

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 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.)

CAUSE NO. 45911

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

PUBLIC’S EXHIBIT NO. 14

TESTIMONY OF OUCC WITNESS

APRIL M. PARONISH

OCTOBER 12, 2023

Respectfully submitted,



T. Jason Haas
Attorney No. 34983-29
Deputy Consumer Counselor

TESTIMONY OF OUCC WITNESS APRIL M. PARONISH
CAUSE NO. 45911
INDIANAPOLIS POWER & LIGHT D/B/A AES INDIANA

1 **Q: Please state your name, employer, business address, and current position.**

2 A: My name is April M. Paronish, and my business address is 115 West Washington
3 Street, Suite 1500 South, Indianapolis, Indiana 46204. I am employed as an
4 Assistant Director in the Indiana Office of Utility Consumer Counselor's
5 ("OUCC") Electric Division. My education and professional experience are
6 detailed in Appendix AMP-1 attached to this testimony.

7 **Q: Have you previously testified before the Indiana Utility Regulatory**
8 **Commission ("IURC" or "Commission")?**

9 A: Yes. I have testified in several cases before the Commission.

I. INTRODUCTION

10 **Q: What is the purpose of your testimony?**

11 A: The purpose of my testimony is to:

- 12 1. Provide background describing Indianapolis Power & Light d/b/a AES
13 Indiana's ("AES Indiana," "Petitioner" or "Company") request for waiver of
14 170 IAC 4-1-16(f) for purposes of remote disconnections;
- 15 2. Discuss AES Indiana's reference to the Commission approving remote
16 disconnection/reconnection in previous dockets;
- 17 3. Explain the OUCC's concerns related to the proposal, and recommend the
18 IURC modify AES Indiana's proposed Remote Disconnect/Reconnect Program
19 to implement the OUCC's recommendations; and
- 20 4. Discuss why AES Indiana should provide a copy of its proposed new residential
21 bill format to the Commission and OUCC, for review prior to implementation.

22 **Q: Are you sponsoring any exhibits or attachments to your testimony?**

23 A: Yes. I am sponsoring:

24 Attachment AMP-1: Response to OUCC Data Request ("DR") 1-11 (including
25 Attachments 1 and 2) and Supplemental Response, and DR
26 19.

1 Attachment AMP-2: A copy of a current AES Indiana bill.

2 Attachment AMP-3: Figure 5-7: Forecasted Residential Customer Sales and
3 Average Use from AES Indiana's 2022 Integrated Resource
4 Plan ("IRP").

5 **Q: To the extent you do not address a specific item in your testimony, should it be**
6 **construed to mean you agree with AES Indiana's proposal?**

7 A: No. My silence regarding any topics, issues, or items AES Indiana proposes does
8 not indicate my approval of those topics, issues, or items. Rather, the scope of my
9 testimony is limited to the specific items addressed herein.

II. BACKGROUND

10 **Q: Please describe AES Indiana's remote disconnection/reconnection request in**
11 **this Cause.**

12 A: AES Indiana is requesting a waiver of 170 IAC 4-1-16(f) ("Rule").

13 **Q: What does the Rule require?**

14 A: The Rule states:

15 (f) Immediately preceding the actual disconnection of service, the
16 employee of the utility designated to perform such function
17 shall:

18 (1) make a reasonable attempt to identify himself or herself to
19 the customer or any other responsible person then upon the
20 premises;

21 (2) announce the purpose of his or her presence;

22 (3) make a record thereof to be maintained for at least thirty (30)
23 days;

24 (4) have in his or her possession information sufficient to enable
25 him or her to inform the customer or other responsible
26 person the reason for disconnection, including the amount of
27 any delinquent bill of the customer; and

28 (5) request the customer for any available verification that the
29 outstanding bill has been satisfied or is currently in dispute
30 pursuant to review.

31 Upon the presentation of such credible evidence, service shall not
32 be disconnected. The employee shall not be required to accept
33 payment from the customer, user, or other responsible person in
34 order to prevent the service from being disconnected. The utility
35 shall notify its customers under section 18 of this rule of its policy
36 with regard to the acceptance or nonacceptance of payment from

1 such employee and shall uniformly follow such policy without
2 discrimination. When the employee has disconnected the service,
3 the employee shall give to a responsible person at the user's premises
4 or, if no one is at home, shall leave at a conspicuous place on the
5 premises, a notice stating that service has been disconnected and
6 stating the address and telephone number of the utility where the
7 user may arrange to have service reconnected.

III. THE IURC'S PREVIOUS REMOTE DISCONNECT/RECONNECT ORDERS

8 **Q: Should the Commission consider AES Indiana's reference regarding the**
9 **remote disconnect/reconnect provisions it approved for Indiana Michigan**
10 **Power ("I&M")?¹**

11 **A:** No. The Commission's order in Cause No. 45576 approved a settlement agreement
12 among the OUCC, I&M, and additional parties. As is standard, the approved
13 settlement agreement includes an important provision declaring its terms to be non-
14 precedential, due to the compromises made by all signatory parties. Therefore, the
15 order is not relevant to this docket and should not be considered as Petitioner
16 requests.

17 **Q: Do IURC orders regularly include language declaring settlement agreements**
18 **to be non-precedential?**

19 **A:** Yes. The Commission's final order in Cause No. 45576 is no exception as it
20 includes the following language:

21 Consistent with the terms of the Settlement Agreement, the
22 Settlement Agreement is not to be used as precedent in any other
23 proceeding or for any other purpose except to the extent necessary
24 to implement or enforce its terms; consequently, with regard to
25 future citation of the Settlement Agreement or of this Order, the
26 Commission finds our approval herein should be construed in a
27 manner consistent with our finding in Richmond Power & Light,

¹ Direct Testimony of Austin Baker, p. 15, lines 20-23.

1 Cause No. 40434, 1997 WL 34880849 at 7-8 (IURC March 19,
2 1997).²

3 Therefore, it is inappropriate for a party in any Commission case to refer to
4 an approved settlement agreement for purposes of establishing precedent.

5 This Cause is no exception.

6 **Q: AES Indiana also mentions Duke Energy Indiana's remote**
7 **disconnect/reconnect request in Cause No. 45253.³ Did the OUCC take a**
8 **position in that case?**

9 A: No, and the OUCC's neutrality in a separate, previous docket should not be
10 interpreted as tacit approval in future dockets with different utilities, such as this
11 one.

