 | 2,704,119 | 2,490,818 | 2,041,453 | 1,790,045 | 1,921,463 | 1,215,954 | 1,614,865 |
| LESS: | | | | | | | | | | | | | |
| 26. | Inter-System Sales through MISO | 1,875,771 | 555,647 | 4,208,626 | 8,067,309 | 717,530 | 1,331,664 | 6,067,135 | 12,467,545 | 8,812,489 | 9,396,080 | 8,422,434 | 9,508,176 |
| 27. | Inter-System Sales other than MISO | - | - | - | - | - | - | - | - | - | - | - | - |
| 28. | Non-Jurisdictional Retail Sales | - | - | - | - | - | - | - | - | - | - | - | - |
| 29. | Transmission Losses | 212,251 | 95,211 | 296,210 | 485,892 | 119,777 | 270,409 | 607,118 | 839,966 | 472,234 | 346,454 | 462,416 | 588,607 |
| 30. | Lakefield PPA Adjustment | 267,375 | 81,563 | 232,292 | 523,976 | 123,771 | 263,268 | 844,400 | 1,220,596 | 891,976 | 576,065 | 545,220 | 1,217,560 |
| 31. | Purchased Power in Excess | - | - | - | - | 10,635 | - | - | - | - | - | - | - |
| 32. | Total Fuel Costs (F) | <u>\$ 59,307,666</u> | <u>\$ 49,083,429</u> | <u>\$ 42,524,674</u> | <u>\$ 46,987,984</u> | <u>\$ 62,186,568</u> | <u>\$ 66,105,265</u> | <u>\$ 61,799,399</u> | <u>\$ 59,164,395</u> | <u>\$ 47,053,631</u> | <u>\$ 38,548,786</u> | <u>\$ 44,544,894</u> | <u>\$ 66,763,496</u> |
| 33. | Fuel Cost per KWH (in Mills) F/S | <u>\$ 45.097</u> | <u>\$ 43.933</u> | <u>\$ 41.158</u> | <u>\$ 52.704</u> | <u>\$ 64.502</u> | <u>\$ 59.533</u> | <u>\$ 50.360</u> | <u>\$ 50.383</u> | <u>\$ 48.399</u> | <u>\$ 44.935</u> | <u>\$ 47.155</u> | <u>\$ 56.758</u> |

