STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF INDIANA MICHIGAN POWER COMPANY FOR AUTHORIZATION OF NEW OFF SYSTEM SALES MARGIN SHARING / PJM COST RIDER ADJUSTMENT FACTORS) **CAUSE NO. 43774 PJM 11**

PETITIONER'S SUBMISSION OF DIRECT TESTIMONY OF STEPHEN HORNYAK

Indiana Michigan Power Company ("I&M"), by counsel, hereby submits the direct testimony and attachments of Stephen Hornyak.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on August 12, 2020, a copy of the foregoing was served by email transmission as follows:

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Indiana Michigan Power Company

I&M Exhibit ______

INDIANA MICHIGAN POWER COMPANY

CAUSE NO. 43774 PJM-11

PRE-FILED VERIFIED DIRECT TESTIMONY

OF

STEPHEN HORNYAK

PRE-FILED VERIFIED DIRECT TESTIMONY OF STEPHEN HORNYAK ON BEHALF OF INDIANA MICHIGAN POWER COMPANY

Q. Please state your name and business address.

A. My name is Stephen Hornyak. My business address is 1 Riverside Plaza, Columbus, Ohio 43215.

Q. By whom are you employed and in what capacity?

A. I currently hold the position of Regulatory Consultant Principal in the Regulated Pricing and Analysis Department for American Electric Power Service Corporation (AEPSC). AEPSC supplies engineering, financing, accounting, planning, advisory, and other services to the subsidiaries of the American Electric Power (AEP) system, one of which is Indiana Michigan Power Company (I&M or the Company).

Q. Please briefly describe your educational background and business experience.

A. I received a Bachelor of Arts degree in Industrial Management from Capital University in 1992. I attended the Advanced Regulatory Studies Program at Michigan State University in 2015. In September 2000, I joined AEPSC as an Information Technology Software Developer in Columbus, Ohio. In September 2007, I joined the Commercial Operations Financial Analysis group as a Commercial Analyst. In 2011, this group merged with Regulatory Services, where I served as a Regulatory Consultant in the Contracts and Analysis Department. I accepted my current position of Regulatory Consultant Principal in the Regulated Pricing and Analysis Department in February 2018.

Q. What are your responsibilities as a Regulatory Consultant Principal?

A. My responsibilities include the support of cost-of-service studies and rate design analyses for the AEP System operating companies, as well as other projects related to regulatory issues and proceedings, individual customer requests, and general rate matters.

Q. Have you previously testified before any regulatory commissions?

A. Yes. I have submitted testimony on behalf of I&M before the Indiana Utility Regulatory Commission in the following cases:

- Cause No. 43774 – PJM-9 & 10
- Cause No. 44871 – ECR-3 & 4
- Cause No. 43827 – DSM-9

I have also submitted testimony before the Michigan Public Service Commission in I&M's 2019 Energy Waste Reduction Reconciliation Filing, Case No. U-20704.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to explain the Company's calculation of the proposed Off-System Sales Margin Sharing/PJM Cost Rider (OSS/PJM Cost Rider) adjustment factors and to provide the resulting rate impacts on I&M's Indiana customers.

Q. Are you sponsoring any attachments in this proceeding?

A. Yes, I am sponsoring the following attachments:

<u>Attachment SH-1</u>: Summary of Jurisdictional Cost Forecast and Prior Period True-Up

<u>Attachment SH-2</u>: OSS Margin Sharing/PJM Cost Rider Rate Design

Attachment SH-3:	Summary of Current and Proposed OSS Margin Sharing/PJM Cost Rider
Attachment SH-4:	Clean and Redline Tariff Sheets
Attachment SH-5:	Typical Electric Bill Comparison

Q. Were these attachments prepared or assembled by you or under your direction and supervision?

A. Yes.

Q. What are the components of the OSS Margin Sharing/PJM Cost Rider?

A. The OSS Margin Sharing/PJM Cost Rider consists of three components. The first two components are forecasts of OSS margins and PJM costs for the forecast period of 2021. In this filing, Company witness Stegall supports the Company's forecast of total I&M OSS margins and PJM costs for calendar year 2021 (Forecast Period). The remaining component is a reconciliation of actual OSS margins and PJM costs to actual billing under the OSS/PJM Cost Rider. In this filing, Company witness Dielman supports the cumulative actual (over)/under recovery as of June 30, 2020.

