

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANAPOLIS POWER &)
LIGHT COMPANY D/B/A AES INDIANA (“AES)
INDIANA”) FOR AUTHORITY TO INCREASE)
RATES AND CHARGES FOR ELECTRIC)
UTILITY SERVICE, AND FOR APPROVAL OF)
RELATED RELIEF, INCLUDING (1) REVISED)
DEPRECIATION RATES, (2) ACCOUNTING) CAUSE NO. 45911
RELIEF, INCLUDING DEFERRALS AND)
AMORTIZATIONS, (3) INCLUSION OF)
CAPITAL INVESTMENTS, (4) RATE)
ADJUSTMENT MECHANISM PROPOSALS,)
INCLUDING NEW ECONOMIC)
DEVELOPMENT RIDER, (5) REMOTE)
DISCONNECT/RECONNECT PROCESS, AND)
(6) NEW SCHEDULES OF RATES, RULES AND)
REGULATIONS FOR SERVICE)

PETITIONER INDIANAPOLIS POWER & LIGHT COMPANY
SUBMISSION OF COMPLIANCE FILING

Petitioner Indianapolis Power & Light Company d/b/a AES Indiana, by counsel, hereby
files the attached compliance filing.

Respectfully submitted,



Teresa Morton Nyhart (Atty. No. 14044-49)
Jeffrey M. Peabody (Atty. No. 28000-53)
Taft Stettinius & Hollister LLP
One Indiana Square, Suite 3500
Indianapolis, IN 46204
Nyhart Phone: (317) 713-3648
Peabody Phone: (317) 713-3647
Fax: (317) 713-3699
Email: tnyhart@taftlaw.com
jpeabody@taftlaw.com

Attorneys for Petitioner

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served this 17th day of January, 2025 via electronic mail, to:

T. Jason Haas
Indiana Office of Utility Consumer Counselor
Suite 1500 South, 115 W. Washington St.
Indianapolis, Indiana 46204
infomgt@oucc.in.gov
thaas@oucc.in.gov

Jennifer A. Washburn
Citizens Action Coalition of Indiana, Inc.
1915 W. 18th Street, Suite C
Indianapolis, Indiana 46202
jwashburn@citact.org

Copy to:
Reagan Kurtz
rkurtz@citact.org

Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
KBoehm@BKLawfirm.com
JKylerCohn@BKLawfirm.com

John P. Cook, Esq.
John P. Cook & Associates
900 W. Jefferson Street
Franklin, Indiana 46131
john.cookassociates@earthlink.net

Justin Bieber
Energy Strategies, LLC
Parkside Towers
111 E. Broadway Street, Suite 1200
Salt Lake City, Utah 84111
jbieber@energystrat.com

Nikki G. Shoultz
Kristina Kern Wheeler
Bose McKinney & Evans LLP
111 Monument Circle
Suite 2700 Indianapolis,
IN 46204
nshoultz@boselaw.com
kwheeler@boselaw.com

Joseph P. Rompala
Aaron A. Schmoll
LEWIS & KAPPES, P.C.
One American Square, Suite 2500
Indianapolis, Indiana 46282-0003
JRompala@Lewis-Kappes.com
aschmoll@lewis-kappes.com

Copy to:
etennant@lewis-kappes.com

Eric E. Kinder
SPILMAN THOMAS & BATTLE, PLLC
300 Kanawha Boulevard, East
P. O. Box 273
Charleston, WV 25321
ekinder@spilmanlaw.com

Barry A. Naum
Steven W. Lee
SPILMAN THOMAS & BATTLE, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
bnaum@spilmanlaw.com
slee@spilmanlaw.com

Anne E. Becker
One American Square, Ste. 2500
Indianapolis, Indiana 46282
ABecker@Lewis-Kappes.com

Copy to: atyler@lewis-kappes.com



Jeffrey M. Peabody

Teresa Morton Nyhart (Atty. No. 14044-49)
Jeffrey M. Peabody (Atty. No. 28000-53)
Taft Stettinius & Hollister LLP
One Indiana Square, Suite 3500
Indianapolis, IN 46204
Nyhart Phone: (317) 713-3648
Peabody Phone: (317) 713-3647
Fax: (317) 713-3699
Email: tnyhart@taftlaw.com
jpeabody@taftlaw.com

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

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**AES Customer Ecosystem (“ACE”) Project
Monthly Compliance Report
IURC Cause No. 45911
January 17, 2025**

1. INTRODUCTION

On November 6, 2023, AES Indiana (“AES Indiana” or “the Company”) launched a comprehensive suite of new systems, including a customer information system (“CIS”), meter data management (“MDM”), customer service management (“CSM”), field services management (“FSM”) applications, asset manager, and multi-resource scheduling tool. These systems, referred to as the ACE Project, are the backbone of the meter-to-cash processes and customer interactions and are operational. As of January 13, 2025, the new systems have generated more than six million customer invoices since the project went into service in November 2023.

