

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 2022 THROUGH)
NOVEMBER 2022, IN ACCORDANCE WITH) CAUSE NO. 38703 FAC 136
THE PROVISIONS OF I.C. 8-1-2-42, 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.)

APPLICANT'S SUBMISSION OF DIRECT TESTIMONY OF
NATALIE HERR COKLOW

Indianapolis Power & Light Company d/b/a AES Indiana ("AES Indiana", "IPL",
"Company", or "Applicant"), by counsel, hereby submits the direct testimony and attachments of
Natalie Herr Coklow.

Respectfully submitted,



Teresa Morton Nyhart (No. 14044-49)
Jeffrey M. Peabody (No. 28000-53)
Barnes & Thornburg LLP
11 South Meridian Street
Indianapolis, Indiana 46204
Nyhart Telephone: (317) 231-7716
Peabody Telephone: (317) 231-6465
Facsimile: (317) 231-7433
Nyhart Email: tnyhart@btlaw.com
Peabody Email: jpeabody@btlaw.com

ATTORNEYS FOR APPLICANT
INDIANAPOLIS POWER & LIGHT COMPANY
D/B/A AES INDIANA

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 17th day of June, 2022, by email transmission, hand delivery or United States Mail, first class, postage prepaid to:

Lorraine Hitz
Office of Utility Consumer Counselor
115 W. Washington Street, Suite 1500 South
Indianapolis, Indiana 46204
infomgt@oucc.in.gov
lhitz@oucc.in.gov

Gregory T. Guerrettaz
Financial Solutions Group, Inc.
2680 East Main Street, Suite 223
Plainfield, Indiana 46168
greg@fsgcorp.com
fsg@fsgcorp.com

A Courtesy Copy to:

Anne E. Becker
Lewis & Kappes
One American Square, Suite 2500
Indianapolis, Indiana 46282
abecker@lewis-kappes.com

and a courtesy copy to:

ATyler@lewis-kappes.com
ETennant@Lewis-kappes.com



Jeffrey M. Peabody

Teresa Morton Nyhart (No. 14044-49)
Jeffrey M. Peabody (No. 28000-53)
Barnes & Thornburg LLP
11 South Meridian Street
Indianapolis, Indiana 46204
Nyhart Telephone: (317) 231-7716
Peabody Telephone: (317) 231-6465
Facsimile: (317) 231-7433
Nyhart Email: tnyhart@btlaw.com
Peabody Email: jpeabody@btlaw.com

ATTORNEYS FOR APPLICANT
INDIANAPOLIS POWER & LIGHT COMPANY
D/B/A AES INDIANA
DMS 22936384v1

VERIFIED TESTIMONY OF NATALIE HERR COKLOW
MANAGER IN REGULATORY ACCOUNTING

1 **Q1. Please state your name, employer, and business address.**

2 A1. My name is Natalie Herr Coklow. I am employed by AES US Services, LLC (“the Service
3 Company”), which is the Service Company that serves Indianapolis Power & Light
4 Company d/b/a AES Indiana (“AES Indiana”, “IPL” or the “Applicant”). The Service
5 Company is located at One Monument Circle, Indianapolis, Indiana 46204. The Service
6 Company provides accounting, legal, human resources, information technology and other
7 corporate services to the businesses owned by The AES Corporation in the United States
8 of America, including AES Indiana.

9 **Q2. What is your position with the Service Company?**

10 A2. I am a Manager in the Regulatory Accounting department.

11 **Q3. Please summarize your work experience with the Service Company.**

12 A3. I began employment with the Service Company in July 2013. During my tenure with the
13 Service Company, I have worked in Regulatory Accounting on various AES Indiana and
14 Dayton Power & Light Company d/b/a AES Ohio (“AES Ohio” or “DP&L”) regulatory
15 filings and the associated accounting entries for both companies. I am responsible for the
16 various general ledger entries, the reconciliation of regulatory asset and liability accounts,
17 the computation and tracking of various costs for regulatory filings, and the preparation of
18 supporting schedules for these filings. These regulatory filings for AES Indiana have
19 included filings related to the Fuel Adjustment Clause (“FAC”) (Cause No. 38703-FAC
20 XX), AES Indiana’s most recent basic rate cases (Cause Nos. 44576 and 45029), the

1 Environmental Compliance Cost Recovery Adjustment (“ECCRA”) (Cause No. 42170-
2 ECR XX) and the Transmission, Distribution, and Storage System Improvement Charge
3 (“TDSIC”) (Cause No 45264-TDSIC XX).

4 **Q4. Please summarize your prior work experience.**

5 A4. Prior to the Service Company, I was employed by London Witte Group, LLC (“LWG”) for
6 seven years. LWG is a certified public accounting firm that provides an array of accounting
7 and consulting services to public utility, private and governmental clients. At LWG, I
8 worked on the review of Gas Cost Adjustments filed with this Commission by various
9 Indiana utilities, performed financial statement audits for predominately gas and electric
10 utility clients, completed rate design for municipally owned utilities, and completed or
11 reviewed financial statements and tax returns.

12 **Q5. Please summarize your educational qualifications.**

13 A5. I hold a Bachelor of Science Degree in Accounting from Indiana University.

14 **Q6. Have you previously testified before this Commission?**

15 A6. Yes. I have submitted testimony on behalf of AES Indiana in previous FAC proceedings
16 as well as ECCRA and TDSIC proceedings. I also submitted testimony in AES Indiana’s
17 basic rates case, Cause No. 45029.

