STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA MICHIGAN POWER COMPANY, AN INDIANA CORPORATION, FOR (1) AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR ELECTRIC UTILITY SERVICE THROUGH A PHASE IN RATE ADJUSTMENT; (2) APPROVAL OF: REVISED DEPRECIATION RATES; ACCOUNTING RELIEF; INCLUSION IN BASIC RATES AND CHARGES OF QUALIFIED POLLUTION CONTROL PROPERTY, CLEAN ENERGY PROJECTS AND COST OF BRINGING I&M'S SYSTEM TO ITS PRESENT STATE OF EFFICIENCY; RATE ADJUSTMENT MECHANISM PROPOSALS; COST DEFERRALS; MAJOR STORM DAMAGE RESTORATION RESERVE AND DISTRIBUTION VEGETATION MANAGEMENT PROGRAM RESERVE; AND AMORTIZATIONS; AND (3) FOR APPROVAL OF NEW SCHEDULES OF RATES, RULES AND REGULATIONS.	)	**CAUSE NO. 44967**

PETITIONER INDIANA MICHIGAN POWER COMPANY'S
SUBMISSION OF INITIAL QUARTERLY PERFORMANCE METRIC REPORT
COMPLIANCE FILING

In accordance with the Commission's Order In Cause No. 44967, dated May 30, 2018, Indiana Michigan Power Company (I&M) hereby submits its initial quarterly Performance Metric Collaborative report.

I&M began the performance metric collaborative process on August 22, 2018 with a kickoff meeting with stakeholders. In compliance with Section 7.G of the Order, please find I&M's initial quarterly Performance Metric Collaborative report, dated March 15, 2019.

Respectfully submitted,

By: _____

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served upon the following via electronic email, hand delivery or First Class, or United States Mail, postage prepaid this 15th day of March, 2019 to:

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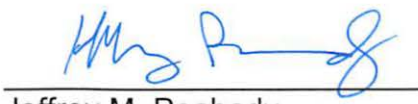

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DMS 14185417v1p

Indiana Michigan Power Company

Performance Metric Collaborative Report

1st Quarter 2019

March 15, 2019

Executive Summary

The Indiana Utility Regulatory Commission's (IURC) order in Indiana Michigan Power Company's (I&M) most recent basic rate case (Cause No. 44967) directed I&M to conduct a performance metric collaborative process with interested stakeholders. The purpose of this effort is to allow IURC Staff, the Office of Utility Consumer Counselor (OUCC), and other interested parties the opportunity to engage with I&M in a collaborative manner on a range of issues.

The objectives of the collaborative include:

- Implement a performance metric collaborative with interested stakeholders culminating in the issuance of performance metric quarterly reports and an annual report by October 1, 2019 as set by the Commission's Order in Cause No. 44967.
- Enhance stakeholder understanding of I&M's business and performance.
- Provide an open forum and opportunity for all stakeholders to actively participate in this collaborative effort.

The first collaborative meeting was held on August 22, 2018. This initial meeting discussed collaborative objectives and deliverables, set future meeting cadence, and began the discussion of appropriate metrics for report consideration. The previous performance metric collaborative efforts and reports from NIPSCO and Indianapolis Power & Light (IPL) were also discussed and used as a starting point for discussion of specific metrics.

Since the initial meeting, three additional meetings have been conducted, as summarized in the "Stakeholder Meetings" section of this report. During the course of these meetings, all parties offered their good faith inputs, observations, and comments in order to achieve the objectives of the collaborative. One of the suggestions provided by the stakeholder team was for I&M to conduct "deep dives" into specific topics and areas of concern. As a result, I&M subject matter experts conducted in-depth discussions on the following topics: underground network performance and monitoring, customer reliability, circuit health, vegetation management, generation assets, and customer service initiatives and activities.

During the course of the meeting discussions, the collaborative team established the following eight performance metric domains:

- Safety
- Reliability
- Vegetation Management
- Generation
- Customer Service

- Operations Investment
- Affordability
- Staffing

Specific performance metrics have been identified within each domain. Currently, a total of 48 metrics have been identified and are included in the draft performance metric report (Attachment 2). Even though I&M takes responsibility for the final content of the report, the report implements numerous comments and suggestions from the stakeholder team.

Background

The IURC's Order in I&M's most recent basic rate case (Cause No. 44967) directed I&M to conduct a performance metric collaborative process with interested stakeholders. The Commission stated "[s]uch a process was created coming out of the recent rate cases for NIPSCO and IPL." Additionally, the Commission "[…] anticipate[s] [the metrics] will enable comparisons of I&M's performance over time and in comparison to similarly situated utilities." Finally, the Commission noted that the collaborative could facilitate a discussion around possible vegetation management metrics, which were a point of considerable discussion in I&M's most recent base rate case.

The following parties elected to participate in the collaborative effort:

Citizens Action Coalition	City of Fort Wayne
City of Marion / Marion Municipal Utilities / Muncie Sanitary District	City of South Bend
Indiana Utility Regulatory Commission Staff	I&M Industrial Group
Office of Utility Consumer Counselor	

Stakeholder Meetings

To date, the parties have met four times as noted below:

August 22, 2018

The collaborative kickoff meeting was held on August 22, 2018 in Indianapolis. The meeting began with a discussion of the collaborative process objectives and deliverables. I&M presented an initial set of performance metrics for discussion along with requesting input on other areas that stakeholders deemed valuable. Discussion was held around the overlap of some metrics with other reporting requirements. Based upon stakeholder input, additional domains were created, and other metrics were added. The stakeholders requested "deep dives" at upcoming meetings of several areas that they wanted to explore further.

September 25, 2018

The second collaborative meeting was held on September 25, 2018 in Indianapolis. This meeting featured a review of an initial draft metric report along with subject matter experts conducting in-depth discussions of the following topics: underground network performance and monitoring, customer reliability, circuit health, vegetation management, generation assets, and customer service initiatives and activities. Thoughtful comments were received from the stakeholder team regarding types of comments best suited for inclusion in the Executive Summary along with suggested clarifications for certain metric definitions, and trend analysis and discussions. Other suggestions included expanding from 5-year data trends to 10-year data trends where appropriate and adding additional underground metrics.

October 24, 2018

The third collaborative meeting was held on October 24, 2018 in Indianapolis. The meeting featured a review of the draft metric report updated with comments from the previous meeting. Again, thoughtful comments and suggestions were provided by all parties for improving the report content and readability. Discussion around Transmission expense led to the agreement to set up a future call on the trend in account 565 (Transmission of Electricity by Others). The meeting also reiterated the timeline for submission of the 90 day performance metric collaborative report to the Commission and the submittal of the initial quarterly report in the first quarter of 2019. All parties agreed to meet again, via a phone call, in early 2019 to review the initial quarterly report and to meet again later in the year, in person, to review the 2018 data as part of the annual report development.

February 8, 2019

The fourth collaborative meeting was held on February 8, 2019 via a phone conference. The meeting reviewed the most recent report in preparation for the initial quarterly filing due March 30, 2019 as directed by the Commission's Order in Cause No. 44967. The review of the report included a discussion of updates made as result of inputs and suggestions from the third collaborative meeting. Additional suggestions were made during this meeting to improve clarity and readability of report information. Further, several additional metric topics were discussed for possible inclusion in the 2nd quarter report to be filed by June 30, 2019. The stakeholder team agreed that the initial quarterly report would include data through 2017 while the 2nd quarter report will include data through 2018. All parties agreed to meet again in June to review the 2nd quarter report and to review data availability concerning the proposed metric additions.

Agendas and attendees for each meeting are included in Attachment 1.

Performance Metric Domains and Metrics

At the onset of the collaborative, I&M evaluated the domains and metrics that are currently reported for IPL and NIPSCO. Over the course of the four collaborative meetings, the domains and supporting metrics were updated to reflect stakeholder input and are identified below. This set of metrics is intended for further review by all stakeholders and may change over time.

Domain	Metric
Safety	Preventable Vehicle Accident Rate
	OSHA Recordable Incident Rate
	Days Away, Restricted, or Transferred (DART) Incident Rate
	Underground Damage Rate
	Network Contact Voltage Survey Results
	Underground Network Events
Reliability	Number of Major Event Days (MED)
	MED Threshold
	System Average Interruption Duration Index (SAIDI) (MED and non-MED data)
	System Average Interruption Frequency Index (SAIFI) (MED and non-MED data)
	Customer Average Interruption Duration Index (CAIDI) (MED and non-MED data)
Vegetation Management	Amount of SAIDI Due to Forestry Caused Outages
	Vegetation Management Distribution Line Miles Maintained
	Forestry Expenditures
Generation	Electric Generation Portfolio
	Equivalent Availability Factor
	Equivalent Forced Outage Rate
	Net Capacity Factor
	Solar Percent of Expected Energy Captured
Customer Service	Average Speed of Calls Answered
	Customer Call Abandonment Rate
	Meter Reading Percentage
	First Call Resolution
	Residential and Commercial Customer Satisfaction Scores
	J.D. Power Scores
	IURC Complaints

Operations Investments	Total O&M Costs per MWh
	Total Non-Fuel O&M Costs per MWh
	Total O&M Costs per Customer
	Total Non-Fuel O&M Costs per Customer
	Non-Fuel Power Production O&M Expense per MWh Generated
	Non-Fuel Power Production O&M Expense per MWh Sold
	Transmission O&M Expense per MWh Sold
	Distribution O&M Expense per MWh Sold
	Transmission O&M Expense per Pole Mile
	Customer Operations O&M Expense per MWh Sold
	Total Administrative & General (A&G) O&M Expense per MWh
	Administrative & General (A&G) O&M Expense per MWh Excluding Account 926 (Employee Pensions and Benefits)
	Total Administrative & General (A&G) O&M Expense per Customer
	Administrative & General (A&G) O&M Expense per Customer Excluding Account 926 (Employee Pensions and Benefits)
Affordability	Residential Bills
	Commercial Bills
	Industrial Bills
	Mailed Disconnect Notices
	Disconnection for Non-Payment
	Accounts in Arrears for 60 or More Days
Staffing	Employee Turnover Ratio
	Employee Population by Age Band

The ongoing collaboration process among the participants provided a sound forum for the exchange of ideas and alignment of priorities. This has culminated in the development of the 1st quarter report as shown in Attachment 2. The reporting remains a work in progress and will receive more consideration and updates from the collaborative team prior to I&M filing the 2nd quarter report in June, 2019.

Conclusion

I&M is pleased with the progress of the Performance Metric Collaborative stakeholder process culminating in the attached initial quarterly report. Going forward, I&M and the collaborative participants will continue to review and refine the reporting process. As such, the previously mentioned metrics may be removed, modified, or new metrics added to the report.

