

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

APPLICATION OF INDIANAPOLIS)
POWER & LIGHT COMPANY D/B/A AES)
INDIANA FOR APPROVAL OF A FUEL)
COST FACTOR FOR ELECTRIC SERVICE)
DURING THE BILLING MONTHS OF JUNE)
2023 THROUGH AUGUST 2023, IN)
ACCORDANCE WITH THE PROVISIONS)
OF I.C. 8-1-242, AND CONTINUED USE OF)
RATEMAKING TREATMENT FOR COSTS)
OF WIND POWER PURCHASES)
PURSUANT TO CAUSE NOS. 43485 AND)
43740, AND CONTINUED RECOVERY OF)
THE COSTS OF THE FUEL HEDGING)
PLAN PURSUANT TO I.C. 8-1-2-42.)

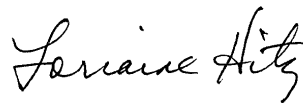
CAUSE NO. 38703
FAC-139

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

PUBLIC'S EXHIBIT NO. 1

PRE-FILED TESTIMONY OF OUCC WITNESS
GREGORY T. GUERRETTAZ

April 20, 2023



Lorraine Hitz
Attorney No. 18006-29
Deputy Consumer Counselor

**INDIANAPOLIS POWER & LIGHT COMPANY
D/B/A AES INDIANA**

(“AES Indiana”)

Report of the Indiana Office of
Utility Consumer Counselor

Application for Change in Fuel Cost Adjustment

Cause No. 38703-FAC 139

April 20, 2023

Gregory T. Guerrettaz, CPA

Wholly Owned by



2680 East Main Street
Suite 223
Plainfield, IN 46168
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OFFICE OF UTILITY CONSUMER COUNSELOR

Pre-Filed Testimony of Gregory T. Guerrettaz, CPA

Review of Fuel Cost Adjustment

CAUSE NO. 38703 FAC-139

INDIANAPOLIS POWER & LIGHT COMPANY D/B/A AES INDIANA

1 **Q: Please state your name and business address.**

2 A: My name is Gregory T. Guerrettaz. I am a CPA and a Municipal Advisor. My office is
3 located at 2680 East Main Street, Suite 223, Plainfield, Indiana 46168. My qualifications
4 are attached to this testimony as Appendix A.

5 **Q: What is the purpose of your testimony in this Cause?**

6 A: I will give an opinion concerning the relief requested by Indianapolis Power & Light
7 Company (“IPL”, “Applicant” or “AES Indiana”) in its Application for Approval of Fuel
8 Cost Charge, filed on March 16, 2023, as discussed in AES Indiana’s direct testimony. My
9 testimony will discuss:

10 Whether AES Indiana has calculated the fuel cost element of the proposed fuel cost
11 adjustment in conformity with the requirements of Ind. Code § 8-1-2-42;

12 Whether the fuel costs paid by AES Indiana, when compared to fuel costs recovered
13 by AES Indiana for the quarter ended January 31, 2023, resulted in a variance which was
14 used to calculate the fuel cost adjustment for the quarter ended August 30, 2023, in
15 conformity with the requirements of I.C. § 8-1-2-42;

16 Whether the level of net operating income experienced by AES Indiana for the
17 twelve months ended January 31, 2023 was greater than that granted in IPL’s rate case

proceedings, Cause No. 45029, as well as applicable ECCRA and Transmission, Distribution and Storage System Improvement Charge Property ("TDSIC") Orders; and

Whether the fuel cost adjustment for the quarter ended January 31, 2023 has been properly applied in conformity with the requirements of Cause No. 38703-FAC 136 and 137.

Q: To the extent you do not address a specific item in your testimony, should it be construed to mean you agree with Petitioners' proposals?

A: No. My silence on any topics, issues, or items Petitioner proposes does not indicate my approval of these topics, issues or items. Rather, the scope of my testimony is limited to the specific topics discussed herein.

Q: Please explain Schedule A.

A: Schedule A presents the components that comprise AES Indiana's proposed fuel cost adjustment factor and shows how the components are used in the calculation. The fuel cost element of the proposed fuel cost adjustment contains more than AES Indiana's actual fuel costs. For example, this calculation includes AES Indiana's power purchases, MISO charges and credits, and ASM charges.

Schedule A also demonstrates that the fuel cost paid by AES Indiana, when compared to the fuel costs recovered from AES Indiana's customers for the quarter ended January 31, 2023, resulted in a variance that was used to calculate the fuel cost adjustment for the quarter ending August 30, 2023. As filed by AES, Schedule A has multiple line items to arrive at the variance factor. The following components have been used to calculate the combined variance as shown on this schedule:

A) the current variance from FAC 139 of (\$10,559,791);

1 B) the impact of the FAC 133 S1 deferred amount of \$20,518,476 over

2 24 months of \$2,564,810; and

3 C) a One-Time Settlement Credit for FAC 133 S1 of (\$6,800,000).

4 These combined variances total (\$14,794,981), which AES Indiana is requesting be spread
5 over the three months in FAC 139. Once the forecasted cost of 39.715 Mills per KWh is
6 added to the (3.914), the total requested amount is 35.801 Mills per KWh. Subtracting the
7 base cost of fuel of 32.938 results in a factor of 2.863 Mills/KWh.

8 **Q: Does the OUCC have an opinion regarding the projections used by AES Indiana for**
9 **fuel costs and sales of power for the quarter ending August 31, 2023?**

10 **A:** Yes. The OUCC performed a detailed review of AES Indiana's estimation model during
11 the audit. The forecast is affected by the following items:

12 A) Daily changes in the price of natural gas;

13 B) Daily changes of power prices for the MISO market;

14 C) Recent hedges put into place;

15 D) AES Indiana's coal inventory; and

16 E) Gas transportation contracts.

17 Based on the OUCC's analysis and what appeared during the audit to be only a small
18 change in commodity pricing, the OUCC is recommending the F÷S of 39.715 Mills/KWh
19 as detailed in this report on Schedule A, be approved.

20 **Q: What components did the OUCC use for the recommended factor?**

21 **A:** First, the OUCC worked with AES to update the commodity prices for power and natural
22 gas prices. Once the prices were updated by AES, the OUCC then conducted an extensive
23 review of all factors affecting the proposed F÷S for the forecasted period.

Q: Please explain Schedules B and B-1.

A: Schedule B compares AES Indiana's actual electric net operating income applicable to jurisdictional retail sales for the twelve months ending January 31, 2023 (as adjusted for rounding), to IPL's authorized electric net operating income per the Commission's Order in Cause No. 45029, as adjusted for all applicable Qualified Pollution Control Property ("QPCP") proceedings under Cause Nos. 42170-ECRs, 45264, and TDSIC Orders. Schedule B-1 depicts AES Indiana's cumulative over- or under- earnings for each fuel cost adjustment for the relevant period calculated.

Q: Has AES Indiana earned a level of net operating income greater than that authorized by the Commission?

A: No. As shown on Schedule B, AES Indiana had jurisdictional net operating income for the twelve months ending January 31, 2023 that was less than that granted in Cause No. 45029, as adjusted for applicable ECR and TDSIC Causes. The "Excess (Under) Earnings for the Relevant Period" as shown on Schedule B-1 shows the Sum of Differentials for the relevant period as a positive \$131,792,218, which has accumulated through the following FAC proceedings (FAC 119 through FAC 139).

Q: Has the fuel cost adjustment for the quarter ending January 31, 2023, been accurately applied in conformity with the requirements of Cause No. 38703-FAC 135?

A: Yes. The fuel cost adjustment approved by the Commission in Cause No. 38703-FAC 135 was the amount applied to AES Indiana's customers for the period approved.