18 **Q7. What are your responsibilities in connection with the Applicant’s fuel cost filings?**

19 A7. The data is assembled and the actual calculations of the fuel cost credit or charge are made
20 under my supervision and direction. In this case, I am presenting the calculated
21 (“unmitigated”) fuel cost charge as well as a reduced fuel charge (“mitigated factor” or
22 “mitigated FAC factor”) the Company proposes to place into effect, subject to

1 reconciliation and true-up, in a future FAC filing or upon resolution of the Eagle Valley
2 forced outage matters pending in the subdocket in FAC 133 S1.

3 **Q8. Have you reviewed the testimony and attachments of the Applicant's other witnesses**
4 **in this Cause?**

5 A8. Yes.

6 **Q9. Are you sponsoring any attachments?**

7 A9. Yes. I am sponsoring the following attachments, which were prepared or assembled by me
8 or under my direction and supervision:

9 • Attachment NHC-1 is a copy of the Verified Application filed in this proceeding,
10 including Schedules 1 through 7 thereto which reflect the proposed mitigated factor.

11 • Attachment NHC-1-A is the proposed tariff sheets revised to reflect the fuel cost
12 adjustment requested herein.

13 • Attachment NHC-2 is a Statement of Jurisdictional Electric Operating Income for
14 the Twelve Months Ended July 31, 2022.

15 • Attachment NHC-3 is a Determination of Authorized Return for the Twelve
16 Months Ended July 31, 2022.

17 • Attachment NHC-4 is an Earnings Test Summary.

18 • Attachment NHC-5 is the calculation of the unmitigated FAC factor.

19 **Q10. Is the information set forth in Attachments NHC-1 through NHC-5 and Attachment**
20 **NHC-1-A true and correct?**

21 A10. Yes, to the best of my knowledge.

22 **Q11. Are you filing any workpapers in this proceeding?**

1 A11. Yes. I have included Excel workbooks that support the calculations of Attachments NHC-
2 1 through Attachment NHC-5. These workpapers were prepared or assembled by me or
3 under my direction and supervision.

4 **Q12. Why is AES Indiana proposing a mitigated FAC factor in this proceeding?**

5 A12. As discussed in FAC 134-135 and FAC 133S1, the Company completed its analysis of the
6 estimated impact of the Eagle Valley outage on the FAC during the outage period (April
7 2021 through March 2022) and modeled an estimate of the variances that were the result
8 of issues independent of the Eagle Valley outage (commodity price and volume variances),
9 which are included for recovery in this proceeding. The Company is including the
10 variances not related to the Eagle Valley outage for recovery in order to recognize the
11 impact of increased natural gas and coal prices on overall fuel costs. Recognizing these
12 increases in fuel costs in the proposed fuel factor will allow the price for the electric service
13 to more timely reflect the actual cost of service.

14 **Q13. Please elaborate further why you are making this proposal.**

15 A13. As stated in prior FAC filings, AES Indiana has been experiencing rising commodity prices
16 like other utilities in the state. This proposal allows the Company to appropriately reflect
17 the cost of service in customer rates by including the non-outage portion of the variances
18 in the FAC factor.

19 **Q14. Please explain the Company's proposal that the mitigated factor be approved on an**
20 **interim basis subject to reconciliation and true-up in a future FAC filing or upon**
21 **resolution of the Eagle Valley forced outage matters pending in the subdocket in FAC**
22 **133 S1.**

1 A14. As explained above, the mitigated factor recovers estimated fuel costs unrelated to the
2 Eagle Valley forced outage matters pending in the subdocket. The proposed factor is based
3 on an estimate of the costs not attributable to the forced outage. The Company recognizes
4 that all these costs remain subject to review. The Company is not seeking to finalize the
5 amount of costs attributable to the forced outage in this FAC 136 but, as explained above,
6 believes it is appropriate to recover costs estimated not related to the forced outage.
7 Therefore, to balance the consumer and Company interests and the need for timely cost
8 recovery, the Company proposes the mitigated factor be approved on an interim basis.

9 **Q15. How was the mitigated FAC factor proposed in this proceeding calculated?**

10 A15. As discussed in more detail by AES Indiana Witness Jackson, output from Open Access
11 Technology International, Inc. (“OATI”) was used to model the portion of the variances
12 not related to the Eagle Valley Outage. The resulting price per Mills/kWh model output for
13 each month was then compared to billed sales to determine the revised FAC variance if
14 Eagle Valley had been running.

15 The difference between the mitigated factor calculated on Attachment NHC-1, Schedule 1
16 and Attachment NHC-5 is that the mitigated factor includes the estimated non-outage
17 portion of the variances for the FAC 136 reconciliation period of February through April
18 2022. The total variance for February through April 2022 is \$24,404,647. After subtracting
19 the estimated Eagle Valley outage impact of \$6,350,096¹ the variance for the FAC 136
20 reconciliation period totals \$18,054,561. The remaining 50% variance approved for
21 recovery in FAC 135 of \$34,140,968 was then added to the FAC 136 variance of

¹ See Attachment DJ-6 for detail calculation.

1 \$18,054,561 for a total variance of \$52,195,529 to be collected in this FAC factor. This
2 adjustment is reflected on Attachment NHC-1, Schedule 1, Line 35.