Q. How are the Indiana retail jurisdictional OSS margins and PJM costs determined in Attachment SH-1?

A. Consistent with the calculations approved in Cause No. 45235, the Company's most recent Commission approved basic rate case (45235 Final Order), each component of total I&M OSS margin and total I&M PJM costs are classified as either retail demand, retail energy, demand, or energy-related. The appropriate jurisdictional demand and energy allocation factors taken from Cause No. 45235, are then applied to determine the Indiana retail jurisdictional portion of OSS margins and PJM costs.

Q. How are the amounts to be included in the OSS Margin Sharing/PJM Cost Rider calculated?

A. As shown in Attachment SH-1, the first step (Lines 1-3) is to calculate the Indiana retail jurisdictional portion of forecasted PJM costs. The retail jurisdictional factors applied here exclude the Michigan Electric Choice customers and properly allocate the power supply costs related to service provided to Indiana and non-Choice Michigan customers. This amount is then reduced (Lines 4-5) by the level of PJM Non Network Integration Transmission Services (Non NITS) included in base rates of $48,643,433 (45235 Final Order).

The second step (Lines 6-8) is to calculate the Indiana retail jurisdictional portion of forecast OSS margin. The third step (Line 9) is to exclude the jurisdictional OSS Margins from Capacity excluded from Base Rates in Cause No. 45235. In accordance with the 45235 Final Order, the requested amount (Line 10) is then multiplied by the Customer share of the OSS Margins (100%). The final step (Lines 11-12) is to include any cumulative actual (over)/under recovery balance remaining at June 30, 2020 in the OSS Margin Sharing/PJM Cost Rider as supported by Company witness Dielman.

Q. Were any other amounts included in the calculation of the OSS Margin Sharing/PJM Cost Rider?

A. Yes. As explained by Company witness Whitmore, the revenue requested in this OSS Margin Sharing/PJM Cost Rider filing includes a Gross Revenue Conversion

Factor (GRCF) adjustment (Lines 13-14). The GRCF is provided in witness Whitmore's Figure 1, and is reflected in Attachment SH-1 as part of the calculation of the revenue requirement.

Q. Are Financial Transmission Right (FTR) revenues and Load Serving Entity (LSE) congestion costs included in the OSS Margin Sharing/PJM Cost Rider?

A. Yes. In accordance with the Settlement Agreement and Commission Order in Cause No. 43306, I&M compares total FTR revenues to LSE congestion costs for both the actual and forecast periods. If LSE congestion costs exceed total FTR revenues then the net amount is included in the PJM Cost calculation portion of the OSS/PJM Cost Rider. If total FTR revenues exceed LSE congestion costs, then the net amount is included in the OSS Margin Sharing calculation portion of the OSS/PJM Cost Rider. For this filing, both actual period and forecasted LSE congestion costs exceed total FTR revenues and therefore are included in the PJM Cost calculations of the OSS/PJM Cost Rider. This calculation is shown at the bottom of Attachment SH-1 (Line 16).

Q. How are the proposed OSS Margin Sharing/PJM Cost Rider costs allocated among the tariff classes?

A. As shown in Attachment SH-1, the OSS/PJM Cost Rider revenue requirement is allocated to the classes based upon the retail demand, retail energy, demand and energy allocation methods approved by the Commission in I&M's most recent rate case (Cause No. 45235), which included the tariff class Coincident Peak (CP) per-kWh ratio method for determining the retail demand and demand allocations.

Q. How are the proposed OSS Margin Sharing/PJM Cost Rider factors calculated?

A. Consistent with the rate design methodologies established in the 45235 Final Order, once the rider costs are allocated among the tariff classes, an energy factor is calculated using the forecasted calendar year 2021 billing energy for that class. In addition, demand charges are calculated for the LGS, IP and EHG tariff classes based on the projected class' billing demand for the Forecast Period. These calculations are reflected in Attachment SH-2. The demand charges are designed to recover only the demand-related rider costs allocated to the LGS, IP and EHG tariff classes. Energy-related rider costs are designed to be collected through the LGS, IP and EHG class' energy charges.

Q. Have you prepared a comparison of current and proposed OSS Margin Sharing/PJM Cost Rider factors?

A. Yes. Attachment SH-3 summarizes projected 2021 billing under current OSS/PJM Cost Rider factors and under proposed OSS/PJM Cost Rider factors. The proposed rider factors have also been incorporated in the Company's existing OSS Margin Sharing/PJM Cost Rider tariff sheet in both a clean and redline format as shown in Attachment SH-4.

