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INDIANA UTILITY
REGULATORY COMMISSION

VERIFIED REBUTTAL TESTIMONY
OF
JUSTIN G. SUFAN
ON BEHALF OF
INDIANAPOLIS POWER & LIGHT COMPANY

CAUSE NO. 45029

SPONSORING IPL WITNESS JGS ATTACHMENTS 1R THROUGH 3R

**VERIFIED REBUTTAL TESTIMONY OF JUSTIN G. SUFAN
ON BEHALF OF
INDIANAPOLIS POWER & LIGHT COMPANY**

1 **Q1. Please state your name, employer and business address.**

2 A1. My name is Justin G. Sufan. I am employed by Indianapolis Power & Light Company
3 (“IPL” or “Company”), whose business address is One Monument Circle, Indianapolis,
4 Indiana 46204.

5 **Q2. What is your position with IPL?**

6 A2. I am Director, Regulatory & RTO Policy.

7 **Q3. Please briefly describe your duties as Director, Regulatory & RTO Policy.**

8 A3. As Director, Regulatory & RTO Policy, I lead a team responsible for various rate and
9 regulatory filings, including analysis and recommendations related to regulatory and
10 regional transmission organization (“RTO”) matters.

11 **Q4. Please briefly describe your educational and business experience.**

12 A4. I hold a Bachelor of Science Degree from Indiana University-Purdue University
13 Indianapolis and a Master’s Degree in Business Administration from the Kelley School
14 of Business at Indiana University. I have attended various regulated utility courses
15 through the Edison Electric Institute, The Institute of Public Utilities at Michigan State
16 University, and The Center for Public Utilities at New Mexico State University. I have
17 been an IPL employee since 2005, and worked in positions of increasing responsibility
18 before joining the Regulatory Affairs department in 2012, initially as a Project Manager.

1 In 2015, I was named Manager, Regulatory Services. I have been in my current position
2 since March 2018.

3 **Q5. Have you previously testified before the Indiana Utility Regulatory Commission**
4 **(“Commission”) or other regulatory agencies?**

5 A5. No.

6 **Q6. What is the purpose of your rebuttal testimony in this proceeding?**

7 A6. IPL President and CEO Craig Jackson responds generally to the testimony regarding the
8 Field Hearings and other customer comments offered by Kerwin L. Olson, on behalf of
9 Citizens Action Coalition of Indiana (“CAC”), the Indiana Coalition for Human Services
10 (“ICHS”), Indiana Community Action Association (“INCAA”) and Sierra Club (“SC”)
11 (collectively “Joint Intervenors”), and by Anthony F. Swinger on behalf of the Office of
12 Utility Consumer Counselor (“OUCC”). Because of my role within IPL, Mr. Jackson
13 asked me to review our rate design in light of that testimony. I provide additional context
14 regarding the public input.

15 I also believe it is important to respond to Mr. Olson’s concern about smart meters and
16 service disconnection practices, his concern regarding the “opaqueness” of IPL’s monthly
17 bills, his request that the Commission require a comprehensive affordability program
18 (with the details to be developed through a collaborative), and his proposal that the
19 Company’s proposed voluntary bill round-up program embrace an opt-out program
20 design, rather than an opt-in program design. Finally, I respond to Mr. Howat’s
21 recommendation (p. 14), on behalf of Joint Intervenors, that IPL be directed by the

1 Commission to deliver high-usage, low-income customers with enhanced, whole-house
2 energy efficiency programming.

3 **Q7. Are you sponsoring any attachments?**

4 A7. Yes. I am sponsoring:

- 5 • IPL Witness JGS Attachment 1R – OUCC Response to IPL’s Data Request Set 2
- 6 • IPL Witness JGS Attachment 2R – CAC Response to IPL’s Data Request Set 2
- 7 • IPL Witness JGS Attachment 3R – Sierra Club Response to IPL’s Data Request
8 Set 2

9 **Q8. Did you submit any workpapers?**

10 A8. Yes.

11 **Q9. Were the workpapers you are submitting prepared or assembled by you or under
12 your direction or supervision?**

13 A9. Yes.

14 **Customer Comments**

15 **Q10. Did you attend the Field Hearings conducted in this Cause?**

16 A10. Yes, as did others from IPL. Additionally, IPL has presented our rate case proposals at
17 numerous community meetings across the City since filing our last rate case in 2014. I
18 have attended several of these community meetings over the last four years on IPL’s
19 behalf, most recently in May 2018.

1 **Q11. In his rebuttal testimony (Q/A 39), IPL’s President and CEO, Craig Jackson states**
2 **that he was struck by the absence of any mention of the “total bill” impact on**
3 **customers in Mr. Olson’s testimony and in the OUCC’s testimony. Given the**
4 **OUCC’s statutory role as the representative of the public, did IPL ask the OUCC**
5 **about the total bill impact?**

6 A11. Yes, we followed up with the OUCC through discovery by asking whether the OUCC is
7 aware of the total bill impact on customers. We also asked whether the OUCC supports a
8 rate design that shifts costs from low income low usage electric customers to low income
9 high usage electric customers. Finally, we asked whether the OUCC agrees that it is
10 reasonable for the Commission to consider the impact of rate design on low income and
11 middle income high usage electric customers. Copies of the OUCC responses are
12 included with my testimony as IPL Witness JGS Attachment 1R.

13 The OUCC’s responses indicate that the OUCC understands that its proposed rate design
14 in this proceeding will cause customer bills to be higher for higher usage low-income and
15 higher usage middle-income customers compared to what the bill will be under IPL’s
16 proposal.¹ But it appears from the OUCC’s discovery responses and its testimony, that
17 the OUCC did not actually analyze the effects of its proposed rate design in actual usage
18 scenarios before objecting to IPL’s proposal or before adopting the OUCC’s own
19 proposal.

20 **Q12. Mr. Swinger (p. 2) states that the customer comments address “issues salient to this**
21 **Cause (i.e. fixed monthly charges and billing affordability).” He says most**
22 **comments oppose IPL’s proposal to increase its fixed monthly customer charge for**

¹ IPL Witness JGS Attachment 1R, OUCC response to IPL DR 2-1.

1 residential service citing concerns about the additional financial burden it would
2 place on low income, low usage electric customers. Pub. Ex. 13 at 3. He adds that
3 IPL’s proposal would raise “an average monthly bill significantly both in
4 percentage and dollars.” Pub. Ex. 13 at 4. Please respond.

5 A12. IPL Witness Gaske compares the total bill impact of IPL’s proposed rate design on
6 residential customers to the total bill impact on those same customers if the residential
7 fixed customer charge remains unchanged. Dr. Gaske also shows the effect on customer
8 bills of the OUCC’s and Joint Intervenors’ proposals. My testimony addresses an
9 additional analysis IPL performed subsequent to the Field Hearings.

10 **Q13. What additional analysis did IPL perform subsequent to the Field Hearing**
11 **testimony?**

12 A13. At the Field Hearings, multiple customers articulated their fear that IPL’s proposed rate
13 design would increase their utility bills and thus cause them hardship. We are open-
14 minded, receptive and responsive to our customers’ concerns. In response to the
15 articulated concerns from multiple customers at the Field Hearings (specifically related to
16 the customer charge), we chose to perform an analysis on this matter. In doing so, we
17 analyzed the effects of our proposed rate design, empirically, for actual customers to
18 determine if the customer concerns were accurately placed. This is essentially the same
19 type of analysis we perform when an individual customer calls us with a concern about
20 their bill. For our test case, IPL applied its proposed rate design to the empirical usage
21 data for the residential customers from the Field Hearings who believed it would
22 adversely affect them. This allowed us to further test the customers’ hypothesis that

1 customers would be better off if the Commission rejected IPL's proposed residential
2 service rate design.

3 **Q14. Please describe the analysis IPL conducted.**

4 A14. IPL gathered the billing determinants for each residential customer from the Field
5 Hearings who expressed concern about IPL's proposed rate design. IPL then calculated
6 hypothetical monthly bills for each customer using IPL's proposed rate design and an
7 alternative rate design with no change in the customer charge (increase in the energy
8 charge only). For purposes of the discussion below, I discuss bill impacts on an
9 aggregate basis for the entire group.

10 **Q15. What did the analysis show?**

11 A15. A large majority of customers (81 total customers analyzed) were low electricity usage
12 customers and did not appear to be low income users.² These customers represent a single
13 perspective. Accordingly, the conclusions to be drawn from our analysis were limited,
14 since the customer test group represented only one segment of the broader residential
15 customer group. Nonetheless IPL's analysis showed that the customers in the test group
16 (*i.e.* mostly low-usage, not low-income) would, on the whole, experience lower total bills
17 under IPL's proposed rate design as compared to a rate design with no change in the
18 customer charge. More specifically, based on their usage for the twelve-month period
19 ended April 2018, the analyzed group of customers would see a combined incremental
20 bill increase of approximately \$130 for the group (or roughly \$0.13/month per customer)
21 using a rate design with no change in the customer charge as compared to IPL's proposed
22 rate design. When looking at the peak month for each customer, this group of customers

² For purposes of its test, IPL considered LIHEAP qualification as indicating low-income. Only 4 of the 81 customers in the test group were LIHEAP qualified.

1 would see a combined incremental bill increase of approximately \$640 for the group (or
2 roughly \$0.65/month per customer) using a rate design with no change in the customer
3 charge as compared to IPL's proposed rate design.

4 Simply put, the analysis supported what Dr. Gaske explains in his rebuttal testimony,
5 (QA 59-71).

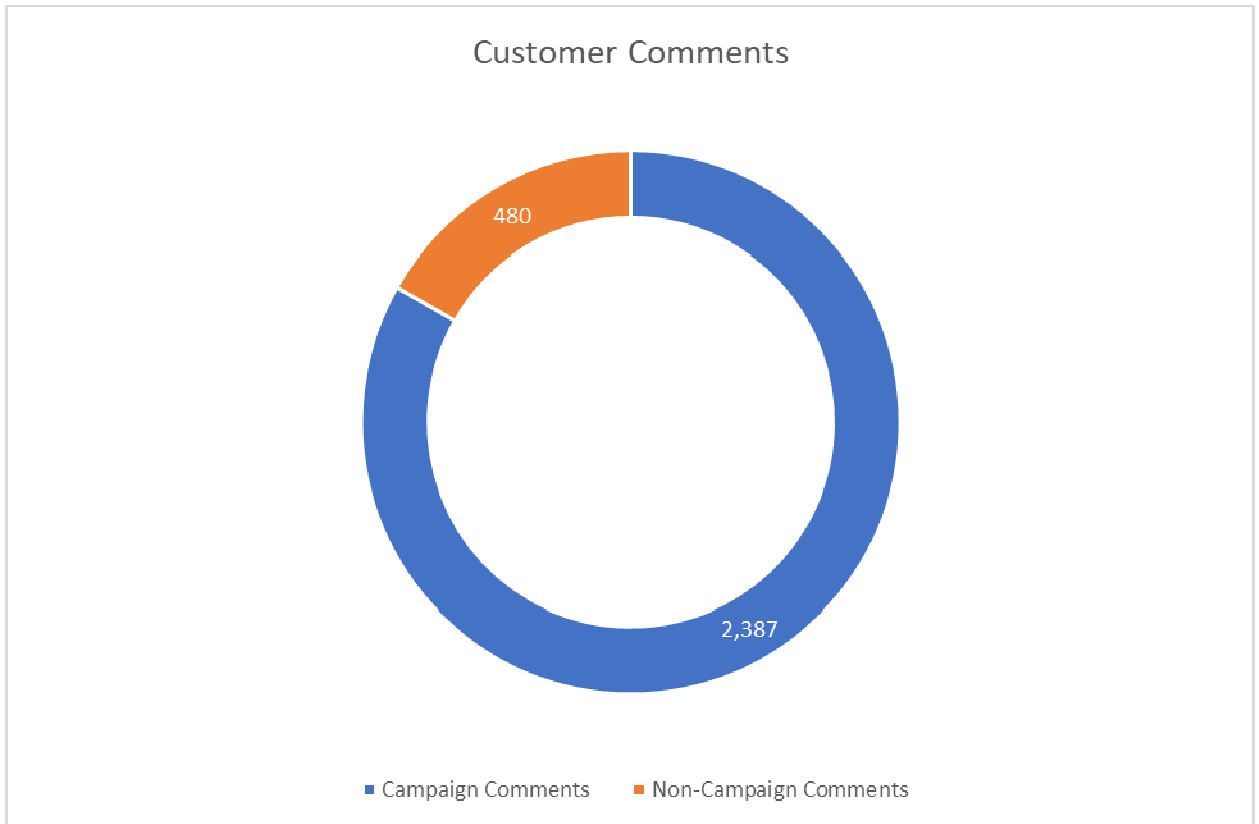
6 **Q16. OUCC Witness Anthony Swinger (p. 2) states that the OUCC has received more
7 than 2,700 written consumer comments pertaining to this docket. Do you have any
8 comments on this customer input?**

9 A16. Yes. I would like to add additional context. First, the written comments represent about
10 one half of one percent (0.5%) of IPL's residential customers.³ Second, the vast majority
11 of the cited written comments stem from electronic forms produced from several
12 organized campaigns advocating the policy positions of the CAC and Sierra Club, with
13 comments drafted by those entities, not the actual customer. In fact, according to our
14 analysis, over 83% of the 2,867 written consumer comments were generated from these
15 pre-populated campaign forms.⁴ In other words, only 480 customers (out of
16 approximately 490,000 total) presented comments actually prepared by the customer and
17 not professional activists.⁵ While I recognize that pre-populated forms can help facilitate
18 the transmittal of information, these are relevant data points as one considers the context
19 of these customer comments.

³ 2,867 comments / 490,000 residential customers = 0.0059.

⁴ See IPL Witness JGS Workpaper 2.

⁵ Of the 480 customer comments submitted to the OUCC, 199 of those comments were submitted via Formstack. Of the Formstack submitted comments, approximately 16% were duplicates.



1

2 **Q17. On pages 4-5 of his testimony, OUCC Witness Swinger discusses the outreach**
 3 **efforts made by Joint Intervenors to solicit customer comments. Did IPL obtain**
 4 **more information about these outreach efforts?**

5 A17. Yes. In responses to discovery, the OUCC stated they have no direct knowledge, nor
 6 have they performed any investigation, into the source of the campaigns which generated
 7 the customer comments.⁶ IPL also followed up with Joint Intervenors through discovery
 8 to better understand the solicitation processes that resulted in these comment cards being
 9 returned to the OUCC.⁷ Some observations:

⁶ See IPL Witness JGS Attachment 1R, OUCC response to IPL DRs 2-6 through 2-13.

⁷ See IPL Witness JGS Attachments 2R and 3R.