3 Witness Jackson further details the cost impact of the Eagle Valley outage for the
4 reconciliation period which impacted the FAC 136 reconciliation months of February and
5 March 2022. This mitigated factor would follow the normal reconciliation process and
6 would be reconciled and true-up as part of the FAC 138 and 139 filing. To the extent that
7 the amount attributable to the outage differs upon the subdocket outcome, these factors
8 would be subject to further true-up in a future FAC filing upon resolution of the subdocket.

9 **Q16. What accounting treatment is being sought for the variances excluded from this**
10 **filing?**

11 A16. AES Indiana is excluding from the mitigated factor, outage related variances for FAC 136
12 of \$6,350,096 and is seeking authority to continue to defer as a regulatory asset this balance
13 for recovery pending conclusion of the FAC 133 subdocket. AES Indiana is not seeking
14 to recover carrying charges on the regulatory asset.

15 **Q17. Why is the mitigated factor calculation reasonable?**

16 A17. The mitigated factor is reasonable because it is using a forecast generated using the same
17 methods as reviewed and approved in previous FACs and reflects our estimated fuel costs
18 and forecasted unit availability for the rate period. In addition, AES Indiana is not including
19 recovery of the estimated variance related to the Eagle Valley outage and has addressed it
20 as part of the FAC 133 subdocket. As stated in the prior FAC and discussed further by
21 Witness Jackson, utilities are experiencing increased commodity prices which is a key
22 driver for the larger variances.

1 **Q18. What is the difference between the proposed mitigated factor and the unmitigated**
2 **calculated factor?**

3 A18. The proposed mitigated FAC factor in this proceeding for the months of September through
4 November 2022 is \$0.037858 per kwh on Attachment NHC-1, Schedule 1 as compared to
5 the unmitigated factor on Attachment NHC-5 of \$0.039970 for a difference of -\$0.002112
6 per kWh.

| FAC Rate Comparison Between FAC 136 Mitigated Factor and Unmitigated Factor | | | |
|---|---|---|-------------|
| | FAC 136 Mitigated Factor <u>Attachment NHC-1</u> , Schedule 1, Line 39 | FAC 136 Unmitigated Factor <u>Attachment NHC-5</u> , Line 39 | Difference |
| Fuel Cost Charge per kWh | \$0.037858 | \$0.039970 | -\$0.002112 |

7
8 **Q19. Have you reviewed the Commission’s June 1, 2005 Order in Cause No. 42685 (“June**
9 **1, 2005 Order”)** and **June 30, 2009 Phase II Order in Cause No. 43426 (“Phase II**
10 **Order”)** regarding changes in operations as a result of the Midcontinent Independent
11 **System Operator Inc.’s (“MISO”) implementation of energy markets and for**
12 **determination of the manner and timing of recovery costs resulting from the**
13 **implementation of standard market design mechanisms and participation in the**
14 **ancillary services market?**

15 A19. Yes.

16 **Q20. Is AES Indiana’s filing in this proceeding consistent with your understanding of these**
17 **two orders?**

18 A20. Yes, AES Indiana’s filing in this proceeding is consistent with my understanding of the
19 Commission’s June 1, 2005 Order and Phase II Order.

1 **Q21. Over what months has the Applicant estimated its fuel costs in Attachment NHC-1**
2 **for the purpose of its proposed fuel cost factor for electric service?**

3 A21. Attachment NHC-1 estimates fuel costs over the months of September through November
4 2022.

5 **Q22. In making such estimate, were actual fuel costs reconciled with estimated fuel costs**
6 **for any period?**

7 A22. Yes, actual fuel costs for the months of February through April 2022 were reconciled with
8 the estimated fuel costs for the same period. As mentioned previously, these variances are
9 shown for reference in the unmitigated FAC factor calculated on Attachment NHC-5 but
10 the non-outage portion is included in the mitigated factor calculated on Attachment NHC-
11 1, Schedule 1.

12 **Q23. Have calculations been made applying the Purchased Power Daily Benchmarks**
13 **established pursuant to the methodology approved in Cause No. 43414?**

14 A23. Yes. As described in the testimony of Witness Jackson, the applicable Purchased Power
15 Daily Benchmarks are set forth in Attachment DJ-1 and have been done in conformity with
16 the Commission's Order in Cause No. 43414.

17 **Q24. Is AES Indiana seeking to recover the costs of any individual purchased power**
18 **transactions used to serve jurisdictional retail customers in excess of the applicable**
19 **Purchased Power Daily Benchmarks?**

20 A24. Yes, for the non outage portion of the purchased power over the benchmark. Company
21 Witness Jackson describes further the calculation of the purchased power costs in excess
22 of the applicable Purchased Power Daily Benchmarks and the amount that is recoverable
23 based on the currently approved calculation methodology. However, AES Indiana is only

1 including the estimated non-outage portion in the mitigated FAC factor. \$498,872 is the
2 total purchased power over the benchmark for FAC 136, of which \$293,356 is estimated
3 to be attributable to the Eagle Valley outage and therefore included in the total variance of
4 \$6,350,096 that is deferred pending the outcome of the FAC 133 subdocket. The remaining
5 purchased power over the benchmark of \$205,516 is included in the purchased power
6 impacting the remaining variances included in the proposed mitigated FAC factor in this
7 proceeding.