I&M Performance Metric Collaborative

Meeting #1 Agenda

August 22, 2018, 9:00 am – 12:00 pm

Location: Barnes & Thornburg, 11 South Meridian St., Indianapolis, IN

Call in: 1-877-253-4307, code:

Time	Topic	Presenter
9:00 am – 9:15 am	**Welcome/Introductions/Review Agenda**	Brent Auer
9:15 am – 9:25 am	**Opening Remarks**	Marc Lewis
9:25 am – 9:45 am	**Collaborative Objectives & Deliverables**	
	Presentation	Brent Auer
	Open Discussion	
9:45 am – 10:45 am	**Performance Metrics**	
	Presentation	Dave Isaacson
	Open Discussion	
10:45 am – 11:00 am	**Break**	
11:00 am – 11:30 am	**Schedule for Submission of First Quarterly Report**	Brent Auer
	Meeting 1 (8/22/2018) Objective – Review Deliverables/Metrics	
	• Stakeholder submission of comments	
	Meeting 2 Objective - Review Draft Metric Report	
	Meeting 3 Objective – Finalize Metric Report	
11:30 am – 11:40 am	**Summarize Action Items**	Brent Auer
11:40 am – 11:45 am	**Schedule Next Meeting**	Brent Auer
11:45 am – 12:00 pm	**Questions/Wrap Up**	Marc Lewis

Meeting Record

Date:	08/22/2018	**Time:**	9am – Noon	**Location:**	Barnes & Thornburg, 11 South Meridian St., Indianapolis, Indiana
Dial Information:			1-877-253-4307	**Dial In Code:**	
Meeting called by:			Brent Auer	**Meeting Subject:**	I&M Performance Metric Collaborative

Invitees Present:

Name	Company or Organization	Present
Anthony Alvarez	Office of Utility Consumer Council	Y
Brent Auer	Indiana Michigan Power Company	Y
Pete Boerger	Office of Utility Consumer Council	Y
Brad Borum	IURC	Y
Jeremy Comeau	IURC	Y
Steve Davies	IURC	Y
Tanner Guthrie	Indiana Michigan Power Company	Y
Jason Haas	Office of Utility Consumer Council	Y
Dave Isaacson	Indiana Michigan Power Company	Y
Kevin Koons	KGR	Y
Marc Lewis	Indiana Michigan Power Company	Y
Matt McKenzie	AEP Service Corp	Y
Tiffany Murray	Office of Utility Consumer Council	Y
Jeff Peabody	Barnes & Thornburg, LLP	Y
Bob Pauley	IURC	Y
Margo Tucker	Citizens Action Coalition	Y
Bob Veneck	IURC	Y
Kristina Wheeler	Bose McKinney & Evans	Y

Others present by phone: Doug Fasick (City of Fort Wayne); Bob Glennon (City of South Bend); Therese Dorau (City of South Bend); Tabitha Balzer (Industrial Group)

I&M Performance Metric Collaborative

Objectives & Deliverables

August, 2018

Background:

- IURC Order in I&M's Basic Rate Case (Cause No. 44967) on May 30, 2018 directed I&M to facilitate a performance metric collaborative process with interested stakeholders

Objectives:

- Work with stakeholders to develop metrics that can enable appropriate comparisons of I&M's performance over time and with those of similarly situated utilities
- Leverage previous collaborative experiences from other utilities
- Develop a performance metric report and meet timelines consistent with the Commission Order
- Enhance collaborative participants' understanding of I&M's performance

Deliverables:

- Conduct an initial meeting with stakeholders within 12 weeks of the Order – August 22, 2018
- Comments from stakeholders – September 15, 2018
- I&M to make progress update filing within 90 days of initial meeting – November 20, 2018
- File quarterly reports for the first year
    - March 15, 2019 (for year-end 2018 data)
- File an annual report by October 1, 2019

I&M Performance Metric Collaborative

Meeting #2 Agenda

September 25, 2018, 9:00 am – 3:00 pm

Location: Barnes & Thornburg, 11 South Meridian St., Indianapolis, IN

Call in: 1-877-253-4307, code:

Time	Topic	Presenter
9:00 am – 9:25 am	**Welcome, Introductions, and Agenda**	Brent Auer
9:25 am – 9:45 am	**Discussion of Safety Metrics**	Dave Isaacson
9:45 am – 11:00 am	**Discussion of Reliability Metrics**	Dave Isaacson
	Subject Matter Expert Discussion – underground network; network monitoring; customer reliability; circuit health monitoring	Dave Isaacson
11:00 am – 11:15 am	**Break**	
11:15 am – 11:45 am	**Discussion of Generation Metrics**	Tim Kerns
11:45 am – 12:15 pm	**Lunch**	
12:15 pm – 12:45 pm	**Discussion of Operations Investment Metrics**	Brent Auer
12:45 pm – 1:00 pm	**Discussion of Staffing Metrics**	Brent Auer
1:00 pm – 2:00 pm	**Discussion of Customer Service Metrics**	Nick Elkins
	Subject Matter Expert Discussion – customer service initiatives and activities	
2:00 pm – 2:15 pm	**Break**	
2:15 pm – 2:40 pm	**Discussion of Affordability Metrics**	Tanner Guthrie
2:40 pm – 2:50 pm	**Summarize Action Items**	Tanner Guthrie
2:50 pm – 3:00 pm	**Questions / Wrap Up**	Marc Lewis

Reminder: Next meeting is October 24, 2018 in Indianapolis

Meeting Record

Date:	09/25/2018	**Time:**	9am – 1pm	**Location:**	Barnes & Thornburg, 11 South Meridian St., Indianapolis, Indiana
Dial Information:		1-877-253-4307	**Dial In Host Code:**		
Meeting called by:		Brent Auer	**Meeting Subject:**	Performance Metric Collaborative #2	

Invitees Present:

Name	Company or Organization	Present
Anthony Alvarez	Office of Utility Consumers Council	Y
Brent Auer	Indiana Michigan Power Company	Y
Brad Borum	IURC	Y
Jeremy Comeau	IURC	Y
Tanner Guthrie	Indiana Michigan Power Company	Y
Jason Haas	Office of Utility Consumers Council	Y
Dave Isaacson	Indiana Michigan Power Company	Y
Kevin Koons	KGR	Y
Matt McKenzie	AEP Service Corp	Y
Jeff Peabody	Barnes & Thornburg, LLP	Y
Margo Tucker	Citizens Action Coalition	Y
Steve Davies	IURC	Y
Bob Pauley	IURC	Y
Rod Walter	Indiana Michigan Power Company	Y
Andrew Williamson	Indiana Michigan Power Company	Y
Tim Kerns	I&M Generating Assets	Y
Nick Elkins	Indiana Michigan Power Company	Y
Josh Scheibelhut	Indiana Michigan Power Company	Y
Robert Glennon	Robert Glennon & Assoc., P.C. (South Bend)	Y
Dale Thomas	IURC	Y
Kris Wheeler	Bose McKinney & Evans LLP	Phone
Therese Dorau	City of South Bend	Phone

I&M Performance Metric Collaborative

Meeting #3 Agenda

October 24, 2018, 9:00 am – 12:00 pm

Location: Indiana Michigan Power offices, 101 W. Ohio St., Suite 1320, Indianapolis, IN

Call in: 1-877-253-4307, code:

Time	Topic	Presenter
9:00 am – 9:10 am	**Welcome, Introductions, and Agenda**	Brent Auer
9:10 am – 10:25 am	**Review and Discussion of Draft Report by Section**	
	Safety	Dave Isaacson
	Reliability	Dave Isaacson
	Vegetation Management	Dave Isaacson
	Generation	Tim Kerns
10:25 am – 10:40 am	**Break**	
10:40 am – 11:45 am	**Review and Discussion of Draft Report by Section (cont.)**	
	Customer Service	Nick Elkins
	Operations Investment	Brent Auer
	Affordability	Tanner Guthrie
	Staffing	Brent Auer
11:45 am – 11:50 am	**Summarize Action Items and next steps**	Tanner Guthrie
11:50 am – 12:00 pm	**Questions / Wrap Up**	Marc Lewis

Meeting Record

Date:	10/24/2018	**Time:**	9am – Noon	**Location:**	AEP Office - Indianapolis
Dial Information:		1-877-253-4307	**Dial In Host Code:**		
Meeting called by:		Brent Auer	**Meeting Subject:**	I&M Performance Metric Collaborative	

Invitees Present:

Name	Company or Organization	Present
Anthony Alvarez	Office of Utility Consumers Council	Y
Brent Auer	Indiana Michigan Power Company	Y
Pete Boerger	Office of Utility Consumers Council	Y
Jeremy Comeau	IURC	Y
Nick Elkins	Indiana Michigan Power Company	Y
Robert Glennon	Robert Glennon & Assoc., P.C. (South Bend)	Y
Tanner Guthrie	Indiana Michigan Power Company	Y
Jason Haas	Office of Utility Consumers Council	Y
Dave Isaacson	Indiana Michigan Power Company	Y
Tim Kerns	I&M Generating Assets	Phone
Kevin Koons	KGR	Phone
Marc Lewis	Indiana Michigan Power Company	Y
Dale Thomas	IURC	Y
Margo Tucker	Citizens Action Coalition	Y
Rod Walter	Indiana Michigan Power Company	Y

I&M Performance Metric Collaborative

Meeting #4 Agenda

February 8, 2019, 1:00 pm – 3:00 pm

Phone Call Meeting: 1-855-211-6968, code:

Topic	Presenter
Welcome, Introductions, and Agenda	Brent Auer
Review and Discussion of Draft Report by Section	
Safety	Dave Isaacson
Reliability	Dave Isaacson
Vegetation Management	Dave Isaacson
Generation	Tim Kerns
Customer Service	Nick Elkins
Operations Investment	Brent Auer
Affordability	Tanner Guthrie
Staffing	Brent Auer

Review and Discussion of Additional Metrics Proposed by the City of Fort Wayne

1. Percentage of On-Time New and Upgraded Service Connections vs. Total New and Upgraded Service Connections
2. Average Days to Complete Customer Right of Way and Easement Request

Summarize Action Items and next steps — Tanner Guthrie

Propose 2nd quarter face to face meeting on June 12

Questions / Wrap Up — Brent Auer

Meeting Record					
Date:	02/08/2019	**Time:**	1 PM – 3 PM	**Location:**	Phone Conference
Dial Information:		1-855-211-6968	**Dial In Host Code:**		
Meeting called by:		Brent Auer	**Meeting Subject:**	I&M Performance Metric Collaborative	

Name	Company or Organization	Present
Brent Auer	Indiana Michigan Power Company	Y
Pete Boerger	Office of Utility Consumers Council	Y
Brad Borum	IURC	Y
Jeremy Comeau	IURC	Y
Doug Fasick	City of Fort Wayne	Y
Tanner Guthrie	Indiana Michigan Power Company	Y
Jason Haas	Office of Utility Consumers Council	Y
Dave Isaacson	Indiana Michigan Power Company	Y
Tim Kerns	Indiana Michigan Power Company	Y
Kevin Koons	KGR	Y
Marc Lewis	Indiana Michigan Power Company	Y
Matt McKenzie	AEP Service Corp	Y
Jeff Peabody	Barnes & Thornburg, LLP	Y
Dale Thomas	IURC	Y
Margo Tucker	Citizens Action Coalition	Y
Rod Walter	Indiana Michigan Power Company	Y

* Meeting conducted via phone conference.