12 In Cause No. 45253, OUCC witness Lauren Aguilar was specifically responsible
13 for covering issues addressed in DEI witness Lesley Quick's testimony,⁴ including
14 remote disconnection. Ms. Aguilar's testimony included the following language
15 preserving the OUCC's right to address this issue at a later date and specifically
16 declaring silence on any issue to *not* be an indication of tacit approval:

17 **Q: To the extent you do not address a specific item or**
18 **adjustment, does this mean you agree with those portions of**
19 **Petitioner's proposal?**

20 A: No. Excluding any specific adjustments or amounts DEI
21 proposes does not indicate my approval of those adjustments or
22 amounts. Rather, the scope of my testimony is limited to the specific
23 items addressed herein.⁵

24
25 The OUCC should not be held to one position throughout all time regarding issues
26 brought before the Commission. No party should. To do so would be extremely

² Cause No. 45576, Final Order, p. 43 (Feb. 23, 2022).

³ Baker Direct, p. 15, lines 19-20.

⁴ Cause No. 45253, Direct Testimony of Lesley Quick (July 2, 2019).

⁵ Cause No. 45253, Direct Testimony (Revised) of Lauren Aguilar, p. 2, lines 5-9 (Oct. 30, 2019).

1 prejudicial. Circumstances change as time progresses and as one gains more
2 knowledge. There may be times when testimony explaining the change in position
3 is expected and appropriate; however, not when that position is a part of a non-
4 precedential settlement.

IV. AES INDIANA'S PROPOSED REMOTE DISCONNECT/RECONNECT PROGRAM

5 **Q: Why is Petitioner requesting a waiver of the Rule?**

6 A: AES Indiana states "Over 99% (actually all but one customer) of residential
7 customers have an AMI meter. The AMI Opt-out program, which has 225
8 participants as of September 21, 2023, utilizes non-communicating AMI meters."⁶
9 Additionally, "With an internal switch that can be controlled over the
10 communications system, the AMI meters allow for efficiencies in the
11 disconnection/reconnection process, reduce the operating costs related to the
12 disconnect/reconnect process, and improve safety to customers and AES Indiana
13 field workers."⁷

14 **Q: If the Commission grants AES Indiana a waiver of the Rule, what does that**
15 **mean to AES Indiana's customers who are remotely disconnected?**

16 A: A waiver of the Rule will allow Petitioner, with a few exceptions explained below,
17 to remotely disconnect eligible customers for non-payment without a visit to the
18 customer's premises immediately preceding the disconnection.

⁶ Attachment AMP-1, AES Indiana Response to OUCC DR 19-5 (b).

⁷ Baker Direct, p. 9, lines 12-15.

1 **Q: Will certain customers continue receiving an in-person visit prior to**
2 **disconnection?**

3 A: Yes. If a residential customer is on the Medical Alert Program, participating in the
4 AMI Opt-Out Program, or does not have AMI, AES Indiana will make a premises
5 visit the disconnection day. According to Petitioner's witness Austin J. Baker,
6 "Customers in these categories are flagged in the Company's Customer Information
7 System, which allows the Company to automate the integration of this information
8 into the disconnection process. Likewise, customers that have not provided phone
9 number or email address contact information will still receive on premises visits."⁸

10 **Q: If there will no longer be an on-site visit to the premises prior to performing a**
11 **final disconnection, what process does Petitioner propose using?**

12 A: AES Indiana, under its remote disconnect/reconnect proposal, "will utilize phone
13 calls, text, or email messages to communicate final disconnect notices to residential
14 customers instead of an in person on-premises visit."⁹ In response to OUCC DR
15 19-6,¹⁰ the Company indicated it has auto dial capabilities; therefore, AES Indiana
16 should use this resource to communicate to customers' mobile phones *and* land
17 lines.

18 **Q: Does the OUCC have concerns with AES Indiana's request?**

19 A: Yes. There will be no in-person visit to the premises under AES Indiana's proposal
20 and, according to Mr. Baker, "AES Indiana's business practice is to collect and
21 maintain contact information for its customers including phone numbers and email
22 addresses, which are provided voluntarily by customers."¹¹ At the IURC's Storm

⁸ Baker Direct, p. 14, lines 10-14.

⁹ Baker Direct, p. 10, lines 3-5.

¹⁰ Attachment AMP-1, AES Indiana Response to OUCC DR 19-6.

¹¹ Baker Direct, p. 11, lines 5-7.

1 Response Technical Conference held on October 2, 2023, AES Indiana's Chief
2 Customer Officer, Brandi Davis-Handy, indicated the Company has 270,000 e-mail
3 addresses and 51,000 mobile numbers for its customers, through which it can
4 provide them with notifications. Given AES Indiana forecasted in its 2022 IRP that
5 it will have 421,275 residential customers in 2024,¹² the Company will not have
6 nearly enough contacts to justify implementing remote disconnect/reconnect. Also,
7 it is unknown whether AES Indiana's current customer contact information is
8 outdated and how many of the e-mail addresses and phone numbers in its database
9 are correct. Therefore, the OUCC is concerned some customers may not receive
10 sufficient notice of an impending disconnection – especially given the contact
11 numbers previously discussed. This can be rectified through the recommendations
12 I discuss below.

13 **Q: Can you provide some examples of reasons AES Indiana may not have**
14 **updated customer contact information or reasons customers may not have the**
15 **capability to receive e-mail or text messages?**

16 A: Yes. If an individual has been a long-term AES Indiana customer, there is a strong
17 probability that customer used a land line telephone at the time the customer signed
18 up for service and did not yet have a mobile phone. Since that time, many
19 individuals have abandoned their land lines in exchange for mobile phones and may
20 not have thought to update their contact information with AES Indiana.
21 Additionally, some customers may be technology-challenged and not have a mobile
22 phone or computer, let alone an e-mail account. The relatively low number of AES

¹² Attachment AMP-3, AES Indiana 2022 Integrated Resource Plan, Volume 1, p. 41, Figure 5-7.

1 Indiana customer phones that can receive text messages, as discussed at the
2 Commission's Technical Conference, underscores this concern.

3 **Q: You discussed issues you have with AES Indiana's proposed notification. Does**
4 **the proposal include any potential customer benefits?**

5 A: Yes. Although the OUCG is concerned about customer notification prior to
6 disconnecting service, AES Indiana is proposing to decrease the reconnection fee
7 from a proposed \$28.00 to \$8.00,¹³ which will make getting reconnected more
8 affordable for customers.