8 A summary of the purchased power volumes, costs, the total hourly purchased power costs
9 above the applicable Purchased Power Daily Benchmarks for February through April 2022
10 and the reasons for the purchases at-risk after consideration of MISO economic dispatch,
11 is set forth in Attachment DJ-2 to Witness Jackson's testimony.

12 **Q25. Did AES Indiana include in this filing the fuel cost and fuel revenues associated with**
13 **sales from its public electric vehicle charging stations during the February through**
14 **April 2022 period?**

15 A25. Yes. AES Indiana determined the fuel cost for its public electric vehicle charging stations
16 by multiplying the total public electric vehicle charging station kWh sales by the average
17 cost of fuel per kWh for each period. AES Indiana calculated the fuel portion of electric
18 vehicle revenues by multiplying the total public electric vehicle charging station kWh sales
19 under Rate EVP by the applicable fuel factor in effect. The amounts accounted for as fuel
20 costs are reflected on Attachment NHC-1, Schedule 4, Line 4, columns C and D. The
21 amounts accounted for as fuel recovery, when received, are reflected on Attachment NHC-
22 1, Schedule 4, Line 4, columns E and F. The recovery represents a reduction in the fuel
23 costs being collected through this FAC filing.

1 **Q26. Did AES Indiana incur any realized gain or losses associated with financial hedges or**
2 **transactional fees for the hedging program?**

3 A26. No. There were no financial hedges settled or transactional fees incurred during the
4 historical FAC period of February through April 2022, as shown on Attachment NHC-5,
5 Schedule 5, Line 20. As I explained in my testimony in FAC 122, physical hedges do not
6 receive mark-to-market accounting treatment and thus there are no recognized gains or
7 losses on physical hedges. See Witness Jackson's testimony for a discussion of the result
8 of any physical hedges.

9 **Q27. Are you familiar with the Applicant's estimated and actual fuel costs for the months**
10 **of February through April 2022?**

11 A27. Yes. As shown in Attachment NHC-1, Schedule 5 (Page 4 of 4), the estimated fuel cost for
12 those months was \$0.037474 per kWh and the actual cost for the same period averaged
13 \$0.045561 per kWh, which represents an underestimate of 17.75%. While AES Indiana
14 has calculated this difference, as previously stated, AES Indiana has not included fuel cost
15 variances for the portion attributable to the Eagle Valley outage at this time in the mitigated
16 factor calculation proposed in this proceeding. The variances are due to multiple factors as
17 described further by Witness Jackson including rising commodity pricing and the Eagle
18 Valley outage.

19 **Q28. Based on such costs, in your opinion, are Applicant's estimated average fuel costs for**
20 **the months of September through November 2022, as set forth in Attachment NHC-**
21 **1, reasonable in amount?**

22 A28. Yes. The estimated fuel costs for those months reflect the expected costs from contract
23 sources. The Company has also included forecasted costs associated with participation in

1 MISO, spot purchases of fuel, and purchased power from Rate REP customers. Also
2 included are the estimated credits to customers for the off-system sales margins related to
3 the Lakefield Wind power purchase agreement (“PPA”) as required per the Commission’s
4 Order in Cause No. 43740, as well as any realized gains or losses for financial hedges
5 (including any associated transactional costs) from natural gas hedging per the
6 Commission’s Orders in Cause Nos. 38703 FAC 122 and FAC 126.

7 **Q29. When was the last Order of the Commission approving Applicant’s basic electric**
8 **rates and charges?**

9 A29. On October 31, 2018, the Commission issued an order in Cause No. 45029 (the “2018 Base
10 Rate Order”) approving new basic rates and charges based on Applicant’s test year
11 operating expenses and operating income for the twelve months ended June 30, 2017. AES
12 Indiana implemented these new base rates on a service rendered basis effective December
13 5, 2018. The 2018 Base Rate Order established an annual level of operating income of
14 \$220,076,000.

15 **Q30. Please explain Attachments NHC-2, NHC-3, and NHC-4.**

16 A30. Attachment NHC-2 contains a comparison of AES Indiana’s electric retail operating results
17 per books for the twelve months ended April 30, 2022, with the electric operating results
18 applicable to jurisdictional retail customers for the same period. Attachment NHC-2
19 calculates the result of the “operating expense” test of I.C. § 8-1-2-42(d)(2). This
20 attachment also calculates the I.C. § 8-1-2-42(d)(3) test, to determine if the Applicant’s
21 actual return applicable to jurisdictional retail customers for the twelve months ended April
22 30, 2022 was higher than the authorized net electric operating income during the same
23 period. Attachment NHC-3 calculates AES Indiana’s authorized return. That total

1 authorized return was \$228,291,000. In accordance with 170 IAC 4-6-21 and the
2 Commission’s Orders in Cause Nos. 42170 and 45264, AES Indiana added the return on
3 its Qualified Pollution Control Property (“QPCP”) of \$1,528,000 and the return on its
4 Transmission, Distribution and Storage System Improvement Charge Property (“TDSIC”)
5 of \$6,687,000 for a total of \$8,215,000, to its authorized net operating income of
6 \$220,076,000. AES Indiana’s TDSIC charge began on November 1, 2020. Attachment
7 NHC-4 reflects the earnings bank total for the relevant period and calculates the differential
8 between the determined return and the authorized return.

