

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 (No. 14044-49)
Jeffrey M. Peabody (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 October, 2024 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. Shultz
Kristina Kern Wheeler
Bose McKinney & Evans LLP
111 Monument Circle, Suite 2700
Indianapolis,
IN 46204
nshultz@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 (No. 14044-49)
Jeffrey M. Peabody (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

135435784v1

**AES Customer Ecosystem (“ACE”) Project
Monthly Compliance Report
IURC Cause No. 45911
October 17, 2024**

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 October 15, 2024, the new systems have generated more than five 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.

As of October 15, 2024, there are 198 open tickets with four degrees of prioritization:

- 1 critical open ticket vs. 5 critical open in September,
 - 0 critical open ticket specific to billing vs 0 critical in September
- 35 high open tickets vs. 36 high last month,
 - 9 high open tickets specific to billing vs 14 high in September
- 91 medium open tickets vs. 109 medium last month, and
- 71 low open tickets vs. 63 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. Over the past month, in addition to resolving bill print issues, AES Indiana has been focused on developing a tool within

ACE for our business users to resolve existing and new OOB bills. The tool is anticipated to be in use by the end of October and decreases in the backlog of OOB bills are expected after that time.

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 who have not received an invoice since going live in the new system	235	32	158 ¹	106	50	0
Unique Customers with bills/invoices impacted by OOB	22,492	16,850	5,907	5,484	5,028	5,333
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
Unable to reissue bills when a bill was sent with inaccurate information	4,200	728 unique customers	0	20-30***	0	0

3. HOW THE ISSUES ARE BEING ADDRESSED

In **Table 2**, the Company shows the targets achieved for measuring billing stabilization in the left column. The Company continues to work across technical and business teams to address the issues customers are experiencing. As mentioned in the September ACE Monthly Compliance Report, the Company is focusing its attention on the root cause analysis (“RCA”). Please see the response to Question 5 in Section 5 below for additional details about the RCA process.

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.

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

Throughout September and October, the Company continued communicating to customers that disconnections and late fees for nonpayment will resume in the near future. The communications were made via bill insert, bill messages and website. A key part of the 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.

On October 5, the Company participated in the Community Resource Day that is part of the Utilities Unite campaign – a partnership between Citizens Energy Group and AES Indiana. The Company promoted in-home energy assessments, extended monthly payment options, and shared payment assistance programs like LIHEAP and AES Indiana’s internal assistance program, Power of Change. There were over 500 people who visited the Company’s booth, and the total attendance was higher than anticipated. This event grew from 150 attendees in 2023 to 1,036 this year. Nearly 75 percent of the people who stopped at the Company’s booth requested winter payment assistance and 25 percent requested bill support.

Figure 1 shows an example of the handout that was given to customers at the Community Resource Day event.

Figure 1. Community Resource Day Handout

AES Indiana is resuming **late fees** and **disconnections** for nonpayment beginning in November.

Call our Customer Care team today to get set up on a payment plan.

Residential customers: 317-261-8222
Business customers: 317-261-8444

aes Indiana

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.

AES Indiana reanudará los **cargos por pagos atrasados** y **desconexiones** por falta de pago a partir de Noviembre.

Llame a nuestro Equipo de Atención Al Cliente hoy para establecer un plan de pago.

Clientes Residenciales: 317-261-8222
Clientes Comerciales: 317-261-8444

aes Indiana

3 **Plan de 3 meses**
Pague su saldo con 3 pagos iguales agregados a sus pagos mensuales regulares.

6 **Plan de 6 meses**
Pague su saldo con 6 pagos iguales agregados a sus pagos mensuales regulares.

9 **Plan de 9 meses**
Pague su saldo con 9 pagos iguales agregados a sus pagos mensuales regulares.


12 **Plan de 12 meses**
Pague su saldo con 12 pagos iguales agregados a sus pagos mensuales regulares.

Clientes comerciales califican para extensiones de pago de 3 y 6 meses y la facturación presupuestaria está disponible para clientes comerciales pequeños. Se requiere un pago inicial de \$10 para clientes residenciales y comerciales según el Código Administrativo de Indiana.

Figure 2 shows an example of the flyer that was given to customers at the Community Resource Day event.