1 - Joint Intervenors (primarily Citizens Action Coalition and Sierra Club) are the
2 primary source of the talking points submitted in writing and at the public field
3 hearings.⁸

4 - Citizens Action Coalition employs both phone and field canvassers to “educate and
5 activate the public” on matters such as utility rate proceedings. Citizens Action
6 Coalition and Sierra Club solicited participation in the field hearings in this Cause
7 and the submission of comments to OUCC. Phone and field canvass operations
8 represent 63% of CAC’s income.⁹

9 While I do not object to such campaigns, I believe we should recognize the existence of
10 the campaigns.

11 **Q18. Why is this information regarding the Joint Intervenors’ campaigning efforts**
12 **relevant?**

13 A18. This information, like the analysis I described above regarding the Field Hearing
14 participants, is relevant in helping the Commission understand the particular perspective
15 and viewpoint that the customer comments represent. In discovery, the Joint Intervenors
16 objected that information about the campaigns was not relevant, yet it is their own
17 witness, Mr. Olson (p. 10), who urges the Commission to “consider these voices.” These
18 voices, however, do not all appear to reflect authentic customer comments and concerns,
19 but merely echo the published talking points of the Citizens Action Coalition and Sierra
20 Club – who are parties to this formal proceeding. Likewise, Mr. Swinger notes certain
21 themes in the written comments received by the OUCC, but it appears again that those

⁸ See talking points, scripts, and other pre-written materials included with IPL Witness JGS Attachments 2R and 3R.
⁹ <http://www.citact.org/about/faq#income>, last accessed June 10, 2018.

1 themes are recurring because over 83% of the written comments contained language Joint
2 Intervenors, not the customers, drafted.

3 I am concerned that overall, these comments imply a misleading impression of IPL's
4 intentions regarding its residential rate design. As explained by Dr. Gaske (Q/A 92) in
5 his rebuttal testimony, we have legitimate basis for our belief that our rate design is better
6 for our customers, and we are willing to bring this analysis to the Commission's
7 attention.

8 **Q19. Mr. Olson (p. 7) states that several witnesses expressed “frustrations regarding the
9 opaqueness of IPL’s monthly bills...” Please respond.**

10 A19. In testimony given at the Field Hearing, there was an assertion that IPL “will not, cannot,
11 and does not provide detailed billing statements for its customers.”¹⁰ This is simply not
12 true. At a customer's request, IPL will send a detailed bill for a specific month, or
13 provide detailed bills on a monthly, recurring basis. Related to this topic, I would note
14 that our customers generally view our bill format favorably. In recent surveys conducted
15 by IPL's third-party administrator, over 92% of respondents stated they easily understand
16 the information on their bills.¹¹

17 **Q20. Mr. Olson (pp. 13-14) states that IPL’s data shows a “disturbing uptick in
18 disconnections from 2016 to 2017.” Please respond.**

19 A20. Customers are responsible for paying their bills on time and in full. We understand that
20 some of our customers have difficulties paying their electric bills, particularly due to their

¹⁰ See Tr. FH-D-20.

¹¹ Customer Survey Data from Research America for the period 5/1/17 – 4/30/18.

1 electricity usage during cold winter periods, such as the month of December 2016.¹²
2 When customers are unable to do so, IPL works to present options, such as payment
3 plans, to prevent disconnects from occurring. This topic is further discussed in the direct
4 testimony of IPL Witness Jackson (Q/A 18). If a service disconnection becomes
5 necessary, IPL follows the established Commission rules regardless of the meter
6 technology on premise. The number of disconnections over any 12-month period is
7 impacted by various factors, such as the weather.

8 The bill volatility our customers experience strongly correlates to extreme weather
9 months. The greatest volatility is seen with higher usage customers. As discussed by Dr.
10 Gaske, IPL's proposed rate design reduces the total bill for customers with the greatest
11 electricity needs and costs. It also mitigates the bill volatility compared to the volatility
12 the customer would see if the customer charge either remained unchanged or decreased
13 as proposed by the OUCC and Joint Intervenors. Additionally, it allows LIHEAP
14 resources for electricity customers to be used efficiently and recognizes that low usage
15 electric consumers who use natural gas for heating and other in-home uses can take
16 advantage of the LIHEAP dollars designated for natural gas customers.

17 **Q21. On pages 14-15 of his testimony, Mr. Olson notes IPL's ongoing deployment of**
18 **"smart meters or advanced metering infrastructure" and says CAC "fear[s] that**
19 **this capability will make the disconnection of service too easy for IPL and other**
20 **electric utilities in Indiana, and may lead to an increase in the number of households**
21 **experiencing more frequent interruptions in their electric service." He urges the**

¹² Mr. Olson relies on data presented in IPL's 2017 Compliance Filing on Asset Management & Performance, as filed in Cause No. 44576 on April 2, 2018. In the cover letter of that report, IPL's Senior Vice President of US Utilities Operations noted that we experienced colder than normal weather in December 2016.

1 **Commission to begin an investigation or rule-making to look into these concerns.**

2 **Please respond.**

3 A21. As noted above, if a service disconnection becomes necessary, IPL follows the
4 established Commission rules regardless of the meter technology on the premise. This
5 includes written notice 14 days in advance. Further, our field personnel make reasonable
6 efforts to identify themselves at the customer’s premise and answer questions about the
7 procedure before any disconnection occurs.

8 IPL’s deployment of smart meters is not a secret. To date, we have not heard substantive
9 customer complaints or concerns regarding this deployment. The conversion to smart
10 meters was recognized by Dr. Brad Borum in his Director’s report on the Company’s
11 2016 Integrated Resource Plan, which stated: “IPL is undertaking an ambitious project to
12 utilize “smart meters” (Advanced Metering Infrastructure or AMI) to increasingly rely on
13 its own customers’ usage data rather than reliance on information from other utilities.”¹³

14 The Director’s report went on to state: “IPL, in particular, should be commended for its
15 expansive deployment of Advanced Metering Infrastructure (AMI)”¹⁴

16 The deployment of modern technology increases efficiency through improvements in
17 work practices. Those improvements benefit customers because increased productivity
18 lowers the cost of providing service or mitigates increases in such costs. Advanced
19 metering infrastructure, or smart meters, provides value to customers by allowing them to
20 better understand their electricity usage. Through IPL’s online PowerView portal,
21 customers with AMI meters can see usage patterns on a 15-minute interval basis rather
22 than just a single daily read. When customers are equipped with better information, they

¹³ See IURC’s Final Director’s Report for the 2016 Integrated Resource Plans, p. 7.

¹⁴ See *Id.*, p. 65.

1 can make better decisions regarding their energy usage. Finally, advanced metering
2 infrastructure enables faster outage detection which in turn facilitates restoration of
3 service, enhances service reliability and improves the customer experience.

4 In this rate review, neither IPL nor any other party has sought Commission approval to
5 depart from the Commission rule regarding service disconnection. Mr. Olson's concerns
6 boil down to an unfounded "fear" of the mere possibility of a future violation of the
7 Commission's rule on service disconnection. Commission proceedings, whether an
8 investigation or a rulemaking, require the utility, the Commission and other stakeholders
9 to devote resources to the proceeding. My view is that Mr. Olson has not identified a
10 sufficient reason for the Commission to decide, in the context of this rate review, to
11 initiate a new proceeding. Therefore, the Commission should decline to adopt Mr.
12 Olson's recommendation.

13 Comprehensive Affordability Program

14 **Q22. Mr. Olson (p. 17) recommends the Commission "order IPL to begin a low-income**
15 **rate class with an arrearage management component." He adds (pp. 15-16) that the**
16 **Commission should order IPL to work out the program details through a**
17 **collaborative process that would embrace the principles identified in his testimony.**
18 **He indicates that the program should be funded through a non-bypassable charge**
19 **on monthly electric bills to all classes of customers. Do you agree with this**
20 **recommendation?**

21 **A22.** No. Mr. Olson does not appear to ask the Commission to require that IPL merely discuss
22 this general topic with stakeholders. Rather, he asks the Commission to mandate that the
23 proposal be implemented, leaving the details, including the cost, of that proposal to be

1 determined via a collaborative process. In other words, Mr. Olson asks the Commission
2 to order this special program without any knowledge of what such a program would cost
3 even though the costs of any such Commission mandate must be reflected in the
4 ratemaking process.

5 IPL recommends that the Commission not adopt Mr. Olson's recommendation.

6 **Q23. Has the Commission rejected a similar proposal in recent cases?**

7 A23. Yes. Joint Intervenors made a similar recommendation in IPL's last general rate case
8 (Cause No. 44576) and in a recent NIPSCO electric rate case (Cause No. 44688). A key
9 difference is that in past cases, Joint Intervenors presented a cost estimate for the
10 program. In IPL's last case, the cost was estimated to be \$10.6 million.¹⁵ In both cases,
11 the Commission found Joint Intervenors' proposals involve policy issues and raise
12 implementation concerns. The Commission's Orders were affirmed on appeal.¹⁶

13 **Q24. What is IPL's position regarding Mr. Olson's recommendation (p. 17) that the**
14 **Commission "order IPL to begin a low-income rate class with an arrearage**
15 **management component"?**

16 A24. IPL's position remains essentially the same as it was in Cause No. 44576. The Company
17 disagrees that the Commission should depart from cost-based ratemaking to address
18 social policy concerns as proposed by Joint Intervenors. Recognized regulatory experts
19 generally agree that utility commissions should address embedded cost ratemaking from
20 a technical and economic perspective, and resist invitations to engage in "wealth

¹⁵ CN 44576 JI Exhibit A, p. 17.

¹⁶ *Re Indianapolis Power & Light Co.*, Cause No. 44576 (IURC 3/16/2016) ("IPL"), *aff'd Citizens Action Coalition of Indiana, Inc. v. Indianapolis Power & Light Co.*, 74 N.E.3d 554 (Ind. Ct. App. 2017); *Re N. Indiana Pub. Serv. Co.*, Cause No. 44688 (IURC 7/18/2016) ("NIPSCO"), *aff'd Citizens Action Coalition of Indiana, Inc. v. N. Indiana Pub. Serv. Co.*, 76 N.E.3d 144 (Ind. Ct. App. 2017).

1 redistribution” or setting rates based on “ability to pay” arguments or to otherwise
2 address social needs.¹⁷ The IURC long ago concurred that social issues involve income
3 redistribution policy decisions that fall outside the ratemaking process and that “such
4 policy decisions should be made in the social and political forum, the legislature.”¹⁸

5 Therefore, the Commission should conclude that these matters are more appropriately
6 addressed by the legislature. If the Commission intends to explore these matters, then
7 they should be explored in a broader investigation involving all utilities and not in the
8 context of one electric utility’s general rate case.

9 **Round-Up Program**

10 **Q25. Mr. Olson (p. 16) applauds the Company for proposing the Round-Up Program but**
11 **states that “to the best of [his] knowledge, the program is still not developed, and the**
12 **details are unclear.” Please respond.**

13 A25. The Company did not intend to implement the Round-Up Program until we received a
14 Commission decision in this case because we wanted to have input from the parties to
15 this proceeding and the Commission on the proposal. In the meantime, we have solicited
16 stakeholder input on program details and have met with potential administrative partners
17 to develop program parameters and an implementation approach.

18 **Q26. Mr. Olson also states (p. 16) that “a voluntary bill round-up program should use an**
19 **‘opt-out’ feature so as to enroll all customers, but then allow the ability of customers**

¹⁷ See, e.g., Scott Hempling, *‘Affordable’ Utility Service: What is Regulation’s Role?*, (June 2012); Bonbright, et al., *Principles of Public Utility Rates*, Chapter 8 – Social Principles of Ratemaking (2nd ed. 1988).

¹⁸ *In re Determination of Proceedings Necessary by the Public Service Commission of Indiana to Fully Comply with the Requirements of PURPA*, Cause No. 35780-S8, 1982 Ind. PUC LEXIS 478, *21 (Ind. PSC 3/24/1982). This decision was affirmed by the Indiana Court of Appeals. *Citizens Action Coalition of Indiana, Inc. v. Public Serv. Co. of Indiana*, 450 N.E.2d 98 (Ind. Ct. App. 1983).

1 **to opt-out, should they lack the desire to contribute to this worthwhile program.”**

2 **Please respond.**

3 A26. In my experience, Round-Up programs that are made available to the public are generally
4 “opt in” programs. In IPL’s case, the program will be available to all customers,
5 including both residential and business customers. Mr. Olson does not identify a utility-
6 offered Round-Up program that is based on an “opt-out” design.

7 The “opt-out” Mr. Olson discusses concerns energy efficiency. Our General Assembly
8 enacted a law that allows certain large industrial customers to “opt-out” of utility energy
9 efficiency programs and the associated cost recovery.¹⁹ This energy efficiency statute
10 allows certain large industrial customers to “opt-out” of paying rates for electric service
11 that reflects the costs of energy efficiency programs. In other words, they can “opt-out”
12 of something they would otherwise be required to do.

13 Like other Round-Up programs, the Round-Up program IPL proposes is voluntary. An
14 “opt-out” feature changes the voluntary and charitable nature of the program. This notion
15 was echoed by Mr. Dwight Burlingame, Professor of Philanthropic Studies at the Lilly
16 School of Philanthropy at Indiana University, in his discussion of a utility opt-out
17 approach: “The fact that they make the customer say no is forced giving. I don't see that
18 as charitable.” Similar comments were echoed by the Better Business Bureau of Central
19 Indiana.²⁰ Additionally, I would presume an “opt-out” approach necessitates that we give
20 multiple notices to our customers before the program begins. This would increase

¹⁹ Ind. Code §§ 8-1-8.5-9, -10.

²⁰ Muirragui, Andrea, Indianapolis Business Journal, *Utility fund-raising effort takes heat for opt-out strategy: Critics say customers should be asked if they want to contribute to Operation Round Up-or any charity*, available at <https://www.ibj.com/articles/17767-utility-fund-raising-effort-takes-heat-for-opt-out-strategy-critics-say-customers-should-be-asked-if-they-want-to-contribute-to-operation-round-up-or-any-charity>

1 program implementation costs and could delay the start of the program. It could also
2 cause customer confusion and lead to increased customer complaints.²¹ All of this could
3 give customers a negative impression of the voluntary program and this in turn could
4 cause the program results to diminish.

5 **Q27. Do you agree with Mr. Olson’s recommendation (p. 17) that the Commission “order
6 a collaborative process” for the design of the Round-Up program?**

7 A27. No. IPL has already solicited input on the design of the voluntary Round-Up program.
8 Further, hundreds of electric round-up programs already exist throughout the country and
9 several exist in Indiana; a formal collaboration is unwarranted.²² We plan to continue to
10 solicit stakeholder input in the design of an administratively efficient program but for the
11 reasons stated above, the Commission order in this case should not require the program to
12 have an “opt-out” design.

13 **Low Income Energy Efficiency**

14 **Q28. Joint Intervenors Witness John Howat (p. 14) recommends that IPL be directed by
15 the Commission to provide high-usage, low-income customers with enhanced,
16 whole-house energy efficiency programming involving major appliance
17 replacements, distribution and installation of effective energy management
18 equipment, substantial building shell retrofits, and actionable energy education.
19 How do you respond?**

20 A28. It is not necessary for the Commission to address energy efficiency in this proceeding.
21 IPL has a long and distinguished record of providing Demand Side Management

²¹ See Tr. FH-A-13 – “I do not think a voluntary program for customers to round up their monthly bills to assist low income customers is a fair price to put on the rest of us, those of us who are already donating money, time, energy to help out our community.”

²² Muirragui, *supra* at n.19.

1 (“DSM”) programs. In fact, IPL has offered DSM programs to our customers on an
2 uninterrupted basis for 25 years. Those programs provide customers with opportunities
3 to manage their energy consumption.