9 **Q31. Based on the calculation on Attachment NHC-2, has AES Indiana passed “operating**
10 **expense” test of I.C. § 8-1-2-42(d)(2)?**

11 A31. Yes. As shown on Attachment NHC-2, the total jurisdictional operating expenses
12 excluding fuel costs have increased as compared to the last basic rate case. Therefore, the
13 Commission should find that the (d)(2) test is satisfied.

14 **Q32. Based on the calculation on Attachment NHC-2, Attachment NHC-3 and Attachment**
15 **NHC-4 has AES Indiana passed the I.C. § 8-1-2-42(d)(3) test?**

16 A32. Yes. The Company’s actual return applicable to jurisdictional retail customers for the
17 twelve months ended April 30, 2022 was \$223,712,000, while the authorized net electric
18 operating income during the same period was \$228,291,000. While the sum of AES
19 Indiana’s differentials for the relevant period is greater than zero, Applicant’s actual return
20 was less than its authorized return for the twelve months ended April 30, 2022. See
21 Attachment NHC-4. Accordingly, no reduction in the fuel factor is required and the
22 Commission should find that the “return” test of I.C. § 8-1-2-42.3 is satisfied.

1 **Q33. Were there any revenue and/or expenses eliminated or excluded from total electric**
2 **operating income for the twelve months ended April 30, 2022 in the preparation of**
3 **Applicant's Attachment NHC-2?**

4 A33. No. AES Indiana did not eliminate or exclude any revenue and/or expenses from the total
5 electric income for the twelve months ended April 30, 2022.

6 **Q34. What was the source of the data contained in Attachment NHC-2?**

7 A34. All the accounting figures and other financial data contained in Attachment NHC-2 were
8 derived from AES Indiana's books of account and accounting records.

9 **Q35. Is AES Indiana including any proposed adjustments in this FAC filing?**

10 A35. Yes. As mentioned previously, AES Indiana has included the remaining uncollected
11 portion of the FAC 133 through FAC 135 estimated non Eagle Valley outage variances
12 totaling \$34,140,968 (Attachment NHC-1, Schedule 1, Line No. 34, Column D) which was
13 approved for recovery in FAC 135. Furthermore, the Company is proposing to defer in this
14 FAC the total fuel cost variance for the reconciliation period of February through April
15 2022 attributable to the Eagle Valley outage equaling an estimated \$6,350,096. The
16 adjustment is included on Attachment NHC-1, Schedule 1, Line 33, Column D. As stated
17 previously in my testimony, the result is a reduction between the unmitigated FAC factor
18 and the proposed mitigated factor of $-\$0.002112$ per kWh. These remaining variances were
19 addressed in the FAC 133 subdocket.

20 **Q36. What is the Applicant's estimated average cost of fuel for September through**
21 **November 2022 as included in the proposed mitigated factor?**

22 A36. The Applicant's estimated average cost of fuel for the months of September through
23 November 2022, after taking into consideration the reconciliation of its estimated and

1 actual fuel costs, is estimated to be \$0.07796 per kWh as shown on Attachment NHC-1,
2 Schedule 1, Page 1 of 1, line 37. This represents an increase of \$0.037858 per kWh from
3 the base cost of fuel approved in the 2018 Base Rate Order of \$0.032938 per kWh.

4 **Q37. What effect will the proposed mitigated factor have on an average residential**
5 **customer using 1,000 kWh per month?**

6 A37. In relation to the FAC 135 factor from the IURC 30-day filing for the URT repeal, the
7 mitigated factor will result in an increase of \$24.39 or 18.90% for an average residential
8 customer using 1,000 kWh per month. The majority of this increase is due to the increase
9 in the forecasted costs. As previously stated in my testimony, the estimated Eagle Valley
10 outage impact has not been included in this FAC factor calculation and thus is not
11 contributing to the FAC factor increase. The forecast costs have risen from the prior FAC
12 filing mostly due to forecasted gas prices. See Company Witness Jackson's testimony for
13 further discussion on commodity pricing for the forecast period (Q/A 18) and the shift in
14 timing of a planned outage at Petersburg that will benefit ratepayers during the forecast
15 period via reduced fuel costs as well as additional off system sales ("OSS") margins that
16 will flowback 100% to customers via the OSS rider (Q/A 19).

17 **Q38. What effect would the unmitigated fuel cost factor have had on an average residential**
18 **customer using 1,000 kWh per month?**

19 A38. In relation to the FAC 135 factor from the IURC 30-day filing for the utility receipts tax
20 ("URT") repeal, the unmitigated factor would result in an increase of \$26.50 or 20.53% for
21 the average residential customer using 1,000 kWh per month.

22 **Q39. If approved by the Commission, when does the Applicant propose to make effective**
23 **for electric service the mitigated fuel cost factor requested in this proceeding?**

1 A39. The Applicant seeks to make the fuel cost factor shown in Attachment NHC-1, Schedule 1,
2 line 41 effective for all bills rendered for electric services beginning with the first billing
3 cycles for the September 2022 billing month (Regular Billing District 41 and Special
4 Billing District 01, which begins August 30, 2022). Such adjustment factor, upon becoming
5 effective, shall remain in effect for approximately three (3) months or until replaced by a
6 different adjustment factor. A copy of the proposed tariff is set forth in Attachment NHC-
7 1-A, attached hereto and made a part hereof.