Q. What impact will the change in the OSS Margin Sharing/PJM Cost Rider have on customer bills?

A. Upon implementation, residential customers using 1,000 kWh of electricity per month would see a monthly rate increase of $1.54 or 1.1%. Attachment SH-5 shows the percentage increases at various "typical" usage levels for I&M's major tariff schedules. These calculations are based upon I&M's current rates in effect at the time of this filing.

Q. Does this conclude your pre-filed verified direct testimony?

A. Yes, it does.

VERIFICATION

I, Stephen Hornyak, Regulatory Consultant Principal – Regulated Pricing and Analysis, American Electric Power Service Corporation (AEPSC), affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information, and belief.

Date: **August 11, 2020**

Stephen Hornyak

Stephen Hornyak

Indiana Michigan Power Company
State of Indiana
Summary of Jurisdictional Cost Forecast and Prior Period True-Up - Off-System Sales Margin Sharing/ PJM Cost Rider
Forecast Calendar Year 2021

Line #		Source:	Retail Demand-Related Costs	Retail Energy-Related Costs	Demand-Related Costs	Energy-Related Costs	Total
I. PJM - Forecast							
1	Total Company PJM Cost Forecast	Attachment JMS-2	$318,090,782	$1,436,451	$17,345,931	$36,714,990	$373,588,154
2	Jurisdictional Allocation Factors (Excluding Shopping)	Cause No. 45235	82.92656%	82.87266%	67.06184%	69.45202%	
3	Indiana Jurisdictional PJM Costs	Line 1 x Line 2	$263,781,744	$1,190,425	$11,632,501	$25,499,302	$302,103,972
4	Less: PJM Non NITS in Base Rates	Cause No. 45235	($23,967,414)	$0	($10,548,689)	($14,127,330)	($48,643,433)
5	Net Total Indiana Jurisdictional PJM Costs	Line 3 + Line 4	$239,814,330	$1,190,425	$1,083,812	$11,371,972	$253,460,539
II. OSS - Forecast							
6	Total Company OSS Margin Forecast	Attachment JMS-1			$2,281,737	($43,506,002)	($41,224,266)
7	Jurisdictional Allocation Factors (Excluding Shopping)	Cause No. 45235			67.06184%	69.45202%	
8	Indiana Jurisdictional OSS Margin Costs (Revenues)	Line 6 x Line 7			$1,530,175	($30,215,797)	($28,685,622)
9	Less: Juris OSS Margins from Capacity Excluded from Base Rates	Cause No. 45235			$0	($17,387,555)	($17,387,555)
10	Customer Share of Incremental Margins in Rider (100%)	(Ln 8 - Ln 9) x 100%			$1,530,175	($12,828,242)	($11,298,067)
TOTAL							
11	Total Cumulative (Over)/Under Recovery Balance at 06/30/2020	Attachment MLD-1	($18,475,213)	($83,377)	($921,911)	$330,342	($19,150,158)
12	Total OSS & PJM Net Revenue Requirement for 2021	Line 5 + Line 10 + Line 11	$221,339,117	$1,107,048	$1,692,076	($1,125,928)	$223,012,313
13	Gross Revenue Conversion Factor (GRCF) (a)	Figure MRW-1	1.9890%	1.9890%	1.9890%	1.9890%	1.9890%
14	GRCF Revenue Required	Line 12 x (1/(1-Line 13)-1)	$4,491,776	$22,466	$34,338	($22,849)	$4,525,732
15	Total Indiana Jurisdictional Rider (Credit)/Charge	Line 12 + Line 14	$225,830,893	$1,129,514	$1,726,414	($1,148,777)	$227,538,044

(a) GRCF as a % of total rider revenue for collection of Indiana Utility Receipts Tax, Public Utility Assessment Fee (IURC) and Uncollected Revenue Factors.

16 **FTR Revenue Test**

(Revenues) / Expenses		Actual [1/]	Forecast Total Company [2/]	Forecast Indiana
LSE FTR Revenue	Accts. 4470101/5550132	($3,715,828)	($10,150,000)	($7,049,380)
OSS FTR Revenue	Accts. 4470100	$84,532	$164,990	$114,589
LSE Congestion Costs	Accts. 4470093/5550124	$9,463,686	$24,400,000	$16,946,293
LSE Net Congestion / (Net FTR Revenues) (Indiana Basis)		$5,832,390		$10,011,502
Net FTR Revenues included in OSS Margin		$0		$0
LSE Net Congestion Costs included in PJM calculation (Included in Line 3 above/ Excluded from Line 8)		$5,832,390		$10,011,502

Sources:
1/ Attachment MLD-1
2/ Attachment JMS-2

Indiana Michigan Power Company
State of Indiana
Off-System Sales Margin Sharing/ PJM Cost Rider Rate Design
Forecast Calendar Year 2021