V. **THE OUCG'S RECOMMENDED REMOTE DISCONNECT/RECONNECT**
CHANGES

9 **Q: Please explain the OUCG's recommended changes to AES Indiana's proposal.**

10 A: Petitioner "proposes to begin notifying customers of the approved remote
11 disconnect/reconnect program no fewer than 30 days in advance of the
12 implementation if the rule waiver referenced in the request is granted."¹⁴ Given
13 AES Indiana collects customers' e-mail addresses and mobile phone numbers,
14 which customers provide on a voluntary basis, the OUCG recommends Petitioner
15 begin a campaign to collect this information at least three months before it
16 implements the remote disconnect/reconnect program, and then continue each
17 month until the program is implemented. This will provide a better opportunity for
18 customers to notice the changing procedure. It will also provide a greater window
19 for customers to provide missing information or update outdated contact
20 information as needed. If, at the end of the three months, AES has not collected

¹³ Baker Direct, Attachment AJB-2, 26.5(b).

¹⁴ Attachment AMP-1, AES Indiana Response to OUCG DR 19-1(a).

1 current information on at least 80% of its customers, it should not be authorized to
2 move forward with the requested waiver until that saturation is achieved.

3 **Q: Does the OUCC have proposed language for communicating these changes to**
4 **customers?**

5 A: Yes. The OUCC proposes AES Indiana use the following language:

6 AES Indiana is implementing remote disconnection/reconnection
7 procedures on mm/dd/year. On mm/dd/year, the Indiana Utility
8 Regulatory Commission approved AES Indiana's request for a
9 waiver of 170 IAC 4-1-16(f). **This means AES Indiana is no**
10 **longer required to visit customers' premises prior to performing**
11 **a disconnection.**

12 **AES Indiana will be notifying customers of an upcoming**
13 **disconnection by text and e-mail.** Therefore, it is important that
14 AES Indiana have your updated contact information. Please update
15 your contact information by accessing "My Profile" under "Account
16 Summary" on AES Indiana's website as soon as possible. This will
17 ensure you do not miss important notifications. If you do not have
18 internet access and need to update your information, please call AES
19 Indiana's residential customer service line at (317) 261-8222 to do
20 so.

21 **Q: Did AES Indiana include a draft notice it will send its customers prior to**
22 **implementing remote disconnect/reconnect in its case-in-chief or in response**
23 **to OUCC DR 19-1(c)?**

24 A: No. Therefore, it should not be difficult for Petitioner to incorporate the OUCC's
25 language provided above.

26 **Q: Did AES Indiana indicate in its case-in-chief how it will communicate to**
27 **customers that the Commission approved its request for waiver of the Rule?**

28 A: No. However, in response to OUCC DR 19-1(b)¹⁵, Petitioner stated "The Company
29 plans to utilize a bill insert" to notify customers of the approved remote
30 disconnect/reconnect Program, which is simply not enough notification given the

¹⁵ Attachment AMP-1, AES Indiana response to OUCC DR 19-1(b).

1 magnitude of this change. The above language should be used in conjunction with
2 all the following notification methods:

3 1. **AES Indiana Website:** The information above should be included on AES
4 Indiana's website in at least two places: 1) If Petitioner's software system
5 allows, a promotional popup/notification should be used once a customer logs
6 onto Petitioner's home web page; 2) This information should be displayed as
7 either a promotional popup/notification or a banner on the customer's "Account
8 Summary" page.

9 2. **Bill Insert:** The previously mentioned language should be included on a bill
10 insert.

11 3. **On Bill:** An alert to read the bill insert or go to AES Indiana's website should
12 be included, in red font if possible, within the "Message Center" portion of the
13 bill.

14 4. **Auto Dial:** AES Indiana, in response to DR 19-6, should use auto dial
15 capabilities it indicates it has to notify customers of the upcoming change.

16 5. **Texts:** Texts should be used to communicate the new procedures to customers
17 for whom AES Indiana has mobile phone numbers.

18 6. **E-mail:** For customers whose e-mail addresses are on file with Petitioner, a
19 notification of the changes and the proposed language above should be included
20 within the e-mail.

VI. AES INDIANA'S NEW BILL FORMAT

1 **Q: Will Petitioner have a new bill format after implementing its AES Indiana**
2 **Customer Ecosystem Project?**

3 A: Yes. According to Petitioner's witness Vanessa Barbarisi, "Additional changes
4 include bill layout changes to make the bills easier to read and customer service
5 representatives will be able to address inquiries more efficiently, resulting in an
6 improved customer experience."¹⁶

7 **Q: Did AES Indiana provide a sample of the new residential bill showing what**
8 **information will be included and how it will be displayed in its case-in-chief?**

9 A: No. Therefore, the OUCC asked Petitioner, in OUCC DR 1-11 (Attachment AMP-
10 1), for a copy of the new bill layout Ms. Barbarisi discusses on p. 14, line 18.

11 **Q: Did Petitioner provide a copy of the new residential bill layout in response to**
12 **OUCC DR1-11?**

13 A: No, the bill did not appear to be in a new layout or significantly different from the
14 current format.

15 **Q: Please elaborate.**

16 A: In response to OUCC DR 1-11, AES Indiana provided two Attachments –
17 Attachment 1 is a residential bill and Attachment 2 is a non-residential bill. I was
18 able to obtain a recent bill from an AES Indiana residential customer¹⁷ and, upon
19 comparison, the residential bill AES Indiana provided in response to DR 1-11
20 appears to be the same format as the bill I obtained from an AES Indiana customer.
21 Attachment AMP-2 is for a February 2023 bill due in March 2023 and the bill I
22 obtained independently is for a June 2023 bill due in July 2023. Therefore, the

¹⁶ Direct Testimony of Vanessa Barbarisi, p. 14, lines 18-20.

¹⁷ Attachment AMP-2, AES Indiana response to OUCC DR1-11.

1 OUCC asked, for clarification. In response, AES Indiana supplemented its answer
2 to OUCC DR 1-11 and indicated:

3 The changes for AES Indiana are minimal for the vast majority of
4 customers – the most noticeable difference is the use of two decimal
5 places in the meter reading detail and the use of a 12-digit account
6 number where the legacy account IDs from AES Indiana's legacy
7 system are typically 6 or 7 digits.

8 The more substantial changes are around customers utilizing net
9 metering/excess distributed generation (riders 9 and 16) and rate
10 CGS (cogeneration). This is a smaller number of customers but the
11 bill will reflect the generation channels of the meter in a more
12 customer-friendly way so they can keep better track of their
13 generation. Below are some examples of how Rider 9 and 16 will be
14 displayed on the billing statements (See Attachment AMP-1, AES
15 Indiana Supplemental Response to OUCC DR 1-11 for these
16 examples).

17
18 Again, the bills provided do not appear to be in the new format, as the account
19 number located in Figures 1-3 have 10-digit numbers, rather than the new 12-digit
20 numbers AES Indiana indicates the new bills will have, and Figures 1-3 are only
21 snapshots of a portion of the bill.