1st Quarter 2019

Performance Metric Report

Cause No: 44967

March 15, 2019

Table of Contents:

Executive Summary

This report represents the first performance metric report as a result of the Performance Metric Collaborative established by the Indiana Utility Regulatory Commission in Cause No. 44967. The purpose of the report is to present I&M's performance in a number of key areas. This report presents data through December 31, 2017. During the course of the performance metric collaborative, the stakeholder team recommended 48 metrics grouped into the following eight domains: Safety, Reliability, Vegetation Management, Generation, Customer Service, Operations Investment, Affordability, and Staffing. It is the Collaborative's intent to provide data through December 31, 2018 during the next filing that is due in the second quarter of 2019.

Each of the performance metric domains is summarized below.

Safety: Zero Harm is a core value for I&M. During 2017, I&M continued a multi-year trend in improving employee safety performance. Employees are encouraged to identify and report near misses and minor issues for trending and learning among all AEP Operating Companies. During the year, AEP instituted a distracted driving policy regarding the use of mobile communication devices while driving.

Reliability: Customer reliability was impacted by equipment failures due to aging assets and vegetation sources. I&M is addressing this need by implementing its Distribution Management Plan as discussed in its previous base case filing (Cause No. 44967). The purpose of the Plan is to improve or maintain I&M's customer experience by improving reliability, addressing public safety, and modernizing the distribution grid.

Vegetation Management: The cornerstone of the aforementioned Distribution Management Plan is transitioning the Company's approach to vegetation management from one that is reactive to one that is proactive and cycle-based. In its most recent base case filing (Cause No. 44967), I&M laid out the plan for the new cycle-based approach. Throughout 2017, the Company worked to make progress on this transition and to prepare for 2018, which will be the initial four-year period of the vegetation management work plan.

Generation: The I&M Generating fleet continued to provide its customers reliable energy at a reasonable cost in 2017. All four of the I&M solar sites were in service for the entire year and performed as expected. Forced outage rates for all fuel types were below the North American Electric Reliability Corporation (NERC) averages and comparable to those in past years. The Rockport plant availability was less than in previous years due to the Unit 1 Selective Catalytic Reduction (SCR) tie in and commissioning. The capacity factor for Rockport continues to be lower than its historical average due to market conditions.

Customer Service: For the fifth consecutive year, I&M improved its J.D. Power Score for Customer Satisfaction. The Company continued its concentrated effort to expand digital options and technology advances that its customers demand and expect. IURC Complaints continued a downward trend in both total number received and the number substantiated.

Operations Investment: O&M cost per retail customer continued to trend lower, driven by lower production fuel costs. Further, regional transmission costs continued to trend upward driven by I&M's share of the costs, incurred by AEP East Operating Companies, in operating and maintaining their transmission systems, as assessed through PJM.

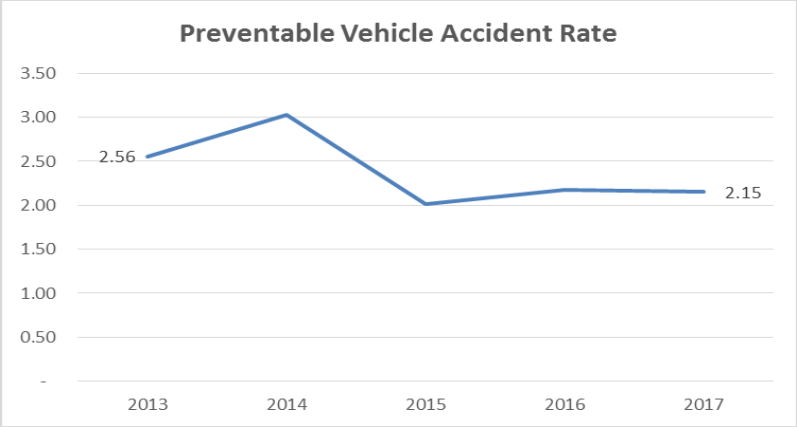
Affordability: Despite continual industry changes that impact operations, I&M remains committed to keeping its rates as competitive and affordable as possible. Throughout 2017, I&M saw improvements in residential service disconnects and the number of accounts in arrears more than sixty days.

Staffing: Employee turnover remains on a gradual upward trend primarily driven by the impact of retirements. This is likely to be a continued challenge for I&M and the greater electric utility industry for the foreseeable future.

I. SAFETY

The health and safety of employees, contractors, and the general public is a vital concern to I&M. The Company's overarching safety and health policy states that "No operating condition or urgency of service can ever justify endangering the life of anyone." I&M has established a strong safety culture and encourages anyone to stop a job if a safety concern is identified. The ultimate goal is for all employees to achieve Zero Harm. The below safety metrics are routinely monitored and discussed by management.

I&M Preventable Vehicle Accident Rate
Number of vehicle events per one million miles driven in which the employee could have taken actions to avoid the event. This rate represents total company performance. PVA Rate = $\frac{\text{Number of events}}{\text{Miles driven (millions)}}$



- I&M and its parent company, AEP, have taken a number of measures over recent years to reduce the number of PVAs. Employee led driving summits were conducted to solicit employee ideas and best practices. The Company has instituted a distracted driving policy that prohibits the use of mobile communication devices while driving.

I&M Employee Safety Incident Rates

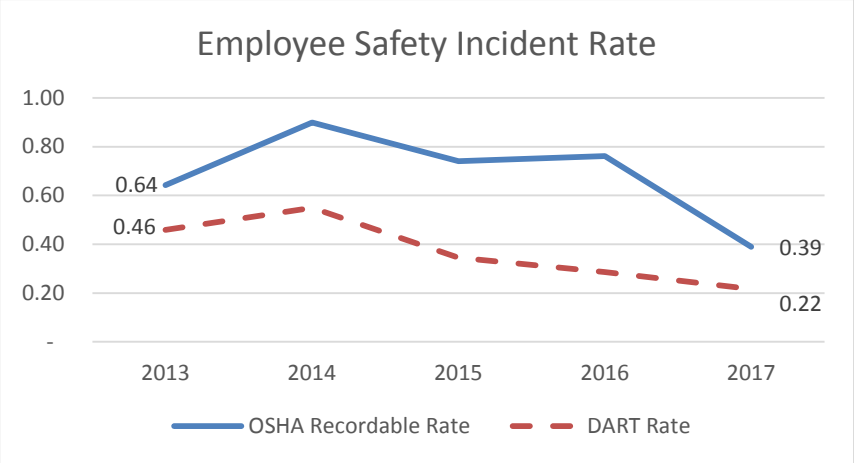
An OSHA Recordable Incident is an employee injury or illness that results in death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness.

$$\text{OSHA Incident Rate} = \frac{\text{Number of recordable events x 200,000 hours}}{\text{Total Number of Hours Worked}}$$

A Days Away, Restricted, or Transferred (DART) event is an employee injury or illness that prevents an employee from being able to perform their typical job assignments.

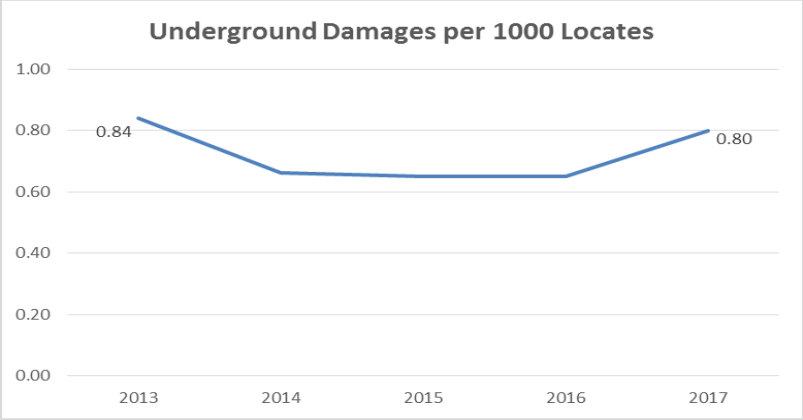
$$\text{DART Incident Rate} = \frac{\text{Number of DART events x 200,000 hours}}{\text{Total Number of Hours Worked}}$$

* Excludes I&M Transmission employees



- I&M routinely reviews safety programs and initiatives with employees and contractors. Recent programs that have resulted in improved safety performance have been the implementation of Human Performance Improvement concepts which helps employees predict and recognize error prone situations and provides concepts for addressing them. Events are tracked and monitored to identify trends that can be addressed before more serious events arise.

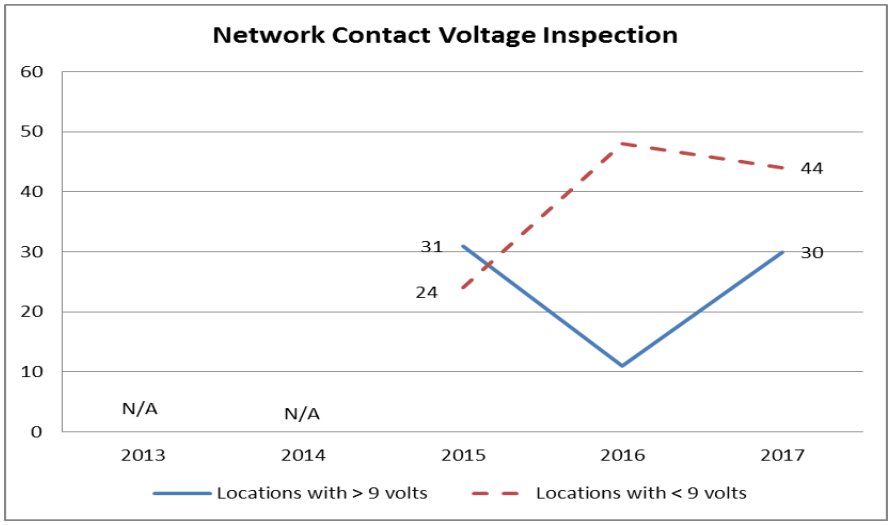
Indiana Jurisdiction Underground Damages Rate
Rate of the number of underground damages to I&M facilities, causing an outage, per 1,000 locate tickets. UG Damage Rate = $\frac{\text{Number of underground damages}}{\text{Number of locate tickets (thousands)}}$



- Underground damages are driven by customers or contractors not requesting locates, mis-located facilties, and construction activities that occur too close to properly located underground facilities.