8 **Q40. Does that conclude your prefiled direct testimony?**

9 A40. Yes.

Verification

I, Natalie Herr Coklow, Manager in Regulatory Accounting for AES US Services, LLC, affirm under penalties for perjury that the foregoing representations are true to the best of my knowledge, information, and belief.

Dated this 16th day of June 2022.

Natalie Herr Coklow

Natalie Herr Coklow

Attachment NHC-1

[Verified Application – Not Duplicated Herein]

AES INDIANA
Statement of Jurisdictional Electric Operating Income for the Twelve Months Ended April 30, 2022
(In \$000's except where otherwise stated)

| Line No. | Description | Per Books For The Twelve Months Ended April 30, 2022 | | | Line No. |
|----------|------------------------------------|---|--------------------|---|----------|
| | | Total Electric For the Twelve Months Ended April 30, 2022 | MISO Attachment GG | Applicable to Jurisdictional Retail Customers | |
| 1 | Operating Revenues | \$ 1,505,140 | \$ 2,643 | \$ 1,502,497 | 1 |
| 2 | Operating Expenses: | | | | 2 |
| 3 | Operation and Maintenance Expenses | \$ 937,899 | \$ 954 | \$ 936,945 | 3 |
| 4 | Depreciation and Amortization | 260,874 | 379 | 260,495 | 4 |
| 5 | Taxes Other than Income Taxes: | 44,459 | 75 | 44,384 | 5 |
| 6 | Income Taxes: | 37,269 | 308 | 36,961 | 6 |
| 7 | Total Operating Expenses | \$ 1,280,501 | \$ 1,716 | \$ 1,278,785 | 7 |
| 8 | Operating Income | \$ 224,639 | \$ 927 | \$ 223,712 | 8 |

(d)(2) Test (In \$000's)
Summary of Increase in Operating Expenses Applicable to Jurisdictional Retail Customers
For the Twelve Months Ended April 30, 2022

| | Per Cause Nos. 45029 | Per Books April 30, 2022 | Increase (Decrease) | | |
|----|---|-----------------------------|------------------------|-----------|----|
| 9 | Operating Expenses Excluding Fuel Costs | \$ 756,890 | \$ 804,276 | \$ 47,386 | 9 |
| 10 | Fuel Costs *** | 436,216 | 474,509 | 38,293 | 10 |
| 11 | Total Operating Expenses ** | \$ 1,193,106 | \$ 1,278,785 | \$ 85,679 | 11 |

(d)(3) Test (In \$'s)

| | | | |
|----|--|----------------|----|
| 12 | Jurisdictional Retail Electric Operating Income (April 30, 2022) | \$ 223,712,000 | 12 |
| 13 | Total Authorized Operating Income ⁽¹⁾ | 228,291,000 | 13 |
| 14 | Excess/(Deficiency) | \$ (4,579,000) | 14 |

(1) Calculated on Applicant's Exhibit 3.

AES INDIANA
Determination of Authorized Return
For the Twelve Months Ended April 2022

| <u>Line No.</u> | | | <u>Line No.</u> |
|-----------------|---|----------------------|-----------------|
| 1 | Operating Income per Cause No. 45029 | | 1 |
| | | \$220,076,000 | |
| 2 | Effective for March 2021 - February 2022 | | 2 |
| 3 | Allowed Return on CCT Utility Plant per Cause No. 42170-ECR34 ⁽²⁾ | 1,541,335 | 3 |
| 4 | Jurisdictional Portion | <u>100.00%</u> | 4 |
| 5 | Jurisdictional Total for Cause No. 42170-ECR34 | 1,541,335 | 5 |
| 6 | Proration for Cause No. 42170-ECR34 | <u>304/365</u> | 6 |
| 7 | Total for Cause No. 42170-ECR34 | | 7 |
| | | 1,284,000 | |
| 8 | Effective for February 2021 - October 2021 | | 8 |
| 9 | Allowed Return on TDISC-1 Distribution Utility Plant per Cause No. 45264-TDSIC-1 ⁽²⁾ | 2,551,960 | 9 |
| 10 | Jurisdictional Portion | <u>100.00%</u> | 10 |
| 11 | Jurisdictional Total for Cause No. 45264-TDSIC-1 | 2,551,960 | 11 |
| 12 | Proration for Cause No.45264-TDSIC-1 | <u>184/365</u> | 12 |
| 13 | Total for Cause No. 45264-TDSIC-1 | | 13 |
| | | 1,286,000 | |
| 14 | Effective for February 2021 - October 2021 | | 14 |
| 15 | Allowed Return on TDISC-1 - Transmission Utility Plant per Cause No. 45264-TDSIC-1 ⁽²⁾ | 530,592 | 15 |
| 16 | Jurisdictional Portion | <u>100.00%</u> | 16 |
| 17 | Jurisdictional Total for Cause No. 45264-TDSIC-1 | 530,592 | 17 |
| 18 | Proration for Cause No.45264-TDSIC-1 | <u>184/365</u> | 18 |
| 19 | Total for Cause No. 45264-TDSIC-1 | | 19 |
| | | 267,000 | |
| 20 | Effective for November 2021 - April 2022 | | 20 |
| 21 | Allowed Return on TDISC-3 Distribution Utility Plant per Cause No. 45264-TDSIC-3 ⁽²⁾ | 8,370,218 | 21 |
| 22 | Jurisdictional Portion | <u>100.00%</u> | 22 |
| 23 | Jurisdictional Total for Cause No. 45264-TDSIC-3 | 8,370,218 | 23 |
| 24 | Proration for Cause No.45264-TDSIC-3 | <u>181/365</u> | 24 |
| 25 | Total for Cause No. 45264-TDSIC-3 | | 25 |
| | | 4,151,000 | |
| 26 | Effective for November 2021 - April 2022 | | 26 |
| 27 | Allowed Return on TDISC-3 - Transmission Utility Plant per Cause No. 45264-TDSIC-3 ⁽²⁾ | 1,982,306 | 27 |
| 28 | Jurisdictional Portion | <u>100.00%</u> | 28 |
| 29 | Jurisdictional Total for Cause No. 45264-TDSIC-3 | 1,982,306 | 29 |
| 30 | Proration for Cause No.45264-TDSIC-3 | <u>181/365</u> | 30 |
| 31 | Total for Cause No. 45264-TDSIC-3 | | 31 |
| | | 983,000 | |
| 32 | Effective for March 2022 - April 2022 | | 32 |
| 33 | Allowed Return on CCT Utility Plant per Cause No. 42170-ECR35 ⁽²⁾ | 1,458,112 | 33 |
| 34 | Jurisdictional Portion | <u>100.00%</u> | 34 |
| 35 | Jurisdictional Total for Cause No. 42170-ECR35 | 1,458,112 | 35 |
| 36 | Proration for Cause No. 42170-ECR35 | <u>61/365</u> | 36 |
| 37 | Total for Cause No. 42170-ECR35 | | 37 |
| | | 244,000 | |
| 26 | Total Authorized Operating Income | | 26 |
| | | <u>\$228,291,000</u> | |