Figure 2. Community Resource Day Flyer

Utilities Unite for Customers



CENTRAL INDIANA:
What Utility Financial Assistance is Available and How Do I Apply?

Citizens Energy Group—the local natural gas, water and wastewater provider—and AES Indiana—the local electricity provider—understand utility bills can provide financial hardship for customers. If you are concerned with paying your bills, there are federal and local assistance programs available to help.

TIP: Most assistance program eligibility is based on household income. Knowing your total income for the past three months will help you determine which programs may be right for you.


GETTING STARTED: EAP

The federal EAP program is the best first step for many residents seeking assistance with their utility bills. While other programs may also be available, they often ask for the results of an EAP application. Learn more about getting started with the EAP below.

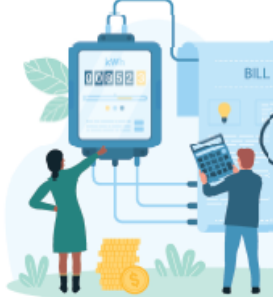
Energy Assistance Program (EAP)

EAP is a federally funded, one-time benefit program that can assist you with the cost of home utilities and can help if you are disconnected or are about to get disconnected. EAP is also referred to as Low-Income Energy Assistance Program ("LIEAP").

Apply at www.eap.ihcda.in.gov
 Or schedule a phone appointment to complete your EAP application: 317-559-7016



Household Size	Last 3 Months' Income Must Be LESS Than:
1	\$8,059
2	\$10,539
3	\$13,018
4	\$15,498
5	\$16,594
6	\$18,883



Apply for EAP to Avoid Utility Disconnection

It can take several weeks to be approved for EAP, but having the completed EAP application can help you avoid a utility shut-off. A winter disconnection moratorium period runs from January 1, 2025 - March 31, 2025. Proof of application or approval letter must be submitted by March 15, 2025. Email aesindianaep@aes.com or call 317-924-3311 for more information.

If approved for EAP, you will receive a 10-25% discount on your gas bill until May.

Key EAP Dates:

- October 1, 2024: Online and mail applications accepted.
- December 1, 2024: Statewide utility disconnection moratorium begins.
- March 15, 2025: Utility shut-off moratorium ends.
- April 14, 2025: Last day to submit application.

ADDITIONAL ASSISTANCE PROGRAMS

United Way of Central Indiana's Winter Assistance Fund (WAF)

Championed by the United Way of Central Indiana, WAF is for Marion County residents who struggle with increased utility costs but don't qualify for Indiana EAP.

Find an application site near you at uwci.org/waf. You can also call 2-1-1 to learn more about which local sites are accepting applications.

The Winter Assistance Fund program period is from January 1, 2025 - May 31, 2025.

Regardless of WAF approval or denial, you can still apply for AES Indiana's Power of Change and assistance from Citizens' Warm Heart Warm Home Foundation™.

Citizens Energy Group

The Warm Heart Warm Home Foundation™ (WHWH) is Citizens' nonprofit organization that provides financial assistance to customers having difficulty paying their utility bills. WHWH grants can help customers sustain their utility services and catch up on past-due bills.

Apply by calling Citizens at 317-924-3311.



WHWH Income Eligibility

Household Size	Last 3 Months' Income Must FALL WITHIN :
1	\$8,060 - \$9,402
2	\$10,540 - \$12,296
3	\$13,020 - \$15,189
4	\$15,500 - \$18,082
5	\$17,979 - \$20,975
6	\$20,459 - \$23,868

AES Indiana


Power of Change, an AES Indiana program administered by the nonprofit Dollar Energy Fund, assists income-qualified customers, regardless of approval or denial from EAP or WAF, with a one-time grant for electric bill assistance.

You must apply for EAP first and be one of the following: EAP Qualified, or have proof of eligibility in SNAP, TANF, HIP or Medicaid.


WAF Income Eligibility Range


Household Size	Last 3 Months' Income Must Be BETWEEN :
1	\$8,060 - \$8,471.25
2	\$10,540 - \$11,497.50
3	\$13,019 - \$14,523.75
4	\$15,499 - \$17,550
5	\$17,979 - \$20,576.25
6	\$20,459 - \$23,602.50



Other ways Citizens helps customer better manage their bills include the following:


- Flexible Payment Arrangements:** Set one up to get your bill back on track. Call Citizens at 317-924-3311.
- Budget Billing:** Enroll to know what you owe every month.
- Conservation Tips:** Conserve energy and water at home to help reduce your bill. Find tips at citizensenergygroup.com/My-Home/Conserve-Save





AES Indiana has several tools for payment assistance (at right). Find more ways to save and schedule your assessment by scanning the QR code.