AES Indiana is filing monthly compliance reports with the Indiana Regulatory Utility Commission (“IURC” or “Commission”) under Cause No. 45911 to inform the Commission of the implementation of the ACE Project pursuant to the Commission order in IURC Cause No. 45911 dated April 17, 2024 (page 25). This compliance filing reports on issues with the ACE Project, how the issues are being addressed, the number of customers affected, and other information requested by the Commission concerning the ACE Project.

2. ISSUES WITH THE ACE PROJECT AND NUMBER OF CUSTOMERS AFFECTED

AES Indiana has reached full stabilization. As of August 15, 2024, AES Indiana has moved all the systems from hypercare into a phase known as “Sustain”, a part of normal business operations. At this phase of the project, Sustain maintains increased technical staff to support addressing tickets at all levels.

With respect to the Sustain phase, as of January 13, 2025, there are 98 open tickets with three degrees of prioritization:

- 0 critical open ticket vs. 1 critical open in December,
 - 0 critical open ticket specific to billing vs 1 critical in December
- 13 high open tickets vs. 21 high last month,
 - 0 high open tickets specific to billing vs 3 high in December
- 53 medium open tickets vs. 97 medium last month, and
- 32 low open tickets vs. 53 low last month.

Table 1 shows the number of customers who have experienced some latency in their billing cycle. The customer counts are not unique because some customers may be affected by multiple issues, so the numbers in this table are not additive. Similarly, customers with out-of-balance (“OOB”) bills, where the Company withholds their bill until the print is revised to define the charges clearly, are not the same customers throughout the months reported below.

Table 1. Current System Issues and Customer Impact*

Description of Issue	Customers Impacted as of May 10, 2024	Customers Impacted as of June 13, 2024	Customers Impacted as of July 11, 2024	Customers Impacted as of August 19, 2024	Customers Impacted as of September 13, 2024	Customers Impacted as of October 15, 2024	Customers Impacted as of November 12, 2024	Customers Impacted as of December 13, 2024	Customers Impacted as of January 13, 2025
Customers who have not received an invoice since going live in the new system	235	32	158 ¹	106	50	0	0	0	0
Unique Customers with bills/invoices impacted by OOB	22,492	16,850	5,907	5,484	5,028	5,333	2,477	2,389	2,035
Complex bills (e.g., outdoor lighting) and large C&I customer billing data and process issues not displaying correctly on the bill	35-40	**50-75	35-40	35-40	5-10	5-10	5-10	5-10	5-10
Unable to reissue bills when a bill was sent with inaccurate information	4,200	728 unique customers	0	20-30***	0	0	0	0	0

3. HOW THE ISSUES ARE BEING ADDRESSED

The Company continues to work across technical and business teams to address the issues customers are experiencing.

The root cause analysis is scheduled to begin the last week of January with an estimated timeline to be finished in the first half of 2025. The Company has engaged with Guidehouse Inc. to facilitate the root cause analysis.

¹ The increase from June to July is due to the backlog of new meter installations getting updated in the CIS. Those backdated installs were awaiting their first billing. All other meters are newer installations.

In **Table 2**, the Company shows the targets achieved for measuring billing stabilization in the left column.

Table 2. Key Performance Indicators for Billing to Reach Stabilization

Stability Measure	Performance as of May 10, 2024	Performance as of June 13, 2024	Performance as of July 11, 2024	Performance as of August 13, 2024
Between ~50-100 OOB after the nightly batch run for 10 consecutive batch runs	~400 bills	~180 bills	~70 bills	Target Achieved July 23, 2024
Zero critical tickets open	16 open critical	8 open critical	2 open critical	Target Achieved August 13, 2024
Backlog of OOBs reduced to under 10k	31,096 bills	22,480 bills	Target Achieved July 3, 2024	
No backlog of cancel/rebills	7,000 bills	2,718 bills	*Target was achieved on July 10th and additional issue found later in July that had to be resolved via cancel/rebill	Target Re-Achieved August 15, 2024

4. CUSTOMER COMMUNICATIONS AND PROJECT ADVANCEMENT

With AES Indiana having reached full stabilization, the Company has continued to resolve any outstanding issues and has begun advancing future phases of deployment. Advancements began with the assessment of late fees on unresolved balances beginning in December 2024. The Company has also continued to progress with its plans to resume disconnects in alignment with prior communications.