Q: Please explain Schedule C.

A: Schedule C compares AES Indiana's pro forma operating expenses approved by the Commission in Cause No. 45029 with the actual operating expenses incurred by AES Indiana for the twelve months ending January 31, 2023. The purpose of this calculation is

1 to determine whether AES Indiana had actual decreases in other operating expenses which
2 could be used to offset increases in AES Indiana's fuel cost. As can be seen on Schedule
3 C, AES Indiana did not have decreases in other operating costs that could be used to offset
4 fuel cost increases.

5 **Q: Please explain Schedules D and E.**

6 **A:** Schedule D sets forth the total fuel cost, in Mills, for the period January 2019 through
7 January 2023. Schedule E graphically depicts the results of Schedule D for the period
8 January 2019 through January 2023.

9 **Q: Does the OUCC have any comments regarding the:**

- 10 **A. purchased power benchmark agreement approved in Cause No. 43414;**
- 11 **B. Ancillary Services Market ("ASM");**
- 12 **C. bill analysis; steam generation cost comparison;**
- 13 **D. actual cost of fuel (Mills/KWh) comparison;**
- 14 **E. coal inventory;**
- 15 **F. Lakefield Wind Park ("Lakefield") and Hoosier Wind Power Project LLC**
- 16 **("Hoosier");**
- 17 **G. coal price decrement;**
- 18 **H. unit commitment status; hedging program; and**
- 19 **I. Eagle Valley Outage ("Eagle Valley")?**

20 **A:** OUCC Witness Michael Eckert will provide testimony on these issues.

21 **Q: Please explain Schedule F.**

22 **A:** Schedule F is the comparison of actual fuel cost and estimated fuel cost for this FAC period
23 and includes transmission loss adjustments.

24 **Q: Please explain Schedule G.**

25 **A:** Schedule G reflects the proposed and historical fuel cost adjustment factors.

26 **Q: Please explain Schedule H.**

27 **A:** Schedule H is the schedule setting forth the MISO – Cost Flow Through in this FAC.

28 **Q: Please explain Schedule I.**

29 **A:** Schedule I is the schedule setting forth all MISO charge types by month.

1 **Q: Did AES Indiana include the fuel cost and fuel revenue associated with sales from its**
2 **public electric vehicle charging stations in this FAC?**

3 **A:** Yes. The amounts accounted for as fuel costs are reflected on Attachment NHC-1,
4 Schedule 4.

5 **Q: What was AES Indiana's weighted average deviation for the reconciliation period?**

6 **A:** The weighted average deviation for the reconciliation period is 5.77%.

7 **Q: How will AES Indiana's proposed factor affect the average residential customer?**

8 **A:** An average residential customer using 1,000 KWh per month will experience a decrease
9 of \$23.09, or 16.51% with the proposed mitigated factor.

10 **Q: Is AES Indiana's coal inventory within its target levels?**

11 **A:** Yes. AES Indiana is currently above its target levels.

12 **Q: Should AES Indiana provide an update to the OUCC on coal inventory changes in**
13 **the next FAC?**

14 **A:** Yes. The OUCC has an on-going request for AES Indiana's coal inventory levels and coal
15 transportation issues.

16 **Q: Is AES Indiana seeking to recover any purchased power costs incurred in November**
17 **2022, December 2022, and January 2023 that are in excess of the Daily Benchmarks?**

18 **A:** Yes. AES Indiana is seeking to recover \$8,968,611 of purchased power costs in excess of
19 the applicable Purchased Power Daily Benchmarks in FAC 139. Mr. Eckert provides
20 testimony on this recoverable amount.

21 **Q: What information does the OUCC continue to review in FAC audits?**

22 **A:** The FAC is impacted by ever-changing generation costs, the generation mix, MISO market
23 offer components, MISO instructions, purchased power costs in the MISO market and
24 other items.

25 **Q: Did AES Indiana discuss and address its fuel hedging policy with the OUCC?**

1 **A:** Yes. AES Indiana discussed its natural gas hedging policy and walked the OUCC through
2 the structure of its hedges. The process appears to be coming together to provide a hedge
3 against higher prices in the next two years. There was a \$16,651,410 cost associated with
4 the hedging program per the after the fact hedging program evaluation performed by AES.

5 **Q: What other additional items came up during the audit?**

6 **A:** Numerous items were discussed during the audit. Coal and transportation contracts have
7 been firmed up for the next year. Higher prices have resulted from the process. Also, the
8 entire amount of MISO charges incurred on December 23 – 24, 2022 were due to Winter
9 Storm Elliott. The material changes in the commodity prices for the forecasted period were
10 also discussed. Reviewing all these issues is necessary to reach the OUCC's opinion on the
11 FAC factor being proposed.

12 **Q: What does the OUCC recommend?**

13 **A:** The OUCC recommends:

14 1) The Commission approve the AES Indiana's proposed fuel cost charge of 2.863 Mills
15 per KWh;

16 2) AES Indiana continue to use its commitment model and provide the results to the OUCC
17 in each FAC; and

18 3) AES Indiana update the OUCC on any strategies developed for hedging natural gas and
19 track the cost or benefit over the life of the program.

20 **Q: Does this conclude your pre-filed testimony?**

21 **A:** Yes.

Appendix A - Qualifications of Gregory T. Guerrettaz

1 **Q: Please state your name, title, and business address.**

2 **A:** My name is Gregory T. Guerrettaz. I am a CPA. My office is located at 2680 East Main
3 Street, Suite 223, in Plainfield, Indiana 46168.

4 **Q: By whom are you employed and what is your position?**

5 **A:** Gregory T. Guerrettaz, CPA is a wholly owned subsidiary of Financial Solutions Group,
6 Inc. (Formed in 1998) which is registered with the Securities and Exchange Commission
7 (SEC), effective January 1, 2011. I am employed as President of Financial Solutions Group,
8 Inc. ("FSG Corp."), a public finance and utility rate consulting firm.

9 **Q: Please summarize your educational and professional qualifications.**

10 **A:** I received a Bachelor's degree in Accounting from Indiana University. During my
11 employment, I have attended and spoken at numerous seminars on governmental
12 accounting and finance throughout the United States. I continue to maintain all
13 requirements under Continuing Professional Education.

14 **Q: How long have you been employed by FSG Corp., and in what capacities?**

15 **A:** I founded FSG Corp. in 1998 and am employed as the President of the company. FSG
16 Corp.'s practice is split about 50% utility and 50% finance related. I have been responsible
17 for numerous projects, including utility rate engagements, cost of capital analyses and rate
18 of return, utility financial analyses, utility business valuations, other projects related to a
19 variety of utility issues and preparation of electric trackers for utilities in the State of
20 Indiana.

1 I have pre-filed written, and given oral, testimony to the Indiana Utility Regulatory
2 Commission on a variety of issues over the years including, but not limited to, revenue
3 requirement calculations, accounting methodology and related areas, utility historical and
4 pro-forma financial information, cost of capital analysis, rate structure and cost of service
5 issues, issuance of both long and short-term debt, utility operating information, utility
6 trackers and a variety of other utility related issues.

7 I prepare activity-based budgets and assist communities in the preparation of both
8 short and long-range plans for all types of entities. I have served as Financial Advisor for
9 over two billion dollars of tax-exempt and taxable securities. FSG Corp. is registered with
10 the Security and Exchange Commission (SEC) and the Municipal Security Rulemaking
11 Board (MSRB), and currently I hold a Series 50 and 54 license as a Municipal Advisor and
12 Chief Compliance Officer.

