

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

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

PETITIONER INDIANAPOLIS POWER & LIGHT COMPANY
SUBMISSION OF COMPLIANCE FILING

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

Respectfully submitted,



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CERTIFICATE OF SERVICE

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

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

1. INTRODUCTION

On November 6, 2023, AES Indiana (“AES Indiana” or “the Company”) launched a comprehensive suite of new systems, including a customer information system (“CIS”), meter data management (“MDM”), customer service management (“CSM”), field services management (“FSM”) applications, asset manager, and multi-resource scheduling tool. These systems, referred to as the ACE Project, are the backbone of the meter-to-cash processes and customer interactions and are operational. As of February 12, 2025, the new systems have generated more than seven million customer invoices since the project went into service in November 2023.

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

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

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

With respect to the Sustain phase, as of February 12, 2025, there are 181 open tickets with three degrees of prioritization:

- 0 critical open ticket vs. 1 critical open in January,
 - 0 critical open ticket specific to billing vs 0 critical in January
- 21 high open tickets vs. 24 high last month,
 - 0 high open tickets specific to billing vs 1 high in January
- 99 medium open tickets vs. 93 medium last month, and
- 61 low open tickets vs. 62 low last month.

The slight increase in ticket count reflects an increase in items identified as medium priority. Medium and low priority items impact internal operations and have associated manual work arounds until the incident is resolved.

Please note this report reflects revised ticket counts for January 2025. We discovered an error in the January report as the data was being retrieved for this month's filing. The correct ticket count for January is 180 and not the 98 total reflected in last month's report.

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

Table 1. Current System Issues and Customer Impact*

| Description of Issue | Customers Impacted as of May 10, 2024 | Customers Impacted as of June 13, 2024 | Customers Impacted as of July 11, 2024 | Customers Impacted as of August 19, 2024 | Customers Impacted as of September 13, 2024 | Customers Impacted as of October 15, 2024 | Customers Impacted as of November 12, 2024 | Customers Impacted as of December 13, 2024 | Customers Impacted as of January 13, 2025 | Customers Impacted as of February 12, 2025 |
|--|---------------------------------------|--|--|--|---|---|--|--|---|--|
| Customers who have not received an invoice since going live in the new system | 235 | 32 | 158 ¹ | 106 | 50 | 0 | 0 | 0 | 0 | 0 |
| Unique Customers with bills/invoices impacted by OOB | 22,492 | 16,850 | 5,907 | 5,484 | 5,028 | 5,333 | 2,477 | 2,389 | 2,035 | 1,724 |
| Complex bills (e.g., outdoor lighting) and large C&I customer billing data and process issues not displaying correctly on the bill | 35-40 | **50-75 | 35-40 | 35-40 | 5-10 | 5-10 | 5-10 | 5-10 | 5-10 | 5-10 |
| Unable to reissue bills when a bill was sent with inaccurate information | 4,200 | 728 unique customers | 0 | 20-30*** | 0 | 0 | 0 | 0 | 0 | 0 |

3. HOW THE ISSUES ARE BEING ADDRESSED

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

Guidehouse Inc. began the root cause analysis in January and is estimated to be finished in the first half of 2025.

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

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

Table 2. Key Performance Indicators for Billing to Reach Stabilization

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

4. CUSTOMER COMMUNICATIONS AND PROJECT ADVANCEMENT

As the Company has advanced work to begin disconnections, additional quality testing of the application is taking place to ensure confidence prior to go-live. The Company will begin the disconnect process once all testing criteria has been met. It is still anticipated that disconnects will resume in Q1. We are working collaboratively with our implementation partner and across the Company to prepare our team to serve our customers.

The Company has continued to reinforce the availability of extended payment arrangements to meet customers' financial needs up to 36 months. As of February 12, 2025 the Company has 25,523 active installment agreements. The Company has continued to promote messages to customers via traditional media, social media, email, newsletters, bill inserts, and bill messages.

The Company has continued its focus on customer experience and has made progress in customer support to better serve customers who inquire within our contact center.

- Since May 2024, the Company has demonstrated an Average Speed of Answer of under 100 seconds, with the exception of September 2024 when our systems were down to support the AES AES digital transformation as reported in July and August 2024.
- The Company introduced "Powered-Up" in June 2024. "Powered-Up" is a training program focused on improving customer experiences. Since the training launched:
 - First Contact Resolution rate has risen by over 5%.
 - Our Agent Satisfaction rating among customers has also risen by 5%.