	Retail Demand	Retail Energy	Demand	Energy	Total
Jurisdictional Costs [1/]	$ 225,830,893	$ 1,129,514	$ 1,726,414	$ (1,148,777)	$ 227,538,044

Class (1)	Forecast Billing Energy (kWh) (2)	Forecast Billing Demand (kVA or kW) (3)	Test Year CP / kWh Ratio [2/] (4)	CP Demand Allocation Factor (5) = (2) x (4)	Allocated Retail Demand Related Costs (6) on (5)	Allocated Retail Energy Related Costs (7) on (2)	Allocated Demand Related Costs (8) on (5)	Allocated Energy Related Costs (9) on (2)	Total Cost (10)=(6)+(7)+(8)+(9)	$ / kWh Rate (11) = (10) / (2)	Total LGS, IP/IRP Demand Cost (12) = (6)+(8)	Total LGS, IP/IRP Energy Cost (13)=(7)+(9)	Total LGS, IP/IRP $ / kVA or kW Rate (14) = (12) / (3)	Total LGS, IP/IRP $ / kWh Rate (15) = (13) / (2)	Revenue Verification (16) = (11) x (2) OR (2) x (15) + (3) x (14)
RS	4,207,991,396		0.0215135%	905,286	$ 97,236,617	$ 401,979	$ 743,347	$ (408,833)	$ 97,973,110	$ 0.023283					$ 97,974,664
GS	1,120,729,207		0.0214942%	240,892	$ 25,874,170	$ 107,060	$ 197,801	$ (108,886)	$ 26,070,145	$ 0.023263 *					$ 26,071,524
LGS	2,608,497,408	8,463,146	0.0162404%	423,630	$ 45,502,028	$ 249,183	$ 347,850	$ (253,433)	$ 45,845,628		$ 45,849,878	$ (4,250)	$ 5.418	$ (0.0000020)	$ 45,848,108
LGS-LM/TOD	9,310,072		0.0162404%	1,512	$ 162,404	$ 889	$ 1,242	$ (905)	$ 163,630	$ 0.017576					$ 163,634
IP, IRP-Firm, Juris-IRP	3,619,092,160	8,082,880	0.0140476%	508,396	$ 54,606,730	$ 345,723	$ 417,453	$ (351,619)	$ 55,018,287		$ 55,024,183	$ (5,896)	$ 6.807	$ (0.0000020)	$ 55,012,926
MS	24,874,090		0.0196742%	4,894	$ 525,664	$ 2,376	$ 4,019	$ (2,417)	$ 529,642	$ 0.021293					$ 529,644
WSS	130,990,027		0.0120590%	15,796	$ 1,696,646	$ 12,513	$ 12,970	$ (12,727)	$ 1,709,402	$ 0.013049 *					$ 1,709,337
IS	805,307		0.0118426%	95	$ 10,204	$ 77	$ 78	$ (78)	$ 10,281	$ 0.012767					$ 10,281
EHG	5,178,477	32,295 [3/]	0.0202743%	1,050	$ 112,780	$ 495	$ 862	$ (503)	$ 113,634		$ 113,642	$ (8)	$ 3.519	$ (0.0000020)	$ 113,636
OL	36,069,107		0.0009770%	352	$ 37,808	$ 3,446	$ 289	$ (3,504)	$ 38,039	$ 0.001055					$ 38,053
SL	60,434,808		0.0010151%	613	$ 65,842	$ 5,773	$ 503	$ (5,872)	$ 66,246	$ 0.001096					$ 66,237
Total	11,823,972,059	16,578,321		2,102,516	$ 225,830,893	$ 1,129,514	$ 1,726,414	$ (1,148,777)	$ 227,538,044		$ 100,987,703	$ (10,154)			$ 227,538,044
														Difference	$ -

Sources:
1/ Attachment SH-1
2/ Cause No. 45235
3/ Forecast based on billing units in Cause No. 45235 (WP-MWN-6, Page 3 of 6)

* Revised after revenue verification

Indiana Michigan Power Company
State of Indiana
Summary of Current and Proposed Off-System Sales Margin Sharing/ PJM Cost Rider
Forecast Calendar Year 2021