13 **Q: Please state your experience prior to joining FSG Corp.**

14 **A:** I was employed for 8 years with a national accounting firm in Indianapolis. I was a partner
15 in that firm for 4 years and, for 4 years was a partner in a partnership between that firm and
16 Municipal Consultants, Inc. Prior to that, Municipal Consultants, Inc. employed me for 7
17 years (4 of those as a shareholder) until the partnership and eventual merger with the
18 national accounting firm. While at Municipal Consultants, Inc., I reviewed, prepared and
19 analyzed over 900 FAC filings by various electric utilities. I also testified numerous times,
20 over the seven years, regarding the earnings and return tests. Preceding my time with
21 Municipal Consultants, Inc., I worked for 3 years as a Staff Accountant for the Accounting
22 Department of the Public Service Commission of Indiana, now known as the Indiana

1 Utility Regulatory Commission. In this position, I prepared and presented testimony in
2 major electric and water cases. I have performed utility reviews since 1981. I have also
3 performed a variety of feasibility and cost-of-service studies for cities and counties
4 throughout Indiana.

5 I am a Certified Public Accountant, licensed in the State of Indiana, and am a
6 member of the American Institute of Certified Public Accountants and the Indiana CPA
7 Society. I am an Associate Member of the Association of Indiana Counties and the Indiana
8 Association of Cities and Towns. I have served as the Chairman of the Indiana CPA
9 Utilities Committee in the past.

**OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT**

Indianapolis Power & Light Company

Cause No. 38703-FAC 139

Calculation of Proposed Fuel Cost Adjustment Factor

Requested by AES

		<u>Mills/KWh</u>
Average projected fuel cost for quarter including June 2023, July 2023 and August 2023 (F+S)	Total	<u>39.715</u>
	Variance	
Current Period Variance	\$ (10,559,791)	-2.794
FAC 133 S1 Settlement Costs to be recovered over 24 months	\$ 2,564,810	
FAC 133 S1 Settlement One-Time Credit	\$ (6,800,000)	<u>-1.121</u>
Total Request by AES		<u>35.801</u>
Less: Base cost of fuel		<u>32.938</u>
Proposed FAC AES		<u>2.863</u>

**OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 139**

**Comparison of Authorized Return
with Actual Net Operating Income (in \$000's)**

Actual Twelve Months Ending January 31, 2023

Jurisdictional Operating Revenue	\$ 1,815,766
Jurisdictional Operating Expense	<u>1,619,284</u>
Jurisdictional Net Operating Income	<u><u>\$ 196,482</u></u>

Per Cause No. 45029

Jurisdictional Net Operating Income	<u>\$ 220,076</u>
Adjustments for Cause No. 42170-ECR34 and ECR 35	<u>\$ 1,464</u>
Adjustments for Cause No. 45264 TDISC-3 Combined	<u>\$ 7,743</u>
Adjustments for Cause No. 45264 TDISC-5 Combined	<u>\$ 5,431</u>

Adjusted Jurisdictional Net Operating Income Total	<u><u>\$ 234,714</u></u>
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Over (Under)	<u><u>\$ (38,232)</u></u>
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OUCS REVIEW OF FUEL COST ADJUSTMENT

Indianapolis Power & Light Company

Cause No. 38703-FAC 139

Excess (Under) Earnings for Relevant Period

Item No.	FAC No.	Reporting Pd.	Determined		Authorized		
			Return		Return	Differential	
1	139	1/31/2023	\$	196,482,000	\$	234,714,000	\$ (38,232,000)
2	138	10/31/2022		203,266,000		231,914,000	(28,648,000)
3	137	7/31/2022		215,542,000		230,102,000	(14,560,000)
4	136	4/30/2022		223,712,000		228,291,000	(4,579,000)
5	135	1/31/2022		227,360,000		226,529,000	831,000
6	134	10/31/2021		226,080,000		224,682,000	1,398,000
7	133	7/31/2021		219,585,000		223,889,000	(4,304,000)
8	132	04/30/2021		232,893,000		223,097,000	9,796,000
9	131	01/31/2021		227,171,000		222,310,000	4,861,000
10	130	10/31/2020		229,881,000		221,451,000	8,430,000
11	129	07/31/2020		242,467,000		221,368,000	21,099,000
12	128	04/30/2020		236,917,000		221,285,000	15,632,000
13	127	01/31/2020		234,075,000		221,201,000	12,874,000
14	126	10/31/2019		230,875,000		218,710,000	12,165,000
15	125	07/31/2019		229,431,000		206,716,000	22,715,000
16	124	04/30/2019		217,179,000		194,654,170	22,524,830
17	123	01/31/2019		212,078,000		182,107,612	29,970,388
18	122	10/31/2018		201,730,000		172,128,000	29,602,000
19	121	07/31/2018		190,971,000		171,399,000	19,572,000
20	120	04/30/2018		180,892,000		170,247,000	10,645,000
Sum of Differential for Relevant Period							\$ 131,792,218

OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 139

Comparison of Pro-Forma Operating Expense
with Actual Operating Expense
(000's Omitted)

Actual Twelve Months Ending January 31, 2023

Total Operating Expense	\$ 1,619,284
Less: Fuel Costs	<u>791,377</u>
Operating Expense Excluding Fuel Cost	<u>\$ 827,907</u>

Per Cause No. 45029

Total Operating Expense	\$ 1,181,174
Less: Fuel Costs	<u>436,216</u>
Operating Expense Excluding Fuel Cost	<u>\$ 744,958</u>

Over (Under)	<u><u>\$ 82,949</u></u>
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OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 139

