

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANAPOLIS)
POWER & LIGHT COMPANY D/B/A AES)
INDIANA FOR COMMISSION APPROVAL)
OF AN ELECTRIC VEHICLE PORTFOLIO,) CAUSE NO. 45843
INCLUDING: (1) A PUBLIC USE ELECTRIC)
VEHICLE PILOT PROGRAM PURSUANT)
TO IND. CODE CH. 8-1-43; AND (2) TIME-)
VARYING AND OTHER ALTERNATIVE)
PRICING STRUCTURES AND TARIFFS)
PURSUANT TO IND. CODE § 8-1-2.5-6(3);)
AND FOR APPROVAL OF ASSOCIATED)
ACCOUNTING AND RATEMAKING)

VERIFIED PETITION

Indianapolis Power & Light Company d/b/a AES Indiana (“Petitioner,” “AES Indiana,” (“IPL”) or “Company”), hereby petitions the Indiana Utility Regulatory Commission (“Commission”) to approve AES Indiana’s Electric Vehicle (“EV”) Portfolio and associated accounting and ratemaking. In support of this Verified Petition, AES Indiana represents and shows the following:

AES Indiana’s Corporate Status and Operations

1. AES Indiana is a public utility corporation organized and existing under the laws of the State of Indiana with its principal office and place of business at One Monument Circle, Indianapolis, Indiana 46204. AES Indiana is engaged in rendering electric utility service in the State of Indiana.

2. AES Indiana provides retail electric utility service to more than 516,000 retail customers located principally in and near the City of Indianapolis, Indiana, and in portions of the

following Indiana counties: Boone, Hamilton, Hancock, Hendricks, Johnson, Marion, Morgan, Owen, Putnam and Shelby Counties. AES Indiana owns and operates electric generating, transmission and distribution plant, property and equipment and related facilities, which are used and useful for the convenience of the public in the production, transmission, delivery and furnishing of electric energy, heat, light and power. AES Indiana has maintained and continues to maintain its properties in a reliable state of operating condition.

Petitioner’s “Public Utility” Status

3. AES Indiana is a “public utility” under Ind. Code § 8-1-2-1. AES Indiana is also an “electric utility” as defined in Ind. Code § 8-1-43-3 and an “energy utility” providing “retail energy service” as defined in Ind. Code §§ 8-1-2.5-2 and -3. AES Indiana is subject to the jurisdiction of this Commission in the manner and to the extent provided by the Public Service Commission Act, as amended, and other pertinent laws of the State of Indiana.

Applicable Law

4. AES Indiana considers the provisions of the Public Service Commission Act, as amended, to be applicable to the subject matter of this Verified Petition, including Ind. Code ch. 8-1-43 (“Chapter 43”) and Ind. Code §§ 8-1-2-61 and 8-1-2.5-6. AES Indiana elects to become subject to Ind. Code § 8-1-2.5-6 for purposes of this Verified Petition.

AES Indiana EV Portfolio

5. AES Indiana proposes to offer a three-year portfolio of EV solutions, which, in part, is designed to expand on AES Indiana’s history of innovation in the EV space by providing a set of services intended to facilitate and manage EV adoption in AES Indiana’s service territory. The EV Portfolio is comprised of two components: (1) a set of Public Use EV Pilot

Programs pursuant to Chapter 43; and (2) alternative rates, tariffs, and pricing structures offered pursuant to Ind. Code ch. 8-1-2.5.

6. The Public Use EV Pilot Program component of the EV Portfolio consists of the limited deployment of charging and make-ready infrastructure as well as incentives and rebates to encourage customer investment in public use EVs and associated EV supply equipment (“EVSE”). As described in greater detail by AES Indiana witness Elliot, the Public Use EV Pilot Program includes the following:

- Bi-directional Charging Pilot: This pilot program will test vehicle-to-grid (“V2G”) integration and bi-directional power flow with select customers in AES Indiana’s service territory.
- Fleet Solutions: This pilot program will provide planning and advisory services to customers who are transitioning their fleets from traditional fuels to Public Use EVs.
- EVSE Rebates: This pilot program will provide rebates to encourage customer investment in Level 2 and direct current fast charging (“DCFC”) equipment to serve Public Use EVs.
- EVSE Rebates for Disadvantaged Communities: This program dedicates funds to help ensure that all customers within AES Indiana’s service area have convenient access to charging infrastructure, including in areas that are economically distressed or racially or ethnically diverse.

7. AES Indiana proposes the following time-varying and alternative pricing structures as part of its EV Portfolio:

Residential:

- Residential Managed Charging: This alternative pricing structure provides incentives to residential customers for allowing AES Indiana to curtail their EV charging during peak hours.
- Off-Peak Incentive: This time-varying pricing structure provides incentives for customers to self-manage their load during peak hours.

- Rate EVX: AES Indiana proposes to close this tariff to new participants and instead offer new participants the opportunity to participate in the proposed Managed Charging or Off-Peak Incentive offerings.