4 Most recently, in Cause No. 44945, IPL and the Citizens Action Coalition agreed to a
5 settlement that provides for a robust and comprehensive 3-year DSM Plan for the 2018-
6 2020 period and IPL is currently implementing this plan. The 2018-2020 DSM Plan
7 includes a diverse offering of DSM programs intended to provide energy savings
8 opportunities for all customers. This Settlement Agreement, as approved by the
9 Commission, represents a substantial investment in energy efficiency of approximately
10 \$92 million that is forecast to provide 3-year gross energy savings of 465,791 MWh.²³ In
11 addition, IPL further agreed in the Settlement Agreement to work collaboratively in good
12 faith with the IPL DSM Oversight Board to prudently exercise the authorized spending
13 flexibility and to use best efforts to achieve an additional 50,000 MWh (net) of cost
14 effective energy savings above the 3-year savings described above. Joint Intervenor’s
15 proposal would circumvent the IPL DSM Oversight Board process already in place.

16 **Q29. Are any of these programs targeted specifically to IPL’s income qualified customers**
17 **and do they provide the energy efficiency actions that Witness Howat advocates for?**

18 A29. Yes. While IPL offers a broad range of DSM programs so that energy savings
19 opportunities are available to all customers, certain residential programs are specifically
20 targeted to income qualified customers. In particular, the Income Qualified
21 Weatherization (“IQW”) program is a whole house energy efficiency program that
22 provides eligible customers with numerous energy efficiency opportunities. Specifically,

²³ *Re Indianapolis Power & Light Co.*, Cause No. 44945, Order at 37 (IURC 2/07/2018).

1 in response to Mr. Howat's suggestions I would note the IQW program includes the
2 following:

- 3 • Major appliance replacements - eligible participants in this program can receive
4 free refrigerator replacements;
- 5 • Energy management equipment - eligible customers can receive smart thermostat
6 upgrades, and have access to IPL's online PowerView portal to view their daily
7 (or interval) usage;
- 8 • Substantial building retrofits – eligible customers can receive blower door
9 directed air sealing, HVAC duct sealing, and attic insulation;
- 10 • Actionable energy education - all IQW participants receive an audit report with
11 low or no-cost actionable recommendations to improve the efficiency of their
12 home; and
- 13 • Free low-cost efficiency measures – included in the whole home program's visits
14 are LEDs, energy efficient water measures, pipe wrap and other measures that are
15 directly installed as appropriate.

16 The IQW program is provided at no participant cost to eligible customers and is targeted
17 to customers with household incomes less than 200% of 2018 Federal poverty guidelines.

18 In addition to the IQW program, IPL is launching the Community Based Lighting
19 program which provides LED bulbs to income qualified customers through local food
20 banks and their affiliates. In addition to providing direct energy saving impacts through
21 the distribution of efficient LED bulbs, this program will serve to cross promote other
22 IPL energy efficiency programs.

1 **Summary**

2 **Q30. Please summarize your rebuttal testimony.**

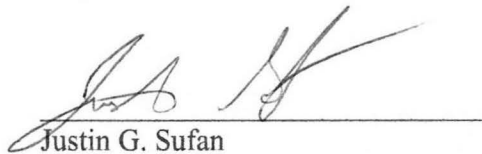
3 A30. My rebuttal testimony explains that the public comments received in this proceeding
4 should be viewed in context. In particular, my rebuttal testimony explains that over 83%
5 of the written comments reflect talking points prepared by Joint Intervenors. I explained
6 that with respect to the customers who spoke at the field hearings, their bills, taken as a
7 whole, would increase under an alternative rate design proposal (with no change to the
8 customer charge) as compared to IPL’s rate design proposal. I responded to Mr. Olson’s
9 unfounded “fear” that smart meter deployment adversely impacts disconnection rates. I
10 also explained that Mr. Olson’s proposed arrearage management program should be
11 rejected, as it was in IPL’s last rate case. I explained that IPL’s proposed voluntary
12 Round-Up program should not be implemented on an “opt-out” basis as Mr. Olson urges.
13 Finally, I explained that Mr. Howat’s proposed energy efficiency program is unnecessary
14 in light of IPL’s long-standing DSM offerings.

15 **Q31. Does this conclude your prepared verified rebuttal testimony?**

16 A31. Yes, at this time.

VERIFICATION

I, Justin G. Sufan, Director, Regulatory & RTO Policy, affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information and belief.



Justin G. Sufan

Dated: June 21, 2018



INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

May 30, 2018

VIA ELECTRONIC MAIL

Teresa Nyhart
Jeffrey Peabody
Barnes & Thornburg
11 S. Meridian St.
Indianapolis, IN 46204
Teresa.Nyhart@btlaw.com
Jeffrey.peabody@btlaw.com

Re: IURC Cause No. 45029
OUCC Data Response to IPL's Set No. 2

Dear Counsel:

Enclosed please find the OUCC's response to IPL's Data Request Set No.2. Please contact me by phone at (317) 232-2494 or by email at jreed@oucc.in.gov if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Reed", with a long horizontal flourish extending to the right.

Jeffrey M Reed
Deputy Consumer Counselor

JMR/tmd
Enclosure

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANAPOLIS POWER & LIGHT)
COMPANY ("IPL") FOR (1) AUTHORITY TO)
INCREASE RATES AND CHARGES FOR ELECTRIC)
UTILITY SERVICE, (2) APPROVAL OF REVISED)
DEPRECIATION RATES, ACCOUNTING RELIEF,)
INCLUDING UPDATE OF THE MAJOR STORM)
DAMAGE RESTORATION RESERVE ACCOUNT,)
APPROVAL OF A VEGETATION MANAGEMENT)
RESERVE ACCOUNT, INCLUSION IN BASIC RATES)
AND CHARGES OF THE COSTS OF CERTAIN)
PREVIOUSLY APPROVED PROJECTS, INCLUDING)
THE EAGLE VALLEY COMBINED CYCLE GAS)
TURBINE, THE NATIONAL POLLUTION DISCHARGE)
ELIMINATION SYSTEM AND COAL COMBUSTION)
RESIDUALS COMPLIANCE PROJECTS, RATE)
ADJUSTMENT MECHANISM PROPOSALS, COST)
DEFERRALS, AMORTIZATIONS, AND (3) APPROVAL)
OF NEW SCHEDULES OF RATES, RULES AND)
REGULATIONS FOR SERVICE.)

CAUSE NO. 45029

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR'S
OBJECTIONS AND RESPONSES TO IPL'S
DATA REQUEST SET 2

GENERAL OBJECTIONS

1. The OUCC objects generally to the Data Requests to the extent that they seek to discover information or the production of documents covered by the attorney-client privilege or the work product doctrine and any other applicable privileges. If privileged information or documents are inadvertently produced, the OUCC does not waive or intend to waive any privilege pertaining to such information or documents or to any other information or documents.
2. In responding to the Data Requests, the OUCC does not waive or intend to waive:
 - (a) Objections to competency, relevancy, materiality and admissibility;

- (b) Rights to object on any ground to the use of any of the material provided or responses made pursuant to the Data Requests in any subsequent proceedings, including the litigation of this or any other action;
 - (c) Objections as to vagueness and ambiguity; and
 - (d) Rights to object further on any ground to these or any other data requests in this proceeding.
3. The OUCC objects generally to the Data Requests to the extent that certain individual requests may purport to require the OUCC to perform a study, analysis; or statistical summary in order to supply the requested information.
 4. The OUCC objects generally to the Data Requests to the extent terms such as "any," "each," "every," "all," "complete," and similar terms are overly broad and unduly burdensome.
 5. The OUCC objects generally to the Data Requests to the extent that they require the OUCC to produce voluminous documents on the ground that such production is unduly burdensome.
 6. The OUCC objects to the Data Requests to the extent that they purport to require the OUCC to supply information in a computer format other than the format in which the OUCC keeps such information.
 7. The responses provided to these Requests have been prepared pursuant to a reasonable and diligent investigation and search for information requested. The responses reflect the information obtained before this date by the OUCC's representatives pursuant to a reasonable and diligent search and investigation conducted in connection with these Data requests in those areas where information is expected to be found. To the extent that the

requests purport to require more than a reasonable and diligent search and investigation, the OUCC objects on grounds that include an undue burden or unreasonable expense.

8. The OUCC objects to any attempt by NIPSCO, by way of its preliminary instruction, to require the OUCC to supplement its responses to these Data Requests in any manner other than that set forth in Rule 26(E) of the Indiana Rules of Trial Procedure. The OUCC's duty to supplement its responses is governed exclusively by that Rule.
9. The OUCC objects to the Data Requests to the extent they seek documents or information which is not relevant to the subject matter of this proceeding and which are not reasonably calculated to lead to the discovery of admissible evidence.
10. The OUCC objects to the Data Requests to the extent the discovery sought is unreasonably cumulative or duplicative, or is obtainable from some other source that is more convenient, less burdensome, or less expensive.
11. The OUCC objects to the Data Requests to the extent they are vague and ambiguous and provide no basis from which the OUCC can determine what information is sought.

Without waiving these objections, the OUCC responds to the Data Requests in the manner set forth below.

DATA REQUESTS

Request No. 2-1

Is the OUCC aware that under IPL's proposal to increase the residential fixed customer charge, the total bill for low income customers who have the highest home electricity costs or needs will be lower compared to what the bill would be if the residential fixed customer charge remained at its current level?

RESPONSE:

The OUCC is aware that all else equal, a higher fixed customer charge reduces the portion of fixed costs collected through the variable energy charge. As the fixed customer charge increases, high use customers would experience a lower bill than if the customer charge was lower.

IPL has presented data to the OUCC which the OUCC understands IPL believes demonstrates that, over the time period presented, IPL's proposal to increase the residential fixed customer charge would have reduced the total bill for the 1000 LIHEAP recipients with the highest home electricity costs compared to what the bill would have been with the current residential fixed customer charge. The OUCC also understands this same data is intended to show that the average bill for IPL customers receiving LIHEAP assistance within the data sample would be minimally impacted, while for other LIHEAP recipients within the sample, IPL's proposal could have increased their monthly bills.

The OUCC represents all ratepayers, including low-income customers. The OUCC bases its ultimate recommendation on ratemaking issues after considering the impact on all customers within the specific context of each case. In this case, the OUCC does not support IPL's proposed increase to the fixed customer charge.

Request No. 2-2

Does the OUCC support a rate design that shifts costs from low income low usage electric customers to low income high usage electric customers? Please explain fully why or why not.

RESPONSE:

Rate design is a complicated process. Modifications to rate design frequently impact multiple segments of customers within any affected rate class. The OUCC represents all ratepayers, including low-income customers, and bases its ultimate recommendation on ratemaking issues, including rate design, after considering the impact on all customers in all customer classes within the specific context of each case.

Request No. 2-3

Does the OUCC agree that it is reasonable for the Indiana Utility Regulatory Commission to consider the impact of electric service rate design on low income high usage electric customers? Please explain fully why or why not.

RESPONSE:

Yes. It is reasonable for the Indiana Utility Regulatory Commission to consider the impact of electric service rate design on all electric customers, just as the OUCC considers the impact of electric service rate design on all electric customers.

Request No. 2-4

Does the OUCC agree that it is reasonable for the Indiana Utility Regulatory Commission to consider the impact of electric service rate design on low income customers who depend on electricity to heat their homes? Please explain fully why or why not.

RESPONSE:

Yes. It is reasonable for the Indiana Utility Regulatory Commission to consider the impact of electric service rate design on all electric customers, just as the OUCC considers the impact of electric service rate design on all electric customers.

Request No. 2-5

Does the OUCC contend the Commission should consider the impact of residential rate design on middle class customers? Please explain why or why not.

OBJECTION:

The OUCC objects to the term “middle class customers” as both vague and ambiguous. Notwithstanding this objection, the OUCC responds as follows:

RESPONSE:

Yes. The Commission is obligated to approve rates and a rate design that are just and reasonable for all customers, including “middle class customers”. Thus it is reasonable for the Indiana Utility Regulatory Commission to consider the impact of electric service rate design on all electric customers, just as the OUCC considers the impact of electric service rate design on all electric customers.

Request No. 2-6

What number of customer comments are associated with the pre-printed “Say NO to IPL Greed!” campaign?

OBJECTION

The OUCC objects on the grounds that the request requires the OUCC to perform a calculation or analysis the OUCC has not performed and does not intend to perform. Notwithstanding this objection, the OUCC responds as follows:

RESPONSE:

The OUCC did not calculate the number of customer comments associated with the pre-printed “Say NO to IPL Greed!” campaign. However, the OUCC has provided IPL with copies of customer comments it has received, and those comments have been filed with the IURC and served on IPL. IPL possesses all the information necessary to make this calculation if it so desires.

Request No. 2-7

Is it the OUCC's understanding that the CAC conducts the "Say NO to IPL Greed!" campaign?

RESPONSE:

The OUCC has performed no investigation into the "Say NO to IPL Greed!" campaign or which entity or entities "conduct" the campaign in this case. The OUCC has no direct knowledge of the nature of CAC's involvement, if any.

Request No. 2-8

What number of customer comments came from “knowwho.com”?

OBJECTION

The OUCC objects on the grounds that the request requires the OUCC to perform a calculation or analysis the OUCC has not performed and does not intend to perform. Notwithstanding this objection, the OUCC responds as follows:

RESPONSE:

The OUCC did not calculate the number of customer comments from “knowwho.com”. However, the OUCC has provided IPL with copies of customer comments it has received, and those comments have been filed with the IURC and served on IPL. IPL possesses all the information necessary to make this calculation if it so desires.

Request No. 2-9

Does the OUCC agree that knowwho.com is an advocacy service?

RESPONSE:

The OUCC agrees that it has received form emails from knowwho.com in this case. Those emails generally oppose IPL's requested increase. The OUCC has no direct knowledge of, and has performed no investigation into, other aspects of knowwho.com.

Request No. 2-10 Does the OUCC know who paid to have the knowwho.com advocacy campaign conducted in this rate case? If so, please identify the source.

RESPONSE: No. See also the response to Request 2-9 above.

Request No. 2-11 What number of customer comments came from “formstack.com”?

OBJECTION The OUCC objects on the grounds that the request requires the OUCC to perform a calculation or analysis the OUCC has not performed and does not intend to perform. Notwithstanding this objection, the OUCC responds as follows:

RESPONSE: The OUCC did not calculate the number of customer comments came from “formstack.com”. However, the OUCC has provided IPL with copies of customer comments it has received, and those comments have been filed with the IURC and served on IPL. IPL possesses all the information necessary to make this calculation if it so desires.

Request No. 2-12 Does the OUCC agree that formstack.com is an advocacy service?

RESPONSE: No.

Request No. 2-13

Does the OUCC know who paid to have the formstack.com advocacy campaign conducted in this rate case? If so, please identify the source?

RESPONSE:

The OUCC is unaware of a “formstack.com advocacy campaign”. Formstack is the vendor with whom the State of Indiana contracts for website-based consumer contact forms. Comments the OUCC received through Formstack were most likely received via the agency’s electronic contact form at www.in.gov/oucc/2361.htm.

Request No. 2-14 Does the OUCC contend that the Commission should establish rates for IPL based on the customer density, costs and economic characteristics of other utilities?