Indiana Jurisdiction Network Contact Voltage Survey

Assessment results of underground network areas, in Indiana, to identify stray voltages causing energized structures owned by I&M or customers. Surveys are conducted from dusk to dawn so street lighting equipment can be included in the survey. Surveys are conducted in the following communities that have underground networks: South Bend, Elkhart, Fort Wayne, and Muncie. Structures found with over 9 volts receive immediate action due to their potential to cause immediate harm. Locations found with voltages between 3 volts and 9 volts are reported for follow up action.



- Results prior to 2015 are not available.
- All stray voltage issues found were fully resolved.

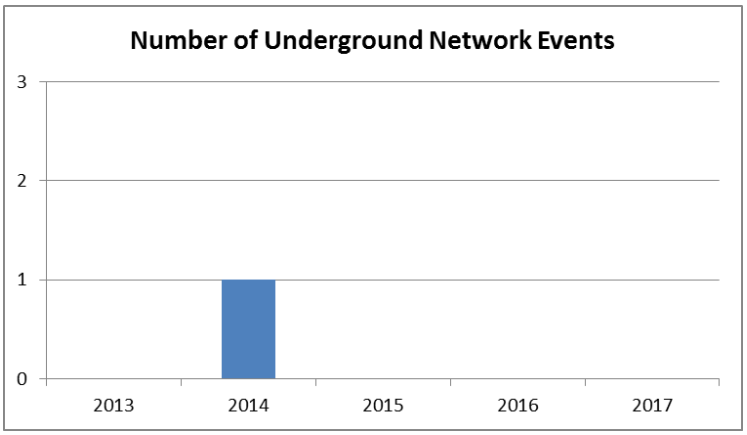
The table 1 below identifies the structures found to be energized as either I&M owned or non-I&M owned.

Table 1

Ownership of Energized Facilities Found During Inspection			
	2015	2016	2017
I&M Owned Facilities	7	4	1
Non - I&M Owned Facilities	48	55	73

Number of Indiana Underground Network Events

Number of events in I&M's Indiana underground networks that result in a sustained fire, smoke emanating from a manhole or a transformer vault, or resulted in the de-energizing of the underground network. Not all events are significant or due to I&M facilities.

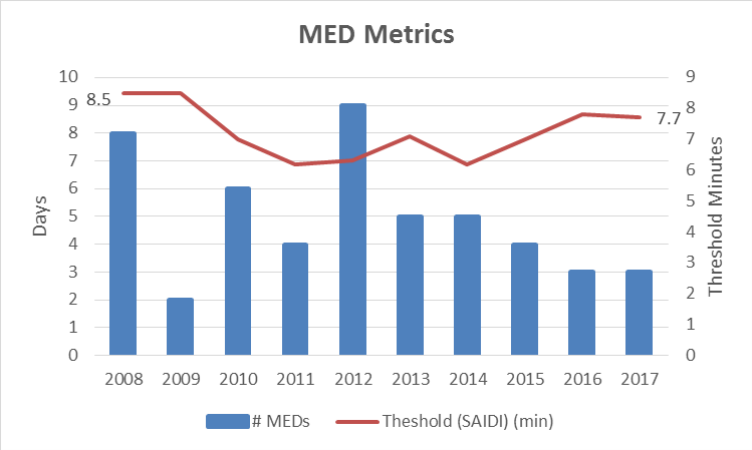


- May, 2014 - secondary conductor failure in the South Bend Network resulted in a loss of power for 788 customers for approximately 60 hours.
- After months of planning, on March 18, 2018, I&M executed an outage in the downtown Fort Wayne underground network in order to energize and transfer load to the new Melita substation. This planned outage will be reflected in the full year 2018 data when available.
- In 2016, I&M began to proactively replace manhole covers with swivel lock manhole covers which provide an extra layer of safety protection in the unlikely event of a manhole explosion.

II. RELIABILITY

The Company strives to provide customers the best reliability it can with existing resources and existing conditions. Outages cause considerable inconvenience and disruption to our residential customers when a vital component of modern life is interrupted. Outages also impose very real financial harm on commercial and industrial customers, who often must close their doors or halt production when outages occur. I&M is making substantial investments in its Indiana distribution system to enhance reliability. Particular emphasis is in the areas of Vegetation Management, Asset Renewal to replace aging infrastructure, improve reliability, and mitigate risk and System Modernization.

Indiana Jurisdiction Major Event Day (MED) Metrics
A major event day is a day in which daily SAIDI exceeds a threshold value determined by IEEE Standard 1366-2012. If an event meets the criteria, the daily SAIDI totals are excluded from normal reliability performance evaluations. The threshold calculation is based upon IEEE Standard 1366-2012. MED's are determined for Indiana and Michigan.



- From a 2012 high, the number of MEDs has dropped and remained much lower.

Indiana Jurisdiction Reliability (including MED data)

System Average Interruption Duration Index (SAIDI) is the average duration of interruptions for customers served in a specific period of time.

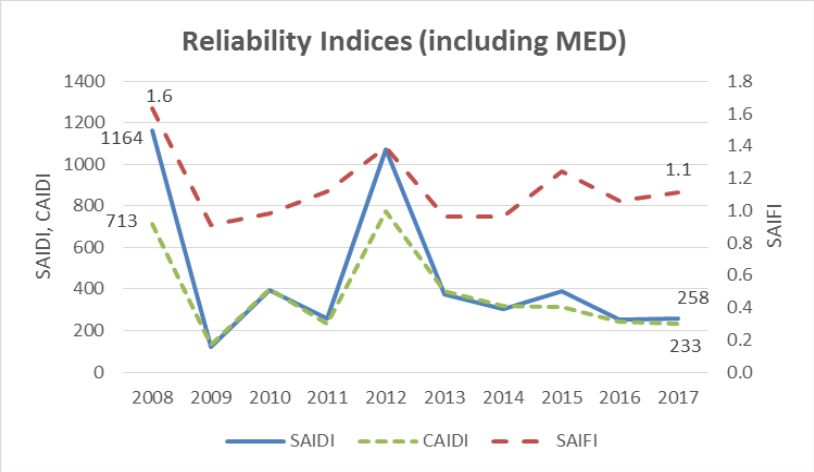
$$\text{SAIDI} = \frac{\text{Total customer outage minutes}}{\text{Number of customers}}$$

System Average Interruption Frequency Index (SAIFI) is the average number of interruptions, lasting five minutes or longer, for customers served in a specific period of time.

$$\text{SAIFI} = \frac{\text{Number of customer outages}}{\text{Number of customers}}$$

Customer Average Interruption Duration Index (CAIDI) is the average length of an outage experienced by a customer in a specific period of time.

$$\text{CAIDI} = \frac{\text{Total customer outage minutes}}{\text{Number of customer outages}}$$



- 2008 - Major ice storm in the Fort Wayne area.
- 2012 - Derecho brought peak wind gusts of 91 mph to I&M's Indiana service territory.

Indiana Jurisdiction Reliability (Excluding MED data)

System Average Interruption Duration Index (SAIDI) is the average duration of interruptions for customers served in a specific period of time.

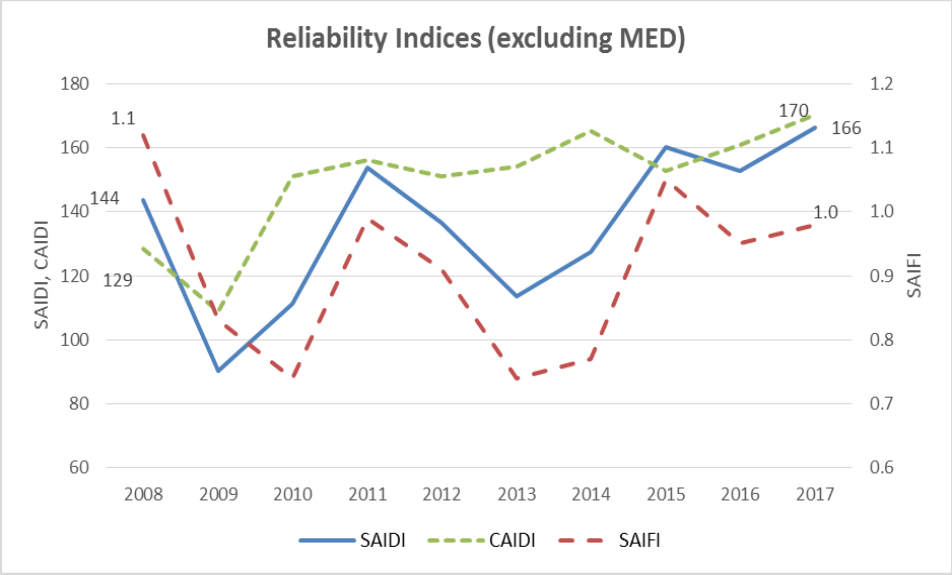
$$\text{SAIDI} = \frac{\text{Total customer outage minutes}}{\text{Number of customers}}$$

System Average Interruption Frequency Index (SAIFI) is the average number of interruptions, lasting five minutes or longer, for customers served in a specific period of time.

$$\text{SAIFI} = \frac{\text{Number of customer outages}}{\text{Number of customers}}$$

Customer Average Interruption Duration Index (CAIDI) is the average length of an outage experienced by a customer in a specific period of time.

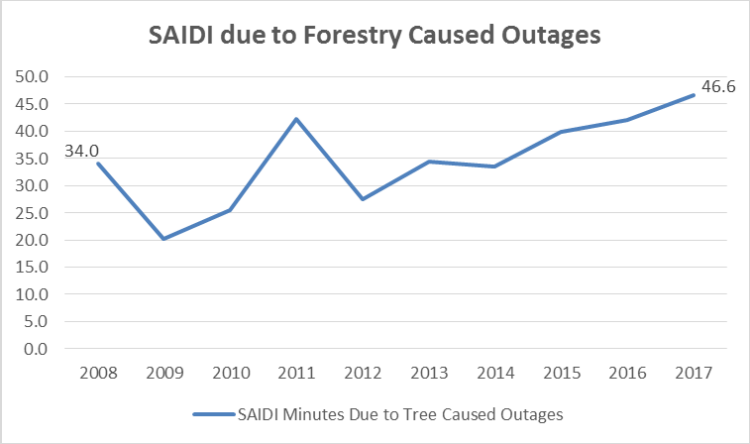
$$\text{CAIDI} = \frac{\text{Total customer outage minutes}}{\text{Number of customer outages}}$$



- 2015 through 2017 trends driven by increases in equipment failures, vegetation sources, and vehicle accidents.
- Primary drivers of the equipment failure trend include age related degradation of porcelain cutouts, underground cable, wood cross arms and overhead conductor.