Commercial, Industrial, and Public:

- C&I Managed Charging: This alternative pricing structure provides incentives to C&I customers for allowing AES Indiana to curtail their EV charging during peak hours.
- Rate EVP: This alternative rate would update AES Indiana's existing Level 2 public charging rate to match current market conditions. This updated rate would be charged to drivers using AES Indiana-owned Level 2 charging infrastructure.
- Rate DCFC: This alternative rate would provide a new, market-based rate that would be charged to drivers using AES Indiana-owned DCFC charging infrastructure.
- Tariff EVSE: This voluntary, participant-funded alternative tariff will provide charging infrastructure to participating customers for a fixed, monthly fee.

8. A cost benefit analysis was completed for the proposed EV Portfolio by AES Indiana Witness Schmidt. The cost benefit analysis of the proposed AES Indiana EV Portfolio shows there are significant net benefits to managing the EV load effectively and doing so serves the public interest in promoting electric utility efficiency.

9. The projected costs to successfully implement the programs and services proposed in the EV Portfolio are estimated at \$16.2 million over the three-year period, with an additional \$10.6 million estimated for Tariff EVSE that would be funded solely through voluntary participation in Tariff EVSE.

Accounting and Ratemaking

10. AES Indiana requests approval to defer and recover the costs necessary to implement the EV Portfolio. As explained in AES Indiana's case-in-chief, AES Indiana seeks

authority to create a regulatory asset to record AES Indiana’s costs of the EV Portfolio, including carrying charges, and to recover such deferred costs in subsequent rate cases. The costs of Tariff EVSE will be funded by Tariff EVSE participants and are therefore not included in AES Indiana’s request for deferral authority.

Procedural and Other Matters

11. AES Indiana is filing its case-in-chief contemporaneous with its Petition, including direct testimony, attachments, and workpapers of the following three witnesses:

- a. AES Indiana Witness Zac Elliot - Electrification Portfolio Lead. Witness Elliot provides an overview of the EV Portfolio, describes the significant community and customer benefits, and explains how approval of the EV Portfolio is in the public interest and otherwise supports state and federal regulatory policy.
- b. AES Indiana Witness Kimberly Aliff – Senior Regulatory Analyst in AES Indiana Regulatory Affairs. Witness Aliff discusses the proposed accounting and ratemaking treatment for the EV Portfolio
- c. AES Indiana Witness Edward J. Schmidt, Jr. – Director for MCR Performance Solutions, LLC. Witness Schmidt presents the inputs, methodology, and results of the cost-effectiveness modeling for the programs included in the EV Portfolio.

12. AES Indiana and the Indiana Office of Utility Consumer Counselor (“OUCC”) have agreed to the following proposed procedural schedule and associated terms:

- a. Schedule.

Filing Date	Jan. 27, 2023	AES Indiana Filing of Case in Chief.
Day 90	April 27, 2023	OUCC and Intervenors Filing of Case in Chief.
Day 133 (43 days)	June 9, 2023	AES Indiana Rebuttal/OUCC & Intervenors Cross Answering, if any.
~Day 157	One day the week of July 3, 2023	Evidentiary hearing.
Day 175	July 21, 2023	AES Indiana proposed order/post

		hearing brief.
Day 189 (14 days)	July 28, 2023	OUC and Intervenor proposed order/brief.
Day 199 (10 days)	August 14, 2023	AES Indiana Reply.

- b. Service. The parties will provide same day service filings via email, hand delivery or large file transfer.
- c. Discovery. Discovery is available to all parties and shall be conducted on an informal basis. Any response or objection to a discovery request shall be made within ten (10) calendar days of the receipt of such request until April 20, 2023. Thereafter, any response or objection to a discovery request shall be made within five (5) calendar days of the receipt of such request. Any discovery communication received after noon on a Friday or day before a State Holiday, or after 5:00 p.m. on any other business day shall be deemed to have been received the following business day. The last discovery response due date shall be two (2) business days before the evidentiary hearing. The parties may conduct discovery through electronic means. Subject to the protection of confidential information, all parties will be served with discovery requests and responses.

Petitioner’s Authorized Representatives

13. The names and address of AES Indiana’s attorneys in this matter who are duly authorized to accept service of papers in this Cause on behalf of AES Indiana are:

Teresa Morton Nyhart (Atty. No. 14044-49)
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WHEREFORE, AES Indiana respectfully requests the Commission to promptly publish notice, make such investigation and hold such hearings as are necessary and advisable, and thereafter make and enter an order in this Cause:

(i) approving AES Indiana's EV Portfolio and associated accounting and ratemaking treatment as set forth above and further detailed in AES Indiana's case-in-chief; and

(ii) granting to AES Indiana such other and further relief in the premises as may be appropriate.

Dated this 27th day of January 2023.

INDIANAPOLIS POWER & LIGHT COMPANY
d/b/a AES Indiana

By 

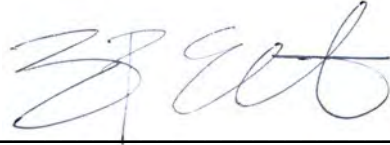
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Attorneys for AES Indiana

VERIFICATION

I, Zac Elliot, Electrification Portfolio Lead, affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information and belief.

Dated: January 27, 2023.

A handwritten signature in blue ink, appearing to read 'Zac Elliot', is written above a solid horizontal line.

Zac Elliot

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 27th day of January, 2023, by email transmission, or United States Mail, first class, postage prepaid to:

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