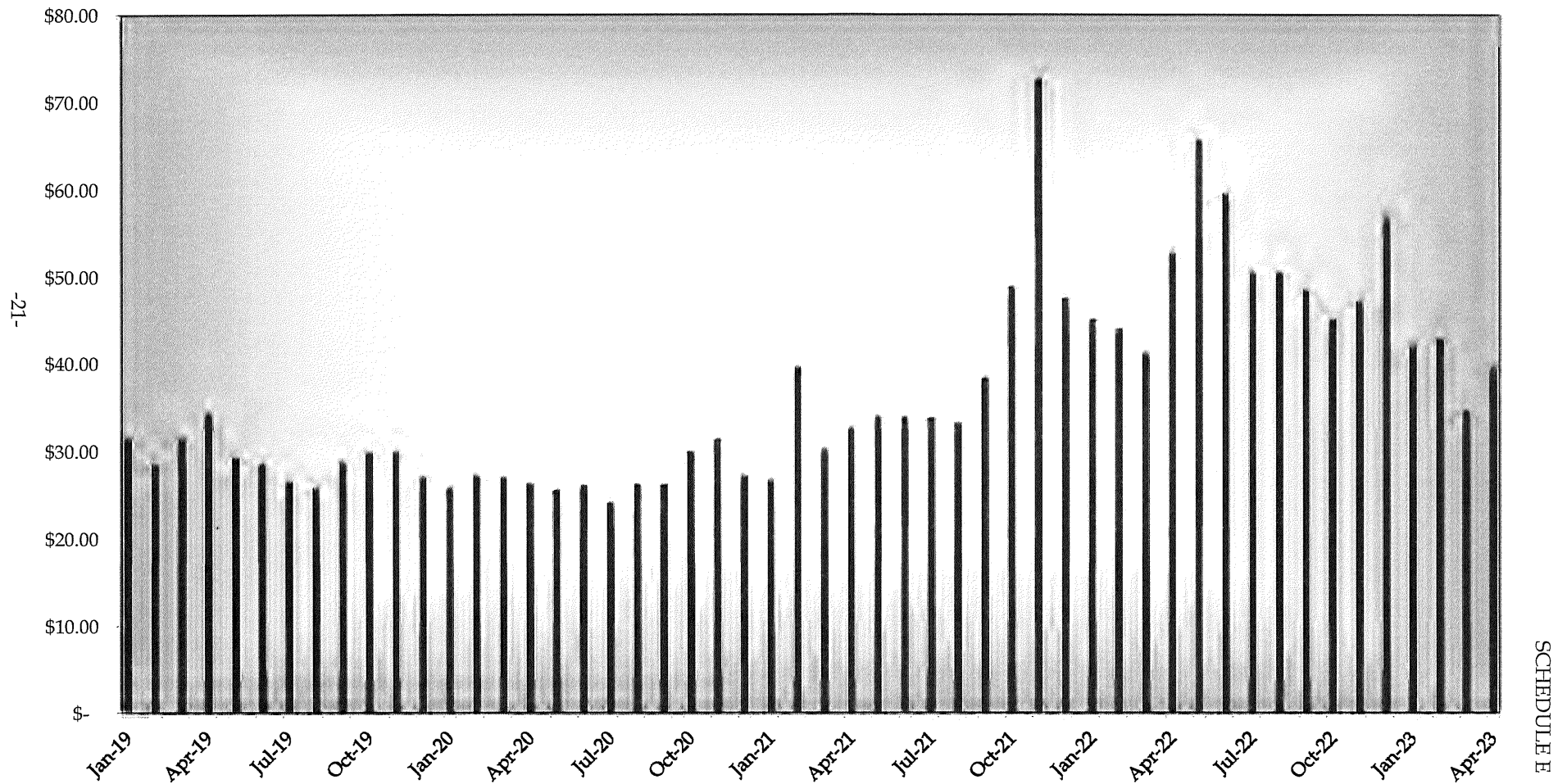
OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 140

Actual Cost of Fuel to Generate Electricity and
the Actual Cost of Fuel Included in the Cost of Purchased Power