⁽²⁾ The Commission requires that, for purposes of computing the authorized net operating income for IC 8-1-2-42(d)(2) and IC 8-1-2-42(d)(3), the jurisdictional portion of the increased return shall be phased-in over the appropriate period of time that the Applicant's net operating income is affected by this earnings modification resulting from the Commission's approval of the QPCP Construction Cost Rider. The following example may be helpful in implementing the appropriate phase-in: Assume a ECCRA Order is effective and implemented Feb. 1, 2015. Assume the test period for the first FAC filing after the ECCRA Order covers the twelve months ended March 31, 2015. The increase to net operating income resulting from the ECCRA Order should be 59/365 of the total additional earnings authorized by the Commission's Order in the ECCRA. Assuming all things remain constant, the next FAC filing would reflect 150/365 of the total additional ECCRA earnings.

AES INDIANA
Earnings Test Summary

| FAC No. | Reporting Period | Determined Return | Authorized Return | Differential |
|---------|------------------|-------------------|-------------------|---------------|
| 136 | 4/30/2022 | \$223,712,000 | \$228,291,000 | (\$4,579,000) |
| 135 | 1/31/2022 | 227,360,000 | 226,529,000 | \$831,000 |
| 134 | 10/31/2021 | 226,080,000 | 224,682,000 | \$1,398,000 |
| 133 | 7/31/2021 | 219,585,000 | 223,889,000 | (4,304,000) |
| 132 | 4/30/2021 | 232,893,000 | 223,097,000 | 9,796,000 |
| 131 | 1/31/2021 | 227,171,000 | 222,310,000 | 4,861,000 |
| 130 | 10/31/2020 | 229,881,000 | 221,451,000 | 8,430,000 |
| 129 | 7/31/2020 | 242,467,000 | 221,368,000 | 21,099,000 |
| 128 | 4/30/2020 | 236,917,000 | 221,285,000 | 15,632,000 |
| 127 | 1/31/2020 | 234,075,000 | 221,201,000 | 12,874,000 |
| 126 | 10/31/2019 | 230,875,000 | 218,710,000 | 12,165,000 |
| 125 | 7/31/2019 | 229,431,000 | 206,716,000 | 22,715,000 |
| 124 | 4/30/2019 | 217,179,000 | 194,654,170 | 22,524,830 |
| 123 | 1/31/2019 | 212,078,000 | 182,107,612 | 29,970,388 |
| 122 | 10/31/2018 | 201,730,000 | 172,128,000 | 29,602,000 |
| 121 | 7/31/2018 | 190,971,000 | 171,399,000 | 19,572,000 |
| 120 | 4/30/2018 | 180,892,000 | 170,247,000 | 10,645,000 |
| 119 | 1/31/2018 | 177,867,000 | 169,205,000 | 8,662,000 |
| 118 | 10/31/2017 | 180,108,000 | 168,291,000 | 11,817,000 |
| 117 | 7/31/2017 | 185,397,000 | 167,012,000 | 18,385,000 |
| | | | | \$252,096,218 |