22 **Q: Why is obtaining a copy of the template for the planned new format**
23 **important?**

24 A: It is important for the Commission and the OUCC to have an opportunity to review
25 the proposed bill format prior to it being implemented to ensure the bill contains
26 necessary information and is not confusing to the customer.

27 **Q: What do you recommend?**

28 A: I recommend AES Indiana provide the Commission and the OUCC a copy of the
29 proposed bill format at least 60 days prior to the date it plans to implement the
30 changes. This will allow the agencies an opportunity to review and provide
31 comments, where necessary. AES Indiana should inform the IURC and OUCC if

1 this process should begin more than 60 days to incorporate changes, based the
2 agencies' comments.

VII. RECOMMENDATIONS

3 **Q: What action does the OUCC recommend the Commission take regarding**
4 **issues in your testimony?**

5 A: The OUCC recommends the Commission:

- 6 1. Modify AES Indiana's proposed remote connect/disconnect program based on
7 the OUCC's recommended changes described above; and
8 2. Require AES Indiana to provide a copy of its proposed new bill format to the
9 IURC and OUCC, as described above, so they may review and have an
10 opportunity to provide feedback.

11 **Q: Does this conclude your testimony?**

12 A: Yes, it does.

**APPENDIX AMP-1 TO TESTIMONY OF
OUCC WITNESS APRIL M. PARONISH**

1 **Q: Please describe the examination and analysis you conducted to prepare your**
2 **testimony and formulate your opinion in this Cause.**

3 A: I reviewed testimony and certain attachments pertaining to my testimony AES
4 Indiana filed in this Cause. I met internally with OUCC staff to discuss issues. I
5 read portions of the IURC's Final Orders in DEI Cause No. 45159 and in I&M
6 Cause No. 45576. I also issued data requests and read Petitioner's responses.

7 **Q: Please summarize your educational background and work experience.**

8 A: I graduated *summa cum laude* from Franklin University in Columbus, Ohio in 1992,
9 with a Bachelor of Science degree, double majoring in both Business Management
10 and Marketing. I also received a Master of Science degree in Marketing and
11 Communications from Franklin University in 2002. I have been employed at the
12 OUCC since April 2007, initially as a Utility Analyst II and subsequently was
13 promoted to Senior Utility Analyst and then to my current Assistant Director position.
14 I have attended several in-house, industry-sponsored, and regulatory educational
15 programs since joining the OUCC.

1 I represent the OUCC on AES Indiana, I&M, DEI, CenterPoint, and NIPSCO
2 Electric DSM Oversight Boards. I previously represented the OUCC on NIPSCO,
3 Vectren, Citizens Gas and Westfield Gas Oversight Boards. I also previously
4 facilitated the Gas Utility Joint Oversight Board. My work on these Oversight Boards
5 includes, but is not limited to, reviewing program progress and budgets (including
6 voting to make changes to programs and/or budgets); developing RFPs; reviewing
7 vendor bids; drafting program-specific questions regarding costs, estimated savings,
8 program implementation, and other related matters. I previously served on the
9 statewide Demand Side Management Coordination Committee (“DSMCC”) and its
10 Third-Party Administrator (“TPA”) Subcommittee and Evaluation, Measurement and
11 Verification (“EM&V”) Subcommittee. I also lead the OUCC team responsible for
12 attending utilities’ Integrated Resource Plan (“IRP”) stakeholder meetings, reviewing
13 IRPs, and submitting comments. Finally, I lead several OUCC case teams in matters
14 such as DSM, rate cases, Transmission Distribution Storage System Improvement
15 Charge (“TDSIC”), and coal combustion residuals to name a few.

16 Prior to joining the OUCC I held various positions at American Electric Power
17 Service Corporation, 3X Corporation, Alliance RTO, and the Midwest ISO.

Data Request OUCC DR 1 - 11

Refer to the direct testimony of Vanessa Barbarisi, p. 14, line 18. Please provide a copy of the new bill layout discussed.

Objection:

Response:

See OUCC DR 1-11 Attachments 1 and 2 for an example of the residential and non-residential bill layouts.

INDIANAPOLIS IN 46229

Monthly Account Summary Billing Date: 02/11/2023

Previous Balance	\$36.74
Metered Electric and Other Services	145.69
State Tax	10.20
Total Account Balance	\$192.63

Total Number of Services	1
Total Services Billed	1

Message Center

Metered Electric and Other Services

Service Address: [REDACTED]
Service ID: [REDACTED] Next Reading Date: 03/10/2023 Rate: RH - Residential-Electric Water Heating
Service Name: [REDACTED]

Historical Usage

Period Last Year	
Previous Period	224
Current Period	948.31

kWh Consumption

Billing Period	Average Daily kWh	Temperature Avg High	Temperature Avg Low
Period Last Year			
Previous Period	32	43°	30°
Current Period	33.9	26°	18°

Current Period Average Daily Cost \$5.57

Meter Reading Detail

Meter Number	Meter Use	Billing Period		Billing Days	Meter Reading			Multiplier	Usage
		From	To		Previous	Current	Difference		
[REDACTED]	P	01/12/23	02/09/23	29	05712.00	06660.31	00948.31	1	948.31

Service Charges Summary

Customer Charge	16.75
Metered Electric Charge	128.94
State Tax	10.20
Subtotal	155.89



Emergency "Lights Out" (24/7/365)
317-261-8111



Online Anytime
aesindiana.com



Customer Service
Residential 317-261-8222
Business 317-261-8444

See reverse side for Customer Service hours & telephone numbers, payment options, and electric rate definitions

Please detach and return only this portion with your check made payable to AES Indiana.

IB_Bills_20230210_IIP01_203448.txt-9-000020167

000005 000020167 **



P.O. Box 110

Indianapolis, IN 46206-0110



Contact Information

Website	aesindiana.com
Customer Service (8:00 AM to 5:00 PM M-F, Closed weekends)	
Residential	317-261-8222
Business	317-261-8444
Toll Free	888-261-8222
Indiana 811/Call Before You Dig	811
or Online at	811NOW.com
Lights Out Day or Night (available 24/7)	317-261-8111

Payment Options

Online Including	Visit aesindiana.com
AES Indiana's Pay Now Option	
Express Check by Phone	317-261-8222
Credit or Debit Card	800-672-2407
Bill Payment Kiosks – Available 24/7	2102 N. Illinois Street Indianapolis, IN, 46202-1330
Other Pay Agent Locations	Visit aesindiana.com

Electronic Check Re-Presentation Policy

In the event that your check is returned unpaid for insufficient or uncollected funds, we may re-present your check electronically (Re-presented Check Entry, or "RCK"). If the electronic attempt similarly fails, we may attempt to collect your check electronically one additional time. Any NSF fee that accrues from the original check will be assessed separately and added to your monthly bill. In the ordinary course of business, your check will not be returned to you with your bank statement, but a copy can be retrieved by contacting your financial institution.