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

- Energy Assistance Program ("EAP"): One-time benefit program to help assist income-qualified customers with utility bills.
- United Way of Central Indiana's Winter Assistance Fund ("WAF"): Effective January 1, 2025, income-eligible customers in Marion County who do not qualify for EAP can apply for WAF, supported by AES Indiana, among others.
- AES Indiana's Power of Change: Assists income-qualified customers, regardless of approval or denial from EAP or WAF, with a one-time grant for electric bill assistance.


The Utilities Unite for Customers also continues to provide essential support to the community through cross social media promotion and customer emails. AES Indiana and Citizens Energy Group are in the planning phases of hosting joint Community Office Hours to provide direct support for customers in signing up for EAP, the Citizens Energy Group energy assistance program, and AES Indiana's Power of Change program. The Company plans to hold additional Community Office Hours throughout the year. AES Indiana also updated the payment assistance webpage that includes all nine translated pieces of utility assistance information, ensuring that our diverse customer base can easily access the help they need.

The Company has continued communicating to customers that disconnections will resume soon. The communications were made via bill messages (see **Figure 2**), social media (see **Figure 3**), bill insert (see **Figure 4**), and the website. A key component of the Company's

ongoing communications strategy is continuing to raise awareness of the availability of extended payment plans. The Company is committed to supporting customers facing financial hardships by offering flexible extended payment options – 3-, 6-, 9-, or 12-month options and up to 36-month options – that work for their unique circumstances. In resuming the disconnect process, the Company will continue to comply with the winter moratorium requirements.

A critical piece of the disconnect for non-payment communications strategy is the Company's media approach. In alignment with when disconnects for non-payment resume, the Company will send a press release with this announcement. To accompany the release, the Company is developing a media kit that will include one-pagers and graphics about the disconnection process, including timing, notifications, and more. The Company spokesperson will be available for interviews with media partners so this announcement can reach as many customers as possible. Following the press release, the Company will send an all-customer email and will also share this announcement and resources with community partners.

Figure 2. Customer Bill Message on February Bills



Account Number

Due Date

Amount Due

02/27/2025

\$627.82

Page 1 of 1

Monthly Account Summary

Billing Date: 02/06/2025

Previous Balance

02/05/2025 Late Payment Charge For

01/07/2025 Bill

Metered Electric and Other Services

State Tax

Total Account Balance

\$377.10

3.83

230.74

16.15

\$627.82

Message Center

Avoid disconnection by staying current on your bill. Explore payment assistance programs and flexible options at aesindiana.com/payment-assistance. Need help? Call us at 317-261-8222. We're here to support you.