RESPONSE: The OUCC does not contend the Commission should establish rates for IPL based only on the customer density, costs and economic characteristics of other utilities. The Commission should establish rates for IPL based on IPL's customer density, costs and economic characteristics.

**Cause No. 45029
CAC Response to IPL Data Request 2**

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANAPOLIS POWER & LIGHT)
COMPANY (“IPL”) FOR (1) AUTHORITY TO INCREASE)
RATES AND CHARGES FOR ELECTRIC UTILITY)
SERVICE, (2) APPROVAL OF REVISED DEPRECIATION)
RATES, ACCOUNTING RELIEF, INCLUDING UPDATE OF)
THE MAJOR STORM DAMAGE RESTORATION)
RESERVE ACCOUNT, APPROVAL OF A VEGETATION)
MANAGEMENT RESERVE ACCOUNT, INCLUSION IN) **CAUSE NO. 45029**
BASIC RATES AND CHARGES OF THE COSTS OF)
CERTAIN PREVIOUSLY APPROVED PROJECTS,)
INCLUDING THE EAGLE VALLEY COMBINED CYCLE)
GAS TURBINE, THE NATIONAL POLLUTION)
DISCHARGE ELIMINATION SYSTEM AND COAL)
COMBUSTION RESIDUALS COMPLIANCE PROJECTS,)
RATE ADJUSTMENT MECHANISM PROPOSALS, COST)
DEFERRALS, AMORTIZATIONS, AND (3) APPROVAL OF)
NEW SCHEDULES OF RATES, RULES AND)
REGULATIONS FOR SERVICE.)

**CAC’S OBJECTIONS AND RESPONSES TO
IPL’S SECOND SET OF DISCOVERY REQUESTS**

Citizens Action Coalition of Indiana (“CAC”) hereby submits its responses and objections to Indianapolis Power & Light Company’s (“IPL”) Second Set of Discovery Requests to CAC.

GENERAL OBJECTIONS

- A. Intervenor objects to Requests to the extent that they seek information that is not relevant to the above referenced proceedings, Indiana Rule of Evidence 401.
- B. Intervenor objects to Requests that are not “reasonably calculated to lead to the discovery of admissible evidence,” Indiana Trial Rule 26(B)(1).

Cause No. 45029
CAC Response to IPL Data Request 2

- C. Intervenor objects to Requests that are overly broad, unduly burdensome, oppressive, and calculated to take Intervenor and their staff away from normal work activities, and require them to expend significant resources to provide complete and accurate answers to IPL's Request, which are only of marginal value to IPL. *See* Indiana Trial Rule 26 (B)(1).
- D. Intervenor assumes, for the purpose of providing these objections and responses, that the Requests do not seek information that is privileged, protected by the work product doctrine, or otherwise exempt from disclosure. Intervenor objects to the Requests to the extent, if any, that they call for production of any such material.
- E. Intervenor reserves all of its evidentiary objections or other objections to the introduction or use of any response at any hearing in this action.
- F. Intervenor does not, by any response to any Request, waive any objections to that Request.
- G. Intervenor does not admit to the validity of any legal or factual contention asserted or assumed in the text of any Request.
- H. Intervenor reserves the right to assert additional objections as appropriate, and to amend or supplement these objections and responses as appropriate.
- I. The foregoing general objections shall apply to each of the following Requests whether or not restated in the response to any particular response.

Cause No. 45029
CAC Response to IPL Data Request 2

Specific Objections and Responses

Request No. 1: Please produce of a copy of the 2017 “Public Good Index” report relied on at page 10 of Kerwin Olson’s prefiled testimony.

Objections and Response:

CAC objects to the extent that the request seeks the discovery of public materials which are as easily accessible to IPL as to CAC and is therefore unduly burdensome.

Notwithstanding said objections, in the spirit of cooperation, please see Joint Intervenors’ Response to IPL Data Request Set 2 to INCAA and ICHS/Joint Intervenors’ Response to IPL Data Request 1 Set to CAC and Sierra Club #10, which states in part, “The Sagamore’s 2017 “Public Good Index” referenced in an article cited by Mr. Olson can be downloaded here: <https://www.sagamoreinstitute.org/download-the-public-good-index.”>

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 2: Please produce a copy of the Energy Information Administration, 2009 Residential Energy Consumption Survey relied on by John Howat at pages 8 and 9 of his prefiled testimony.

Objections and Response:

CAC objects to the extent that the request seeks the discovery of public materials which are as easily accessible to IPL as to CAC and is therefore unduly burdensome.

Notwithstanding said objections, in the spirit of cooperation, please see Joint Intervenors' Response to IPL Data Request Set 2 to INCAA and ICHS/Joint Intervenors' Response to IPL Data Request 1 Set to CAC and Sierra Club #7, which states in part: "For the 2009 Residential Energy Consumption Survey data referenced in Mr. Howat's testimony, please see: <https://www.eia.gov/consumption/residential/data/2009/>."

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 3:

CAC Witness Wallach discusses declining block rates at pages 4, 10-11 of his prefiled testimony:

- (a) Admit IPL's declining block rates do not contain a declining energy cost component. If your response is anything other than an unqualified admission, please explain your response.
- (b) Admit, in IPL's declining block rate, the energy cost component is the same in all blocks. If your response is anything other than an unqualified admission, please explain your response.
- (c) Admit, in IPL's declining block rates the cost component that declines with increasing usage is the demand-related cost component and not the energy-related cost component. If your response is anything other than an unqualified admission, please explain your response.

Objections and Response:

Notwithstanding said objections, in the spirit of cooperation, CAC states as follows:

- (a., b.) As shown in Table 7 of his direct testimony, Mr. Wallach estimates that the energy and fuel costs are recovered through all three energy blocks at the same rate of 3.23¢/kwh.
- (c.) As discussed on pp. 31-32 and as shown in Table 7 of his direct testimony, Mr. Wallach finds that the declining block energy rates proposed by IPL recover demand-related costs at a declining rate.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 4:

Does CAC Witness Wallach agree that a customer's demand on the IPL system does not increase in direct proportion to the amount of energy used? If not, please explain why not.

Objections and Response:

Notwithstanding said objections, in the spirit of cooperation, CAC responds as follows:

No, Mr. Wallach does not agree with this statement as a general proposition for IPL's residential customers. To the contrary, as discussed on pp. 33-34 and as illustrated in Figure 1 of Mr. Wallach's direct testimony, load-research data collected by IPL indicates that customer load factors are relatively constant across energy usage. This indicates that peak demand increases in direct proportion to usage.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 5:

Referring to the public field hearings held on April 23, 2018 and May 7, 2018 in this Cause:

- (a) Have any of the individuals who testified at the field hearings ever served as a director, employee, agent, advisor, consultant, witness or representative of CAC? If yes, for each such individual:
 - (i) Identify the individual.
 - (ii) Identify and explain the relationship between the individual and CAC, including any positions or titles held and the time period during which the individual held each position or title.
 - (iii) Please provide details regarding any pay, compensation or other contribution provided by CAC to the individual at any time.
- (b) Have any of the individuals who testified at the field hearings ever acted in any other formal or informal capacity for CAC or otherwise acted or purported to act on CAC's behalf? If yes, for each such individual:
 - (i) Identify the individual.
 - (ii) Identify and explain the relationship between the individual and CAC, including any positions or titles held and the time period during which the individual held each position or title.
 - (iii) Identify each time the individual acted in any other formal or informal capacity for CAC or otherwise acted or purported to act on CAC's behalf.
 - (iv) Please provide details regarding any pay, compensation or other contribution provided by CAC to the individual at any time.

Objections and Response:

CAC objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence, Indiana Trial Rule 26(B)(1). CAC also objects to this request as it is unduly burdensome, oppressive, and calculated to take CAC and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL, Indiana Trial Rule 26(B)(1).

Notwithstanding said objections, in the spirit of cooperation, please see the following response:

- (a) Two employees testified at the April 23, 2018 field hearing, although they testified during their time off and in their personal capacity as IPL ratepayers.
 - (i) Anthony Bozzo, Laren Williams
 - (ii) These two employees serve as part-time phone canvassers.
 - (iii) Please see the objection above.
- (b) Please see the response to subpart (a) above.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 6:

Did CAC use any director, employee, agent, advisor, consultant, witness or representative to solicit participation in the field hearings in this Cause and/or the submission of comments to the OUCC? If yes:

- (a) Please identify each such director, employee, agent, advisor, consultant, witness or representative and their position or role.
- (b) Please identify the pay or compensation provided to each such individual.

Objections and Responses:

CAC objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence, Indiana Trial Rule 26 (B)(1). CAC also objects to this request as it is overly broad, unduly burdensome, oppressive, and calculated to take CAC and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL, Indiana Trial Rule 26 (B)(1).

Notwithstanding said objections, in the spirit of cooperation, CAC states as follows:

CAC employs both phone and field canvassers to educate and activate the public. When canvassing in Indianapolis since early January, the issue that canvassers have discussed with the public is Cause No. 45029. On the backside of the fact sheet are instructions on how to submit comments to the OUCC. The text of the fact sheet is also posted on CAC's website at: <http://www.citact.org/sites/default/files/03-19-18%20IPL%20rate%20case%20%2845029%29.pdf>. After the field hearing was announced, CAC canvassers informed members of the public about the field hearing, specifically the time and location. CAC employs on average 3 field canvassers and 12 phone canvassers. CAC's Executive Director, Kerwin Olson, also gave interviews to any interested media persons. CAC also gave a presentation, upon request, to the BG Our Place organization on May 22, 2018. Please also see the other responses to this set of data requests.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 7:

Please identify all activities undertaken by CAC or by CAC's directors, employees, agents, advisors, consultants, witnesses or representatives to solicit participation in the field hearings in this Cause and/or the submission of comments in this Cause.

Objections and Responses:

See Objections and Response No. 2-6 above. Additionally, CAC sent out a blast email to individuals within Marion County who have signed up to receive CAC's e-mail action alerts.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 8:

Did CAC prepare or have prepared a letter, form, or other form of correspondence for submitting comments in this Cause? If yes, please provide a copy of each such letter, form or other form of correspondence.

Objections and Responses:

CAC prepared a post card for members and the public to use, if they so choose. Please see, for example, “45029 OUCC Consumer Comments_Part50_Postcards.pdf” through “45029 OUCC Consumer Comments_Part52_Postcards.pdf” filed by the OUCC on May 24, 2018, for a copy of such.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 9: Please provide a copy of all communications and other documentation soliciting participation in the field hearings in this Cause and/or submission of comments in this Cause.

Objections and Responses:

Please see Objections and Responses to IPL Data Requests 2-6, 2-7, and 2-8 above. CAC has information on this page of its website: <http://www.citact.org/utility-rates-and-regulation-issues-utility-ipl/campaign/ipl-wants-25-increase-base-rates-tell-them>.

The text of the fact sheet is posted on CAC's website at:

<http://www.citact.org/sites/default/files/03-19-18%20IPL%20rate%20case%20%2845029%29.pdf>.

CAC sent out a blast email to individuals within Marion County who have signed up to receive CAC's e-mail action alerts. Please see Attachment 9(A) for those emails.

CAC created a Facebook event page for both of the field hearings, and those two events can be viewed here: https://www.facebook.com/pg/cacindiana/events/?ref=page_internal.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 10:

How many individuals did CAC pay, compensate or otherwise contribute to in order to solicit participation in the field hearing and/or the submission of comments in this Cause? Please identify each such individual and the compensation provided to each such individual.

Objections and Responses:

CAC objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence, Indiana Trial Rule 26 (B)(1). CAC also objects to this request as it is overly broad, unduly burdensome, oppressive, and calculated to take CAC and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL, Indiana Trial Rule 26 (B)(1).

However, in the spirit of cooperation, CAC provides the following answer: Please see CAC's Response and Objections to IPL Data Request 2-6 above.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 11: Did CAC pay, compensate or otherwise contribute to any person to make or submit comments at the field hearings in this Cause?

Objections and Responses:

No.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 12:

Did CAC pay, compensate or otherwise contribute to any person to make or submit written comments to the OUCC in this Cause?

Objections and Responses:

No.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 13:

Please identify all canvassing, soliciting or other promotional or advocacy activities conducted by CAC or its directors, employees, agents, advisors, consultants, witnesses or representatives in connection with this Cause.

Objections and Responses:

CAC objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence, Indiana Trial Rule 26 (B)(1). CAC also objects to this request as it is overly broad, unduly burdensome, oppressive, and calculated to take CAC and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL, Indiana Trial Rule 26 (B)(1).

However, in the spirit of cooperation, CAC provides the following answer: Please see the other responses to this set of data requests.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 14:

Did CAC engage, employ or otherwise use any online advocacy websites, tools, or services to solicit participation in the field hearings in this Cause and/or the submission of comments in this Cause? If yes:

- (a) Please identify each such online advocacy website, tool, or service.
- (b) Explain how each such online advocacy website, tool, or service was used by CAC.
- (c) Please identify all expenses incurred by CAC or payments made by CAC for the use of each such online advocacy website, tool, or service used by CAC.

Objections and Response:

Notwithstanding the stated objections, and in the spirit of cooperation, CAC provides the following answer:

Please see the other responses to this set of data requests. CAC also created a Facebook event page for both of the field hearings and spent approximately \$30 on Facebook promoting these Facebook events.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 15:

Did CAC's directors, employees, agents, advisors, consultants, witnesses or representatives draft or assist in the drafting of proposed testimony to be presented at the field hearings in this Cause?

- (a) If so, please provide copies of all such testimony.
- (b) Please identify all CAC directors, employees, agents, advisors, consultants, witnesses or representatives who engaged in or assisted the drafting of proposed testimony to be presented at the field hearings in this Cause.

Objections and Response:

No.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 16:

Did CAC's directors, employees, agents, advisors, consultants, witnesses or representatives draft or assist in the drafting of the form letter contained in the documents labeled "45029 OUCC Consumer Comments_Part42_30Letters.pdf" through "45029 OUCC Consumer Comments_Part48_305Letters.pdf" filed by the OUCC on May 24, 2018?

- (a) If so, please identify all CAC directors, employees, agents, advisors, consultants, witnesses or representatives who engaged in or assisted the drafting of the form letter.
- (b) Please explain CAC's role in preparing and/or distributing the form letter.

Objections and Response:

Notwithstanding the stated objections, and in the spirit of cooperation, CAC provides the following answer:

No, CAC as an organization did not draft or assist in the drafting of the form letter contained in those two documents. However, CAC Counsel on Energy & Environment, Jennifer Washburn, is serving as local counsel for Sierra Club and did review the form letter for Sierra Club.

Cause No. 45029
CAC Response to IPL Data Request 2

Request No. 17:

Did CAC's directors, employees, agents, advisors, consultants, witnesses or representatives draft or assist in the drafting of the postcard contained in the documents labeled "45029 OUCC Consumer Comments_Part50_Postcards.pdf" through "45029 OUCC Consumer Comments_Part52_Postcards.pdf" filed by the OUCC on May 24, 2018?

- (a) If so, please identify all CAC directors, employees, agents, advisors, consultants, witnesses or representatives who engaged in or assisted the drafting of the postcard.
- (b) Please explain CAC's role in preparing and/or distributing the postcard.

Objections and Response:

Notwithstanding the stated objections, and in the spirit of cooperation, CAC provides the following answer:

Yes. Please see CAC's Response and Objections to IPL Data Request 2-8 above.