Your Rights & Responsibilities

A Welcome Booklet with rights and responsibilities as an electric service customer with AES Indiana has been furnished to our customers.

Rate Code Explanations

RS	Residential service for a single family dwelling
RT/W	Same as RS qualifications but for a multi-family dwelling
RC	Residential service for a single family dwelling with electric water heating
RD/G	Same as RC qualifications but for a multi-family dwelling
RH	Residential service for a single family dwelling with electric heat
RI/L	Same as RH qualifications but for a multi-family dwelling
CR	Controlled residential electric water heating only for a single family dwelling
SS	Secondary service small (General Service)
SE	Secondary service with electric heat for educational institutions (Schools) only
SH	Secondary service for electric heat (May have electric water heating and electric air conditioning combined with electric heat)
CB	Controlled electric water heating only (Not qualified for residential electric water heating rate)
UW	Uncontrolled electric water heating only (Not qualified for residential electric water heating rate)

For Large Commercial & Industrial rate information, please visit aesindiana.com. If you have questions concerning your rate classification, please call 317-261-8222

Meter Use Explanations

P	Permanent Meter	R	RkVah Meter
D	Demand Meter	T	Temporary Meter

VISIT OUR NEW BILL PAYMENT KIOSKS



▶ Scan QR code at our payment kiosks located at **2102 N. Illinois Street** and pay by credit card, debit card, cash, or check.

Exterior kiosks are available 24 hours a day, 7 days a week.

Payments post to your AES Indiana account immediately.

For more information, customers can contact AES Indiana Customer Service at 317-261-8222.



INDIANAPOLIS IN 46201

Monthly Account Summary Billing Date: 02/11/2023

Previous Balance	\$196.37
Metered Electric and Other Services	165.84
State Tax	11.61

Total Account Balance \$373.82

Total Number of Services	1
Total Services Billed	1

Message Center

Metered Electric and Other Services

Service Address: [REDACTED]
Service ID: [REDACTED] Next Reading Date: 03/10/2023 Rate: SS - Secondary Service-Small
Service Name: [REDACTED]

Meter Reading Detail

Meter Number	Meter Use	Billing Period		Billing Days	Meter Reading			Multiplier	Usage
		From	To		Previous	Current	Difference		
[REDACTED]	P	01/12/23	02/10/23	30	00876.00	00897.93	00021.93	40	877.35

Service Charges Summary

Customer Charge	39.40
Metered Electric Charge	126.44
State Tax	11.61
Subtotal	177.45



Emergency "Lights Out" (24/7/365)
317-261-8111



Online Anytime
aesindiana.com



Customer Service
Residential 317-261-8222
Business 317-261-8444

See reverse side for Customer Service hours & telephone numbers, payment options, and electric rate definitions

Please detach and return only this portion with your check made payable to AES Indiana.

IB_Bills_20230210_IIP01_203448.txt-1549-000019797

000775 000019797



INDIANAPOLIS IN 46201-1502



P.O. Box 110
Indianapolis, IN 46206-0110



Contact Information

Website	aesindiana.com
Customer Service (8:00 AM to 5:00 PM M-F, Closed weekends)	
Residential	317-261-8222
Business	317-261-8444
Toll Free	888-261-8222
Indiana 811/Call Before You Dig	811
or Online at	811NOW.com
Lights Out Day or Night (available 24/7)	317-261-8111

Payment Options

Online Including	Visit aesindiana.com
AES Indiana's Pay Now Option	
Express Check by Phone	317-261-8222
Credit or Debit Card	800-672-2407
Bill Payment Kiosks – Available 24/7	2102 N. Illinois Street Indianapolis, IN, 46202-1330
Other Pay Agent Locations	Visit aesindiana.com

Electronic Check Re-Presentation Policy

In the event that your check is returned unpaid for insufficient or uncollected funds, we may re-present your check electronically (Re-presented Check Entry, or "RCK"). If the electronic attempt similarly fails, we may attempt to collect your check electronically one additional time. Any NSF fee that accrues from the original check will be assessed separately and added to your monthly bill. In the ordinary course of business, your check will not be returned to you with your bank statement, but a copy can be retrieved by contacting your financial institution.

Your Rights & Responsibilities

A Welcome Booklet with rights and responsibilities as an electric service customer with AES Indiana has been furnished to our customers.

Rate Code Explanations

RS	Residential service for a single family dwelling
RT/W	Same as RS qualifications but for a multi-family dwelling
RC	Residential service for a single family dwelling with electric water heating
RD/G	Same as RC qualifications but for a multi-family dwelling
RH	Residential service for a single family dwelling with electric heat
RI/L	Same as RH qualifications but for a multi-family dwelling
CR	Controlled residential electric water heating only for a single family dwelling
SS	Secondary service small (General Service)
SE	Secondary service with electric heat for educational institutions (Schools) only
SH	Secondary service for electric heat (May have electric water heating and electric air conditioning combined with electric heat)
CB	Controlled electric water heating only (Not qualified for residential electric water heating rate)
UW	Uncontrolled electric water heating only (Not qualified for residential electric water heating rate)

For Large Commercial & Industrial rate information, please visit aesindiana.com. If you have questions concerning your rate classification, please call 317-261-8222

Meter Use Explanations

P	Permanent Meter	R	RkVah Meter
D	Demand Meter	T	Temporary Meter

VISIT OUR NEW BILL PAYMENT KIOSKS



▶ Scan QR code at our payment kiosks located at **2102 N. Illinois Street** and pay by credit card, debit card, cash, or check.

Exterior kiosks are available 24 hours a day, 7 days a week.

Payments post to your AES Indiana account immediately.

For more information, customers can contact AES Indiana Customer Service at 317-261-8222.



Data Request OUCC DR 1 - 11

Refer to the direct testimony of Vanessa Barbarisi, p. 14, line 18. Please provide a copy of the new bill layout discussed.

Objection:

Response:

See OUCC DR 1-11 Attachments 1 and 2 for an example of the residential and non-residential bill layouts.

Supplemental Response:

The changes for AES Indiana are minimal for the vast majority of customers – the most noticeable difference is the use of two decimal places in the meter reading detail and the use of a 12-digit account number where the legacy account IDs from AES Indiana’s legacy system are typically 6 or 7 digits.