**Actual Cost of Fuel to Generate Electricity and
the Actual Cost of Fuel Included in the Cost of Purchased Power**

Line No.	Description	January 2019	February 2019	March 2019	April 2019	May 2019	June 2019	July 2019	August 2019	September 2019	October 2019	November 2019	December 2019
KWH Source (000's) :													
1.	Coal Generation	770,207	686,760	609,764	478,816	458,862	724,120	789,818	757,758	769,213	856,262	928,065	927,979
2.	Nuclear Generation	-	-	-	-	-	-	-	-	-	-	-	-
3.	Hydro Generation	-	-	-	-	-	-	-	-	-	-	-	-
4.	Other Generation - Internal Combustion	20	18	21	23	10	11	22	16	21	8	15	5
5.	Gas Generation	540,187	463,083	500,822	386,005	446,217	520,853	687,668	644,957	580,973	574,081	503,730	543,891
Purchases through MISO:													
6.	Wind Purchase Power Agreement Purchases	77,865	63,944	84,775	78,799	69,525	51,012	44,188	36,827	62,428	87,732	83,809	84,592
7.	Non-Wind PPA Market Purchases	43,724	24,321	86,364	110,442	87,872	21,733	34,678	5,545	20,264	197	10,246	6,473
8.	Other	8	6	11	22	31	34	30	44	34	26	26	11
9.	Purchased Power other than MISO	7,137	8,356	9,668	14,770	13,659	15,459	19,167	18,310	16,369	14,009	9,054	6,648
LESS:													
10.	Energy Losses and Company Use	74,812	64,295	64,408	52,410	56,613	60,207	74,746	68,228	63,636	54,511	59,893	65,043
11.	Inter-System Sales through MISO	69,387	80,189	119,240	118,968	43,667	234,050	200,045	211,938	282,634	534,597	439,388	382,950
12.	Inter-System Sales other than MISO	-	-	-	-	-	-	-	-	-	-	-	-
13.	Non-Jurisdictional Retail Sales	-	-	-	-	-	-	-	-	-	-	-	-
14.	Sales (\$)	<u>1,294,949</u>	<u>1,102,004</u>	<u>1,107,777</u>	<u>897,499</u>	<u>975,896</u>	<u>1,038,965</u>	<u>1,300,780</u>	<u>1,183,291</u>	<u>1,103,032</u>	<u>943,207</u>	<u>1,035,664</u>	<u>1,121,606</u>
Fuel Cost \$ (F) :													
15.	Coal Generation	\$ 16,696,294	\$ 14,706,645	\$ 13,722,596	\$ 10,424,270	\$ 10,401,513	\$ 15,713,388	\$ 16,230,872	\$ 15,236,020	\$ 15,669,695	\$ 17,031,501	\$ 19,211,506	\$ 17,862,410
16.	Nuclear Generation	-	-	-	-	-	-	-	-	-	-	-	-
17.	Hydro Generation	-	-	-	-	-	-	-	-	-	-	-	-
18.	Other Generation - Internal Combustion	2,992	2,712	3,242	4,947	1,595	1,759	4,203	2,526	3,094	1,154	2,470	780
19.	Gas Generation	14,983,451	10,813,630	12,383,862	8,412,722	9,206,214	10,560,348	13,774,871	12,347,535	11,272,816	9,653,971	10,285,132	10,162,980
20.	Financial Hedges Gains/Losses & Trans. Fees	-	-	-	-	-	-	-	-	-	-	-	-
Purchases through MISO:													
21.	Wind Purchase Power Agreement Purchases	6,113,708	4,802,582	6,768,046	6,048,356	5,409,411	3,942,332	3,335,474	2,838,063	4,652,850	6,778,041	6,648,508	6,587,935
22.	Non-Wind PPA Market Purchases	2,176,397	632,183	2,965,688	3,002,418	2,159,779	445,025	831,948	99,556	702,619	3,865	243,780	122,784
23.	Other	225	192	314	700	827	924	813	1,169	913	706	687	297
24.	MISO Components of Cost of Fuel	1,344,091	816,947	(206,912)	2,740,064	49,393	655,668	1,109,015	858,330	1,791,027	1,294,798	1,446,196	1,266,124
25.	Purchased Power other than MISO	933,770	1,224,752	1,510,746	2,265,633	2,171,605	2,549,657	3,211,065	2,947,222	2,597,391	2,252,739	1,397,289	873,619
LESS:													
26.	Inter-System Sales through MISO	1,204,084	1,378,211	2,015,320	1,973,918	683,448	3,831,213	3,377,524	3,469,006	4,441,529	8,021,192	7,494,076	6,151,467
27.	Inter-System Sales other than MISO	-	-	-	-	-	-	-	-	-	-	-	-
28.	Non-Jurisdictional Retail Sales	-	-	-	-	-	-	-	-	-	-	-	-
29.	Transmission Losses	219,757	214,951	222,738	153,443	90,769	273,022	359,847	321,204	371,880	311,351	409,395	327,432
30.	Lakefield PPA Adjustment	136,211	47,132	102,456	166,441	63,516	146,258	192,921	95,630	277,465	520,486	407,456	300,163
31.	Purchased Power in Excess	98,057	-	-	-	-	-	-	-	-	-	-	-
32.	Total Fuel Costs (F)	<u>\$ 40,592,819</u>	<u>\$ 31,359,349</u>	<u>\$ 34,807,068</u>	<u>\$ 30,605,308</u>	<u>\$ 28,562,604</u>	<u>\$ 29,618,608</u>	<u>\$ 34,567,969</u>	<u>\$ 30,444,581</u>	<u>\$ 31,599,531</u>	<u>\$ 28,163,746</u>	<u>\$ 30,924,641</u>	<u>\$ 30,097,867</u>
33.	Fuel Cost per KWH (in Mills) F/S	<u>\$ 31.347</u>	<u>\$ 28.457</u>	<u>\$ 31.421</u>	<u>\$ 34.101</u>	<u>\$ 29.268</u>	<u>\$ 28.508</u>	<u>\$ 26.575</u>	<u>\$ 25.729</u>	<u>\$ 28.648</u>	<u>\$ 29.860</u>	<u>\$ 29.860</u>	<u>\$ 26.835</u>

OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 139

Actual Cost of Fuel to Generate Electricity and
the Actual Cost of Fuel Included in the Cost of Purchased Power

Line No.	Description	January 2020	February 2020	March 2020	April 2020	May 2020	June 2020	July 2020	August 2020	September 2020	October 2020	November 2020	December 2020
KWH Source (000's) :													
1.	Coal Generation	629,367	797,762	352,582	(6,945)	18,808	476,399	805,452	726,943	547,994	454,911	406,656	933,629
2.	Nuclear Generation	-	-	-	-	-	-	-	-	-	-	-	-
3.	Hydro Generation	-	-	-	-	-	-	-	-	-	-	-	-
4.	Other Generation - Internal Combustion	17	15	17	19	10	14	9	15	20	12	12	27
5.	Gas Generation	600,605	526,779	431,161	500,461	588,385	740,517	849,534	516,354	507,369	591,349	441,249	496,280
Purchases through MISO:													
6.	Wind Purchase Power Agreement Purchases	72,777	85,331	73,840	75,404	53,913	43,584	37,037	47,741	43,136	41,895	58,893	57,207
7.	Non-Wind PPA Market Purchases	72,562	4,162	256,736	315,833	269,846	45,347	7,222	69,716	45,799	28,264	103,272	7,736
8.	Other	9	8	15	26	40	47	57	48	51	35	21	16
9.	Purchased Power other than MISO	7,980	6,482	11,862	13,970	15,401	19,302	19,411	17,469	15,866	11,562	10,123	8,162
LESS:													
10.	Energy Losses and Company Use	68,045	64,478	58,114	49,898	52,020	62,342	72,591	67,715	55,881	52,260	53,782	66,319
11.	Inter-System Sales through MISO	153,446	255,982	76,391	41	1,732	188,768	390,262	140,735	144,700	176,874	42,072	295,848
12.	Inter-System Sales other than MISO	-	-	-	-	-	-	-	-	-	-	-	-
13.	Non-Jurisdictional Retail Sales	-	-	-	-	-	-	-	-	-	-	-	-
14.	Sales (\$)	<u>1,161,826</u>	<u>1,100,079</u>	<u>991,708</u>	<u>848,829</u>	<u>892,651</u>	<u>1,074,100</u>	<u>1,255,869</u>	<u>1,169,836</u>	<u>959,654</u>	<u>898,894</u>	<u>924,372</u>	<u>1,140,890</u>
Fuel Cost \$ (F) :													
15.	Coal Generation	\$ 12,762,365	\$ 15,475,847	\$ 6,531,454	\$ 1,463	\$ 707,441	\$ 9,495,157	\$ 15,965,045	\$ 14,925,058	\$ 10,750,486	\$ 10,938,210	\$ 8,492,560	\$ 17,990,480
16.	Nuclear Generation	-	-	-	-	-	-	-	-	-	-	-	-
17.	Hydro Generation	-	-	-	-	-	-	-	-	-	-	-	-
18.	Other Generation - Internal Combustion	2,475	11,715	103,829	1,314	1,186	1,727	1,054	1,801	2,338	1,526	1,324	3,391
19.	Gas Generation	10,437,380	10,554,048	7,777,162	7,195,834	8,730,098	11,584,612	14,338,159	10,123,756	7,974,287	10,643,545	8,518,400	10,042,131
20.	Financial Hedges Gains/Losses & Trans. Fees	-	-	-	-	-	-	-	-	-	-	-	-
Purchases through MISO:													
21.	Wind Purchase Power Agreement Purchases	5,599,074	6,620,038	6,349,109	6,152,717	5,388,452	5,502,919	2,234,272	3,812,773	4,767,733	5,807,100	7,957,840	6,157,677
22.	Non-Wind PPA Market Purchases	1,674,294	90,525	4,840,437	6,000,682	5,084,625	753,861	176,328	1,600,695	792,037	511,042	2,297,255	131,614
23.	Other	242	217	403	695	1,065	1,258	1,433	1,115	1,171	817	479	374
24.	MISO Components of Cost of Fuel	1,228,608	817,713	735,285	812,239	542,060	597,545	922,538	36,436	490,558	673,875	974,731	789,238
25.	Purchased Power other than MISO	1,079,064	835,271	1,718,351	2,119,067	2,391,097	3,051,478	3,020,823	2,640,812	2,600,977	1,910,708	1,431,699	1,066,322
LESS:													
26.	Inter-System Sales through MISO	2,632,469	4,039,637	1,214,308	994	25,709	2,758,676	5,949,606	2,200,469	2,070,538	3,235,829	642,821	4,798,579
27.	Inter-System Sales other than MISO	-	-	-	-	-	-	-	-	-	-	-	-
28.	Non-Jurisdictional Retail Sales	-	-	-	-	-	-	-	-	-	-	-	-
29.	Transmission Losses	168,228	270,901	67,041	-	6,112	194,868	346,961	213,296	175,576	239,449	80,282	325,137
30.	Lakefield PPA Adjustment	60,051	295,414	93,247	(376)	1,669	102,739	238,979	168,077	56,282	108,245	30,154	117,481
31.	Purchased Power in Excess	-	-	-	-	-	-	-	-	-	-	-	-
32.	Total Fuel Costs (F)	<u>\$ 29,922,754</u>	<u>\$ 29,799,422</u>	<u>\$ 26,681,434</u>	<u>\$ 22,283,393</u>	<u>\$ 22,812,534</u>	<u>\$ 27,932,274</u>	<u>\$ 30,124,106</u>	<u>\$ 30,560,604</u>	<u>\$ 25,077,191</u>	<u>\$ 26,903,300</u>	<u>\$ 28,921,031</u>	<u>\$ 30,940,030</u>
33.	Fuel Cost per KWH (in Mills) F/S	<u>\$ 25.755</u>	<u>\$ 27.088</u>	<u>\$ 26.905</u>	<u>\$ 26.252</u>	<u>\$ 25.556</u>	<u>\$ 26.005</u>	<u>\$ 23.987</u>	<u>\$ 26.124</u>	<u>\$ 26.131</u>	<u>\$ 29.929</u>	<u>\$ 31.287</u>	<u>\$ 27.119</u>

OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 139

Actual Cost of Fuel to Generate Electricity and
the Actual Cost of Fuel Included in the Cost of Purchased Power

Line No.	Description	January 2021	February 2021	March 2021	April 2021	May 2021	June 2021	July 2021	August 2021	September 2021	October 2021	November 2021	December 2021
KWH Source (000's) :													
1.	Coal Generation	955,235	831,066	780,187	711,009	624,722	698,779	788,815	912,737	704,109	500,538	184,482	623,008
2.	Nuclear Generation	-	-	-	-	-	-	-	-	-	-	-	-
3.	Hydro Generation	-	-	-	-	-	-	-	-	-	-	-	-
4.	Other Generation - Internal Combustion	16	17	15	10	14	12	12	9	9	2	19	15
5.	Gas Generation	498,866	423,048	466,231	194,733	70,111	172,257	191,859	271,949	108,110	207,310	382,977	211,212
	Purchases through MISO:					-	-	-					
6.	Wind Purchase Power Agreement Purchases	48,251	42,148	34,729	44,667	36,481	35,842	27,171	30,060	44,287	38,539	59,790	74,863
7.	Non-Wind PPA Market Purchases	1,533	45,941	8,101	118,780	230,274	256,927	244,777	126,699	215,195	289,542	427,674	226,904
8.	Other	10	13	23	35	33	37	128	124	51	92	19	14
9.	Purchased Power other than MISO	6,219	6,829	13,358	16,094	15,681	16,709	14,658	15,776	15,190	10,410	7,585	6,768
	LESS:					-	-	-					
10.	Energy Losses and Company Use	62,973	61,560	51,593	46,520	48,566	57,892	61,860	65,214	53,790	51,304	52,802	56,393
11.	Inter-System Sales through MISO	253,049	117,416	275,234	156,900	2,710	12,844	17,611	39,146	6,714	16,288	-	10,527
12.	Inter-System Sales other than MISO	-	-	-	-	-	-	-	-	-	-	-	-
13.	Non-Jurisdictional Retail Sales	-	-	-	-	-	-	-	-	-	-	-	-
14.	Sales (\$)	<u>1,194,108</u>	<u>1,170,086</u>	<u>975,817</u>	<u>881,908</u>	<u>926,040</u>	<u>1,109,827</u>	<u>1,187,949</u>	<u>1,252,994</u>	<u>1,026,447</u>	<u>978,841</u>	<u>1,009,744</u>	<u>1,075,864</u>
Fuel Cost \$ (F) :													
15.	Coal Generation	\$ 18,215,836	\$ 16,261,039	\$ 15,170,668	\$ 14,088,080	\$ 12,947,434	\$ 14,566,015	\$ 16,170,366	\$ 18,506,946	\$ 14,707,630	\$ 10,865,067	\$ 4,974,914	\$ 14,770,615
16.	Nuclear Generation	-	-	-	-	-	-	-	-	-	-	-	-
17.	Hydro Generation	-	-	-	-	-	-	-	-	-	-	-	-
18.	Other Generation - Internal Combustion	2,079	1,996	1,250	2,274	1,850	1,565	1,932	1,103	1,931	203	2,954	1,009
19.	Gas Generation	10,576,392	23,585,279	10,256,313	5,642,310	3,812,298	8,382,253	9,964,055	14,459,213	8,234,683	13,977,551	24,572,739	15,481,539
20.	Financial Hedges Gains/Losses & Trans. Fees	-	-	-	-	-	(758,807)	(832,167)	(2,080,504)	(1,953,922)	(1,601,046)	-	482,546
	Purchases through MISO:					-	-	-					
21.	Wind Purchase Power Agreement Purchases	5,647,543	4,595,633	6,072,044	5,851,366	4,406,203	3,369,274	2,478,097	3,111,966	4,894,700	4,953,401	7,929,986	7,483,356
22.	Non-Wind PPA Market Purchases	52,443	2,469,000	136,619	2,982,658	6,861,548	8,564,046	8,991,144	5,095,128	9,512,983	17,335,847	27,481,782	9,524,139
23.	Other	230	296	539	803	796	910	3,135	3,032	1,247	714	472	337
24.	MISO Components of Cost of Fuel	1,070,150	2,259,360	609,901	472,209	887,341	947,011	1,316,000	1,194,277	1,637,668	1,181,362	7,081,450	2,546,715
25.	Purchased Power other than MISO	812,041	968,863	2,153,696	2,539,973	2,474,999	2,744,086	2,487,989	2,541,299	2,463,525	1,703,176	1,225,785	1,112,262
	LESS:					-	-	-					
26.	Inter-System Sales through MISO	4,072,886	3,422,725	4,608,943	2,697,427	46,933	292,850	395,817	1,055,312	141,081	621,586	-	331,296
27.	Inter-System Sales other than MISO	-	-	-	-	-	-	-	-	-	-	-	-
28.	Non-Jurisdictional Retail Sales	-	-	-	-	-	-	-	-	-	-	-	-
29.	Transmission Losses	408,345	306,663	256,504	161,095	9,799	60,408	87,000	227,063	32,517	25,713	-	40,793
30.	Lakefield PPA Adjustment	100,644	51,489	84,538	111,306	6,116	13,128	35,132	58,681	19,532	42,006	69	10,114
31.	Purchased Power in Excess	-	-	-	-	-	-	-	-	-	-	-	-
32.	Total Fuel Costs (F)	<u>\$ 31,794,839</u>	<u>\$ 46,360,589</u>	<u>\$ 29,451,045</u>	<u>\$ 28,609,845</u>	<u>\$ 31,329,621</u>	<u>\$ 37,449,967</u>	<u>\$ 40,062,602</u>	<u>\$ 41,491,404</u>	<u>\$ 39,307,315</u>	<u>\$ 47,726,970</u>	<u>\$ 73,270,013</u>	<u>\$ 51,020,315</u>
33.	Fuel Cost per KWH (in Mills) F/S	<u>\$ 26.626</u>	<u>\$ 39.622</u>	<u>\$ 30.181</u>	<u>\$ 32.441</u>	<u>\$ 33.832</u>	<u>\$ 33.744</u>	<u>\$ 33.724</u>	<u>\$ 33.114</u>	<u>\$ 38.295</u>	<u>\$ 48.759</u>	<u>\$ 72.563</u>	<u>\$ 47.423</u>

OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 139

Actual Cost of Fuel to Generate Electricity and
the Actual Cost of Fuel Included in the Cost of Purchased Power

Line No.	Description	January 2022	February 2022	March 2022	April 2022	May 2022	June 2022	July 2022	August 2022	September 2022	October 2022	November 2022	December 2022
KWH Source (000's) :													
1.	Coal Generation	913,115	752,607	730,680	613,375	265,468	483,778	723,699	839,897	632,407	576,299	649,657	856,858.00
2.	Nuclear Generation	-	-	-	-	-	-	-	-	-	-	-	-
3.	Hydro Generation	-	-	-	-	-	-	-	-	-	-	-	-
4.	Other Generation - Internal Combustion	14	13	13	13	13	14	-	9	16	17	10	10.00
5.	Gas Generation	273,678	184,977	325,985	508,885	501,819	542,023	627,869	640,237	562,029	563,713	561,573	535,332.00
Purchases through MISO:													
6.	Wind Purchase Power Agreement Purchases	90,717	69,836	57,680	49,368	50,976	39,328	40,139	40,767	46,747	49,010	73,429	81,225.00
7.	Non-Wind PPA Market Purchases	141,264	179,039	111,706	14,044	200,402	117,536	44,768	2,195	7,617	9,216	14,180	35,999.00
8.	Other	280	244	335	349	336	413	384	430	439	418	366	204.00
9.	Purchased Power other than MISO	7,292	8,141	11,533	11,513	13,903	16,210	15,226	12,294	10,846	12,183	7,683	9,525.00
LESS:													
10.	Energy Losses and Company Use	66,608	56,881	52,505	45,506	48,773	55,967	61,696	59,058	49,512	43,491	47,679	59,547.00
11.	Inter-System Sales through MISO	44,636	20,731	152,216	260,498	20,040	32,938	163,245	302,477	238,381	309,480	314,573	283,314.00
12.	Inter-System Sales other than MISO	-	-	-	-	-	-	-	-	-	-	-	-
13.	Non-Jurisdictional Retail Sales	-	-	-	-	-	-	-	-	-	-	-	-
14.	Sales (\$)	1,315,116	1,117,245	1,033,211	891,543	964,104	1,110,397	1,227,144	1,174,294	972,208	857,885	944,646	1,176,292
Fuel Cost \$ (F) :													
15.	Coal Generation	\$ 23,001,892	\$ 19,537,889	\$ 19,250,722	\$ 17,230,274	\$ 7,918,875	\$ 13,794,488	\$ 19,241,352	\$ 21,011,451	\$ 15,316,693	\$ 14,380,565	\$ 15,817,346	\$ 20,056,204
16.	Nuclear Generation	-	-	-	-	-	-	-	-	-	-	-	-
17.	Hydro Generation	-	-	-	-	-	-	-	-	-	-	-	-
18.	Other Generation - Internal Combustion	2,203	2,481	1,584	1,471	2,123	892	264	3,872	1,911	10,006	1,729	1,570
19.	Gas Generation	20,227,469	15,018,577	14,155,764	24,540,323	28,488,382	31,782,189	37,166,790	41,937,420	32,341,187	24,857,468	25,129,802	33,727,231
20.	Financial Hedges Gains/Losses & Trans. Fees	-	-	-	-	(1,292,165)	-	-	-	-	-	-	-
Purchases through MISO:													
21.	Wind Purchase Power Agreement Purchases	8,162,108	7,768,052	7,126,150	8,667,133	6,342,074	4,832,186	3,556,705	3,466,155	4,405,270	6,185,359	8,824,924	8,135,776
22.	Non-Wind PPA Market Purchases	7,659,290	8,842,750	5,832,964	876,479	15,972,723	11,100,334	3,514,639	172,074	496,003	650,199	684,502	11,369,257
23.	Other	6,673	5,829	7,996	9,489	9,738	11,924	11,060	12,396	12,978	12,576	11,037	6,194
24.	MISO Components of Cost of Fuel	1,516,613	(2,646,879)	(1,016,874)	2,826,986	3,389,240	3,744,474	3,336,424	5,047,681	2,866,243	849,749	2,289,670	3,166,742
25.	Purchased Power other than MISO	1,086,815	1,287,151	1,903,496	1,913,006	2,327,291	2,704,119	2,490,818	2,041,453	1,790,045	1,921,463	1,215,954	1,614,865
LESS:													
26.	Inter-System Sales through MISO	1,875,771	555,647	4,208,626	8,067,309	717,530	1,331,664	6,067,135	12,467,545	8,812,489	9,396,080	8,422,434	9,508,176
27.	Inter-System Sales other than MISO	-	-	-	-	-	-	-	-	-	-	-	-
28.	Non-Jurisdictional Retail Sales	-	-	-	-	-	-	-	-	-	-	-	-
29.	Transmission Losses	212,251	95,211	296,210	485,892	119,777	270,409	607,118	839,966	472,234	346,454	462,416	588,607
30.	Lakefield PPA Adjustment	267,375	81,563	232,292	523,976	123,771	263,268	844,400	1,220,596	891,976	576,065	545,220	1,217,560
31.	Purchased Power in Excess	-	-	-	-	10,635	-	-	-	-	-	-	-
32.	Total Fuel Costs (F)	\$ 59,307,666	\$ 49,083,429	\$ 42,524,674	\$ 46,987,984	\$ 62,186,568	\$ 66,105,265	\$ 61,799,399	\$ 59,164,395	\$ 47,053,631	\$ 38,548,786	\$ 44,544,894	\$ 66,763,496
33.	Fuel Cost per KWH (in Mills) F/S	\$ 45.097	\$ 43.933	\$ 41.158	\$ 52.704	\$ 64.502	\$ 59.533	\$ 50.360	\$ 50.383	\$ 48.399	\$ 44.935	\$ 47.155	\$ 56.758