Jennifer Washburn <jwashburn@citact.org>

Fwd: ACT NOW! Say NO to another IPL rate hike!

Lisa Smith <lsmith@citact.org>
To: Jennifer Washburn <jwashburn@citact.org>

Thu, Jun 7, 2018 at 7:11 PM

Sent April 16.

Lisa Smith
IT Manager
Citizens Action Coalition
ph 317-735-7742
fx 317-216-8347

PLEASE NOTE: Citizens Action Coalition has moved!
Our new address is:

1915 W. 18th St.
Suite C
Indianapolis, IN 46202

----- Forwarded message -----
From: **Citizens Action Coalition** <alert@citact.org>
Date: Mon, Apr 16, 2018 at 12:05 PM
Subject: ACT NOW! Say NO to another IPL rate hike!
To: lsmith@citact.org

Having trouble viewing this email? [Click here](#)



Dear Lisa,

Indianapolis Power & Light (IPL) has filed a request with the Indiana Utility Regulatory Commission (IURC) to increase their annual operating revenues by \$97M. **This would increase your base electric rates by 25%!**

As part of that request, IPL wants to **raise the monthly fixed charge on your electric bill from \$17/month to an outrageous \$27/month!** That's right, **IPL wants you to pay them \$27 a month regardless of how much electricity you use, or even if you don't use any electricity!**

IPL's monthly electric bills have already increased 45% over the last 10 years. At the same time, as you well know, Hoosier households struggle with declining and stagnant wages and significant increases in the cost of energy, health care, food, and other necessities. **Enough is enough!**

MAKE YOUR VOICE HEARD!

The Indiana Utility Regulatory Commission (IURC) will be holding several public field hearings so that you can tell them what you think about the rate hike that IPL wants. **It is critical that regulators hear from the YOU!**

Please attend one of these field hearings and tell Indiana's regulators NO WAY to the IPL rate hike and a higher fixed charge!

Monday, April 23, 2018: [Arsenal Technical High School \(Anderson Hall\), 1500 E. Michigan St., 46202](#)

Monday, May 7, 2018: [New Augusta Public Academy-North \(Auditorium\), 6450 Rodebaugh Rd., 46268](#)

Each hearing will start at 6:00 p.m. Customers are encouraged to arrive no later than 5:45 p.m. for a presentation by the [Indiana Office of Utility Consumer Counselor \(OUCC\)](#) which will provide an overview of the field hearing procedures and the rate case process.

If you cannot attend one of these meetings, at the very least, please submit your comments to the OUCC at <http://www.in.gov/oucc/2361.htm>. **Be sure to reference Cause Number 45029 in the subject line of your email.**

Thank you very much for your support of our work, and for making your voice heard!

Kerwin Olson
Executive Director
Citizens Action Coalition
www.citact.org

Follow us on social media:



Hi, just a reminder that you're receiving this email because you gave us your email, either when someone came to your door or called you. Don't forget to add alert@citact.org to your address book so we'll be sure to land in your inbox!

6/7/2018

Citizens Action Coalition Mail - Fwd: ACT NOW! Say NO to another IPL rate hike!

Indianapolis Power & Light Company

Cause No. 45029 Cause No. 45029

CITIZENS ACTION COALITION OF INDIANA
1915 W. 18th Street
Suite C, Indianapolis, IN 46202

CAC Response to IPL Set 2 (Attachment 9(A))

IPL Witness JGS Attachment 2R

Page 22 of 22

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Cause No. 45029
Sierra Club Response to IPL Data Request 2

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANAPOLIS POWER & LIGHT)
COMPANY (“IPL”) FOR (1) AUTHORITY TO INCREASE)
RATES AND CHARGES FOR ELECTRIC UTILITY)
SERVICE, (2) APPROVAL OF REVISED DEPRECIATION)
RATES, ACCOUNTING RELIEF, INCLUDING UPDATE OF)
THE MAJOR STORM DAMAGE RESTORATION)
RESERVE ACCOUNT, APPROVAL OF A VEGETATION)
MANAGEMENT RESERVE ACCOUNT, INCLUSION IN) **CAUSE NO. 45029**
BASIC RATES AND CHARGES OF THE COSTS OF)
CERTAIN PREVIOUSLY APPROVED PROJECTS,)
INCLUDING THE EAGLE VALLEY COMBINED CYCLE)
GAS TURBINE, THE NATIONAL POLLUTION)
DISCHARGE ELIMINATION SYSTEM AND COAL)
COMBUSTION RESIDUALS COMPLIANCE PROJECTS,)
RATE ADJUSTMENT MECHANISM PROPOSALS, COST)
DEFERRALS, AMORTIZATIONS, AND (3) APPROVAL OF)
NEW SCHEDULES OF RATES, RULES AND)
REGULATIONS FOR SERVICE.)

SIERRA CLUB’S OBJECTIONS AND RESPONSES TO
IPL’S SECOND SET OF DISCOVERY REQUESTS

Sierra Club hereby submits its responses and objections to Indianapolis Power & Light Company’s (“IPL”) Second Set of Discovery Requests to Sierra Club.

GENERAL OBJECTIONS

- A. Sierra Club objects to Requests to the extent that they seek information that is not relevant to the above referenced proceedings, Indiana Rule of Evidence 401.
- B. Sierra Club objects to Requests that are not “reasonably calculated to lead to the discovery of admissible evidence,” Indiana Trial Rule 26(B)(1).
- C. Sierra Club objects to Requests that are overly broad, unduly burdensome, oppressive, and calculated to take Intervenor and its staff away from normal work activities, and

Cause No. 45029
Sierra Club Response to IPL Data Request 2

- require them to expend significant resources to provide complete and accurate answers to IPL's Request, which are only of marginal value to IPL. *See* Indiana Trial Rule 26 (B)(1).
- D. Sierra Club assumes, for the purpose of providing these objections and responses, that the Requests do not seek information that is privileged, protected by the work product doctrine, or otherwise exempt from disclosure. Sierra Club objects to the Requests to the extent, if any, that they call for production of any such material.
- E. Sierra Club reserves all of its evidentiary objections or other objections to the introduction or use of any response at any hearing in this action.
- F. Sierra Club does not, by any response to any Request, waive any objections to that Request.
- G. Sierra Club does not admit to the validity of any legal or factual contention asserted or assumed in the text of any Request.
- H. Sierra Club reserves the right to assert additional objections as appropriate, and to amend or supplement these objections and responses as appropriate.
- I. The foregoing general objections shall apply to each of the following Requests whether or not restated in the response to any particular response.

Cause No. 45029
Sierra Club Response to IPL Data Request 2

Specific Objections and Responses

Request No. 2-1:

Referring to the public field hearings held on April 23, 2018 and May 7, 2018 in this Cause:

- (a) Have any of the individuals who testified at the field hearings ever served as a director, employee, agent, advisor, consultant, witness or representative of Sierra Club? If yes, for each such individual:
 - (i) Identify the individual.
 - (ii) Identify and explain the relationship between the individual and Sierra Club, including any positions or titles held and the time period during which the individual held each position or title.
 - (iii) Please provide details regarding any pay, compensation or other contribution provided by Sierra Club to the individual at any time.

- (b) Have any of the individuals who testified at the field hearings ever acted in any other formal or informal capacity for Sierra Club or otherwise acted or purported to act on Sierra Club's behalf? If yes, for each such individual:
 - (i) Identify the individual.
 - (ii) Identify and explain the relationship between the individual and Sierra Club, including any positions or titles held and the time period during which the individual held each position or title.
 - (iii) Identify each time the individual acted in any other formal or informal capacity for Sierra Club or otherwise acted or purported to act on Sierra Club's behalf.
 - (iv) Please provide details regarding any pay, compensation or other contribution provided by Sierra Club to the individual at any time.

Objections and Response:

Sierra Club objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. *See* Indiana Trial Rule 26(B)(1). Sierra Club also objects to this request as it is vague, unduly burdensome, oppressive, and calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL. *See id.*

Notwithstanding these objections, in the spirit of cooperation, Sierra Club states that no employee of Sierra Club testified at the referenced field hearings.

Cause No. 45029
Sierra Club Response to IPL Data Request 2

Request No. 2-2:

Did Sierra Club use any director, employee, agent, advisor, consultant, witness or representative to solicit participation in the field hearings in this Cause and/or the submission of comments to the OUCC? If yes:

- (a) Please identify each such director, employee, agent, advisor, consultant, witness or representative and their position or role.
- (b) Please identify the pay or compensation provided to each such individual.

Objections and Response:

Sierra Club objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. *See* Indiana Trial Rule 26(B)(1). Sierra Club also objects to this request as it is vague, unduly burdensome, oppressive, and calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL. *See id.*

Notwithstanding these objections, in the spirit of cooperation, Sierra Club employees Megan Anderson and Matthew Skuya-Boss solicited participation in the field hearings in this Cause and the submission of comments to OUCC. Refer to other responses to this set of data requests and to the attached documents, which speak for themselves.

Cause No. 45029
Sierra Club Response to IPL Data Request 2

Request No. 2-3: Please identify all activities undertaken by Sierra Club or by Sierra Club's directors, employees, agents, advisors, consultants, witnesses or representatives to solicit participation in the field hearings in this Cause and/or the submission of comments in this Cause.

Objections and Response:

Sierra Club objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. *See* Indiana Trial Rule 26(B)(1). Sierra Club also objects to this request as it is vague, unduly burdensome, oppressive, and calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL. *See id.*

Notwithstanding these objections, in the spirit of cooperation, Sierra Club employees Megan Anderson and Matthew Skuya-Boss solicited participation in the field hearings in this Cause and the submission of comments to OUCC. Furthermore, Sierra Club social media accounts have made statements related to this Cause, and those social media accounts (hyperlinks provided below) are public and equally available to IPL as to Sierra Club. In addition, refer to the attached documents, which speak for themselves.

<https://twitter.com/INBeyondCoal>

<https://www.facebook.com/IndianaBeyondCoal/>

<https://www.instagram.com/indianabeyondcoal/>

Cause No. 45029
Sierra Club Response to IPL Data Request 2

Request No. 2-4: Did Sierra Club prepare or have prepared a letter, form, or other form of correspondence for submitting comments in this Cause? If yes, please provide a copy of each such letter, form or other form of correspondence.

Objections and Response:

Sierra Club objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. *See* Indiana Trial Rule 26(B)(1). Sierra Club also objects to this request as it is vague, unduly burdensome, oppressive, and calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL. *See id.*

Notwithstanding these objections, in the spirit of cooperation, Sierra Club employees Megan Anderson and Matthew Skuya-Boss solicited participation in the field hearings in this Cause and the submission of comments to OUCC. Refer to the attached documents, which speak for themselves.

Cause No. 45029
Sierra Club Response to IPL Data Request 2

Request No. 2-5: Please provide a copy of all communications and other documentation soliciting participation in the field hearings in this Cause and/or submission of comments in this Cause.

Objections and Response:

Sierra Club objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. *See* Indiana Trial Rule 26(B)(1). Sierra Club also objects to this request as it is vague, unduly burdensome, oppressive, and calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL. *See id.*

Notwithstanding these objections, in the spirit of cooperation, refer to the attached documents, which speak for themselves.

Cause No. 45029
Sierra Club Response to IPL Data Request 2

Request No. 2-6:

How many individuals did Sierra Club pay, compensate or otherwise contribute to in order to solicit participation in the field hearing and/or the submission of comments in this Cause? Please identify each such individual and the compensation provided to each such individual.

Objections and Responses:

Sierra Club objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. *See* Indiana Trial Rule 26(B)(1). Sierra Club also objects to this request as it is vague, unduly burdensome, oppressive, and calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL. *See id.*

Notwithstanding these objections, in the spirit of cooperation, Sierra Club employees Megan Anderson and Matthew Skuya-Boss solicited participation in the field hearings in this Cause and the submission of comments to OUCC. Sierra Club did not pay any person to participate in the field hearings or to submit comments to OUCC in this Cause.

Cause No. 45029
Sierra Club Response to IPL Data Request 2

Request No. 2-7: Did Sierra Club pay, compensate or otherwise contribute to any person to make or submit comments at the field hearings in this Cause?

Objections and Responses:

Sierra Club objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. *See* Indiana Trial Rule 26(B)(1). Sierra Club also objects to this request as it is vague, unduly burdensome, oppressive, and calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL. *See id.*

Notwithstanding these objections, in the spirit of cooperation, Sierra Club employees Megan Anderson and Matthew Skuya-Boss solicited participation in the field hearings in this Cause and the submission of comments to OUCC. Sierra Club did not pay any person to submit comments to OUCC in this Cause. Refer also to the attached documents.

Cause No. 45029
Sierra Club Response to IPL Data Request 2

Request No. 2-8: Did Sierra Club pay, compensate or otherwise contribute to any person to make or submit written comments to the OUCC in this Cause?

Objections and Responses:

Sierra Club objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. *See* Indiana Trial Rule 26(B)(1). Sierra Club also objects to this request as it is vague, unduly burdensome, oppressive, and calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL. *See id.*

Notwithstanding these objections, in the spirit of cooperation, Sierra Club employees Megan Anderson and Matthew Skuya-Boss solicited participation in the field hearings in this Cause and the submission of comments to OUCC.

Cause No. 45029
Sierra Club Response to IPL Data Request 2

Request No. 2-9:

Please identify all canvassing, soliciting or other promotional or advocacy activities conducted by Sierra Club or its directors, employees, agents, advisors, consultants, witnesses or representatives in connection with this Cause.

Objections and Responses:

Sierra Club objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. *See* Indiana Trial Rule 26(B)(1). Sierra Club also objects to this request as it is vague, unduly burdensome, oppressive, and calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL. *See id.*

Notwithstanding these objections, in the spirit of cooperation, Sierra Club employees Megan Anderson and Matthew Skuya-Boss solicited participation in the field hearings in this Cause and the submission of comments to OUCC. Refer also to documents produced here, which speak for themselves.

Cause No. 45029
Sierra Club Response to IPL Data Request 2

Request No. 2-10:

Did Sierra Club engage, employ or otherwise use any online advocacy websites, tools, or services to solicit participation in the field hearings in this Cause and/or the submission of comments in this Cause? If yes:

- (a) Please identify each such online advocacy website, tool, or service.
- (b) Explain how each such online advocacy website, tool, or service was used by Sierra Club.

Please identify all expenses incurred by Sierra Club or payments made by Sierra Club for the use of each such online advocacy website, tool, or service used by Sierra Club..

Objections and Responses:

Sierra Club objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. *See* Indiana Trial Rule 26(B)(1). Sierra Club also objects to this request as it is vague, unduly burdensome, oppressive, and calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL. *See id.*

Notwithstanding these objections, in the spirit of cooperation, Sierra Club employees Megan Anderson and Matthew Skuya-Boss solicited participation in the field hearings in this Cause and the submission of comments to OUCC. Furthermore, Sierra Club social media accounts have made statements related to this Cause, and those social media accounts (hyperlinks provided below) are public and equally available to IPL as to Sierra Club. In addition, refer to the attached documents, which speak for themselves.