III. VEGETATION MANAGEMENT

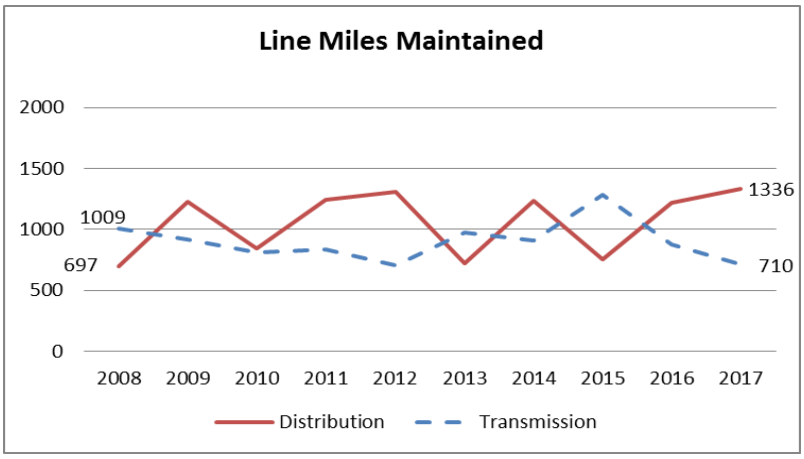
Indiana Jurisdiction Amount of SAIDI Due to Forestry Caused Outages
The amount of SAIDI minutes attributed to tree related outages. Excludes major events as defined using the major event day methodology detailed in "IEEE Std 1366 -2012, IEEE Guide for Electric Power Distribution Reliability Indices."



- In 2018, I&M began moving toward a four year vegetation management cycle which is anticipated to have a significant reduction of SAIDI due to forestry caused outages.

Indiana Jurisdiction Vegetation Management Line Miles Maintained

Indiana transmission and distribution primary overhead line miles maintained in accordance with I&M's vegetation management standard. I&M maintains vegetation line clearances using a variety of tactics, including tree removal, tree trimming, and growth retardant applications.



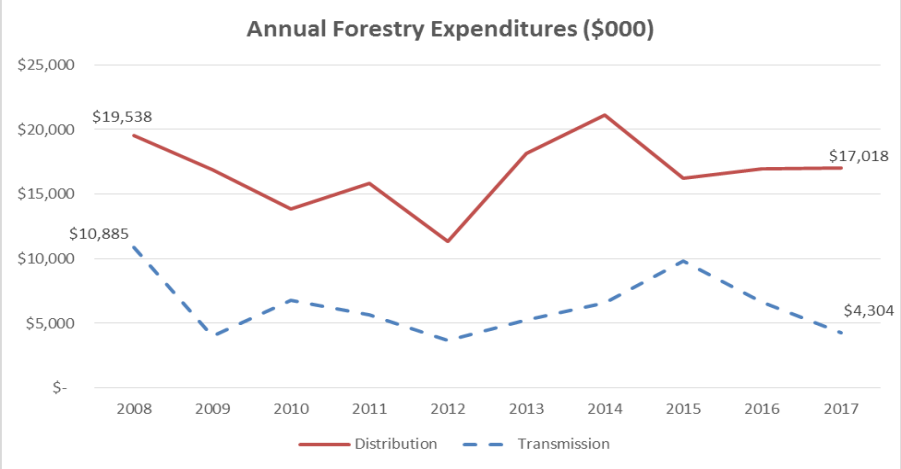
- Transmission and Distribution began move toward a four year trim cycle in 2018.
- Going forward, expect 25% of total line miles cleared each year. 2018 targets and actuals are shown below in Table 2:

Table 2: 2018 Line Miles Maintained

	Forecast (miles)	Actuals (miles)
Transmission	920	TBD after year-end
Distribution	2,555	TBD after year-end

Indiana Jurisdiction Forestry Expenditures

Total annual vegetation management capital and O&M expenditures for Transmission and Distribution.



- Going forward, the amount of Distribution O&M spend embedded in base rates is $16.2M (Settlement Agreement in Cause No. 44967).

IV. GENERATION

I&M provides low cost energy to our customers from a portfolio of assets that is over 50% emission-free. The company's generating capacity is comprised of nuclear, hydro, wind, solar and coal. I&M strives to operate and maintain its fleet in a way that yields high availability. By doing so, our customers are insulated from energy market volatility.

Electric Generation Portfolio

Electric generation ratings for each generation source owned, leased or contracted to I&M via a power purchase agreement (PPA). Unforced Capacity (UCAP) represents the amount of capacity available to meet PJM generation obligations.

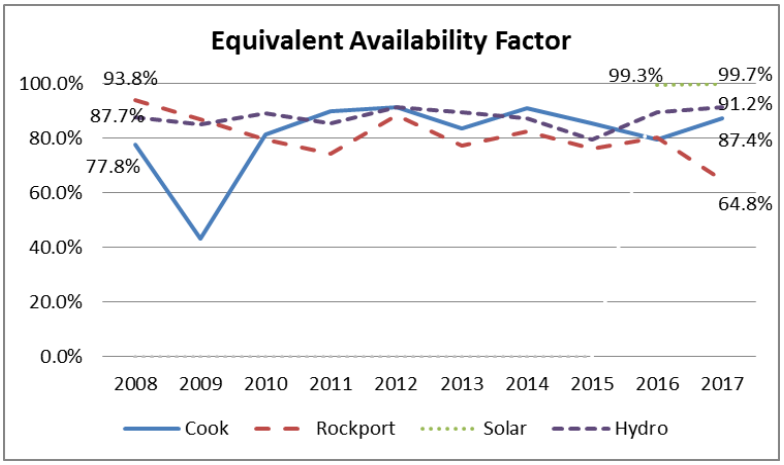
	ICAP (MW)	*I&M Share of ICAP (MW)*	*UCAP (MW)*
DC Cook Unit 1	1084	1084	1003
DC Cook Unit 2	1194	1194	1119
Rockport Unit 1	1320	1122	1083
Rockport Unit 2	1300	1105	1052
Solar	14.7	14.7	7.4
Hydro	22	22	16.3
Fowler - Phase 1 (PPA)	100	100	12.7
Fowler - Phase 2 (PPA)	50	50	6.5
Headwaters (PPA)	200	200	26
Wildcat (PPA)	100	100	12.8
Notes			
ICAP = Installed Capacity (Nameplate Output)			
I&M Share of ICAP = I&M Portion of the generator's ICAP			
UCAP = Unforced Capacity			

- I&M and AEP Generating Company co-own and co-lease Rockport units 1 and 2, respectively. The I&M share represents the amount of energy available to I&M.

Equivalent Availability Factor (EAF)

Percent of time that a unit was available to provide generation.

$$EAF = \frac{\text{(Available hours)} - \text{(Equivalent planned derated hours)} - \text{(Equivalent forced derated hours)} - \text{(Equivalent maintenance derated hours)} - \text{(Equivalent seasonal derated hours)}}{\text{Number of hours in period}}$$

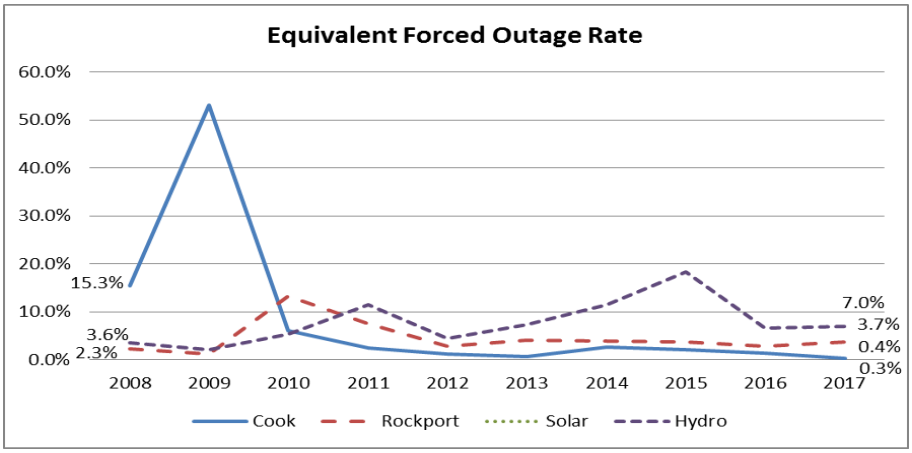


- 2009 Cook EAF was the result of a turbine failure on Unit 1. The Unit was out of service for 15 months. The root cause and recovery from this event can be found in Cause No. 38702-FAC62-S1 filed May 7, 2010.
- 2017 decline in Rockport EAF was due to a 15 week outage for the Rockport Plant Clean Coal Technology Project to retrofit Unit 1 with Selective Catalytic Reduction (SCR) technology to reduce the plant's emissions of nitrogen oxides.

Equivalent Forced Outage Rate (EFOR)

Percent of time that a unit was unavailable to provide generation due to unplanned outages.

$$EFOR = \frac{\text{(Forced outage hours) + (Equivalent forced derated hours)}}{\text{Number of hours in period}}$$

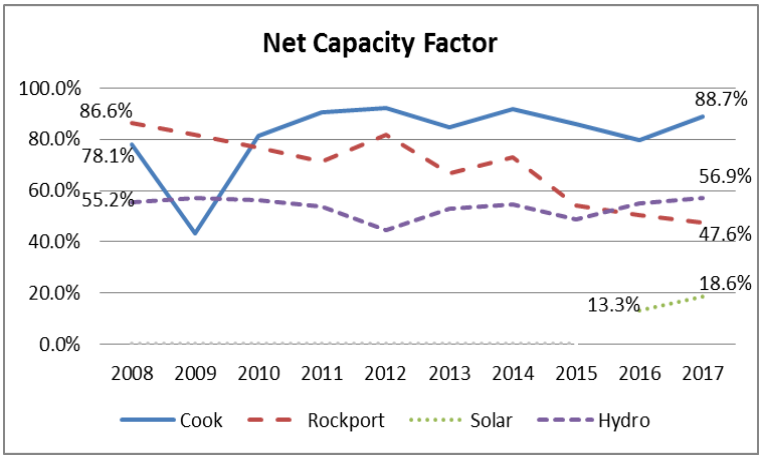


- 2009 Cook EFOR was the result of a turbine failure on Unit 1. The Unit was out of service for 15 months. The root cause and recovery from this event can be found in Cause No. 38702-FAC62-S1 filed May 7, 2010.
- 2014 and 2015 Hydro EFOR increase was the result of planetary gear and turbine blade failures at Berrien Springs and Twin Branch plants. The planetary gears and the turbine blades were long lead time items which forced the units out of service for an extended period of time.