The functionality for disconnects will be deployed early February 2025, with the first disconnections taking place as early as the end of February 2025 and is based upon the customers' billing cycle. Whereas late fees began being assessed on a go forward basis in December, disconnect notices are cumulative considering the total unpaid balance. Customers are not eligible for disconnect if they have an active up-to-date installment agreement or are subject to the rules of the winter moratorium. Disconnections occur 21 days after an invoiced bill has been unresolved. As remote disconnections begin, through leveraging advanced metering infrastructure ("AMI") technology, customers can be assured that upon completing a successful payment either through the portal or the automated telephone prompts, service will be restored upon receipt of payment.

The Company has continued to perform outreach to customers who have carried a balance of older than 90 days to avoid any service interruptions. Since September 2024, the Company has proactively communicated through a variety of channels that disconnections and late fee charges for nonpayment would begin. Additionally, the Company has made multiple direct outreach attempts by the Customer Care Team with outbound calling to customers in arrears to set them up on extended payment plans. Additionally, the Company has continued to reinforce the availability of payment arrangements and have extended options in the length of payment arrangements to meet the customers' financial needs up to 36 months. The Company has continued to promote messages to customers via social media, email, newsletters, and bill messages to take action on their account in advance. To date, a total of 23,571 customers have enrolled in installment agreements since these enhanced efforts. Please see the report file dated December 17, 2024 for a more detailed analysis.

The Company has continued its focus on advancing improvements in customer experience and made significant investments in Q4 2024 to upgrade its legacy telephony platform. A new telephony experience is expected to launch in June 2025, giving customers an improved interactive voice response ("IVR") experience, more ways to connect with AES and advanced features to make it easier to work with the Company. More will be shared with customers and the IURC as this technology is closer to deployment.

Furthermore, the Company continues to promote the following utility assistance resources through customer communication channels:

- Energy Assistance Program ("EAP"): One-time benefit program to help assist income-qualified customers with utility bills.
- United Way of Central Indiana's Winter Assistance Fund ("WAF"): Opening January 1, 2025, income-eligible customers in Marion County who do not qualify for EAP can apply for WAF, supported by AES Indiana, among others.

- AES Indiana's Power of Change: Assists income-qualified customers, regardless of approval or denial from EAP or WAF, with a one-time grant for electric bill assistance.

The Utilities Unite for Customers also continues to provide essential support to the community through cross social media promotion and customer emails. AES Indiana and Citizens Energy Group will be hosting joint Community Office Hours in February. Customer emails and social media will invite the public to attend to assist in getting set up for EAP, the Citizens Energy Group energy assistance program, and AES Indiana's Power of Change program. The Company plans to hold additional Community Office Hours throughout the year. AES Indiana also updated the payment assistance webpage (see Figure 1). Now, it includes all nine translated pieces of utility assistance information, ensuring that our diverse customer base can easily access the help they need. This ongoing commitment to inclusivity and support underscores our dedication to serving every member of the community.

Figure 1. Updated Webpage Screenshot (aesindiana.com/payment-assistance)

Quick Reference Guides

This webpage offers essential information for the 2024-2025 winter season, available in a single PDF that has been translated into multiple languages for accessibility. As part of the Utilities Unite for Customers initiative, these PDF guides also include water utility details from Citizens Energy Group (separate from AES Indiana), aiming to provide comprehensive utility assistance information for all of Central Indiana in one convenient place.


If you or someone you know needs a quick reference to financial assistance programs this winter, these PDFs are great to share in both digital and printed formats.

Please find below PDFs to specific languages:

- [English](#)
- [Burmese](#)
- [Falam Chin](#)
- [Hakha Chin](#)
- [French](#)
- [Pashto](#)
- [Dari](#)
- [Haitian Creole](#)
- [Spanish](#)

The Company has continued communicating to customers that disconnections and late fees for nonpayment will resume soon. The communications were made via bill messages (see **Figure 2**), social media (see **Figure 3**), bill insert (see **Figure 4**), bill messages, website, and a community resource day in partnership with Citizens Energy Group. A key part of the Company's communications strategy includes the availability of extended payment plans. The Company is committed to supporting customers facing financial hardships by offering flexible extended payment options – 3-, 6-, 9-, or 12-month options and up to 36-month options – that work for their unique circumstances. In resuming the disconnect process, the Company will continue to comply with the winter moratorium requirements.