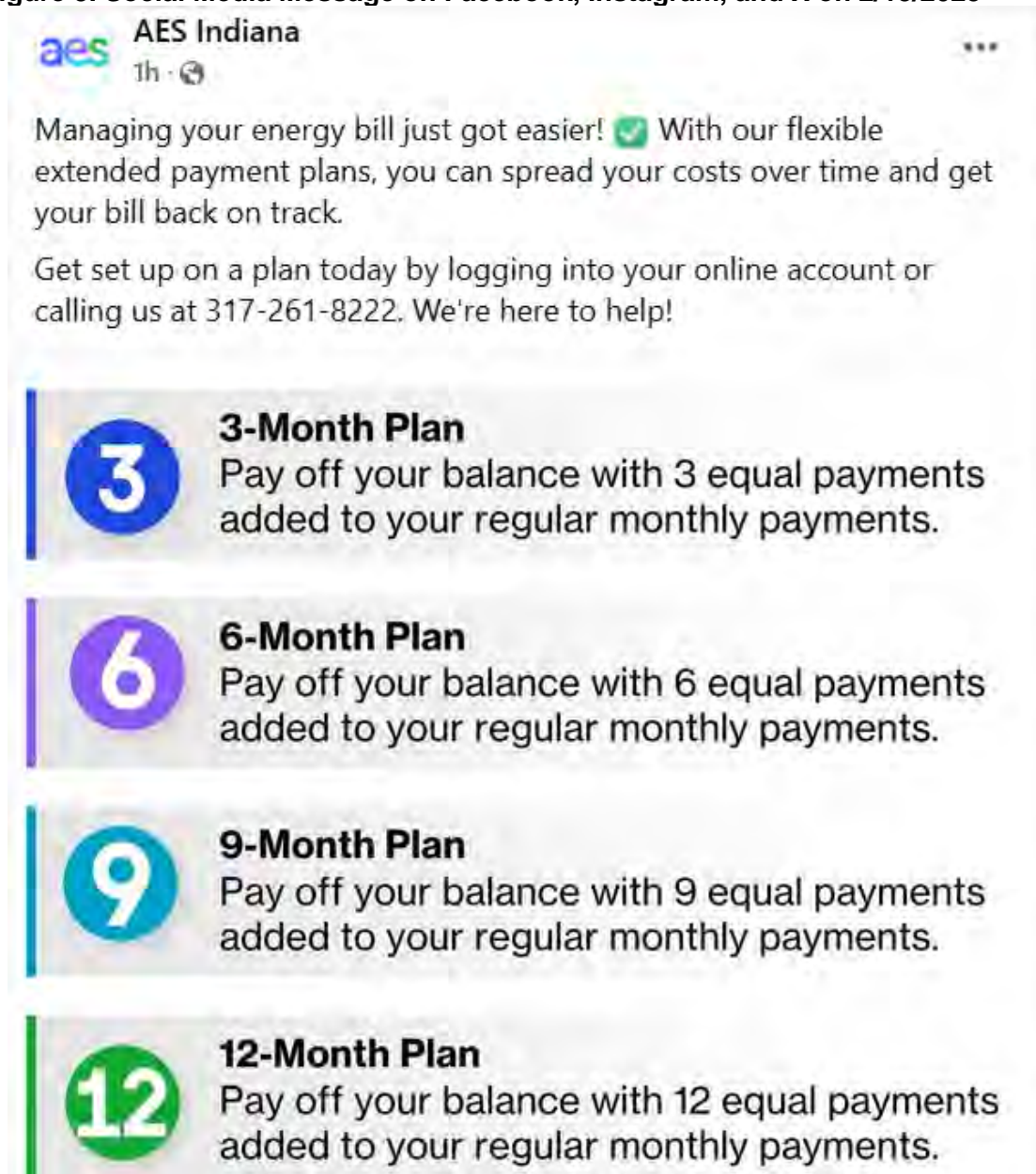
Total Number of Services

Total Services Billed

1

1

Figure 3. Social Media Message on Facebook, Instagram, and X on 2/13/2025

A screenshot of a social media post from AES Indiana. The post includes a header with the AES Indiana logo and name, a timestamp of "1h", and a menu icon. The main text promotes flexible extended payment plans. Below the text is a list of four payment plans, each with a numbered icon in a colored circle and a description. The plans are: 3-Month Plan (blue circle), 6-Month Plan (purple circle), 9-Month Plan (teal circle), and 12-Month Plan (green circle).

aes AES Indiana
1h · 🌐

Managing your energy bill just got easier! ✅ With our flexible extended payment plans, you can spread your costs over time and get your bill back on track.

Get set up on a plan today by logging into your online account or calling us at 317-261-8222. We're here to help!

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

Figure 4. February Bill Insert

Avoid disconnection: ensure your account is up to date

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

Call us today at 317-261-8222.



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

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

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

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

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

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

Figure 5. Draft March Bill Insert

Powering Hoosiers through Spring and beyond



AES Indiana is committed to providing reliable service to everyone in our community, regardless of financial circumstances. We understand that managing utility bills can be challenging, which is why we offer a variety of assistance programs to help ease the burden of energy costs. As a reminder, Winter Disconnect Moratorium ends on March 15.

Energy Assistance Program (EAP): This federally-funded program offers a one-time benefit to help with your utility bills and is designed for Indiana households earning 60% or less of the state median income. Applications are open until April 14, 2025.

United Way of Central Indiana's Winter Assistance Fund (WAF): For Marion County residents who may not qualify for EAP. Eligibility is based on household incomes and applications are accepted through May 31, 2025.

AES Indiana's Power of Change: A one-time grant for electric bill assistance to income-qualified customers, regardless of EAP or WAF application status. To be eligible, you must first apply for EAP.



These programs and more can be found at aesindiana.com/payment-assistance and aesindiana.com/your-home.

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Keep your account current to avoid disconnection

Managing your payments is easier than ever. Ensure your account is up-to-date to avoid service interruptions. If you're behind on your bill, take action as soon as possible.

Call us today at 317-261-8222.



Lighting up downtown Indy!

Since 1954, AES Indiana's window lights have been an iconic staple to the downtown Indy landscape. Want to know what colors are shining each night? Check out our window lights calendar.



View the schedule and learn more at aesindiana.com/window-lights



AES Indiana quick tip: Paying your bill by check? Be sure to include your full 12-digit account number in the memo line. This helps us verify your payment quickly and accurately.

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OTHER INFORMATION REQUESTED BY THE COMMISSION

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