Net Capacity Factor (NCF)

Percent of a unit's full capacity that it produced over a period of time.

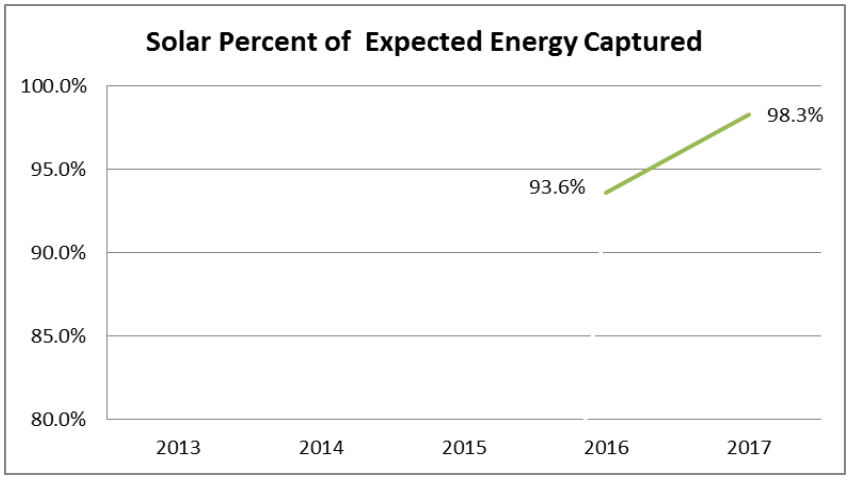
$$NCF = \frac{\text{Net Generation over period}}{\text{Number of hours in period x Net maximum capacity}}$$



- 2009 Cook NCF was the result of a turbine failure on Unit 1. The Unit was out of service for 15 months. The root cause and recovery from this event can be found in Cause No. 38702-FAC62-S1 filed May 7, 2010.
- 2016 Solar NCF negatively impacted by the Olive and Watervliet sites not going into Commercial service until 8/28/2016 and 11/8/2016, respectively.
- Decline in Rockport NCF driven by market trends which have been impacted by low natural gas prices and increased natural gas generation.

Solar Percent of Expected Energy Captured

Comparison of the actual amount of energy generated versus the expected amount of energy to be generated. The expected energy is the predicted energy to be generated adjusted for specific conditions and characteristics at each site that may impact the amount of energy that can be produced at the site. Conditions that can affect this metric are site configuration, historical insolation (amount of solar energy reaching a particular area), shading, and solar panels covered with frost or snow, etc.

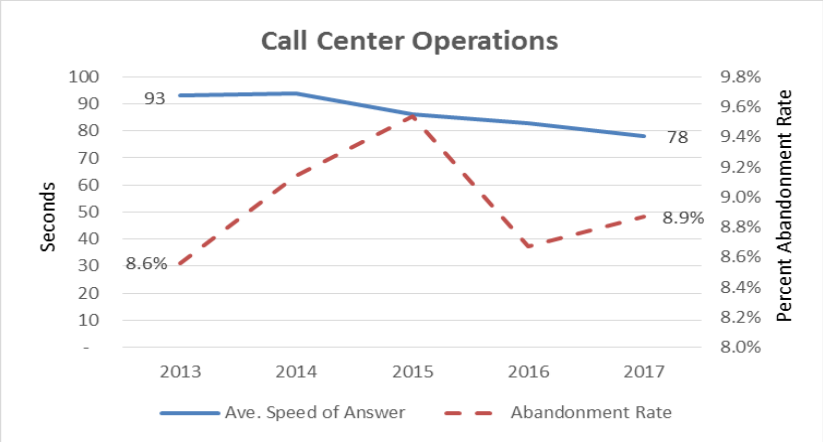


- The increase from 2016 into 2017 occurred as a result of measures taken to improve the site and setup of the solar facilities.

V. CUSTOMER SERVICE

Providing exceptional customer service has always been a core value at I&M. In 2017, AEP began to implement new strategies and technologies to address the changing needs and desires of its customers. This included a complete redesign of the bill layout and releasing an app dedicated to serving our customers who prefer to interface with the utility via mobile devices. I&M continues to adapt and innovate to keep up with rapidly changing technology and customer preferences. The metrics below were selected based upon their direct focus on serving customers. It should be noted that comparing customer service metrics across utilities can be difficult due to nuances in calculating metrics. For example, when calculating the average speed of answer, some utilities only include the amount of wait time the customer incurs after they have gone through the phone menu. Other utilities include both the amount of time the customer spent going through the phone menu plus the amount of wait time.

I&M Call Center Operations
Average speed of answer represents the average number of seconds an Indiana customer waits before his or her call is answered by a resource ready to provide assistance. Abandonment rate represents the percentage of phone calls made by Indiana customers that are abandoned by the customer before speaking with an agent or utilizing call automation.

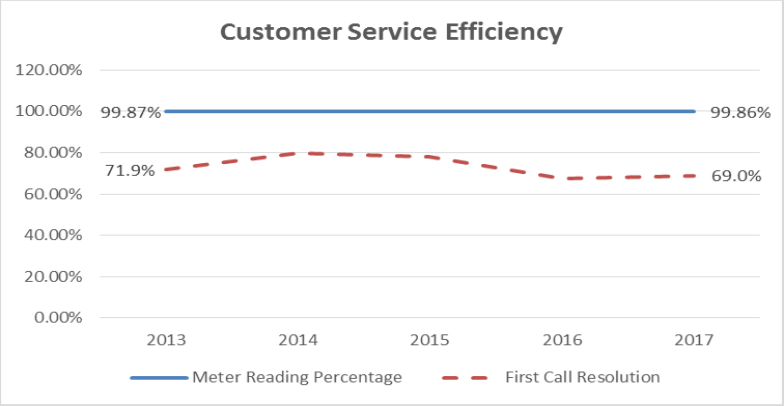


- To better help customers, AEP will be implementing new routing software that will allow I&M to offer call backs and a virtual waiting queue. This will also support customers to communicate more efficiently with our Call Centers via email and chats. This investment will provide a better customer experience.

I&M Customer Service Efficiency

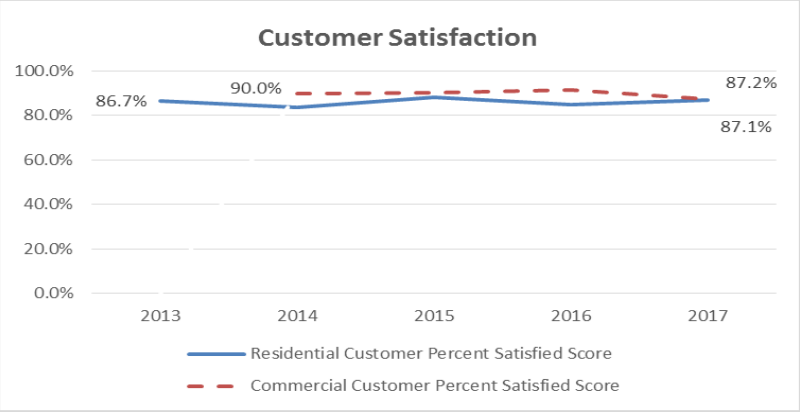
Percent meter reading is the percent of total meters with actual reads for the period of time. This metric represents only Indiana data.

First Call Resolution represents ability to meet a customer's needs during their first phone call to the Company. This metric is measured by an outside vendor during customer transactional surveys. This metric represents total I&M data.



- 2013 - completed upgrade to metering infrastrucutre by installing Automated Meter Reading (AMR) technology. This accounts for the sustained high level of meter reading which has resulted in a significant drop in estimated bills and associated customer calls.

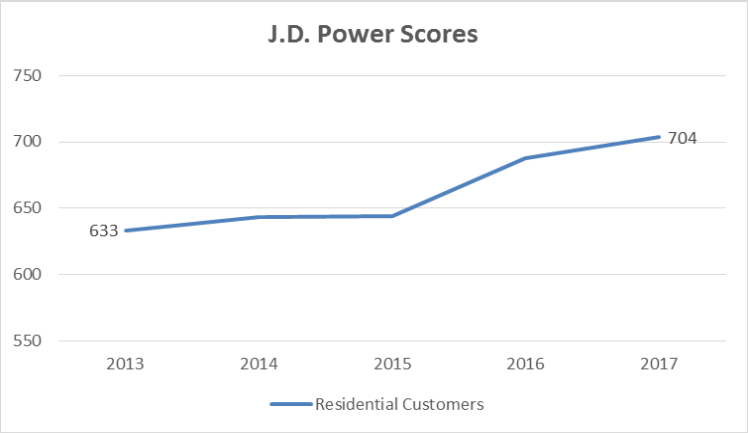
I&M Customer Satisfaction
Percent of Residential and Commercial customers who expressed satisfaction based upon overall experience with I&M.



- I&M utilizes a nuetral, third party research firm to survey a random sampling of residential and commercial customers . The overall customer satisfaction scores for I&M's Indiana customers summarize the total percent of "Very Satisifed" or "Somewhat Satified" ratings using a five point scale of "Very Satisfied", "Somewhat Satisfied"," Neither Satisfied nor Dissatisfied"," Somewhat Dissatisfied", and "Very Dissatisfied".

J.D. Power Scores

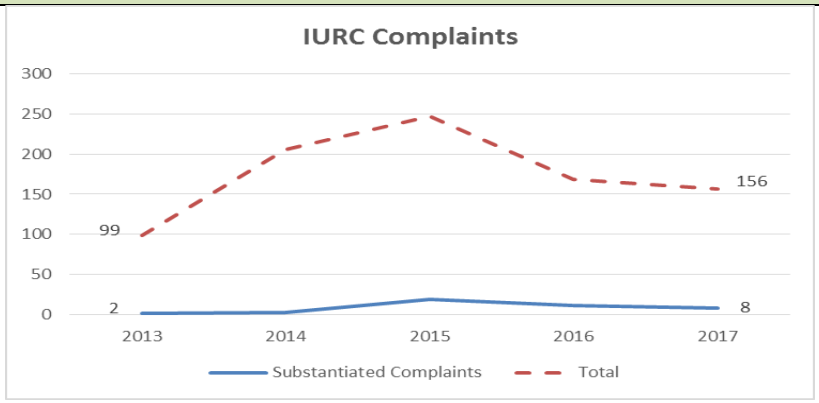
Overall I&M residential customer satisfaction as reported J.D. Power Electric Utility Customer Satisfaction studies. Results are on a 1,000 point scale.



- I&M subscribes to the J.D. Power Electric Utility Residential Customer Satisfaction Study. The satisfaction measure reflects overall Indiana customer satisfaction from six contributing factors: power quality & reliability, price, billing & payment, communications, corporate citizenship, and customer service.