Figure 2. Customer Bill Message on December Bills



Account Number	
Due Date	12/26/2024
Amount Due	\$159.78

Page 1 of 1


Monthly Account Summary	Billing Date: 12/03/2024
Previous Balance	\$187.41
11/18/2024 Payment - Thank You	-187.41
Metered Electric and Other Services	149.33
State Tax	10.45
Total Account Balance	\$159.78

Message Center

Keeping your account up to date is crucial to avoid any potential late fees or service disruptions. Please ensure your account balance is current. We encourage you to take action as soon as possible. To make a payment or set up a payment arrangement, log in to your online account or contact us at 317-261-8222.

Total Number of Services	1
Total Services Billed	1

Figure 3. Social Media Message on Facebook, Instagram, and X on 1/13/2025

 **AES Indiana**
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Setting up an extended payment plan has never been easier. Find a plan that works best to suit your needs and keeps your account up-to-date at the same time.

📞 Speak to a member of our Customer Care team at 317-261-8222

🖥️ Log into your account at myaccount.aesindiana.com

We're here to support you every step of the way!

3

3-Month Plan
Pay off your balance with 3 equal payments added to your regular monthly payments.

6

6-Month Plan
Pay off your balance with 6 equal payments added to your regular monthly payments.

9

9-Month Plan
Pay off your balance with 9 equal payments added to your regular monthly payments.


12

12-Month Plan
Pay off your balance with 12 equal payments added to your regular monthly payments.

Business customers qualify for 3 and 6 month payment extensions and budget billing is available to small commercial customers. A \$10 upfront payment is required for residential and commercial customers under Indiana Administrative Code.

Figure 4. January Bill Insert


What you need to know about winter bill assistance



Unsure of where to turn for help paying your utility bills? We understand the process of applying for assistance can be confusing. We are here to help you receive the support you need.


Income-qualified Hoosiers can apply for assistance through the Energy Assistance Program (EAP) to help manage your energy bill. Fill out an application online or pick up a paper application at John Boner Neighborhood Centers located at 2236 E. 10th St., Indianapolis, IN 46201.

Need additional support with paying your energy bill?



For more information about EAP and to see if you qualify, scan the QR code or visit indyep.org.

Additionally, AES Indiana is here for you to help you maintain your utility service. Explore Power of Change for even more support with your utility bill.



Visit aesindiana.com/power-change or scan the QR code to learn more and apply for assistance today.

Supporting you through the season

Keeping your account up to date is crucial to avoid any potential late fees or service disruptions. Please ensure your account balance is current. If you've fallen behind on payments, we encourage you to take action as soon as possible.

3

3-Month Plan
Pay off your balance with 3 equal payments added to your regular monthly payments.

6

6-Month Plan
Pay off your balance with 6 equal payments added to your regular monthly payments.

9

9-Month Plan
Pay off your balance with 9 equal payments added to your regular monthly payments.

12

12-Month Plan
Pay off your balance with 12 equal payments added to your regular monthly payments.

If you're experiencing financial challenges, we're here to help.

Our Customer Care team can work with you to find options that make payments more manageable, including installment plans and assistance programs.

To make a payment or set up a payment arrangement, please log in to your online account or contact Customer Care today at [317-261-8222](tel:317-261-8222).

To further illustrate the Company's communication effort, a draft of the February bill insert is provided below in **Figure 5**.

Figure 5. Draft February Bill Insert

Avoid disconnection: ensure your account is up to date

Setting up a payment arrangement has never been easier. Please make sure your account balance is current. If you're behind on payments, we encourage you to take action as soon as possible, we're here to assist you.

Call us today at 317-261-8222.



- 3 3-Month Plan**
Pay off your balance with 3 equal payments added to your regular monthly payments.
- 6 6-Month Plan**
Pay off your balance with 6 equal payments added to your regular monthly payments.
- 9 9-Month Plan**
Pay off your balance with 9 equal payments added to your regular monthly payments.
- 12 12-Month Plan**
Pay off your balance with 12 equal payments added to your regular monthly payments.

Business customers qualify for 3 and 6 month payment extensions and budget billing is available to small commercial customers. A \$10 upfront payment is required for residential and commercial customers under Indiana Administrative Code.

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Schedule your free virtual or in-home* appointment today at aesindiana.com/assessments.

*Must meet income-eligibility guidelines to qualify for an in-home assessment.



The Company will reach out to specific media outlets that initially covered the announcement of resuming disconnections to offer an update story in Q1 of 2025. In addition, the Company always adds information about extended payment plans and customer assistance options during any interview it is relevant.

5. OTHER INFORMATION REQUESTED BY THE COMMISSION

No other information was requested by the Commission for this report.