The more substantial changes are around customers utilizing net metering/excess distributed generation (riders 9 and 16) and rate CGS (cogeneration). This is a smaller number of customers but the bill will reflect the generation channels of the meter in a more customer-friendly way so they can keep better track of their generation. Below are some examples of how Rider 9 and 16 will be displayed on the billing statements.

Examples of Rider 9:

In the meter reading detail section, the meter use codes represent the following:

- C – Any surplus generation carried over from the previous month billing – will only be displayed if applicable
- P – (primary) kWh consumption/delivered
- G – Generated kWh/received
- N – Net difference of delivered-received
 - Note – if net is negative, it will only be taken to zero
- S – Surplus generation that will be carried over to the next month’s billing – will only be displayed if applicable

Figure 1 is an example with surplus generation for the current bill period.

AES Indiana Second Supplemental Responses to OUCC DR Set 1

Figure 1

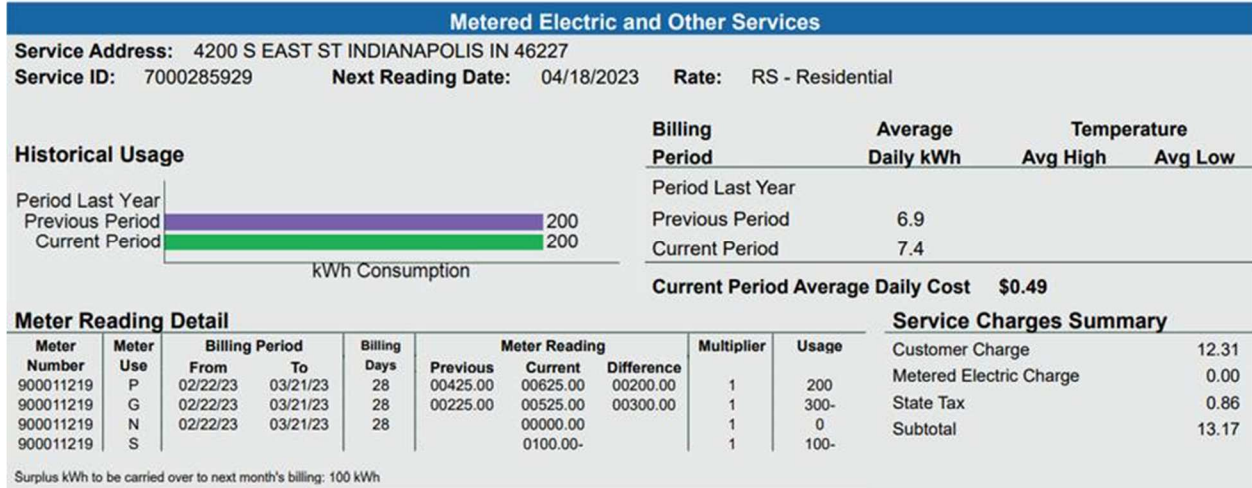
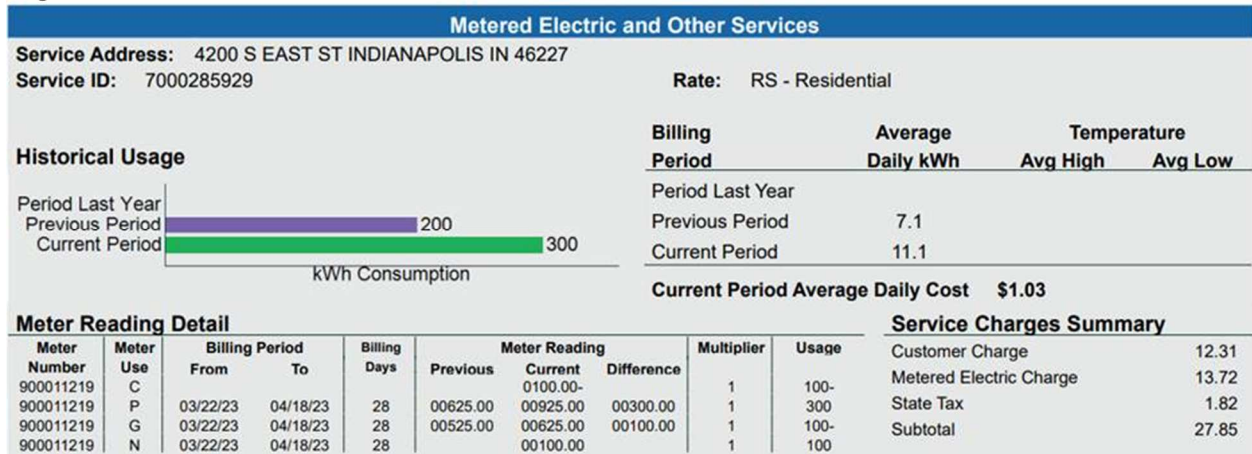


Figure 2 is an example with surplus generation being carried over from prior month.

Figure 2



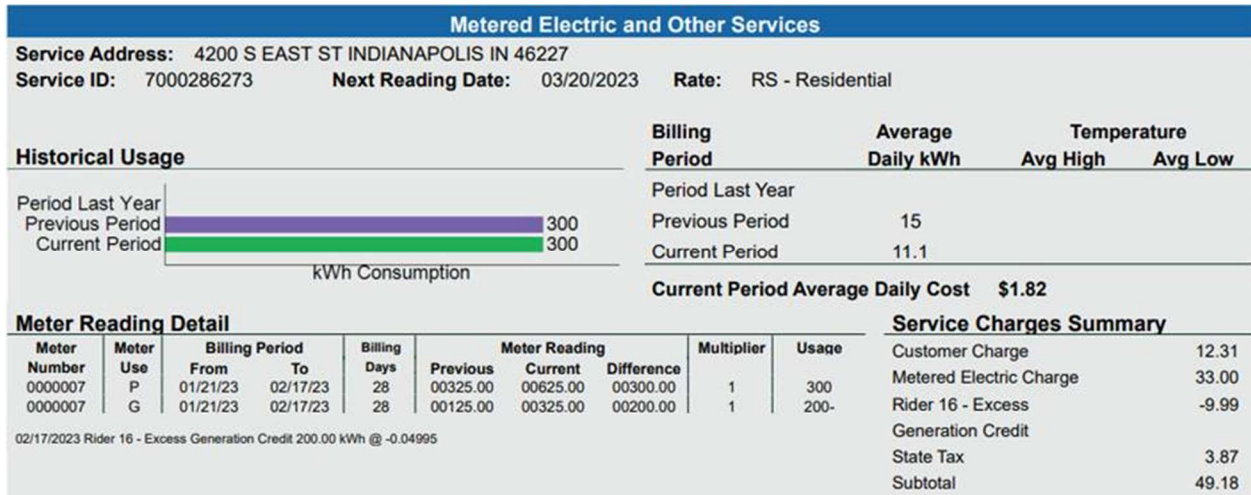
Example of Rider 16:

In the meter reading detail section, the meter use codes represent the following:

- P – (primary) kWh consumption/delivered
- G – Generated kWh/received

Figure 3 is an example of the Rider 16 bill format.