IURC Complaints

The number of customer complaints filed with the Indiana Utility Regulatory Commission (IURC) and the number of those complaints that were determined to be substantiated.

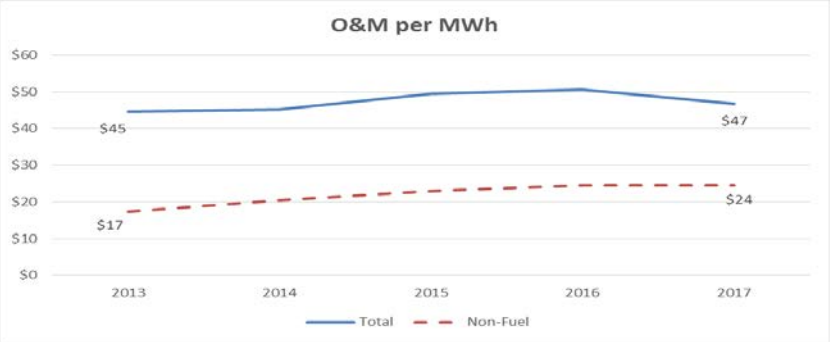


- Substantiated complaints represent complaints from Indiana customers that were investigated by the IURC's Consumer Affairs Division and deemed to be justified. The peak in total complaints in 2015 was driven by general billing issues and disconnection of service. Since then, the number of complaints in both categories has trended lower.

VI. OPERATIONS INVESTMENTS

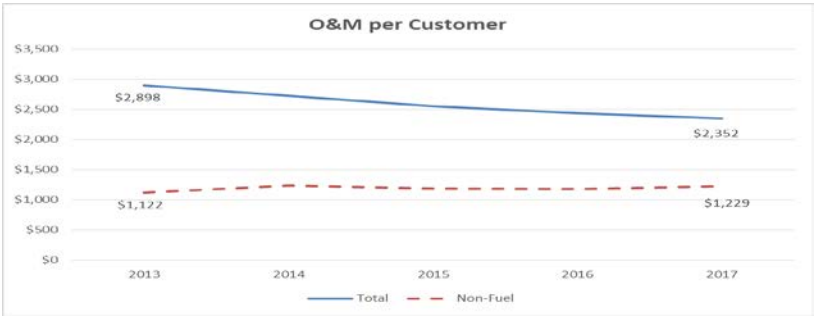
This section analyzes I&M's operation and maintenance (O&M) expenses for the prior five years. The source of this data comes from I&M's annual FERC Form 1 filings. Each metric below notes the FERC Form 1 page number and line number that contain the data used in the metric calculation. Since I&M is a multi-jurisdictional utility, it is important to note that this data represents I&M operations in Indiana and Michigan.

O&M Costs per MWh
Historical annual spending for operations and maintenance activities per MWh sales.



- Total: page 323, line 198 / page 301, line 14(d)
- Non-fuel: page 323, line 198 – (page 320, lines 5, 25 and page 321, lines 63, 76) / page 301, line 14(d)

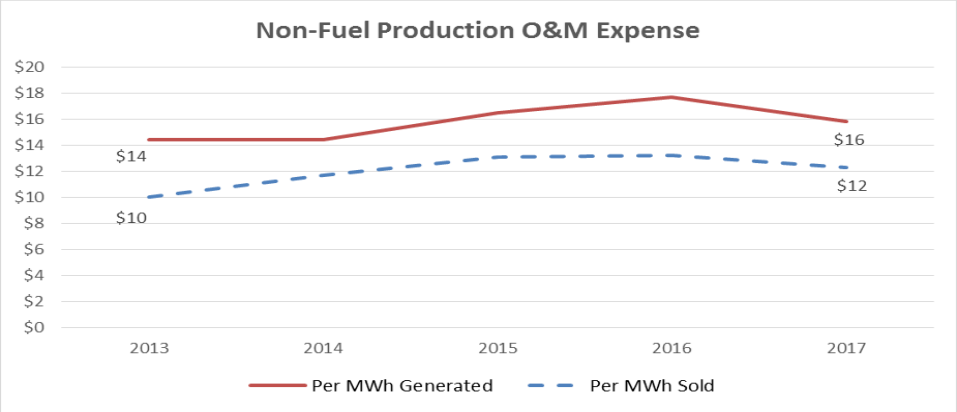
O&M Costs per Retail Customer
Historical annual spending for operations and maintenance activities per number of retail customers.



- Total: page 323, line 198 / page 301, line 14(f)
- Non-fuel: page 323, line 198 – (page 320, lines 5, 25 and page 321, lines 63, 76) / page 301, line 14(f)

Non-Fuel Power Production O&M Expense

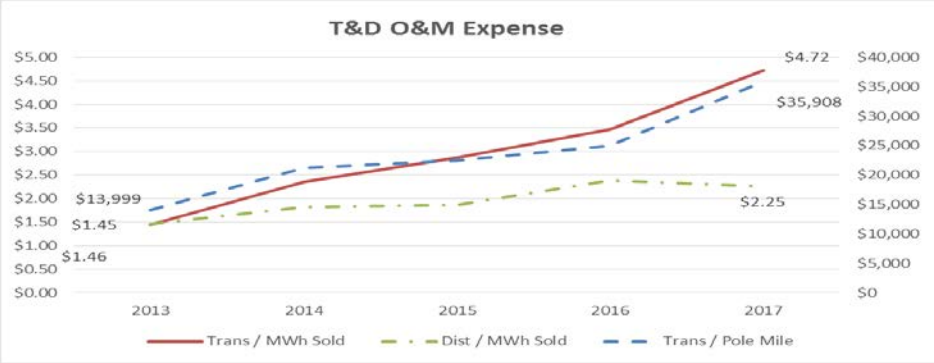
Historical annual spending for operations and maintenance activities per MWh, excluding fuel expense and purchased power.



- Per MWh Generated: page 321, line 80 – (page 320, lines 5, 25 and page 321, lines 63, 76) / page 401a, line 9
- Per MWh Sold: page 321, line 80 – (page 320, lines 5, 25 and page 321, lines 63, 76) / page 301, line 14(d)

Transmission and Distribution O&M Expense

Historical annual transmission and distribution spending for operations and maintenance activities as a function of MWh energy sales and line miles (transmission only).

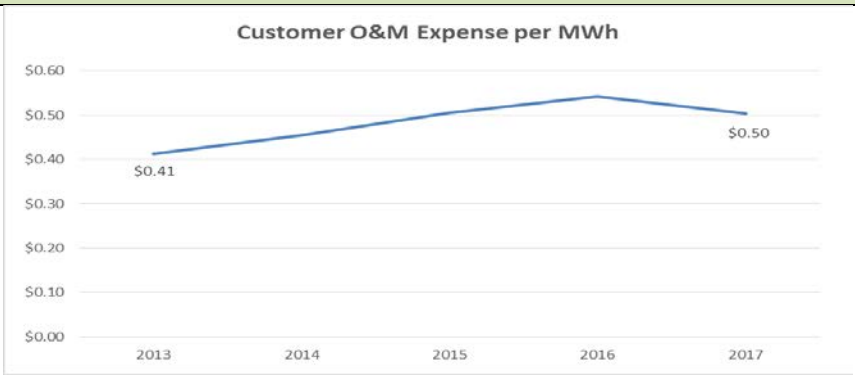


Upward trend in Transmission expense driven by account 565 (Transmission of Electricity by Others). Expenses reflect costs assessed by and through the PJM Regional Transmission Organization (RTO). As a member of PJM, costs are billed to I&M for functional operation of the transmission system, management of the PJM markets, and general administration of the RTO. This category includes I&M's share of the costs charged by PJM to the AEP East Operating Companies and allocated per the terms of the Transmission Agreement entered into among those companies.

- Trans / MWh Sold: page 321, line 112 / page 301, line 14(d)
- Dist / MWh Sold: page 322, line 156 / page 301, line 14(d)
- Trans / Pole Mile: page 321, line 112 / page 422, line 36

Customer Operations O&M Expense

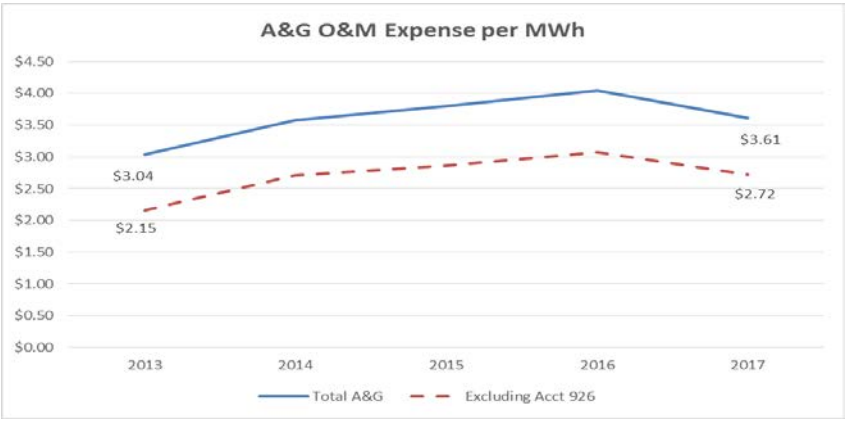
Historical annual customer spending for operations and maintenance activities per MWh energy sales.



- 2017 expenses declined by 2.4%, driven by a reduction in account 903 (Customer Records and Collection Expenses).
- Page 322, line 164 / page 301, line 14(d)

Administrative & General (A&G) O&M Expense Per MWh

Historical A&G spending for operations and maintenance activities per MWh energy sales. A&G is also shown excluding account 926 (employee pensions and benefits). The expenses associated with this account are driven by interest rates and investment returns, which are factors outside of I&M's direct control.



- 2017 - Expenses declined by 6.2%, driven by a reduction in account 931 (Rents).
- Total A&G: page 323, line 197 / page 301, line 14(d)
- Excluding Acct 926: (page 323, line 197 – page 323, line 187) / page 301, line 14(d)

Administrative & General (A&G) O&M Expense Per Retail Customer

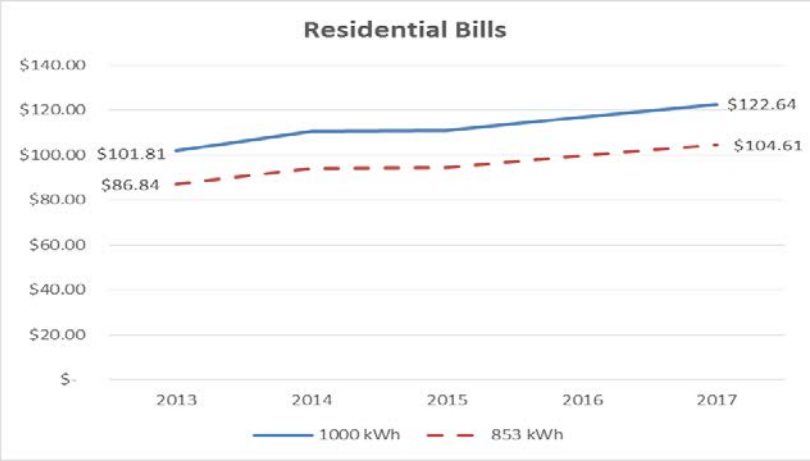
Historical A&G spending for operations and maintenance activities per retail customer. The expenses associated with this account are driven by interest rates and investment returns, which are factors outside of I&M's direct control.