<https://twitter.com/INBeyondCoal>

<https://www.facebook.com/IndianaBeyondCoal/>

<https://www.instagram.com/indianabeyondcoal/>

Cause No. 45029
Sierra Club Response to IPL Data Request 2

Request No. 2-11:

Did Sierra Club's directors, employees, agents, advisors, consultants, witnesses or representatives draft or assist in the drafting of proposed testimony to be presented at the field hearings in this Cause?

- (a) If so, please provide copies of all such testimony.
- (b) Please identify all Sierra Club directors, employees, agents, advisors, consultants, witnesses or representatives who engaged in or assisted the drafting of proposed testimony to be presented at the field hearings in this Cause.

Objections and Responses:

Sierra Club objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. *See* Indiana Trial Rule 26(B)(1). Sierra Club also objects to this request as it is vague, unduly burdensome, oppressive, and calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL. *See id.*

Notwithstanding these objections, in the spirit of cooperation, refer to the attached documents, which speak for themselves.

Cause No. 45029
Sierra Club Response to IPL Data Request 2

Request No. 2-12:

Did Sierra Club's directors, employees, agents, advisors, consultants, witnesses or representatives draft or assist in the drafting of the form letter contained in the documents labeled "45029 OUCC Consumer Comments_Part42_30Letters.pdf" through "45029 OUCC Consumer Comments_Part48_305Letters.pdf" filed by the OUCC on May 24, 2018?

- (a) If so, please identify all Sierra Club directors, employees, agents, advisors, consultants, witnesses or representatives who engaged in or assisted the drafting of the form letter.
- (b) Please explain Sierra Club's role in preparing and/or distributing the form letter.

Objections and Responses:

Sierra Club objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. *See* Indiana Trial Rule 26(B)(1). Sierra Club also objects to this request as it is vague, unduly burdensome, oppressive, and calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL. *See id.*

Notwithstanding these objections, in the spirit of cooperation, Sierra Club employees Megan Anderson and Matthew Skuya-Boss solicited participation in the field hearings in this Cause and the submission of comments to OUCC. In addition, refer to the attached documents, which speak for themselves.

Cause No. 45029
Sierra Club Response to IPL Data Request 2

Request No. 2-13:

Did Sierra Club's directors, employees, agents, advisors, consultants, witnesses or representatives draft or assist in the drafting of the postcard contained in the documents labeled "45029 OUCC Consumer Comments_Part50_Postcards.pdf" through "45029 OUCC Consumer Comments_Part52_Postcards.pdf" filed by the OUCC on May 24, 2018?

- (a) If so, please identify all Sierra Club directors, employees, agents, advisors, consultants, witnesses or representatives who engaged in or assisted the drafting of the postcard.

Please explain Sierra Club's role in preparing and/or distributing the postcard

Objections and Responses:

Sierra Club objects to this request as it seeks information that is not relevant to and outside the scope of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. *See* Indiana Trial Rule 26(B)(1). Sierra Club also objects to this request as it is vague, unduly burdensome, oppressive, and calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant time and resources to provide complete and accurate answers to IPL's request for information, which is only of marginal value to IPL. *See id.*

Notwithstanding these objections, in the spirit of cooperation, Sierra Club employees Megan Anderson and Matthew Skuya-Boss solicited participation in the field hearings in this Cause and the submission of comments to OUCC. In addition, refer to the attached documents, which speak for themselves.

Media Advisory
May 16, 2018

Media Contact: Ricky Junquera, 617.599.7048, ricky.junquera@sierraclub.org

Clean Energy Advocates delivering over 1000 comments urging OUCC to oppose IPL Rate Hike

*Every IPL customer should live in safety and dignity, without fear of utility
shutoffs.*

INDIANAPOLIS, IN - Today, customers and clean energy advocates will deliver over 1000 customer comments to the Office of Utility Consumer Counselor asking them to oppose Indianapolis Power & Light's proposed rate increase.

What: Public Comment Delivery to Office of Utility Consumer Counselor

Where: Rotunda, Indiana State House, 200 W Washington St, Indianapolis, IN

When: Wednesday, May 16 @4:00 PM - Speakers at 4:15 PM followed by march to PNC building and the Office of Utility Consumer Counselor

Who: Customers and Clean Energy Advocates

IPL's current rate hike request fails to protect Indianapolis area families already struggling to pay high electricity bills. IPL's monthly bills have already increased 45% during the last decade for the average customer, even though incomes in Indianapolis declined by 8%. Now, IPL is seeking to further increase customer bills by requesting an increase to the fixed charges on bills from \$17 to \$27. Increasing customers' monthly fixed charges takes more money out of customers' paychecks each month, even before using any electricity.

###

About the Sierra Club

The Sierra Club is America's largest and most influential grassroots environmental

organization, with more than 3 million members and supporters. In addition to helping people from all backgrounds explore nature and our outdoor heritage, the Sierra Club works to promote clean energy, safeguard the health of our communities, protect wildlife, and preserve our remaining wild places through grassroots activism, public education, lobbying, and legal action. For more information, visit www.sierraclub.org.

FOR IMMEDIATE RELEASE

April 19, 2018

Media Contact: Ricky Junquera, 617.599.7048, ricky.junquera@sierraclub.org

Faith Leaders and Clean Energy Advocates Urge Utility Commission to Reject IPL Rate Hike

Every IPL customer should live in safety and dignity, without fear of utility shutoffs.

INDIANAPOLIS, IN - Today, over a dozen faith leaders and clean energy advocates marched through downtown Indianapolis, stopping at Indianapolis Power and Light's (IPL) Headquarters, Mayor Joe Hogsett's Office, and the Indiana Utility Regulatory Commission (IURC). The group of marchers carried with them a letter signed by over 50 faith leaders and activists against the rate hike; they delivered the letter to the mayor, IPL and the IURC.

IPL's current rate hike request fails to protect Indianapolis area families already struggling to pay high electricity bills. IPL's monthly bills have already increased 45% during the last decade for the average customer, even though incomes in Indianapolis declined by 8%. Now, IPL is seeking to further increase customer bills by requesting an increase to the fixed charges on bills from \$17 to \$27. Increasing customers' monthly fixed charges takes more money out of customers' paychecks each month, even before using any electricity.

Faith Leaders' Letter reads as follows:

"We, clergy and faith leaders, ask you to oppose Indianapolis Power & Light's (IPL) fixed fee increase request in Cause Number 45029.

"During his first official mass as Pope in 2013, Pope Francis preached:

'Please, I would like to ask all those who have positions of responsibility in economic, political and social life, and all men and women of goodwill: let us be "protectors" of creation, protectors of God's plan inscribed in nature, protectors of one another and of the environment.' -Pope Francis, 2013

“We believe that IPL, as a regulated utility monopoly in Indiana, and charged with serving the public interest, should act as protectors of our community. To do so, we believe that the electricity we use in Indianapolis and across Indiana should be affordable and generated by wind and solar.

“IPL’s current rate hike request fails to protect Indianapolis area families who are already struggling to pay high electricity bills. IPL’s monthly bills have already increased 45% during the last decade for the average customer, even though incomes in Indianapolis declined by 8%.

“Meanwhile, IPL continues to fail to protect the environment and by asking customers to bail out the super-polluting Petersburg Generating Station, a coal-burning power plant that is hurting the planet and Hoosier health. Research even shows that phasing out, not bailing out, Petersburg could save customers over eighty million dollars while protecting public health and protecting against further environmental devastation.

“To act as protectors of our community, IPL should take immediate action against poverty and pollution; problems that IPL helped create—but could also help solve. IPL should create programs and policies that set affordable rates for low-income customers. Every IPL customer should live in safety and dignity, without fear of utility shutoffs. As a summary of the NAACP Lights Out in the Cold report states, ‘humans have a right to safe, affordable, sustainable power. [Utilities]... should ensure access to electricity for all people.’ IPL also should begin to phase out Petersburg and move Indianapolis towards 100% renewable energy.”

Two hearings are being held on IPL's request to raise our electric bills:

HEARING 1: Monday, April 23, 2018 at 6:00 p.m.

WHERE: Arsenal Tech High School (Anderson Hall), 1500 E Michigan Street, Indianapolis IN 46202 (MAP)

HEARING 2: Monday, May 7 at 6:00 p.m.

WHERE: New Augusta North Middle School (Auditorium), 6450 Rodebaugh Rd., Indianapolis, IN 46268 (MAP)

###

About the Sierra Club

The Sierra Club is America's largest and most influential grassroots environmental organization, with more than 3 million members and supporters. In addition to helping people from all backgrounds explore nature and our outdoor heritage, the Sierra Club works to promote clean energy, safeguard the health of our communities, protect wildlife, and preserve our remaining wild places through grassroots activism, public education, lobbying, and legal action. For more information, visit www.sierraclub.org.

MEDIA ALERT

Thursday, April 19, 2017

Contact:

Ricky Junquera - ricky.junquera@sierraclub.org - (617) 599-7048

*****MEDIA ADVISORY*****

**Faith Leaders and Clean Energy Advocates Urge Utility Commission to Reject IPL
Rate Hike**

Every IPL customer should live in safety and dignity, without fear of utility shutoffs.

INDIANAPOLIS, IN -- Today at 12:20pm, faith leaders and clean energy advocates will march through downtown Indianapolis, with stops at Indianapolis Power and Light's (IPL) Headquarters, Mayor Joe Hogsett's Office, and the Indiana Utility Regulatory Commission (IURC). A letter, signed by over 50 faith leaders and activists against the rate hike, will be delivered to the mayor, IPL and the IURC.

IPL's current rate hike request fails to protect Indianapolis area families already struggling to pay high electricity bills. IPL's monthly bills have already increased 45% during the last decade for the average customer, even though incomes in Indianapolis declined by 8%. Now, IPL is seeking to further increase customer bills by requesting an increase to the fixed charges on bills. Increasing customers' monthly fixed charges takes more money out of customers' paychecks each month, even before using any electricity.

Who: Hoosier Interfaith Power & Light, Indiana Beyond Coal, and others

What: March Against IPL Rate Hike

When: Thursday, April 19, 12:20 PM

Where: March starting and ending at City Market Plaza, 222 E. Market Street, Indianapolis, Indiana 46204

###

PUBLIC NOTICE

April 23 @ 6:00 PM

Arsenal Tech High School
(Anderson Hall),
1500 E. Michigan St.
Indianapolis, IN 46202

May 7 @ 6:00 PM

New Augusta North Middle School
Auditorium
6450 Rodebaugh Rd.
Indianapolis, IN 46268

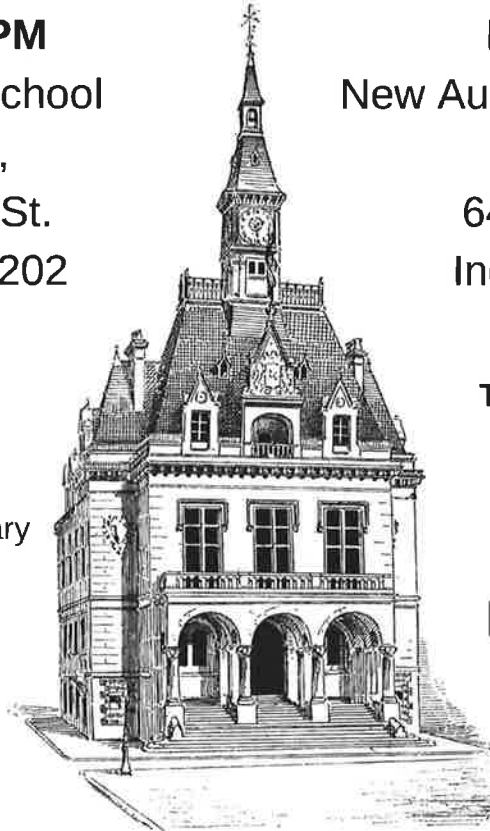
To request disability or
language services contact:

Office of the Executive Secretary
Indiana Utility Commission

(317) 232-2701

TDD (317) 232-8556

email stehodgin@urc.in.gov
at least 48 hours in advance.



To get materials for your friends
or community organization

Megan Anderson
Sierra Club Organizer

(cell)

Facebook.com/INBeyondCoal
Twitter @IndianaBeyondCoal

Indianapolis Power and Light wants to raise our utility bills!

Write a public comment online
tinyurl.com/noiplratehike

HEARING ON UTILITY BILLS

IPL wants to raise our electric bills!



Make your voice heard!

State Regulators are holding two public hearings to allow IPL customers to comment on the proposed rate increases.

Monday, April 23 @ 6:00 PM

Arsenal Tech High School (Anderson Hall),
1500 E. Michigan St., Indianapolis, IN 46202

Monday, May 7 @ 6:00 PM

New Augusta North Middle School Auditorium
6450 Rodebaugh Rd., Indianapolis, IN 46268

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Write a public comment online via Sierra Club at tinyurl.com/noiplratehike

To get materials for your friends or community organization, contact Megan Anderson, Sierra Club Organizer, [REDACTED], [REDACTED] (cell)

**Facebook.com/INBeyondCoal
Twitter @IndianaBeyondCoal**

To request disability or language services contact the Office of the Executive Secretary of the IURC at (317) 232-2701 or TDD (317) 232-8556, or email stehodgin@urc.in.gov, at least 48 hours in advance.

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C3 - BCC - OR - CC1172 - IPL Rate Case Hearing

New Contacts Invite Script:

Hey {{Contact Name:leadName}}! This is {{Agent Name:agentName}} with Sierra Club. We have one final public hearing to voice our concerns about IPL's proposed rate hike 📈📈 coming up {{on event date:onGoalDate}} {{at event time:atGoalTime}}. Are you free to attend?

Existing Contacts Invite Script:

Hey {{Contact Name:leadName}}! We have one final public hearing to voice our concerns about IPL's proposed rate hike 📈📈 coming up {{:onGoalDate}} {{:atGoalTime}}. Can you come?

RSVP Yes

Thank you! We had a great turnout at the first hearing on April 23rd, with 100 people turning out and 34 people speaking all opposing rate increases for our electric bills. Will you plan to speak?

RSVP No

We'll miss you on Monday {{Contact Name:leadName}}! Hope you can join us next time! If you haven't already you can submit your comment online by May 17th at tinyurl.com/noiplratehike. Have a great day!

Initial Script For New Contacts

Hey {{Contact Name:leadName}}! My name is {{Agent Name:agentName}} and I'm volunteering with Sierra Club. There is a public hearing on IPL's rate hike happening {{on event date:onGoalDate}} {{at event time:atGoalTime}}. IPL wants average customers to pay over \$300/a year before using any energy. The event will go on for awhile so you can arrive later than the start time. Can you come?

Initial Script for Existing Contacts

Hey {{Contact Name:leadName}}! There is a public hearing on IPL's rate hike happening {{:onGoalDate}} {{:atGoalTime}}. IPL wants average customers to pay over \$300/a year before using any energy. The event will go on for awhile so you can arrive later than the start time. Can you come?

RSVP Yes:

Great! Excited you can join us. The hearing will be happening @Arsenal Tech High School (Anderson Hall), 1500 E. Michigan St., Indianapolis, IN. Will you share your story at the hearing?

RSVP No:

Ok, I understand. Hope you can join us on May 7th for the second Public hearing!