			Under Current Rates			Under Proposed Rates [1]			
Tariff Class	Billing kWh [1]	Billing kW / kVA [1]	$ / kWh	$ / kVA or kW	$	$ / kWh	$ / kVA or kW	$	Difference
RS, RS-TOD, RS-TOD2 and RS-OPES	4,207,991,396		$0.021736		$ 91,464,901	$0.023283		$ 97,974,664	$ 6,509,763
GS, GS-TOD and GS-TOD2	1,120,729,207		$0.021715		$ 24,336,635	$0.023263		$ 26,071,524	$ 1,734,889
LGS and LGS-TOD	2,608,497,408	8,463,146	-$0.000803	$5.312	$ 42,861,609	-$0.000002	$5.418	$ 45,848,108	$ 2,986,499
LGS-LM-TOD	9,310,072		$0.016208		$ 150,898	$0.017576		$ 163,634	$ 12,736
IP and CS-IRP2	3,619,092,160	8,082,880	-$0.000803	$6.638	$ 50,748,026	-$0.000002	$6.807	$ 55,012,926	$ 4,264,900
MS	24,874,090		$0.019808		$ 492,706	$0.021293		$ 529,644	$ 36,938
WSS	130,990,027		$0.011834		$ 1,550,136	$0.013049		$ 1,709,337	$ 159,201
IS	805,307		$0.011560		$ 9,309	$0.012767		$ 10,281	$ 972
EHG	5,178,477	32,295	-$0.008030	$3.405	$ (41,583)	-$0.000002	$3.519	$ 113,636	$ 155,219
OL	36,069,107		$0.000220		$ 7,935	$0.001055		$ 38,053	$ 30,118
SLS, ECLS, SLC, SLCM and FW-SL	60,434,808		$0.000260		$ 15,713	$0.001096		$ 66,237	$ 50,524
TOTAL	11,823,972,059	16,578,321			$211,596,285			$ 227,538,044	$15,941,759

Sources:
1/ Attachment SH-2

I.U.R.C. NO. 18
INDIANA MICHIGAN POWER COMPANY
STATE OF INDIANA

SECOND REVISED SHEET NO. 46
CANCELS FIRST REVISED SHEET NO. 46

OFF SYSTEM SALES MARGIN SHARING / PJM COST RIDER

This rider combines Off-System Sales Margin Sharing with PJM Costs (OSS / PJM Cost Rider). The OSS / PJM Cost Rider allows the Company to share wholesale margins related to Indiana retail electric service with customers while recovering costs associated with mandated participation in a regional transmission organization. Beginning June 1, 2020, I&M's Indiana jurisdictional OSS margins are reduced by $17.4 million annually, for capacity excluded from base rates. All customer bills subject to the provisions of this rider shall be adjusted by the OSS / PJM Cost Rider adjustment factor per billing kWh and kW or kVA as follows:

Tariff Class	¢/kWh	$/kW or $/kVa
RS, RS-TOD, RS-TOD2 and RS-OPES	2.3283	--
GS, GS-TOD and GS-TOD2	2.3263	--
LGS and LGS-TOD	-0.0002	5.418
LGS-LM-TOD	1.7576	--
IP and CS-IRP2	-0.0002	6.807
MS	2.1293	--
WSS	1.3049	--
IS	1.2767	--
EHG	-0.0002	3.519
OL	0.1055	--
SLS, ECLS, SLC, SLCM and FW-SL	0.1096	--

ISSUED BY
TOBY L. THOMAS
PRESIDENT
FORT WAYNE, INDIANA

EFFECTIVE FOR BILLS RENDERED BEGINNING
BILLING MONTH

ISSUED UNDER AUTHORITY OF THE
INDIANA UTILITY REGULATORY COMMISSION

IN CAUSE NO. 43774 PJM-11

I.U.R.C. NO. 18
INDIANA MICHIGAN POWER COMPANY
STATE OF INDIANA

SECOND ~~FIRST~~ REVISED SHEET NO. 46
CANCELS ~~ORIGINAL~~ FIRST REVISED SHEET NO. 46

OFF SYSTEM SALES MARGIN SHARING / PJM COST RIDER

~~THIS SET OF RATES EFFECTIVE CYCLE 1, JUNE 2020~~

This rider combines Off-System Sales Margin Sharing with PJM Costs (OSS / PJM Cost Rider). The OSS / PJM Cost Rider allows the Company to share wholesale margins related to Indiana retail electric service with customers while recovering costs associated with mandated participation in a regional transmission organization. Beginning June 1, 2020, I&M's Indiana jurisdictional OSS margins are reduced by $17.4 million annually, for capacity excluded from base rates. All customer bills subject to the provisions of this rider shall be adjusted by the OSS / PJM Cost Rider adjustment factor per billing kWh and kW or kVA as follows:

Tariff Class	¢/kWh	$/kW or $/kVa
RS, RS-TOD, RS-TOD2 and RS-OPES	2.~~1736~~3283	--
GS, GS-TOD and GS-TOD2	2.~~1715~~3263	--
LGS and LGS-TOD	-0.~~0803~~0002	5.~~312~~418
LGS-LM-TOD	1.~~6208~~7576	--
IP and CS-IRP2	-0.~~0803~~0002	6.~~638~~807
MS	~~1.9808~~2.1293	--
WSS	1.~~1834~~3049	--
IS	1.~~1560~~2767	--
EHG	-0.~~0803~~0002	3.~~405~~519
OL	0.~~0220~~1055	--
SLS, ECLS, SLC, SLCM and FW-SL	0.~~0260~~1096	--

ISSUED BY
TOBY L. THOMAS
PRESIDENT
FORT WAYNE, INDIANA

EFFECTIVE FOR BILLS RENDERED BEGINNING
~~JUNE 2020~~ BILLING MONTH

ISSUED UNDER AUTHORITY OF THE
INDIANA UTILITY REGULATORY COMMISSION
~~DATED MARCH 11, 2020~~
IN CAUSE NO. ~~45235~~ 43774 PJM-11

Indiana Michigan Power Company - Indiana
Typical Electric Bill Comparison

Line No.	Tariff	Demand	Metered Energy	Current Bill	Proposed Bill	Bill Increase	% Change
	RS						
1		--	250	$47.86	$48.25	$0.39	0.8%
2		--	500	$80.71	$81.48	$0.77	1.0%
3	Block 1 - up to 900 kWh	--	750	$113.58	$114.74	$1.16	1.0%
4	Block 2 - all other kWh	--	1,000	$145.76	$147.30	$1.54	1.1%
5		--	2,000	$270.42	$273.52	$3.10	1.1%
6		--	4,000	$519.79	$525.98	$6.19	1.2%
	RS-OPES						
7	On-Peak=30%	--	250	$44.14	$44.53	$0.39	0.9%
8	Off-Peak=70%	--	500	$71.78	$72.55	$0.77	1.1%
9		--	750	$99.42	$100.58	$1.16	1.2%
10		--	1,000	$127.06	$128.60	$1.54	1.2%
11		--	2,000	$237.58	$240.68	$3.10	1.3%
12		--	4,000	$458.66	$464.85	$6.19	1.3%
	RS-TOD						
13	On-Peak 30%	--	500	$71.78	$72.55	$0.77	1.1%
14	Off-Peak 70%	--	1,000	$127.06	$128.60	$1.54	1.2%
15		--	2,000	$237.58	$240.68	$3.10	1.3%
16		--	3,000	$348.13	$352.77	$4.64	1.3%
17		--	4,000	$458.66	$464.85	$6.19	1.3%
18		--	5,000	$569.21	$576.95	$7.74	1.4%
	RS-TOD2						
19	On-Peak 5%	--	500	$77.60	$78.37	$0.77	1.0%
20	Off-Peak 95%	--	1,000	$140.22	$141.76	$1.54	1.1%
21		--	2,000	$265.40	$268.50	$3.10	1.2%
22		--	3,000	$390.61	$395.25	$4.64	1.2%
23		--	4,000	$515.81	$522.00	$6.19	1.2%
24		--	5,000	$641.01	$648.75	$7.74	1.2%
	GS-SEC <10 kW						
25	Block 1 - up to 4,500 kWh	3 kW	250	$54.61	$55.00	$0.39	0.7%
26	Block 2 - all other kWh	3 kW	500	$90.21	$90.98	$0.77	0.9%
27		5 kW	1,000	$161.43	$162.97	$1.54	1.0%
28		7 kW	2,500	$375.06	$378.93	$3.87	1.0%
29		9 kW	5,000	$713.02	$720.76	$7.74	1.1%
	GS-TOD2						
30	On-Peak 5%	--	1,000	$156.83	$158.37	$1.54	1.0%
31	Off-Peak 95%	--	2,500	$363.56	$367.43	$3.87	1.1%
32		--	5,000	$708.16	$715.90	$7.74	1.1%
33		--	7,500	$1,052.73	$1,064.34	$11.61	1.1%
	GS-OUSP						
34	Optional Unmetered	--	100	$21.43	$21.59	$0.16	0.7%
35	Service Provision	--	250	$41.58	$41.97	$0.39	0.9%
36		--	500	$75.14	$75.91	$0.77	1.0%
37		--	1,000	$142.30	$143.84	$1.54	1.1%
38		--	2,000	$276.59	$279.69	$3.10	1.1%
	GS-SEC						
39	Block 1 - up to 4,500 kWh	10 kW	2,000	$303.86	$306.96	$3.10	1.0%
40	Block 2 - all other kWh	10 kW	3,000	$446.27	$450.91	$4.64	1.0%
41		10 kW	4,000	$588.70	$594.89	$6.19	1.1%
42		10 kW	5,000	$713.02	$720.76	$7.74	1.1%
43		100 kW	20,000	$2,867.51	$2,898.47	$30.96	1.1%
44		100 kW	25,000	$3,398.45	$3,437.15	$38.70	1.1%
45		100 kW	30,000	$3,929.38	$3,975.82	$46.44	1.2%
46		500 kW	100,000	$13,858.87	$14,013.67	$154.80	1.1%
	GS-TOD-SEC						
47	On-Peak 40%	--	100	$30.57	$30.73	$0.16	0.5%
48	Off-Peak 60%	--	250	$47.94	$48.33	$0.39	0.8%
49		--	500	$76.87	$77.64	$0.77	1.0%
50		--	1,000	$134.75	$136.29	$1.54	1.1%
51		--	2,000	$250.52	$253.62	$3.10	1.2%
52		--	4,000	$482.02	$488.21	$6.19	1.3%