Figure 3



Data Request OUCC DR 19 - 1

Please reference Mr. Baker's direct testimony, p. 15, line 26 to p. 16, line 6. AES Indiana indicates it will notify its customers of the waiver of 170 IAC 4-1-16(f).

- a. Please indicate how far in advance of implementing the rule AES Indiana will notify its customers.
- b. What method(s) will be used to notify customers.
- c. Please provide the copy of the notice AES Indiana will use when it notifies customers the Commission approved the waiver.

Objection:

AES Indiana objects to the Request on the grounds and to the extent the request seeks a compilation, analysis or study that AES Indiana has not performed and to which AES Indiana objects to performing. Subject to and without waiver of the foregoing objections, AES Indiana provides the following response.

Response:

- a) AES Indiana proposes to begin notifying its customers of the approved remote disconnect/reconnect program no fewer than 30 days in advance of implementation if the rule waiver referenced in the request is granted.
- b) The Company plans to utilize a bill insert.
- c) The Company does not yet have a notice drafted since the program is still pending approval in this case.

Data Request OUCC DR 19 - 2

AES Indiana indicates it is reducing its reconnection fees for customers who are eligible for remote disconnection/reconnection from \$28.00 to \$8.00. Will AES Indiana realize any additional cost savings if the Commission approves its request for waiver of 170 IAC 4-1-16(f).

Objection:

AES Indiana objects to the Request on the grounds and to the extent it mischaracterizes the proposed reconnection fee. AES Indiana objects to the Request on the grounds and to the extent it is vague and ambiguous, particularly with respect to the phrase “additional cost savings”. Subject to and without waiver of the foregoing objections, AES Indiana provides the following response.

Response:

To clarify the mischaracterization of the request, the referenced \$28.00 is the proposed disconnection fee if the service is disconnected at the meter. The Company proposes a charge of eight dollars (\$8.00) if the service is remotely disconnected. The proposed minimum reconnection fee is \$51.00. For customers eligible for remote reconnection, a charge of eight dollars (\$8.00) will be made by the Company to cover the cost of reconnection of the service.

No, we have not identified additional cost savings not represented by the reduction in disconnection/reconnection fees. The costs of these disconnections/reconnections are charged directly to the customers who cause these costs. Identified cost savings generated by the proposed remote disconnect/reconnect program are represented by the reduction in disconnection/reconnection fees, from \$28.00 to \$8.00 for the disconnection fee, and \$51.00 to \$8.00 for the reconnection fee. Line 12 of AES Indiana Financial Exhibit AESI-OPER, Schedule REV-10 identifies the proposed adjustment in total other electric revenues. Schedule REV10-WP1 details how that adjustment was calculated.

Data Request OUCC DR 19 - 3

Please refer to Mr. Baker's direct testimony, Attachment ABJ-1, p. 153 of 160, Sec. 26.5.

- a. Why would a trip to the customer's premises be necessary if the service is remotely disconnected? Please provide examples.
- b. Please explain the rationale for an \$8.00 charge (and not \$28.00) when a trip to the customer's premises is necessary for an unpaid bill, but the disconnection is performed remotely.

Objection:

Response:

- a) The referenced tariff states that: "A charge of eight dollars (\$8.00) will be made if the service is remotely disconnected". This language was intended to reflect what the charge would be if a trip was not necessary. AES Indiana recognizes the potential for confusion stemming from the inclusion of this language under the heading that refers only to trips to premises. AES Indiana will file a revision to the proposed tariff to reflect the intended language. A trip to the customer's premises would only be necessary if the service is unable to be remotely disconnected. An example of this would be if the customer is a participant of the AMI Opt-out program, thus requiring a truck-roll to disconnect the service. This opt-out program was approved in Cause No. 45264 S1.
- b) See clarification in subpart a) above. In the proposed remote disconnect/reconnect program, if the customer is eligible for a remote disconnection a trip to the customer's premises would not be performed and they would be charged the \$8.00 disconnect fee. If a trip to the customer's premises is necessary to disconnect service at the meter, the customer would be charged the \$28.00 disconnect fee.

Data Request OUCC DR 19 - 4

Please provide AES Indiana's internal process/procedure for disconnection showing the disconnection process from the point of providing final notice to the customer through the disconnection using an internal switch that can be controlled over the communication system. Please include departments responsible for each step.

Objection:

Response:

In a typical case on the day of scheduled disconnection, a final disconnection notice is communicated to customers via phone call or their requested means of communication at 8AM. This communication is performed by the Customer Service department. Following that notification, field technicians from the Metering Service department are then sent into the field to perform the disconnections scheduled for that day. The field technicians use a mobile device that instructs them which service is scheduled for disconnection next.

The Metering Service field technicians go from service to service to complete disconnection jobs as informed on their mobile devices. When a technician updates a job status to "enroute" on the mobile device the request is issued to collect a final meter reading before disconnection. If the meter reading is successful, the job is updated on their mobile device indicating the electricity will be shut off. When the field technician arrives at the premises to conduct the on-premises visit, they update the job status to "arrived", which opens the meter disconnect switch, disconnecting electricity to the service. Following the opening of the meter disconnect switch, the field technician hangs the leaflet on the door handle at the premise marking the box "Disconnected".

Data Request OUCC DR 19 - 5

Please refer to Mr. Baker's direct testimony, p. 9, lines 8-10. Please indicate:

- a. Whether the AES Indiana completed its AMI rollout by the end of July 2023.
- b. Please indicate updated percentage of residential customers with AMI meters.

Objection:

Response:

- a) Yes, the rollout of AMI meters was completed by the end of July 2023.
- b) Over 99% (actually all but one customer) of residential customers have an AMI meter. The AMI Opt-out program, which has 225 participants as of September 21, 2023, utilizes non-communicating AMI meters.

Data Request OUCC DR 19 - 6

Does AES Indiana have auto dial capabilities to call customers regarding an impending disconnection?

Objection:

Response:

Yes.