| Line No. | Description | January 2023 | February 2023 | March 2023 | April 2023 |
|----------|---|----------------------|----------------------|----------------------|----------------------|
| | KWH Source (000's) : | | | | |
| 1. | Coal Generation | 759,534 | 502,596 | 381,016 | 336,417 |
| 2. | Nuclear Generation | - | - | - | - |
| 3. | Hydro Generation | - | - | - | - |
| 4. | Other Generation - Internal Combustion | - | 13 | 15 | 11 |
| 5. | Gas Generation | 677,207 | 595,411 | 773,263 | 563,913 |
| | Purchases through MISO: | | | | |
| 6. | Wind Purchase Power Agreement Purchases | 62,431 | 57,198 | 56,776 | 45,619 |
| 7. | Non-Wind PPA Market Purchases | 14,347 | 26,326 | 42,660 | 60,652 |
| 8. | Other | 252 | 363 | 408 | 457 |
| 9. | Purchased Power other than MISO | 4,965 | 7,283 | 10,540 | 12,279 |
| | LESS: | | | | |
| 10. | Energy Losses and Company Use | 56,689 | 48,591 | 53,007 | 43,454 |
| 11. | Inter-System Sales through MISO | 351,326 | 188,723 | 168,134 | 124,462 |
| 12. | Inter-System Sales other than MISO | - | - | - | - |
| 13. | Non-Jurisdictional Retail Sales | - | - | - | - |
| 14. | Sales (\$) | <u>1,110,721</u> | <u>951,876</u> | <u>1,043,537</u> | <u>851,432</u> |
| | Fuel Cost \$ (F) : | | | | |
| 15. | Coal Generation | \$ 18,827,861 | 13,275,344 | 10,772,669 | 9,882,166 |
| 16. | Nuclear Generation | - | - | - | - |
| 17. | Hydro Generation | - | - | - | - |
| 18. | Other Generation - Internal Combustion | - | 2,813 | 3,847 | 1,782 |
| 19. | Gas Generation | 31,402,304 | 25,398,847 | 20,629,271 | 15,682,112 |
| 20. | Financial Hedges Gains/Losses & Trans. Fees | - | - | - | - |
| | Purchases through MISO: | | | | |
| 21. | Wind Purchase Power Agreement Purchases | 5,869,531 | 6,680,047 | 6,278,701 | 8,035,715 |
| 22. | Non-Wind PPA Market Purchases | 404,766 | 582,533 | 1,172,733 | 1,578,545 |
| 23. | Other | 7,509 | 10,907 | 12,862 | 14,679 |
| 24. | MISO Components of Cost of Fuel | 945,587 | (284,899) | (288,607) | (704,021) |
| 25. | Purchased Power other than MISO | 773,505 | 1,167,869 | 1,741,812 | 2,035,433 |
| | LESS: | | | | |
| 26. | Inter-System Sales through MISO | 11,104,462 | 5,889,470 | 3,881,360 | 2,809,964 |
| 27. | Inter-System Sales other than MISO | - | - | - | - |
| 28. | Non-Jurisdictional Retail Sales | - | - | - | - |
| 29. | Transmission Losses | 526,449 | 370,769 | 287,586 | 159,077 |
| 30. | Lakefield PPA Adjustment | 148,636 | (131,098) | 147,424 | 135,568 |
| 31. | Purchased Power in Excess | - | - | - | - |
| 32. | Total Fuel Costs (F) | <u>\$ 46,451,516</u> | <u>\$ 40,704,320</u> | <u>\$ 36,006,918</u> | <u>\$ 33,421,802</u> |
| 33. | Fuel Cost per KWH (in Mills) F/S | <u>\$ 41.821</u> | <u>\$ 42.762</u> | <u>\$ 34.505</u> | <u>\$ 39.254</u> |

OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 140

Actual Fuel Cost (in mills) for January 2019 through April 2023



OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 140

**Comparison of Actual Fuel Cost and Estimated Fuel Cost for
February, March and April 2023**

| Month | Actual Sales | Actual Fuel Cost | Average Actual Fuel Cost | Forecast Sales | Forecast Fuel Cost | Average Forecast Fuel Cost | Weighted Average Error |
|---------------|-----------------|---------------------|--------------------------------|-------------------|-----------------------|----------------------------------|---------------------------|
| February 2023 | 951,876 | \$ 40,704,320 | \$ 42.762 | 1,154,954 | \$ 64,885,507 | \$ 56.180 | (38.686) |
| March 2023 | 1,043,537 | 36,006,918 | 34.505 | 1,029,844 | 41,827,653 | 40.616 | 47.296 |
| April 2023 | 851,432 | 33,421,802 | 39.254 | 923,164 | 40,279,765 | 43.632 | 8.610 |
| Total | 2,846,845 | \$ 110,133,040 | \$ 38.686 | 3,107,962 | \$ 146,992,925 | \$ 47.296 | 22.26% |

SCHEDULE F

OFFICE OF UTILITY CONSUMER COUNSELOR
 REVIEW OF FUEL COST ADJUSTMENT
 Indianapolis Power & Light Company
 Cause No. 38703-FAC 140