- Total A&G: page 323, line 197 / page 301, line 14(f)
- Excluding Acct 926: (page 323, line 197 – page 323, line 187) / page 301, line 14(f)

VII. AFFORDABILITY

I&M is committed to provide quality service while maintaining rates as low as possible. During 2018, I&M is partnering with stakeholders to develop programs to assist low income customers throughout the year.

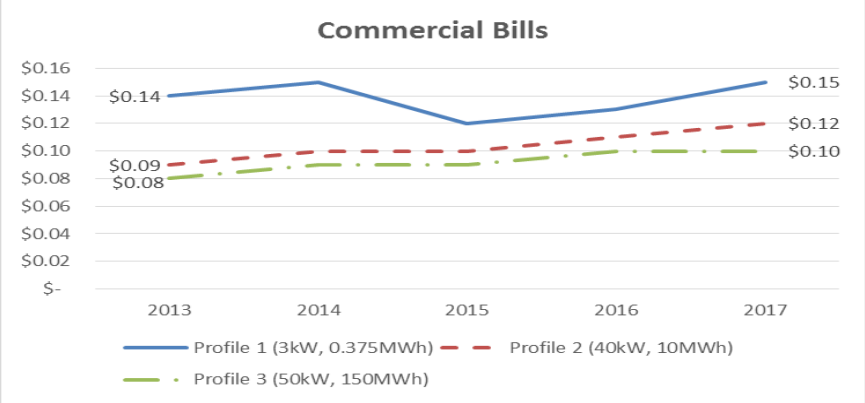
Indiana Residential Bills
Average monthly bill for an Indiana residential customer that uses 1,000 kWh and the I&M system average (853 kWh) per month. Bill amount includes standard tariff rate, cost recovery riders, and monthly service charge. State sales tax is excluded.



- Current rates in Indiana went into effect July 1, 2018.
- Average I&M residential customer usage is 853 kWh.

Indiana Commercial Bills

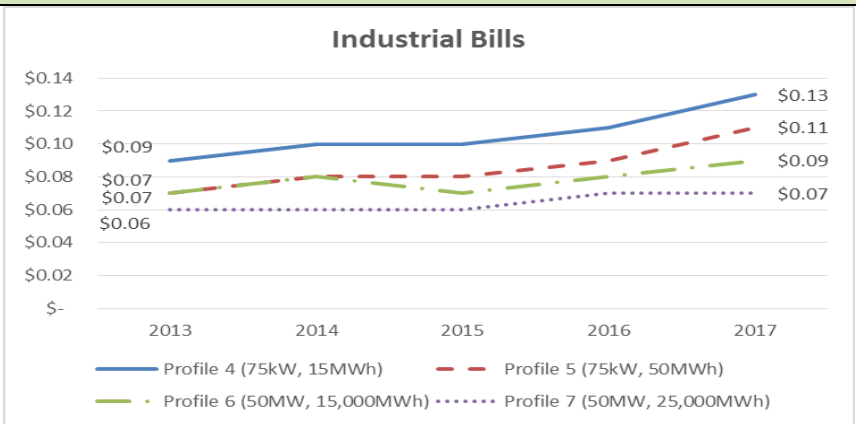
Average rates for an Indiana commercial customer at different energy and demand thresholds. Rate amount includes standard tariff rate, cost recovery riders, and monthly service charge. State sales tax is excluded.



- The above combinations of energy usage and demand are standard combinations that the Edison Electric Institute includes in its annual *Typical Bills and Average Rates Report.*
- Profile 1 is a usage profile that has experienced several tariff changes over this time period. In general, this profile also has larger bill fluctuations due to the low usage and demand.

Indiana Industrial Bills

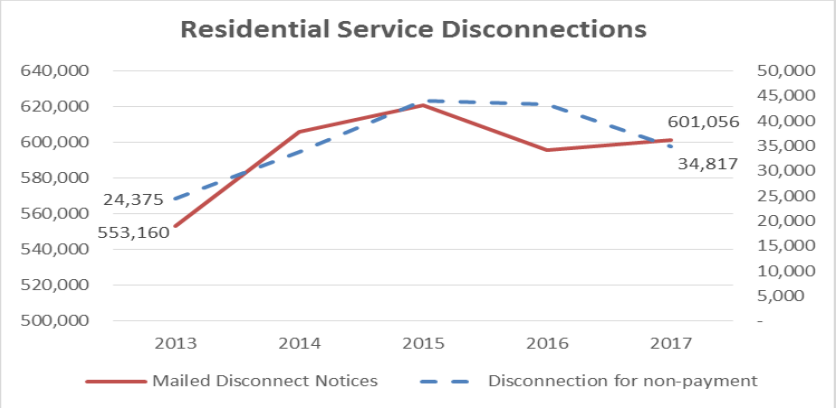
Average rates for an Indiana industrial customer at different energy and demand thresholds. Rate amount includes standard tariff rate, cost recovery riders, and monthly service charge. State sales tax is excluded.



- The above combinations of energy usage and demand are standard combinations that the Edison Electric Institute includes in its annual *Typical Bills and Average Rates Report.*

Indiana Residential Service Disconnections

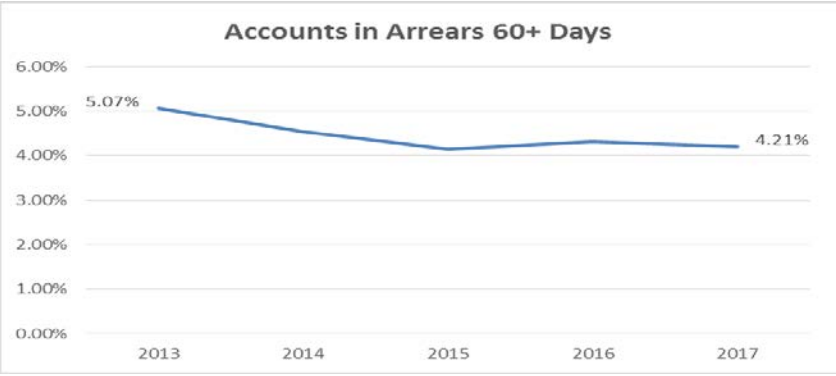
Annual number of disconnect notices mailed to Indiana customers and volume of Indiana customers disconnected for non-payment of bill.



- Number of delinquent accounts increased from 2013 through 2015, especially in 2014 due to the "polar vortex". This contributed to the rise in the number of mailed disconnect notices and disconnections for non-payment.
- Since 2015, improved economic conditions and customer education have pushed these metrics downward.

Indiana Accounts in Arrears for 60 or More Days

Percent of total Indiana customer (residential, commercial, and industrial) accounts that have past due balances of 60 days or more.

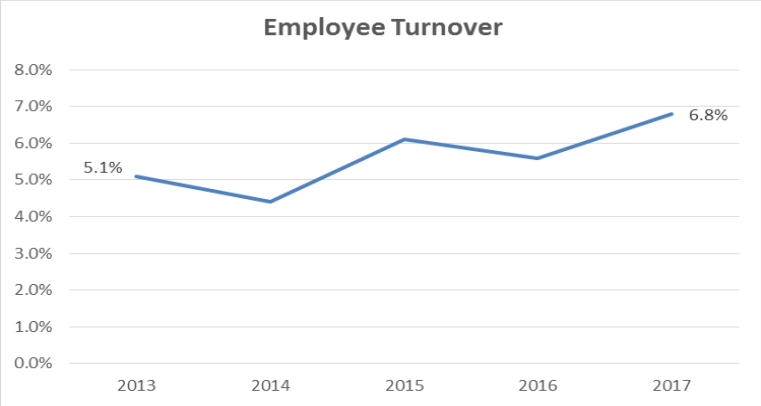


- Improved economic conditions have contributed to the declining trend.

VIII. STAFFING

Maintaining a well-staffed organization is key for supporting safe operations and delivering customer satisfaction. I&M monitors and strives to maintain a diverse workforce that will have the skills to meet the demands of the future.

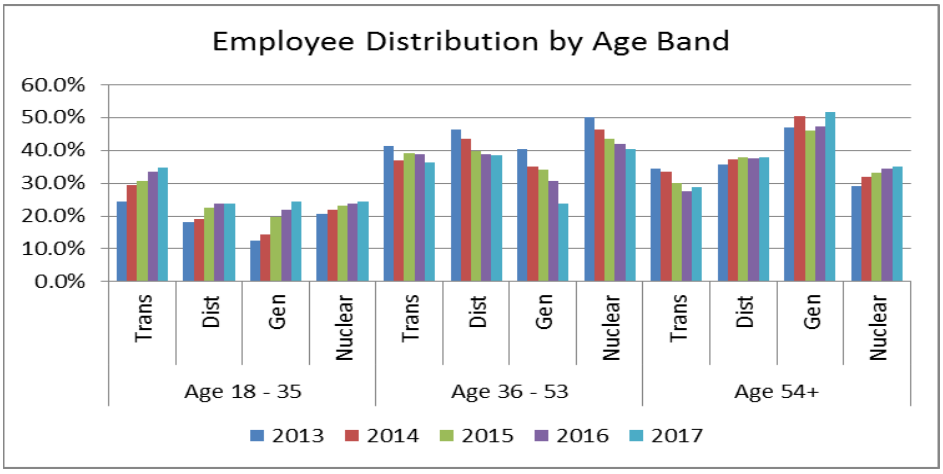
I&M Employee Turnover Ratio
Turnover ratio is calculated using the average number of employees for each year. This includes total I&M employees within Generation, Nuclear, Transmission, and Distribution functions. Support employees, such as fleet mechanics are also included. This data excludes the impact from the 2015 retirement of the Tanners Creek generating plant. Includes those employees who were classified as full-time, part-time and college interns.



- Employee turnover has been on a gradual upward trend, which is due primarily to the impact of retirements.

I&M Employee Population by Age Band

Percent of total I&M employees by age band for the Transmission, Distribution, Generation, and Nuclear functions.



- Data is broken down into three groupings to reflect those employees who are in their early career, mid-career, and at or near retirement age.