- Payment Extensions:** 3-, 6-, 9-, and 12-month plans available.
- Budget Billing:** Balance seasonal highs and lows.
- Custom Bill Due Date:** Choose a due date that works for you.
- Energy Efficiency Programs:** Schedule your free virtual or in-home energy assessment to help with future bills.



Moving forward, additional promotion of winter assistance will occur on social media with a call-to-action to visit [aesindiana.com/payment assistance](https://aesindiana.com/payment-assistance) to learn more.

Since the Company's last compliance report, AES Indiana has not received any follow-up media inquiries about disconnections and late fees for nonpayment. The Company is developing a proactive media strategy that will begin as November gets closer to ensure timely and relevant information is shared with our customers.

5. **OTHER INFORMATION REQUESTED BY THE COMMISSION**

The Commission submitted additional questions on October 7, 2024. These questions are addressed individually in this section.

Q1. Of the 213 tickets that are still open as part of the ACE Project implementation, how many are related to billing? What are other types of issues you are still experiencing that have resulted in tickets?

A1. The 213 tickets referenced in the question were as of September 13, 2024. There are 198 open tickets as of October 15, 2024. Of this amount, 53 are related to billing. The other types of open tickets are largely related to system integrations, data issues from prior tickets, exception case routing, system navigation, and modifications to enable field teams to operate more effectively.

Q2. Can you provide an update to your July 17, 2024, compliance filing response related to the question on number of total accounts that are in arrears/delinquent accounts? Specifically, what is that number/percentage of total accounts? How does that compare to accounts that are in arrears on average? How many customers have not paid their bills at all (whether they have received a bill or not) since the ACE Project implementation?

A2. **Table 3** below includes updated customer accounts that are in arrears for September 2024.

The total number of active accounts that are in arrears as of September 2024 is 85,425 and it represents 18.33% of total accounts. The average total number of accounts that are in arrears as of June from 2020 to 2023 (periods before ACE go-live) is 88,410.

Currently 6,375 accounts have not paid their bills at all (whether they have received a bill or not) since the ACE Implementation.

Table 3. Customer Accounts in Arrears²

Total AR 31+ Days in Arrears						
	C&I Dollars	C&I Accounts	Residential Dollars	Residential Accounts	Total Dollars	Percentage of Customers in Arrears
June 2020	\$4,353,006	4,101	\$19,118,923	83,804	\$23,471,929	18.69%
June 2021	\$1,980,065	3,078	\$11,607,708	80,095	\$13,587,772	17.69%
June 2022	\$3,080,182	3,447	\$15,378,916	86,340	\$18,459,098	19.09%
June 2023	\$2,639,439	3,838	\$18,178,388	88,937	\$20,817,826	19.73%
June 2024	\$9,865,787	6,244	\$30,384,798	101,663	\$40,250,585	22.95%
Sept 2024	\$30,784,573	4,262	\$42,261,233	81,163	\$73,145,797	18.33%

Q3. Of the 50 customers who have not received a bill in the new system, what customer class are they from? Are they all new customers?

A3. As of September 13, 2024, of the 50 customers who have not received a bill in the new system, they belong to the small commercial customer class. These were new service installations for both new and existing customers.

Q4. Can you describe how your customer service agents will offer, discuss, and advise customers on the various extended payment arrangements that AES is offering. How many customers do you typically have on payment arrangements, and how many do you expect to have once disconnections are expected to begin after Nov. 1, 2024?

A4. Residential customers are able to establish extended payment arrangements through the self-service interactive voice response (“IVR”) capabilities over the phone or through the AES Indiana website. They are able to select between a three or six-month extension through the self-service channels.

If the self-service options do not work for the residential customer, or if they prefer to speak to a customer service team member, they may contact the customer service team at

² The numbers reported for September 2024 only include active accounts. The June 2024 number of customer accounts in arrears previously reported to the Commission includes both active and inactive accounts. The change was made in this report to allow better comparisons to historical data which reflect active accounts.