Tracker History

| Cause No. | Requested & Approved Fuel Cost Adjustment Factor | |
|----------------------|---|--------------|
| 38703-FAC140 | (3.102) | |
| 38703-FAC139 | 2.863 | |
| 38703-FAC138 | 30.088 | |
| 38703-FAC137 | 37.324 | AES |
| 38703-FAC137 | 32.529 | OUCC |
| 38703-FAC136 | 23.579 | OUCC |
| 38703-FAC136 | 37.858 | AES |
| 38703-FAC135 | 13.472 | Without IURT |
| 38703-FAC135 | 13.673 | With IURT |
| 38703-FAC134 | 7.418 | |
| 38703-FAC133 | 5.350 | |
| 38703-FAC132 | 2.147 | AES |
| 38703-FAC132 | (0.036) | OUCC |
| 38703-FAC131 | (6.178) | |
| 38703-FAC130 | (3.725) | |
| 38703-FAC129 | (8.576) | |
| 38703-FAC128 | (7.414) | |
| 38703-FAC127 | (8.665) | |
| 38703-FAC126 | (4.648) | |
| Revised 38703-FAC125 | (5.374) | |
| 38703-FAC125 | (5.370) | |
| 38703-FAC124 | (3.484) | |
| 38703-FAC123 (2) | (2.890) | |
| 38703-FAC122 | 1.165 | IPL |
| 38703-FAC122 | 0.285 | OUCC |
| 38703-FAC121 | (1.582) | |
| 38703-FAC120 | (0.464) | |
| 38703-FAC119 | 1.347 | |
| 38703-FAC118 | 2.504 | |
| 38703-FAC117 | 1.006 | |
| 38703-FAC116 | 3.945 | |
| 38703-FAC115 | 0.480 | |
| 38703-FAC114 | 3.707 | |
| 38703-FAC113 (1) | 2.534 | |

(1) New base of 31.520 mills/kWh and a significant increase due to the variance

(2) Effective 12/05/18, a new base rate of 32.938 (established by Cause No. 45029) replaced the old rate of 31.520 (established by Cause No. 44576).

**OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 140**

**MISO - COST FLOW THROUGH IN THIS FAC
February, March and April 2023**

In Purchased Power

| Month | Purchases through MISO Wind Purchase | Purchases through MISO Non-Wind | MISO Components Cost of Fuel | MISO Sales |
|---------------|---|--|------------------------------------|----------------------|
| February 2023 | \$ 6,680,047 | \$ 582,533 | \$ (284,899) | \$ 5,889,470 |
| March 2023 | 6,278,701 | 1,172,733 | (288,607) | 3,881,360 |
| April 2023 | 8,035,715 | 1,578,545 | (704,021) | 2,809,964 |
| Total | <u>\$ 20,994,463</u> | <u>\$ 3,333,811</u> | <u>\$ (1,277,527)</u> | <u>\$ 12,580,794</u> |

OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 140

MISO CHARGE TYPES BY MONTH

| <u>Charge Type</u> | | <u>February 2023</u> | <u>March 2023</u> | <u>April 2023</u> |
|--|---|-----------------------|-----------------------|-----------------------|
| | | <u>Invoice Total</u> | <u>Invoice Total</u> | <u>Invoice Total</u> |
| 1 | Day Ahead Market Administration Amount | \$ 234,021 | \$ 173,020 | \$ 219,204 |
| 2 | Day Ahead Regulation Amount | - | (50) | (520) |
| 3 | Day Ahead Spinning Reserve Amount | (95) | (783) | (937) |
| 4 | Day-Ahead Short-Term Reserve Amount | (304) | (961) | (7,768) |
| 5 | Day Ahead Supplemental Reserve Amount | - | - | - |
| 6 | Day Ahead Asset Energy Amount | (7,599,880) | (7,554,135) | (9,290,115) |
| 7 | Day Ahead Financial Bilateral Transaction Congestion Amount | - | - | - |
| 8 | Day Ahead Financial Bilateral Transaction Loss Amount | - | - | - |
| 9 | Day Ahead Congestion Rebate on Carve-Out Grandfathered Agrmnts | - | - | - |
| 10 | Day Ahead Losses Rebate on Carve-Out Grandfathered Agrmnts | - | - | - |
| 11 | Day Ahead Congestion Rebate on Option B Grandfathered Agrmnts | - | - | - |
| 12 | Day Ahead Losses Rebate on Option B Grandfathered Agrmnts | - | - | - |
| 13 | Day Ahead Non-Asset Energy Amount | - | - | - |
| 14 | Day Ahead Ramp Capability Amount | (147) | (1,256) | (3,723) |
| 15 | Day Ahead Revenue Sufficiency Guarantee Distribution Amount | 30,668 | 28,871 | 19,899 |
| 16 | Day Ahead Revenue Sufficiency Guarantee Make Whole Payment Amt. | (5,335) | (2,224) | (65,605) |
| 17 | Day Ahead Schedule 24 Allocation Amount | 30,616 | 32,624 | 28,747 |
| 18 | Day Ahead Virtual Energy Amount | - | - | - |
| Day Ahead Subtotal | | <u>\$ (7,310,456)</u> | <u>\$ (7,324,894)</u> | <u>\$ (9,100,818)</u> |
| 19 | Financial Transmission Rights Market Administration Amount | \$ 6,512 | \$ 3,627 | \$ 5,761 |
| 20 | Auction Revenue Rights Transaction Amount | (2,448,900) | (1,999,001) | (1,999,001) |
| 21 | Financial Transmission Rights Annual Transaction Amount | 1,853,092 | 1,279,474 | 1,279,474 |
| 22 | Auction Revenue Rights Infeasible Uplift Amount | 31,325 | 105,302 | 105,303 |
| 23 | Auction Revenue Rights Stage 2 Distribution Amount | (141,739) | (146,488) | (146,488) |
| 24 | Financial Transmission Rights Full Funding Guarantee Amount | - | (5,413) | (15,523) |
| 25 | Financial Transmission Guarantee Uplift amount | - | 4,580 | 15,894 |
| 26 | Financial Transmission Rights Hourly Allocation Amount | (137,846) | (17,948) | 74,052 |
| 27 | Financial Transmission Rights Monthly Allocation Amount | (16,576) | (19,680) | (6,373) |
| 28 | Financial Transmission Rights Monthly Transaction Amount | - | - | - |
| 29 | Financial Transmission Rights Transaction Amount | - | - | - |
| 30 | Financial Transmission Rights Yearly Allocation Amount | - | - | - |
| Financial Transmission Rights Subtotal | | <u>\$ (854,132)</u> | <u>\$ (795,547)</u> | <u>\$ (686,901)</u> |
| 31 | Real Time Market Administration Amount | \$ 33,924 | \$ 26,185 | \$ 42,246 |
| 32 | Contingency Reserve Deployment Failure Charge Amount | - | - | - |
| 33 | Excessive Energy Amount | (22,658) | (14,990) | (14,389) |
| 34 | Real Time Excessive Deficient Energy Deployment Charge Amount | 6,743 | 8,088 | 25,812 |
| 35 | Net Regulation Adjustment Amount | - | - | - |
| 36 | Non-Excessive Energy Amount | 3,818,204 | 3,260,442 | 7,541,175 |
| 37 | Real Time Regulation Amount | - | 6 | 320 |