Indiana Michigan Power Company - Indiana
Typical Electric Bill Comparison

Line No.	Tariff	Demand	Metered Energy	Current Bill	Proposed Bill	Bill Increase	% Change
	GS-LM-TOD						
53	On-Peak 30%	--	500	$72.14	$72.91	$0.77	1.1%
54	Off-Peak 70%	--	1,000	$125.29	$126.83	$1.54	1.2%
55		--	2,000	$231.59	$234.69	$3.10	1.3%
		--	2,500	$284.71	$288.58	$3.87	1.4%
56		--	3,000	$337.85	$342.49	$4.64	1.4%
57		--	4,000	$444.14	$450.33	$6.19	1.4%
58		--	5,000	$550.45	$558.19	$7.74	1.4%
	GS-PRI						
59		300 kW	60,000	$7,749.02	$7,841.90	$92.88	1.2%
	GS-SUB						
60		100 kW	40,000	$4,514.62	$4,576.54	$61.92	1.4%
	LGS-SEC						
61	Block 1 - 1st 300 kWh/kVA	100 kW	30,000	$3,367.60	$3,401.92	$34.32	1.0%
62	Block 2 - all other kWh	100 kW	40,000	$3,834.02	$3,876.07	$42.05	1.1%
63		100 kW	50,000	$4,207.75	$4,257.52	$49.77	1.2%
64		100 kW	60,000	$4,581.48	$4,638.98	$57.50	1.3%
65		500 kW	150,000	$16,707.78	$16,879.48	$171.70	1.0%
66		500 kW	200,000	$19,050.76	$19,261.11	$210.35	1.1%
67		500 kW	250,000	$20,919.40	$21,168.40	$249.00	1.2%
68		500 kW	300,000	$22,788.03	$23,075.68	$287.65	1.3%
	LGS-PRI						
69		500 kW	150,000	$15,465.05	$15,636.75	$171.70	1.1%
70		500 kW	200,000	$17,741.15	$17,951.50	$210.35	1.2%
71		500 kW	250,000	$19,556.24	$19,805.24	$249.00	1.3%
72		500 kW	300,000	$21,371.31	$21,658.96	$287.65	1.3%
	LGS-SUB						
73		900 kW	150,000	$16,268.43	$16,484.76	$216.33	1.3%
74		900 kW	250,000	$23,210.44	$23,504.07	$293.63	1.3%
75		900 kW	350,000	$28,283.83	$28,654.75	$370.92	1.3%
76		900 kW	450,000	$31,864.76	$32,312.98	$448.22	1.4%
	LGS-TRAN						
77		100 kW	20,000	$2,162.95	$2,189.54	$26.59	1.2%
78		100 kW	25,000	$2,506.39	$2,536.84	$30.45	1.2%
79		100 kW	30,000	$2,849.81	$2,884.13	$34.32	1.2%
80		100 kW	35,000	$3,114.85	$3,153.03	$38.18	1.2%
	LGS-LM-TOD						
81	On-Peak 30%	--	15,000	$1,472.67	$1,493.19	$20.52	1.4%
82	Off-Peak 70%	--	25,000	$2,430.91	$2,465.11	$34.20	1.4%
83		--	35,000	$3,389.15	$3,437.03	$47.88	1.4%
	LGS-TOD-SEC						
84	On-Peak 45%	50 kW	20,000	$2,047.65	$2,068.97	$21.32	1.0%
85	Off-Peak 55%	100 kW	50,000	$4,816.50	$4,867.15	$50.65	1.1%
86		100 kW	60,000	$5,573.00	$5,631.66	$58.66	1.1%
	LGS-TOD-PRI						
87	On-Peak 40%	400 kW	150,000	$13,882.10	$14,044.65	$162.55	1.2%
88	Off-Peak 60%	400 kW	200,000	$17,406.60	$17,609.20	$202.60	1.2%
89		400 kW	250,000	$20,931.10	$21,173.75	$242.65	1.2%
	IP-SEC						
90	Block 1 - 1st 410 kWh/kVA	1,000 kVA	250,000	$34,006.96	$34,369.20	$362.24	1.1%
91	Block 2 - all other kWh	1,000 kVA	350,000	$39,262.55	$39,702.08	$439.53	1.1%
92		1,500 kVA	550,000	$60,150.21	$60,828.84	$678.63	1.1%
93		1,500 kVA	650,000	$64,872.92	$65,628.85	$755.93	1.2%
94		1,500 kVA	750,000	$65,930.74	$66,763.96	$833.22	1.3%
	IP-PRI						
95		3,000 kVA	1,000,000	$105,916.27	$107,196.24	$1,279.97	1.2%
96		3,000 kVA	1,500,000	$122,002.28	$123,668.72	$1,666.44	1.4%
97		3,000 kVA	2,000,000	$127,122.56	$129,175.49	$2,052.93	1.6%
	IP-SUB						
98		7,500 kVA	2,000,000	$214,029.36	$216,842.79	$2,813.43	1.3%
99		7,500 kVA	3,000,000	$263,246.28	$266,832.68	$3,586.40	1.4%
100		7,500 kVA	4,000,000	$280,631.47	$284,990.83	$4,359.36	1.6%
	IP-TRAN						
101		7,500 kVA	3,000,000	$262,277.58	$265,863.98	$3,586.40	1.4%
102		7,500 kVA	4,000,000	$279,565.62	$283,924.98	$4,359.36	1.6%
103		10,000 kVA	6,000,000	$379,348.18	$385,675.97	$6,327.79	1.7%