46219-1554

Monthly Account Summary Billing Date: 06/12/2023

Previous Balance	\$72.69
05/22/2023 Payment - Thank You	-72.69
Metered Electric and Other Services	38.58
State Tax	2.70
Total Account Balance	\$41.28

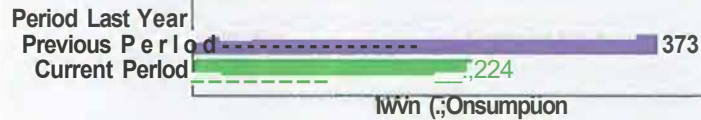
Message Center

Get text alerts and notifications for billing information, outages and more sent right to your phone! Sign into your account, select "Alerts & Notifications" and pick and choose what is sent directly to your phone. Stay up-to-date all the time!

Metered Electric and Other Services

Service Address: ██████████ INDIANAPOLIS N 46219-1554
Service ID: - Next Reading Date: 07/12/23 Rate: RS - ResidenU1 Family

Historical Usage



Billing Period Average Daily kWh **Temperature** Avg High Avg Low

Billing Period	Average Daily kWh	Temperature Avg High	Temperature Avg Low
Period Last Year			
Previous Period	12.9	66°	45°
Current Period	6.8	79°	57°

Current Period Average Daily Cost \$1.25

Meter Reading Detail

Meter Number	Meter Use p	Billing Period From	To	Billing Days	Previous	Current	Difference	Multiplier	Usa1e
		05/10/23	06/12/23	33	56631	66865	00224	1	224

Service Charges Summary

Customer Charge	12.31
Metered Electric Charge	26.27
State Tax	2.70
Subtotal	41.28

A. Emergency "lights Out" (24h/365)
317-261-8111

Online Anytime
aesindiana.com

Customer Service
Residential 317-261-8222
Business 317-261-8444

Please detach and return only this portion with your check made payable to AES Indiana.

IPIP_JPL_06132023.0-33623-00002528

Account Number

Amount to be paid by 07/05/2023	\$41.28
Amount to be paid after 07/05/2023	\$42.65

Amount Enclosed \$ -----

N 46219-1554

P.O. Box 110
Indianapolis, IN 46206-0110

Contact Information

Website	aesindiana.com
Customer Service (8:00 AM to 5:00 PM MF, Closed weekends)	
Residential	317-261-8222
Business	317-261-8444
Toll Free	888-261-8222
Indiana 811/Call Before You Dig	811
or Online at	811 NOW.com
Lights Out Day or Night (available 24/7)	317-261-8111

Cause No. 45911

Rate Attachment AMP-2
Page 2 of 2

Rate Code Explanations

	Residential service for a single family dwelling
RTNV	Same as RS qualifications but for a multi-family dwelling
RC	Residential service for a single family dwelling with electric water heating
RD/G	Same as RC qualifications but for a multi-family dwelling
RH	Residential service for a single family dwelling with electric heat
RHl	Same as RH qualifications but for a multi-family dwelling
CR	Controlled residential electric water heating only for a single family dwelling
SS	Secondary service small (General Service)
SE	Secondary service with electric heat for educational institutions (Schools) only
SH	Secondary service for electric heat (May have electric water heating and electric air conditioning combined with electric heat)
CB	Controlled electric water heating only (Not qualified for residential electric water heating rate)
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Payment Options

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Credit or Debit Card	800-672-2407
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Meter Use Explanations

p	Permanent Meter	R	RkVah Meter
D	Demand Meter	T	Temporary Meter

VISIT OUR NEW BILL PAYMENT KIOSKS



Scan QR code at our payment kiosks located at **2102 N. Illinois Street** and pay by credit card, debit card, cash, or check.

Exterior kiosks are available 24 hours a day, 7 days a week.
Payments post to your AES Indiana account immediately.
For more information, customers can contact AES Indiana Customer Service at 317-261-8222.

Printed by
KUBRAEZ-PAY

The residential sales forecast is generated as the product of the average use and customer forecasts. Total residential sales are calculated by totaling the rate level forecasts. Figure 5-7 below shows the forecasted residential customer, sales, and average use before future DSM, distributed generation, and electric vehicle adjustments.

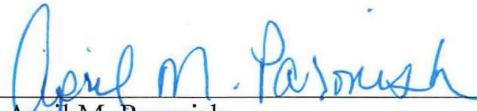
Figure 5-7: Forecasted Residential Customer Sales and Average Use¹⁴

Year	Sales (MWh)	Change	Customers	Change	Average Use (kWh)	Change
2022	5,120,205		415,728		12,316	
2023	5,148,145	0.5%	418,276	0.6%	12,308	-0.1%
2024	5,183,132	0.7%	421,275	0.7%	12,303	0.0%
2025	5,208,018	0.5%	425,237	0.9%	12,247	-0.5%
2026	5,246,104	0.7%	429,000	0.9%	12,229	-0.2%
2027	5,299,299	1.0%	432,885	0.9%	12,242	0.1%
2028	5,360,175	1.1%	437,014	1.0%	12,265	0.2%
2029	5,416,700	1.1%	440,588	0.8%	12,294	0.2%
2030	5,472,660	1.0%	445,760	1.2%	12,277	-0.1%
2031	5,532,095	1.1%	450,367	1.0%	12,284	0.1%
2032	5,592,595	1.1%	453,800	0.8%	12,324	0.3%
2033	5,654,854	1.1%	457,267	0.8%	12,367	0.3%
2034	5,723,758	1.2%	462,142	1.1%	12,385	0.2%
2035	5,792,730	1.2%	466,305	0.9%	12,423	0.3%
2036	5,862,577	1.2%	470,260	0.8%	12,467	0.4%
2037	5,934,492	1.2%	474,157	0.8%	12,516	0.4%
2038	6,006,119	1.2%	478,188	0.9%	12,560	0.4%
2039	6,076,064	1.2%	481,976	0.8%	12,607	0.4%
2040	6,142,240	1.1%	485,759	0.8%	12,645	0.3%
2041	6,210,088	1.1%	489,543	0.8%	12,685	0.3%
2042	6,279,732	1.1%	493,330	0.8%	12,729	0.3%
2022-42		1.0%		0.9%		0.2%

¹⁴ The forecasted sales and average use values do not include future DSM, distributed generation, or electric vehicle adjustments.

AFFIRMATION

I affirm, under the penalties for perjury, that the foregoing representations are true.



April M. Paronish
Electric Division Assistant Director
Indiana Office of Utility Consumer Counselor

Cause No. 45911
AES Indiana

October 12, 2023
Date

CERTIFICATE OF SERVICE

This is to certify that a copy of the *Indiana Office of Utility Consumer Counselor's Testimony of April M. Paronish* has been served upon the following parties of record in the captioned proceeding by electronic service on October 12, 2023.

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T. Joseph Wendt
Jeffrey M. Peabody
Lauren Aguilar
Janet Nichols

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