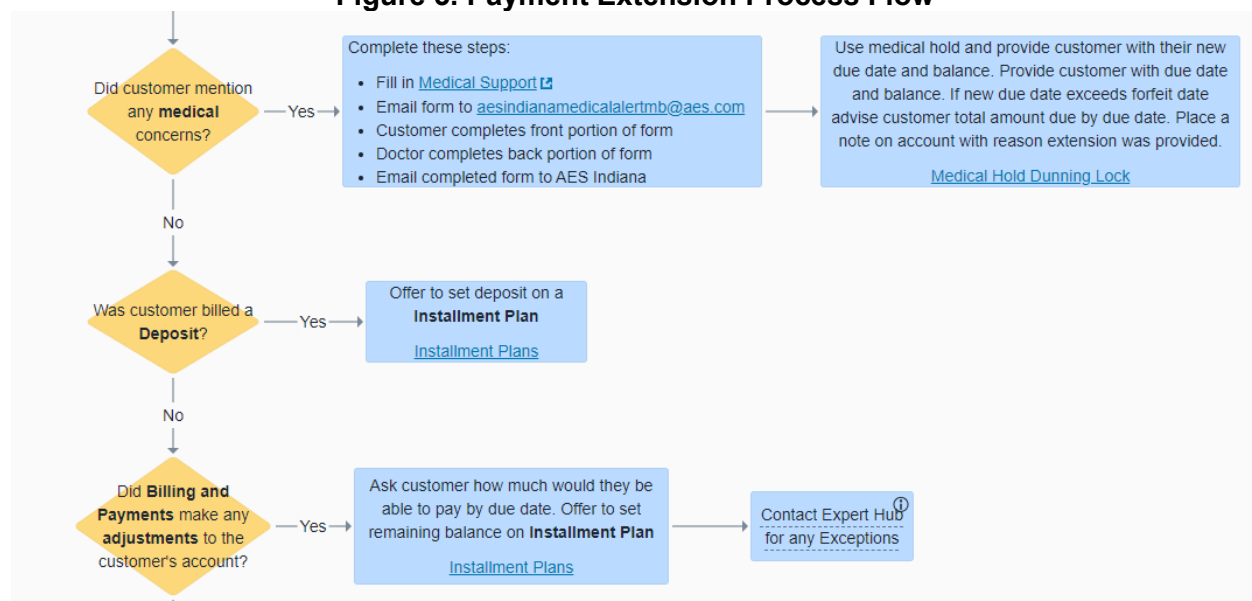
317.261.8222. Customers are able to select up to a 12-month extension by communicating directly with a customer service team member.

Non-residential customers are also able to contact a customer service team member to establish an extended payment arrangement.

Customer service works with the customer to understand what is driving the extended payment request. For example, if the customer is requesting an extended payment arrangement because of a medical condition, the customer's account is updated for emergency purposes. If the customer is requesting an extended payment arrangement because of a billing error (including delayed billing, or an error related to the ACE implementation), customer service will ask the customer how much they are able to pay, then offer to place the remaining balance on an installment agreement that works best for the customer, considering their financial circumstances.

Figure 3 below is an illustration of the process the customer service team uses when speaking with a customer regarding a payment extension:

Figure 3. Payment Extension Process Flow



In 2023 and prior to the ACE Project go-live, the month-end average of the number of customer accounts on payment arrangements was approximately 20,000. As of October 7, 2024, the number of customer accounts on payment arrangements was approximately 13,000.

Since announcing the resumption of late fees and disconnects in September, there has been an increase in extended payment enrollments. While it is difficult to estimate the

number of customers who will elect payment arrangements once disconnections commence, the Company encourages customers to take advantage of such arrangements as appropriate. In an effort to best support customers, the Company opened applications for Power of Change on October 1, 2024, a full month earlier than planned. Power of Change is a one-time grant to assist with electric bill payments when financial challenges occur.

- Q5. Do you have additional information to share about the root cause analysis timeline/process other than it starting in Q4 of 2024?**
- A5. In the September ACE Compliance Report, the Company indicated it is turning its attention to commencing a root cause analysis. Currently, the Company is in the evaluation phase of selecting a third-party organization to lead the RCA in collaboration with internal subject matter experts.