| 38 | Regulation Cost Distribution Amount | 39,539 | 43,497 | 40,851 |
| 39 | Real Time Spinning Reserve Amount | (1,630) | (1,548) | (15,390) |
| 40 | Spinning Reserve Cost Distribution Amount | 22,381 | 30,073 | 39,148 |
| 41 | Real Time Short-Term Reserve Amount | (234) | (352) | (9,586) |
| 42 | Real-Time Short-Term Reserve Deployment Failure Charge Amount | - | - | - |
| 43 | Short-Term Reserve Cost Distribution Amount | 941 | 6,859 | 30,005 |
| 44 | Real Time Supplemental Reserve Amount | - | - | - |
| 45 | Supplemental Reserve Cost Distribution Amount | 3,771 | 3,657 | 3,102 |
| 46 | Real Time Asset Energy Amount | (501,087) | 768,508 | (432,412) |
| 47 | Real Time Demand Response Allocation Uplift Charge | 61 | 335 | 358 |
| 48 | Real Time Financial Bilateral Transaction Congestion Amount | - | - | - |
| 49 | Real Time Financial Bilateral Transaction Loss Amount | - | - | - |
| 50 | Real Time Congestion Rebate on Carve-Out Grandfathered Agrmnts | - | - | - |
| 51 | Real Time Losses Rebate on Carve-Out Grandfathered Agrmnts | - | - | - |
| 52 | Real Time Distribution of Losses Amount | (263,942) | (217,836) | (131,969) |
| 53 | Real Time Miscellaneous Amount | (120,303) | 96,203 | 6,011 |
| 54 | Real Time MVP Distribution Amount | (55,610) | (37,804) | (33,690) |
| 55 | Real Time Non-Asset Energy Amount | - | - | - |
| 56 | Real Time Net Inadvertent Distribution Amount | (58,614) | (9,036) | (2,371) |
| 57 | Real Time Price Volatility Make Whole Payment | (178,365) | (132,179) | (333,896) |
| 58 | Real Time Resource Adequacy Auction Amount | (1,513,762) | (1,680,613) | (1,626,399) |
| 59 | Real Time Ramp Capability Amount | (1,915) | (7,572) | (7,047) |
| 60 | Real Time Revenue Neutrality Uplift Amount | 271,304 | 455,393 | 437,536 |
| 61 | Real Time Revenue Sufficiency Guarantee First Pass Dist Amount | 8,294 | 17,545 | 22,002 |
| 62 | Real Time Revenue Sufficiency Guarantee Make Whole Payment Amt. | (321) | (7,805) | (1,439) |
| 63 | Real Time Storage as Transmission Only Asset Amount | - | - | - |
| 64 | Real Time Schedule 24 Allocation Amount | 4,437 | 4,937 | 5,540 |
| 65 | Real Time Schedule 24 Distribution Amount | (55,188) | (61,406) | (57,746) |
| 66 | Real Time Schedule 49 Cost Distribution Amount | 131,533 | 55,198 | 58,087 |
| | Real Time Virtual Energy Amount | - | - | - |
| Real Time Subtotal | | <u>\$ 1,567,503</u> | <u>\$ 2,605,785</u> | <u>\$ 5,585,859</u> |
| Grand Total | | <u>\$ (6,597,085)</u> | <u>\$ (5,514,656)</u> | <u>\$ (4,201,860)</u> |

AFFIRMATION

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

A handwritten signature in black ink, appearing to read "Gregory J. Bennett", is written over a horizontal line.

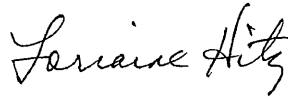
By:
Indiana Office of
Utility Consumer Counselor

July 21, 2023
Date

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing *Indiana Office of Utility Consumer Counselor Public's Exhibit No. 1 Pre-Filed Testimony OUCC Witness Gregory T. Guerrettaz* has been served upon the following counsel of record in the captioned proceeding by electronic service on July 21, 2023.

Teresa Morton Nyhart
Jeffrey M. Peabody
BARNES & THORNBURG LLP
tnyhart@btlaw.com
jpeabody@btlaw.com



Lorraine Hitz
Deputy Consumer Counselor

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR
115 West Washington Street
Suite 1500 South
Indianapolis, IN 46204
infomgt@oucc.in.gov
317/232-2775 - Lorraine's No.
317/232-2494 – Phone
317/232-5923 – Facsimile