Confirm Script New Contacts:

Hi {{Contact Name:leadName}}! It's {{Agent Name:agentName}} with Sierra Club. State regulators will be listening to public comments on IPL's rate increase proposal tonight {{:atGoalTime}}! Looking forward to having you join us. ☺ Any questions I can try and answer for you before tonight?

Confirm Script Existing Contacts:


Hey {{Contact Name:leadName}}! State regulators will be listening to public comments on IPL's rate increase proposal tonight {{:atGoalTime}}! Looking forward to having you join us. ☺ Any questions I can try and answer for you before tonight?

FOR VOLUNTEER USE ONLY – DO NOT DISTRIBUTE

Hi, is [FIRST NAME] home? My name is [YOUR FIRST NAME] and I’m calling with Power Indy Forward. **You may have heard, Indianapolis Power and Light (IPL) is proposing to increase our electric bills.**

IPL wants to raise the monthly fixed charge that average residential customers pay, no matter how much electricity they use, from what it is today, \$17.00 to \$27.00 dollars a month. This would be the highest fixed charge in the state of Indiana. IPL is raising this fixed charge to earn more revenue, and discourage people from investing in energy efficiency and solar. **How would this rate increase impact you? [CIRCLE THE ‘Y’ TO THE RIGHT OF “Story” if you find their story compelling]**

Will you write the Office of Utility Consumer Counselor saying you oppose this increase in the monthly fixed fee?

IF YES	IF NO
Continue below 	Thank you for your time today. Have a great weekend. [END CALL]

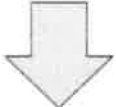
Would you like to fill that out online or write a letter and send through the mail?

IF ONLINE	IF WRITING A LETTER
<p>You can participate online by visiting:</p> <p style="text-align: center;">tinyurl.com/noiplratehike</p> <p>I can also send that link via email if you prefer.</p> <p>[IF WOULD LIKE EMAIL, ASK FOR THE BEST EMAIL TO SEND TO AND WRITE ON YOUR PHONE LIST]</p>	<p>You can mail your comments to:</p> <p>Indiana Office of Utility Consumer Counselor PNC Center 115 W. Washington St., Suite 1500 South Indianapolis, Indiana 46204</p> <p>If writing to the OUC on your own be sure to include the following information:</p> <ul style="list-style-type: none"> ● Your full name ● Mailing address ● E-mail address (if applicable) ● Your daytime telephone number ● Reference “IURC Cause No. 45029”

Continue on back

This spring, there will be two public hearings in Indianapolis on April 23rd and May 7th where customers can speak about how this rate increase will impact them before the utility commission. Would you be available to attend either of these hearings? (Mark Date in Notes)

Do you think anyone else you know, such as friends, neighborhood association, church or other organizations would want to hear about this rate hike?

IF YES	IF NO
Continue below 	Thank you for your support today. Have a great weekend. ***NOTE: If you talk to someone who is enthusiastic, but may not have networks they want to collect comment cards from - Ask: Would you be interested in helping us collect comment cards at community events? Or would you be interested in doing something from home like spreading the word on social media, making phone calls, or writing a letter to the local paper? [IF YES, CIRCLE 'Y' NEXT TO "VolInterest"] Thank you for your support today. Have a great weekend. <p style="text-align: center;">[END CALL]</p>

Great. We will mail you a packet with comment cards and fact sheets, about how many copies do you think you would like?

(Take notes on how many packets are needed, and what organizations they are collecting comments from such as name of church, if any additional support is needed, etc.)

Let me confirm your address. **[CONFIRM ADDRESS AND CIRCLE 'Y' NEXT TO "PC" for petition captain]**

Thank you for your support today. Have a great weekend.

[END CALL]

ADDITIONAL CODING INSTRUCTIONS

When you don't talk directly to the person on your list check the box next to the appropriate code:

- NH = Not Home/No Answer**
- RF = Refused/Hang Up/Take off List**
- DC = Deceased**
- MV = Moved**
- CB = Call Back**
- BZ = Line Busy**
- LM = Left Message**
- WN = Wrong Number**
- WX = Disconnected Line**

More Info on IPL & the IPL Rate Case:

- Low usage customers (primarily low and fixed income households, most notably senior citizens) who use 325 kilowatt hours or less per month will see their monthly fixed cost increase by 42% to \$16!
- IPL has fought energy efficiency and solar at the statehouse, and now they are trying to discourage this by proposing this outrageous increase in the fixed fee to all their customers' bills.
- Why do utilities want to raise monthly fixed fees? Utilities prefer to collect revenue through fixed charges because the fixed charge reduces the utility's risk that lower sales (from energy efficiency, (rooftop solar), weather, or economic downturns) will reduce its revenues. However, higher fixed charges are an inequitable and inefficient means to address utility concerns. (source Synapse)

In addition, IPL wants to increase the price of electricity to cover expenses for their dirty fossil fuel facilities and more. IPL wants to increase per kilowatt hour charges for the first 500 kWh used each month by 15% and every kWh used thereafter by 21%.

- IPL operates one of the largest polluters in the nation, the Petersburg coal plant. This coal plant was featured on USA today as one of America's "Super Polluters" because it

is the 9th most toxic power plant in the nation – releasing toxic pollution into our air, land, and water; and the 35th worst greenhouse gas polluter – releasing millions of tons of greenhouse gas pollution which is fueling climate change. (www.superpolluter.com)

● IPL’s Petersburg power plant reported releasing more air pollution than any other coal plant in Indiana, and is one of the largest coal plant polluters of arsenic, mercury, and selenium into our waterways in the nation

This would mean the residential base rate of \$97.42 (for a household using 1,000 kWh per month) approved in IPL’s last base rate case would increase to \$121.85 before taxes, trackers, and other fees - a 25% INCREASE in base rates! IPL’s proposal has to be approved by the Indiana Utility Regulatory Commission, the state agency that regulates utilities including IPL. Their sister agency, the Office of Utility Consumer Counselor has a duty to represent customers in this case.

FOR VOLUNTEER USE ONLY – DO NOT DISTRIBUTE

Hello, my name is [YOUR NAME], I am going door-to-door with Power Indy Forward, a coalition of community organizations to let Indy residents know about Indianapolis Power and Light's proposed rate hike. You may have heard, Indianapolis Power and Light (IPL) is proposing to increase our electric bills.

IPL wants to raise the monthly fixed charge that average residential customers pay, no matter how much electricity they use, from what it is today, \$17.00 to \$27.00 dollars a month. IPL already has the highest fixed . IPL is raising this fixed charge to earn more revenue and discourage people from investing in energy efficiency and solar. **How would this rate increase impact you?**

Will you write the Office of Utility Consumer Counselor saying you oppose this increase in the monthly fixed fee? (Hand comment card) Please include some details about how this rate increase will impact you on the card.

Do you think anyone else you know, such as friends, neighborhood association, church or other organizations would want to hear about this rate hike?

**If they are collecting comments from an organization record the name of the organization on the comment card as well. Include any other details such as if they request a speaker, or if they need a large volume of supplies. Once Megan is alerted to their need she'll get people their supplies.*

Don't Forget

Check

"I would like materials to share with others" on the comment card

On the comment card

write "LP" if you leave a comment packet at the door

There are two public hearings in Indianapolis fast approaching where customers can speak about how this rate increase will impact them before the utility commission, the state agency that will decide on this case. Can you attend either of these hearings? (Record date they can attend on comment card)

Monday, April 23, 2018 at 6:00 pm
Arsenal Tech High School (Anderson Hall), 1500 E Michigan Street, Indianapolis IN
46202

Monday, May 7 at 6:00 pm
New Augusta North Middle School (Auditorium), 6450 Rodebaugh Rd., Indianapolis, IN
46268

For disability and language accommodations, please contact the Office of the Executive Secretary of the Indiana Utility Regulatory Commission at (317) 232-2701 or TDD (317) 232-8556, or email stehodgin@urc.in.gov, at least 48 hours in advance.

More Info on IPL & the IPL Rate Case:

- Low usage customers (primarily low and fixed income households, most notably senior citizens) who use 325 kilowatt hours or less per month will see their monthly fixed cost increase by 42% to \$16!
- IPL has fought energy efficiency and solar at the statehouse, and now they are trying to discourage this by proposing this outrageous increase in the fixed fee to all their customers' bills.
- Why do utilities want to raise monthly fixed fees? Utilities prefer to collect revenue through fixed charges because the fixed charge reduces the utility's risk that lower sales (from energy efficiency, (rooftop solar), weather, or economic downturns) will reduce its revenues. However, higher fixed charges are an inequitable and inefficient means to address utility concerns. (source Synapse)

In addition, IPL wants to increase the price of electricity to cover expenses for their dirty fossil fuel facilities and more. IPL wants to increase per kilowatt hour charges for the first 500 kWh used each month by 15% and every kWh used thereafter by 21%.

- IPL operates one of the largest polluters in the nation, the Petersburg coal plant. This coal plant was featured on USA today as one of America's "Super Polluters" because it is the 9th most toxic power plant in the nation – releasing toxic pollution into our air, land, and water; and the 35th worst greenhouse gas polluter – releasing millions of tons of greenhouse gas pollution which is fueling climate change. (www.superpolluter.com)
- IPL's Petersburg power plant reported releasing more air pollution than any other coal plant in Indiana, and is one of the largest coal plant polluters of arsenic, mercury, and selenium into our waterways in the nation

This would mean the residential base rate of \$97.42 (for a household using 1,000 kWh per month) approved in IPL's last base rate case would increase to \$121.85 before taxes, trackers, and other fees - a 25% INCREASE in base rates! IPL's proposal has to be approved by the Indiana Utility Regulatory Commission, the state agency that regulates utilities including IPL. Their sister agency, the Office of Utility Consumer Counselor has a duty to represent customers in this case.

FOR VOLUNTEER USE ONLY – DO NOT DISTRIBUTE

Our goal is to build a relationship with people who wrote the utility commission, and learn more about why they are concerned about the rate increase, and invite them to speak/ attend upcoming public hearings. Remember to record responses and take down as many notes as you need. Record if they plan to attend and/or speak, if they are bringing friends, notes about why they care about this issue, and if they are interested in volunteering.

Hi, is [FIRST NAME] home? My name is [YOUR FIRST NAME], I'm a volunteer with the Sierra Club. **Thank you for writing a public comment regarding Indianapolis Power and Light's proposed electric rate increase.**

**Kick-off the conversation: Give some time for people to share why this is important to them or ask them, see more conversation points at the bottom of this script.*

Indianapolis Power and Light (IPL) wants to raise our bills again, and if their proposal is approved, the fixed monthly charge residential customers pay regardless of how much electricity they consume would go up from \$17 to \$27 a month; a 59% increase. IPL's fixed charge is already the highest in Indiana. Fixed fees discourage investments in solar and energy efficiency, and burden low and fixed income customers. Also IPL continues to burn coal at the Petersburg Super Polluter in SW Indiana, a region unfairly burdened with coal pollution.

How would this rate increase impact you?

We want to show overwhelming opposition to this dirty rate hike by having a big turnout at a public hearing being held by the state agencies who will decide on this rate case. This public hearing is taking place this upcoming Monday, May 7 starting at 6:00pm at New Augusta North Middle School (Auditorium) (6450 Rodebaugh Rd., Indianapolis, IN 46268).

The hearing will continue into the evening so if you can't arrive right at 6:00 pm, you'll still be able to participate.

Would you be available to attend or speak at this hearing (on May 7)?


[RECORD IF SPEAKING OR ATTENDING AND ARRIVAL TIME IF POSSIBLE]

If applicable:


- We will be looking to see if we can help out by providing childcare, I can take note that you would need childcare to attend the hearing? How many children, and what age(s)? [IF CHILDCARE IS NEEDED PLEASE TAKE NOTE OF AGE OF CHILD/ CHILDREN]
- For disability and language services for the public hearing, please contact Stephanie Hodgins, Office of the Executive Secretary, Indiana Utility Regulatory Commission at (317) 232-2701 or TDD (317) 232-8556, or email stehodgin@urc.in.gov, at least 48 hours in advance.

IF YES

IF NO

<p>Continue below</p> 	<p><i>*If enthusiastic but simply can't attend, continue below</i></p> <p>Thank you for your time today. Have a great weekend.</p> <p>[END CALL]</p>
---	---

Would you be willing to write the Mayor and City-Council letting them know you want them to protect Indianapolis residents from this harmful fixed fee increase? [IF YES, WRITE WE FOR "WriteElected"]

IF YES	IF NO
<p>Continue below</p> 	<p><i>*If enthusiastic, but may not have networks they want to collect comment cards from ask:</i></p> <p><i>*Other volunteer opportunities include: making calls from home, writing a letter to the editor, just take a side note if they are interested in these activities</i></p> <p>Thank you for your support today. Have a great weekend.</p> <p>[END CALL]</p>

Do you think anyone else you know, such as friends, neighborhood association, church or other organizations would want to hear about these upcoming public hearings?

Great. We will mail you a packet with comment cards and fact sheets, about how many copies do you think you would like?

(Take notes on how many packets are needed, and what organizations they are collecting comments from such as name of church, if any additional support is needed, etc.)

Let me confirm your address. [CONFIRM ADDRESS and write "PC" for petition captain in Notes section]

Thank you for your support today. Have a great weekend.

[END CALL]

- Low usage customers (primarily low and fixed income households, most notably senior citizens) who use 325 kilowatt hours or less per month will see their monthly fixed cost increase by 42% to \$16!
- IPL has fought against energy efficiency and solar at the statehouse, and now they are trying to discourage this by proposing this outrageous increase in the fixed fee to all their customers' bills.
- Why do utilities want to raise monthly fixed fees? Utilities prefer to collect revenue through fixed charges because the fixed charge reduces the utility's risk that lower sales (from energy efficiency, (rooftop solar),

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- Part of this rate increase also prolongs the life of the Petersburg coal plant, one of the largest polluters in the nation, which IPL owns in Southern Indiana. IPL has been delaying a transition to renewable energy, and has fought rooftop solar and energy efficiency at the statehouse. IPL doesn't plan to invest in anymore renewable energy until the late 2030's.

HELPFUL ONLINE LINKS

ONLINE PUBLIC COMMENT VIA SIERRA CLUB: tinyurl.com/noiplratehike

If they don't have internet, write the IURC at Indiana Office of Utility Consumer Counselor
PNC Center
115 W. Washington St., Suite 1500 South
Indianapolis, Indiana 46204

If writing to the OUCC on your own be sure to include the following information:

- Your full name
- Mailing address
- E-mail address (if applicable)
- Your daytime telephone number
- Reference "IURC Cause No. 45029"

ONLINE RSVP TO PUBLIC HEARING: <https://tinyurl.com/iplhearings>

FACT SHEET IN ENGLISH: tinyurl.com/caciplinfo

FACT SHEET IN SPANISH: <https://tinyurl.com/CACespanol>

CODING INSTRUCTIONS:

- NH = Not Home/No Answer**
- RF = Refused/Hang Up/Take off List**
- DC = Deceased**
- MV = Moved**
- CB = Call Back**
- BZ = Line Busy**
- LM = Left Message**
- WN = Wrong Number**
- WX = Disconnected Line**

EXPLORE, ENJOY AND PROTECT THE PLANET



Oppose IPL's Fixed Fee Increase to Our Bills!