AES INDIANA
Determination of Fuel Cost Adjustment
Beginning with November 2022 Based on the Estimated
Three Months Average of September, October, and November 2022

| Line No. | Description | (A) | (B) | (C) | (D) | (E) | Line No. |
|----------|---|--------------------------------|----------------------|----------------------|-----------------------|-------------------------------|----------|
| | | Estimated Month of: | | | Total | Estimated Three Month Average | |
| | kWh Source (000's) | September | October | November | | | |
| 1 | Coal and Oil Generation | 720,972 | 857,188 | 927,139 | 2,505,299 | 835,100 | 1 |
| 2 | Nuclear Generation | - | - | - | - | - | 2 |
| 3 | Hydro Generation | - | - | - | - | - | 3 |
| 4 | Other Generation - Internal Combustion | - | - | - | - | - | 4 |
| 5 | Gas Generation | 729,222 | 792,634 | 711,016 | 2,232,872 | 744,291 | 5 |
| | Purchases through MISO: | | | | | | |
| 6 | Wind Purchase Power Agreement Purchases | 38,119 | 64,703 | 76,987 | 179,809 | 59,936 | 6 |
| 7 | Non-Wind PPA Market Purchases | 13,792 | - | - | 13,792 | 4,597 | 7 |
| 8 | Other | - | - | - | - | - | 8 |
| 9 | Purchased Power other than MISO | 16,366 | 13,526 | 10,260 | 40,152 | 13,384 | 9 |
| | LESS: | | | | | | |
| 10 | Energy Losses and Company Use | 50,080 | 47,264 | 47,773 | 145,117 | 48,372 | 10 |
| 11 | Inter-System Sales through MISO | 430,459 | 701,175 | 687,517 | 1,819,151 | 606,384 | 11 |
| 12 | Inter-System Sales other than MISO | - | - | - | - | - | 12 |
| 13 | Non-Jurisdictional Retail Sales | - | - | - | - | - | 13 |
| 14 | Sales (S) | <u>1,037,932</u> | <u>979,612</u> | <u>990,112</u> | <u>3,007,656</u> | <u>1,002,552</u> | 14 |
| | Fuel Cost (\$) | | | | | | |
| 15 | Coal and Oil Generation | 17,401,721 | 19,651,559 | 20,958,787 | 58,012,067 | 19,337,356 | 15 |
| 16 | Nuclear Generation | - | - | - | - | - | 16 |
| 17 | Hydro Generation | - | - | - | - | - | 17 |
| 18 | Other Generation - Internal Combustion | - | - | - | - | - | 18 |
| 19 | Gas Generation | 50,447,177 | 55,571,828 | 50,616,983 | 156,635,988 | 52,211,996 | 19 |
| | Purchases through MISO: | | | | | | |
| 20 | Wind Purchase Power Agreement Purchases | 4,913,364 | 6,972,374 | 8,119,302 | 20,005,040 | 6,668,347 | 20 |
| 21 | Non-Wind PPA Market Purchases | 860,689 | - | - | 860,689 | 286,896 | 21 |
| 22 | Other | - | - | - | - | - | 22 |
| 23 | MISO Components of Cost of Fuel | 1,523,685 | 1,438,070 | 1,453,485 | 4,415,240 | 1,471,747 | 23 |
| 24 | Purchased Power other than MISO | 2,669,023 | 2,165,444 | 1,863,671 | 6,698,138 | 2,232,713 | 24 |
| | Less: | | | | | | |
| 25 | Inter-System Sales through MISO | 19,505,443 | 31,233,351 | 29,321,470 | 80,060,264 | 26,686,755 | 25 |
| 26 | Inter-System Sales other than MISO | - | - | - | - | - | 26 |
| 27 | Non-Jurisdictional Retail Sales | - | - | - | - | - | 27 |
| 28 | Transmission Losses | 677,260 | 628,360 | 608,064 | 1,913,684 | 637,895 | 28 |
| 29 | Lakefield PPA Adjustment | 1,093,588 | 1,297,812 | 1,525,783 | 3,917,183 | 1,305,728 | 29 |
| 30 | Total Fuel Cost (F) | <u>\$ 56,539,368</u> | <u>\$ 52,639,752</u> | <u>\$ 51,556,911</u> | <u>\$ 160,736,031</u> | <u>\$ 53,578,677</u> | 30 |
| 31 | F ÷ S (Line 30 ÷ Line 14) (Mills/kWh) | | | | | <u>53.442</u> | 31 |
| | | <u>Months to be Reconciled</u> | | | | | |
| | | <u>February</u> | <u>March</u> | <u>April</u> | <u>Total</u> | | |
| 32 | Fuel Cost Variance - FAC 136 | <u>\$ 11,488,761</u> | <u>\$ 889,428</u> | <u>\$ 12,026,467</u> | <u>\$ 24,404,656</u> | | 32 |
| 33 | Estimated Eagle Valley Outage Impact FAC 136 (1) | | | | | | 33 |
| 34 | 50% Fuel Cost Variance Not Attributable to Eagle Valley Outage as Calculated in FAC 135 | | | | <u>34,140,968</u> | | 34 |
| 35 | Total Fuel Cost Variance Included in this Filing | | | | | <u>\$ 58,545,624</u> | 35 |
| | (Mills/kWh) | | | | | | |
| 36 | Variance Charge (Line 32 Total divided by estimated Indiana jurisdictional sales of | | <u>3,007,656</u> | kWh (000's) | | <u>19.466</u> | 36 |
| 37 | Adjusted Fuel Cost Charge (Line 31 + Line 33) | | | | | <u>72.908</u> | 37 |
| 38 | Less: Base Cost of Fuel Included in Rates | | | | | <u>32.938</u> | 38 |
| 39 | Fuel Cost Charge | | | | | <u>39.970</u> | 39 |