Indiana Michigan Power Company - Indiana
Typical Electric Bill Comparison

Line No.	Tariff	Demand	Metered Energy	Current Bill	Proposed Bill	Bill Increase	% Change
	MS						
104	Block 1 - up to 4,500 kWh	40 kW	8,000	$1,099.88	$1,111.76	$11.88	1.1%
105	Block 2 - all other kWh	40 kW	10,000	$1,288.34	$1,303.19	$14.85	1.2%
106		40 kW	12,000	$1,476.80	$1,494.62	$17.82	1.2%
	WSS-SEC						
107	Block 1 - First 300 kWh/kW	50 kW	15,000	$1,324.07	$1,342.30	$18.23	1.4%
108	Block 2 - all other kWh	50 kW	17,500	$1,535.50	$1,556.76	$21.26	1.4%
109		50 kW	20,000	$1,746.92	$1,771.23	$24.31	1.4%
	WSS-PRI						
110		750 kW	250,000	$19,560.00	$19,863.84	$303.84	1.6%
111		750 kW	300,000	$23,364.05	$23,728.66	$364.61	1.6%
112		750 kW	400,000	$30,972.15	$31,458.30	$486.15	1.6%
	WSS-SUB						
113		750 kW	250,000	$17,014.00	$17,317.84	$303.84	1.8%
114		750 kW	300,000	$20,311.55	$20,676.16	$364.61	1.8%
115		750 kW	400,000	$26,906.65	$27,392.80	$486.15	1.8%
	WSS-TOD-SEC						
116	On-Peak 30%	--	100,000	$7,803.70	$7,925.24	$121.54	1.6%
117	Off-Peak 70%	--	200,000	$15,580.40	$15,823.47	$243.07	1.6%
118							
	IS						
119		--	1,000	$207.67	$208.88	$1.21	0.6%
120		--	2,500	$519.17	$522.19	$3.02	0.6%
121		--	4,000	$830.66	$835.49	$4.83	0.6%
	EHG						
122		25 kW	3,500	$548.12	$550.92	$2.80	0.5%
123		25 kW	4,000	$590.30	$593.50	$3.20	0.5%
124		25 kW	4,500	$632.51	$636.11	$3.60	0.6%