Instead of phasing out its expensive, super-polluting Petersburg coal plant to save money, Indianapolis Power & Light wants to increase your electric bill and charge you nearly \$325 a year before you use any electricity at all.

The higher fixed fees would discourage people from investing in solar and energy efficiency, as well as disproportionately burden those on low- and fixed incomes. The Office of Utility Consumer Counselor (OUCC) will represent Hoosiers in the rate case, and they're accepting customer comments on IPL's request. **Make sure your voice is heard!**

Tell the OUCC to oppose IPL's request for increased fees and include a personal message about how high utility bills affect you, to have more influence.



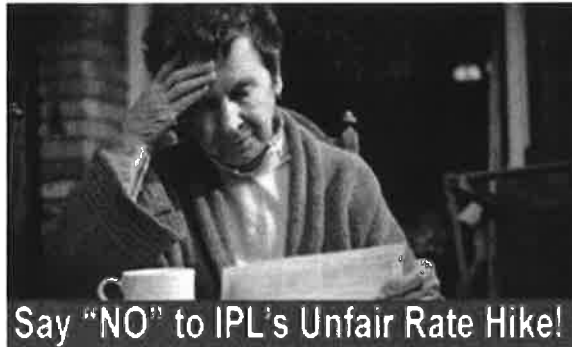
Say "NO!" to IPL's Electricity Fee Increase!



First Name	Last Name
<input type="text"/>	<input type="text"/>
Email	Zip
<input type="text"/>	<input type="text"/>

By clicking continue, you will also receive periodic communications from the Sierra Club. You can unsubscribe at any time.

Continue



Dear First_indiana,

Indianapolis Power & Light wants to raise its fixed charge -- the money you pay on your electric bill every month no matter how much energy you use - - to more than \$300 a year!

Join us May 7 at a hearing in Indianapolis to speak out against IPL's fixed charge increase!

RSVP!

IPL already has the highest monthly fixed charge of any investor-owned utility in Indiana, and now they want to raise that fixed charge by 59%, unfairly burdening low, and fixed-income customers, who will be hit with a bill increase much higher than customers who waste energy.^[1]

Fixed charges on our utility bills serve to discourage people from investing in solar and energy efficiency while locking in added profits for IPL. Not only is IPL proposing an increase in fixed costs hurting low income customers right here, IPL wants to continue burning coal at their Petersburg Super Polluter in Southwest Indiana, hurting the health of us and our neighbors in Southern Indiana.

That's why I'm demanding state regulators lower IPL's fixed fee, which is already too high, at a public hearing on May 7. Will you join me to make sure your voice is heard too? RSVP today!

HEARING DETAILS:

HEARING 2: Monday, May 7 at 6:00 p.m.

WHERE: New Augusta North Middle School (Auditorium), 6450 Rodebaugh Rd., Indianapolis, IN 46268 ([MAP](#))

Questions? Contact Megan Anderson at megan.anderson@sierraclub.org



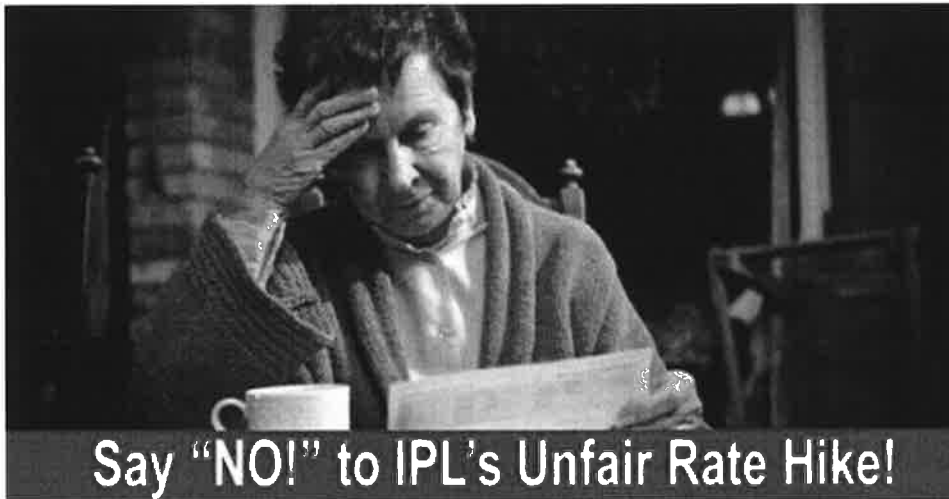
Sierra Club



Written by Sydni Johnson [?] · April 30 · 🌐

Indianapolis Power & Light (IPL) is trying to raise your monthly fixed fee to more than \$300 a year before you use any electricity at all. The Office of Utility Consumer Counselor (OUCC) will represent Hoosiers in the rate case, and they're accepting customer comments on IPL's request.

Submit a comment to oppose IPL's rate increase today -->
<https://sc.org/2r8XM4Q>



SIERRACLUB.ORG

Oppose IPL's rate increase.

Submit a comment today!

Sign Up

Initial Script For New Contacts

Hey {{Contact Name:leadName}}! My name is {{Agent Name:agentName}} and I'm volunteering with Sierra Club. There is a public hearing on IPL's rate hike happening {{on event date:onGoalDate}} {{at event time:atGoalTime}}. IPL wants average customers to pay over \$300/a year before using any energy. The event will go on for awhile so you can arrive later than the start time. Can you come?

Initial Script for Existing Contacts

Hey {{Contact Name:leadName}}! There is a public hearing on IPL's rate hike happening {{:onGoalDate}} {{:atGoalTime}}. IPL wants average customers to pay over \$300/a year before using any energy. The event will go on for awhile so you can arrive later than the start time. Can you come?

RSVP Yes:

Great! Excited you can join us. The hearing will be happening @Arsenal Tech High School (Anderson Hall), 1500 E. Michigan St., Indianapolis, IN. Will you share your story at the hearing?

RSVP No:

Ok, I understand. Hope you can join us on May 7th for the second Public hearing!

Confirm Script New Contacts:

Hi {{Contact Name:leadName}}! It's {{Agent Name:agentName}} with Sierra Club. State regulators will be listening to public comments on IPL's rate increase proposal tonight {{:atGoalTime}}! Looking forward to having you join us. ☺ Any questions I can try and answer for you before tonight?

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Hey {{Contact Name:leadName}}! State regulators will be listening to public comments on IPL's rate increase proposal tonight {{:atGoalTime}}! Looking forward to having you join us. ☺ Any questions I can try and answer for you before tonight?

C3 - BCC - OR - CC1172 - IPL Rate Case Hearing

New Contacts Invite Script:

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Hey {{Contact Name:leadName}}! We have one final public hearing to voice our concerns about IPL's proposed rate hike 🗳️ 🗳️ coming up {{:onGoalDate}} {{:atGoalTime}}. Can you come?

RSVP Yes

Thank you! We had a great turnout at the first hearing on April 23rd, with 100 people turning out and 34 people speaking all opposing rate increases for our electric bills. Will you plan to speak?

RSVP No

We'll miss you on Monday {{Contact Name:leadName}}! Hope you can join us next time! If you haven't already you can submit your comment online by May 17th at tinyurl.com/noiplratehike. Have a great day!

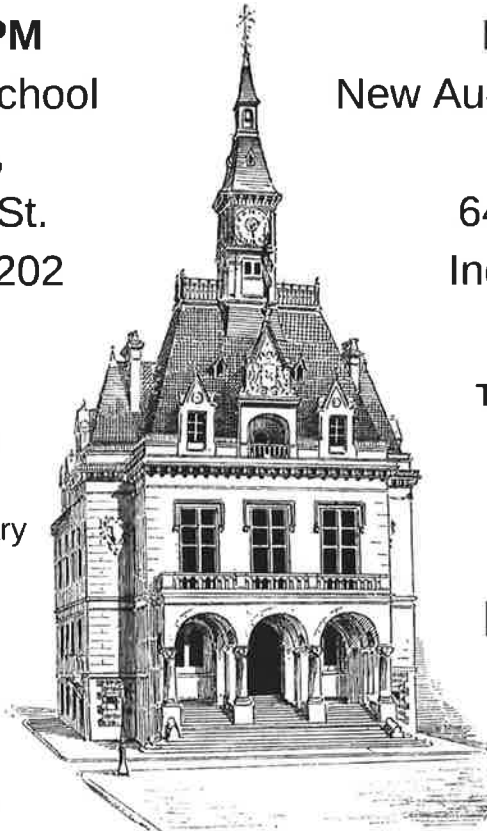
PUBLIC NOTICE

April 23 @ 6:00 PM

Arsenal Tech High School
(Anderson Hall),
1500 E. Michigan St.
Indianapolis, IN 46202

May 7 @ 6:00 PM

New Augusta North Middle School
Auditorium
6450 Rodebaugh Rd.
Indianapolis, IN 46268



To request disability or
language services contact:

Office of the Executive Secretary
Indiana Utility Commission

(317) 232-2701
TDD (317) 232-8556
email stehodgin@urc.in.gov
at least 48 hours in advance.

To get materials for your friends
or community organization

Megan Anderson
Sierra Club Organizer

██████████ (cell)

Facebook.com/INBeyondCoal
Twitter @IndianaBeyondCoal

**Indianapolis Power and Light
wants to raise our utility bills!**

Write a public comment online
tinyurl.com/noiplratehike

HEARING ON UTILITY BILLS

IPL wants to raise our electric bills!



Make your voice heard!

State Regulators are holding two public hearings to allow IPL customers to comment on the proposed rate increases.

Monday, April 23 @ 6:00 PM

Arsenal Tech High School (Anderson Hall),
1500 E. Michigan St., Indianapolis, IN 46202

Monday, May 7 @ 6:00 PM

New Augusta North Middle School Auditorium
6450 Rodebaugh Rd., Indianapolis, IN 46268

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SOURCE: <https://www.facebook.com/IndianaBeyondCoal/>

Indiana Beyond Coal
Published by Matthew Skuya Boss · May 17 at 12:06pm

Final Day to Say No to higher electric bills in Indianapolis! visit: tinyurl.com/noipratehike today!

In 2017, IPL pulled the plug on customers 59,163 times for nonpayment. Customers can't afford higher electric bills.

COMMENT DEADLINE TODAY, MAY 17!

Go online to submit your comment visit: tinyurl.com/noipratehike

Or Submit directly to the Office of Utility Consumer Counselor by emailing: ucccinfo@oucc.IN.gov

IMPORTANT: Reference "Cause No. 45029" in your comments

Questions? email matt.skuya.boss@sierraclub.org



Indiana Beyond Coal
Published by Megan Anderson · April 19

Indianapolis Power and Light has increased bills 45% in the last decade. even though incomes in Indianapolis has declined 8%. **SAY NO WAY TO MORE RATE INCREASES!** Public hearing Monday, April 23 starting at 6pm at Arsenal Tech High School #repowerindiana tinyurl.com/iplhearings



Say "NO!" to IPL's Unfair Rate Hike!

SIERRA.SECURE.FORCE.COM
Say "NO!" to IPL's Unfair Rate Hike!
RSVP for an upcoming hearing to oppose IPL's rate increase.

340 people reached

Boost Post

Like Comment Share

Indiana Beyond Coal
Published by Megan Anderson · May 10 at 4:29pm

IPL wants to charge one of the highest monthly fixed charges in the nation. Say NO WAY! at tinyurl.com/noipratehike #RepowerIndiana

SIERRA.SECURE.FORCE.COM
Oppose IPL's Fixed Fee Increase to our Bills!

Instead of investing in money saving energy efficiency, IPL is requesting an increase in our monthly fixed fee of more than \$300 a year for

to IPL's Electricity Fee

175 people reached

2 Shares

Write a comment

Boost Post

Like Comment Share

Indiana Beyond Coal
Published by Megan Anderson · April 24

Indianapolis Power and Light is trying to sell the public a lie - claiming they've moved away from coal to "clean" energy. While it's true IPL retired two outdated coal plants, the utility still operates one of the dirtiest coal plants in the nation, the super polluter Peterburg plant. IPL built an unnecessarily large gas plant in Martinsville, hoping to turn a profit from customers. IPL has less than 10% renewable energy and no plans to add more until the late 2030's. Tell the IURC you won't buy the lie! See the comments to take action #RepowerIndiana

CBS4INDY.COM
Hearings allow IPL customers to sound off on proposed rate hike that would increase bills by \$11 a month

INDIANAPOLIS, Ind. — Indianapolis Power & Light customers will have the chance to sound off Monday on a proposed rate increase from the utility. If state regulators approve the hike, the average bill will go up about \$11 a...

Boost Post

Like Comment Share


SOURCE: <https://twitter.com/INBeyondCoal>

 **Indiana Beyond Coal** @INBeyondCoal · May 7
Say NO WAY at tinyurl.com/noipratehike #Indy

CAC Indiana @cacindiana

Why does @IPLPower ask us for a \$95 Million raise? BECAUSE THEY CAN. Because the IURC rarely says no. How do we make an impact? Having folks like YOU call to say NO to this ridiculous #rateincrease. More here: citact.org/utility-rates-...


  2  3 

 **Indiana Beyond Coal** @INBeyondCoal · Apr 16
IPL is trying to raise electric rates again, even though their parent company reported \$2 BILLION in excess cash in 2017! Public hearing Monday, April 23, 2018 at 6:00 pm (Arsenal Tech High School) #RepowerIndiana



You can weigh in on the proposed IPL rate hikes at a public hearing ... Your IPL bill could soon go up if state regulators approve the company's proposed rate increase - but there are still chances to make your voice theindychannel.com

  10  7 

 **Indiana Beyond Coal** @INBeyondCoal · Apr 22
Speak up and speak out against high electric bills for dirty energy. Public hearing tomorrow starting at 6pm @Arsenal Tech High School. Anderson Hall, 1500 E Michigan St. #RepowerIndiana



In 2017, IPL pulled the plug on customers 59,163 times for nonpayment. Customers can't afford higher electric bills.

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1500 E. Michigan St.
Indianapolis, IN 46202

May 7 @ 6:00 PM
New Augusta North Middle School
Auditorium
6450 Rodebaugh Rd.
Indianapolis, IN 46268

more info at: tinyurl.com/iplhearing

  3  2 



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Customers can't afford higher electric bills.**

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more info at: tinyurl.com/plhearings



indianabeyondcoal

indianabeyondcoal Eastsiders saying NO WAY to a \$27 a month fixed fee! You can too at tinyurl.com/noiplrte #RepowerIndiana indianabeyondcoal PS- don't forget to come say no way in person at the next public hearing happening on May 7 starting at 6pm, at New Augusta North Middle School (Auditorium) 6450 Rodebaugh Road, Indianapolis IN 46268



16 likes

479, 34



Add a comment...



indianabeyondcoal

indianabeyondcoal Speak up and speak out against high electric bills for dirty energy. Public hearing tomorrow starting at 6pm. @Arsenal Tech High School, Anderson Hall, 1500 E Michigan St., Indianapolis. #RepowerIndiana IPL wants to increase our monthly fixed charge from \$17 to \$27 this would be the highest in the state of Indiana, burden low and fixed income customers, and make it more difficult for you to see savings from energy efficiency or solar efforts in your home. Read more at tinyurl.com/cadplmfo.



heffermanshomeservices, k8lie_savage, mreeowry, noosierchapter and csanalvis3595 like this

479, 34



Add a comment...