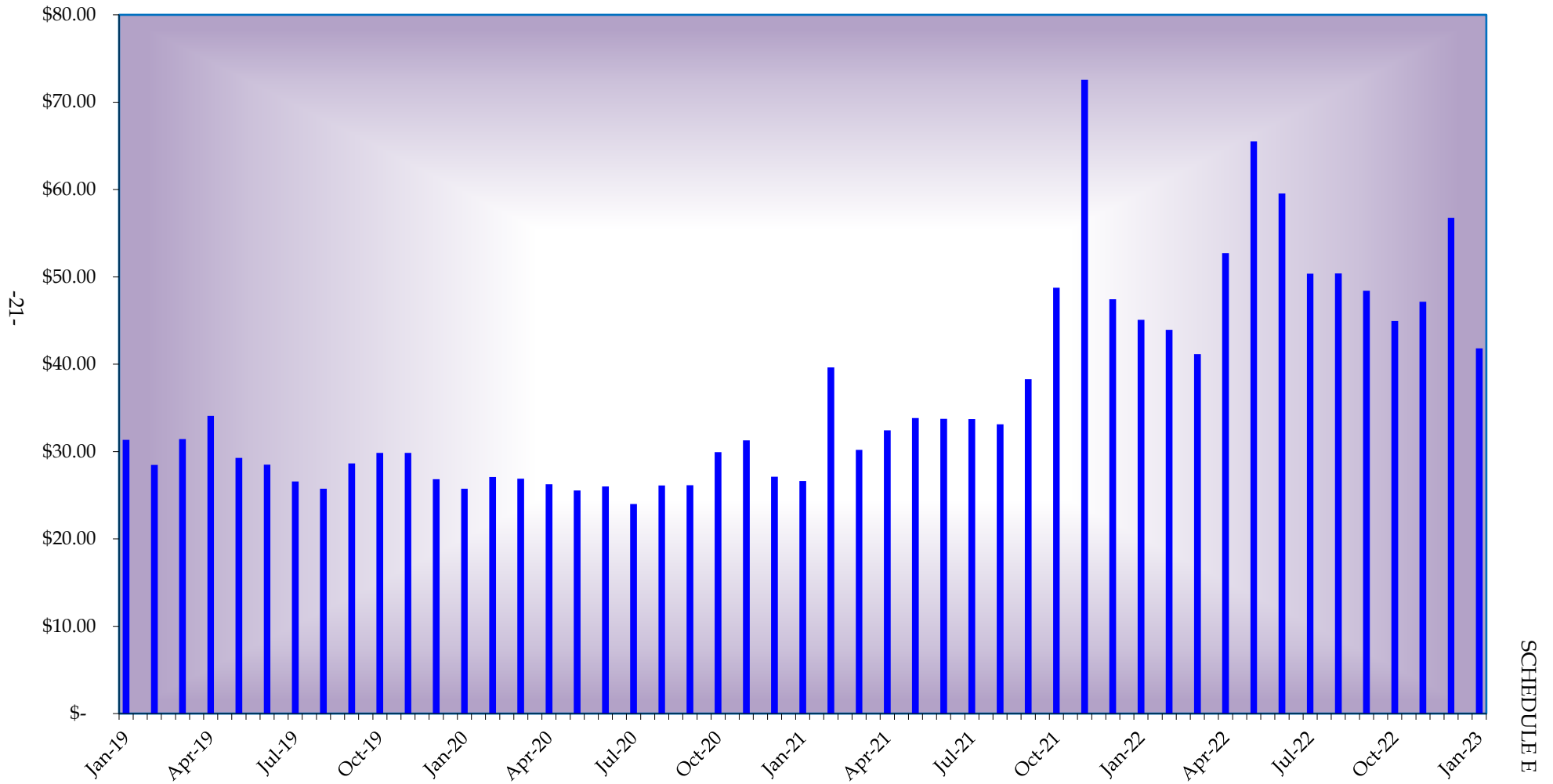
**OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 139**

**Actual Cost of Fuel to Generate Electricity and
the Actual Cost of Fuel Included in the Cost of Purchased Power**

Line No.	Description	January 2023
KWH Source (000's) :		
1.	Coal Generation	759,534
2.	Nuclear Generation	-
3.	Hydro Generation	-
4.	Other Generation - Internal Combustion	-
5.	Gas Generation	677,207
Purchases through MISO:		
6.	Wind Purchase Power Agreement Purchases	62,431
7.	Non-Wind PPA Market Purchases	14,347
8.	Other	252
9.	Purchased Power other than MISO	4,965
LESS:		
10.	Energy Losses and Company Use	56,689
11.	Inter-System Sales through MISO	351,326
12.	Inter-System Sales other than MISO	-
13.	Non-Jurisdictional Retail Sales	-
14.	Sales (\$)	<u>1,110,721</u>
Fuel Cost \$ (F) :		
15.	Coal Generation	\$ 18,827,861
16.	Nuclear Generation	-
17.	Hydro Generation	-
18.	Other Generation - Internal Combustion	-
19.	Gas Generation	31,402,304
20.	Financial Hedges Gains/Losses & Trans. Fees	-
Purchases through MISO:		
21.	Wind Purchase Power Agreement Purchases	5,869,531
22.	Non-Wind PPA Market Purchases	404,766
23.	Other	7,509
24.	MISO Components of Cost of Fuel	945,587
25.	Purchased Power other than MISO	773,505
LESS:		
26.	Inter-System Sales through MISO	11,104,462
27.	Inter-System Sales other than MISO	-
28.	Non-Jurisdictional Retail Sales	-
29.	Transmission Losses	526,449
30.	Lakefield PPA Adjustment	148,636
31.	Purchased Power in Excess	-
32.	Total Fuel Costs (F)	<u>\$ 46,451,516</u>
33.	Fuel Cost per KWH (in Mills) F/S	<u>\$ 41.821</u>

OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 139

Actual Fuel Cost (in mills) for January 2019 through January 2023



OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 139

**Comparison of Actual Fuel Cost and Estimated Fuel Cost for
November and December 2022 and January 2023**

Month	Actual Sales	Actual Fuel Cost	Average Actual Fuel Cost	Forecast Sales	Forecast Fuel Cost	Average Forecast Fuel Cost	Weighted Average Error
November 2022	944,646	\$ 44,544,894	\$ 47.155	990,113	\$ 47,041,127	\$ 47.511	(48.817) 51.632
December 2022	1,176,292	66,763,496	56.758	1,203,305	60,633,260	50.389	
January 2023	1,110,721	46,451,516	41.821	1,299,964	72,697,257	55.923	2.815
Total	3,231,659	\$ 157,759,906	\$ 48.817	3,493,382	\$ 180,371,644	\$ 51.632	5.77%

SCHEDULE F

**OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT**

Indianapolis Power & Light Company
Cause No. 38703-FAC 139

Tracker History

<u>Cause No.</u>	<u>Requested & Approved Fuel Cost Adjustment Factor</u>	
38703-FAC133	2.863	
38703-FAC138	30.088	
38703-FAC137	37.324	AES
38703-FAC137	32.529	OUCC
38703-FAC136	23.579	OUCC
38703-FAC136	37.858	AES
38703-FAC135	13.472	Without IURT
38703-FAC135	13.673	With IURT
38703-FAC134	7.418	
38703-FAC133	5.350	
38703-FAC132	2.147	AES
38703-FAC132	(0.036)	OUCC
38703-FAC131	(6.178)	
38703-FAC130	(3.725)	
38703-FAC129	(8.576)	
38703-FAC128	(7.414)	
38703-FAC127	(8.665)	
38703-FAC126	(4.648)	
Revised 38703-FAC125	(5.374)	
38703-FAC125	(5.370)	
38703-FAC124	(3.484)	
38703-FAC123 (2)	(2.890)	
38703-FAC122	1.165	IPL
38703-FAC122	0.285	OUCC
38703-FAC121	(1.582)	
38703-FAC120	(0.464)	
38703-FAC119	1.347	
38703-FAC118	2.504	
38703-FAC117	1.006	
38703-FAC116	3.945	
38703-FAC115	0.480	
38703-FAC114	3.707	
38703-FAC113 (1)	2.534	

(1) New base of 31.520 mills/kWh and a significant increase due to the variance

(2) Effective 12/05/18, a new base rate of 32.938 (established by Cause No. 45029) replaced the old rate of 31.520 (established by Cause No. 44576).

**OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 139**

**MISO - COST FLOW THROUGH IN THIS FAC
November and December 2022 and January 2023**

In Purchased Power

<u>Month</u>	<u>Purchases through MISO Wind Purchase</u>	<u>Purchases through MISO Non-Wind</u>	<u>MISO Components Cost of Fuel</u>	<u>MISO Sales</u>
November 2022	\$ 8,824,924	\$ 684,502	\$ 2,289,670	\$ 8,422,434
December 2022	8,135,776	11,369,257	3,166,742	9,508,176
January 2023	<u>5,869,531</u>	<u>404,766</u>	<u>945,587</u>	<u>11,104,462</u>
Total	<u>\$ 22,830,231</u>	<u>\$ 12,458,525</u>	<u>\$ 6,401,999</u>	<u>\$ 29,035,072</u>

OFFICE OF UTILITY CONSUMER COUNSELOR
REVIEW OF FUEL COST ADJUSTMENT
Indianapolis Power & Light Company
Cause No. 38703-FAC 139

MISO CHARGE TYPES BY MONTH

		November 2022	December 2022	January 2023
	<u>Charge Type</u>	<u>Invoice Total</u>	<u>Invoice Total</u>	<u>Invoice Total</u>
1	Day Ahead Market Administration Amount	\$ 209,737	\$ 186,954	\$ 203,717
2	Day Ahead Regulation Amount	-	(3,957)	-
3	Day Ahead Spinning Reserve Amount	-	-	-
4	Day-Ahead Short-Term Reserve Amount	(3,933)	(8,162)	(784)
5	Day Ahead Supplemental Reserve Amount	-	-	-
6	Day Ahead Asset Energy Amount	(9,659,798)	(9,524,448)	(11,980,304)
7	Day Ahead Financial Bilateral Transaction Congestion Amount	-	-	-
8	Day Ahead Financial Bilateral Transaction Loss Amount	-	-	-
9	Day Ahead Congestion Rebate on Carve-Out Grandfathered Agrmnts	-	-	-
10	Day Ahead Losses Rebate on Carve-Out Grandfathered Agrmnts	-	-	-
11	Day Ahead Congestion Rebate on Option B Grandfathered Agrmnts	-	-	-
12	Day Ahead Losses Rebate on Option B Grandfathered Agrmnts	-	-	-
13	Day Ahead Non-Asset Energy Amount	-	-	-
14	Day Ahead Ramp Capability Amount	(4,563)	(2,172)	(74)
15	Day Ahead Revenue Sufficiency Guarantee Distribution Amount	57,864	29,998	26,095
16	Day Ahead Revenue Sufficiency Guarantee Make Whole Payment Amt.	(40,286)	(21,847)	(22,763)
17	Day Ahead Schedule 24 Allocation Amount	31,985	35,727	32,311
18	Day Ahead Virtual Energy Amount	-	-	-
	Day Ahead Subtotal	<u>\$ (9,408,994)</u>	<u>\$ (9,307,907)</u>	<u>\$ (11,741,802)</u>
19	Financial Transmission Rights Market Administration Amount	\$ 4,908	\$ 5,744	\$ 6,235
20	Auction Revenue Rights Transaction Amount	(2,005,082)	(2,448,900)	(2,448,900)
21	Financial Transmission Rights Annual Transaction Amount	1,168,783	1,853,092	1,853,092
22	Auction Revenue Rights Infeasible Uplift Amount	82,570	31,332	31,328
23	Auction Revenue Rights Stage 2 Distribution Amount	(107,136)	(141,739)	(141,739)
24	Financial Transmission Rights Full Funding Guarantee Amount	-	44,109	-
25	Financial Transmission Guarantee Uplift amount	-	(44,851)	-
26	Financial Transmission Rights Hourly Allocation Amount	84,588	(952,651)	(9,975)
27	Financial Transmission Rights Monthly Allocation Amount	(3,853)	(51,416)	(16,425)
28	Financial Transmission Rights Monthly Transaction Amount	-	-	-
29	Financial Transmission Rights Transaction Amount	-	-	-
30	Financial Transmission Rights Yearly Allocation Amount	-	(44,109)	-
	Financial Transmission Rights Subtotal	<u>\$ (775,222)</u>	<u>\$ (1,749,389)</u>	<u>\$ (726,384)</u>
31	Real Time Market Administration Amount	\$ 21,989	\$ 19,908	\$ 22,220
32	Contingency Reserve Deployment Failure Charge Amount	-	-	-
33	Excessive Energy Amount	3,039	(29,210)	(29,375)
34	Real Time Excessive Deficient Energy Deployment Charge Amount	7,553	12,415	7,198
35	Net Regulation Adjustment Amount	-	-	-
36	Non-Excessive Energy Amount	30,079	939,669	1,829,715
37	Real Time Regulation Amount	-	2,656	(26)
38	Regulation Cost Distribution Amount	51,557	10,905	52,544
39	Real Time Spinning Reserve Amount	(974)	(2,543)	(265)
40	Spinning Reserve Cost Distribution Amount	61,348	61,876	37,469
41	Real Time Short-Term Reserve Amount	(3,477)	(24,407)	(808)
42	Real-Time Short-Term Reserve Deployment Failure Charge Amount	-	-	-
43	Short-Term Reserve Cost Distribution Amount	15,052	12,038	2,734
44	Real Time Supplemental Reserve Amount	-	(746)	-
45	Supplemental Reserve Cost Distribution Amount	2,896	(3,420)	5,055
46	Real Time Asset Energy Amount	(187,725)	8,721,443	(364,482)
47	Real Time Demand Response Allocation Uplift Charge	6	32	192
48	Real Time Financial Bilateral Transaction Congestion Amount	-	-	-
49	Real Time Financial Bilateral Transaction Loss Amount	-	-	-
50	Real Time Congestion Rebate on Carve-Out Grandfathered Agrmnts	-	-	-
51	Real Time Losses Rebate on Carve-Out Grandfathered Agrmnts	-	-	-
52	Real Time Distribution of Losses Amount	(282,275)	(691,487)	(237,882)
53	Real Time Miscellaneous Amount	(16,839)	28,832	14,678
54	Real Time MVP Distribution Amount	(11,640)	(58,195)	(56,309)
55	Real Time Non-Asset Energy Amount	-	-	-
56	Real Time Net Inadvertent Distribution Amount	58,266	92,053	(4,833)
57	Real Time Price Volatility Make Whole Payment	(109,857)	(733,661)	(160,828)
58	Real Time Resource Adequacy Auction Amount	(1,630,009)	(1,684,342)	(1,673,755)
59	Real Time Ramp Capability Amount	(5,046)	(4,668)	(4,181)
60	Real Time Revenue Neutrality Uplift Amount	(87,152)	(903,037)	167,666
61	Real Time Revenue Sufficiency Guarantee First Pass Dist Amount	80,228	599,073	32,038
62	Real Time Revenue Sufficiency Guarantee Make Whole Payment Amt.	(135,628)	(7,107)	(17,380)
63	Real Time Schedule 24 Allocation Amount	-	-	-
64	Real Time Schedule 24 Distribution Amount	3,353	3,805	3,525
65	Real Time Schedule 49 Cost Distribution Amount	(61,486)	(64,628)	(53,974)
66	Real Time Virtual Energy Amount	45,123	39,270.00	35,660.00
	Real Time Subtotal	<u>\$ (2,151,619)</u>	<u>\$ 6,336,524</u>	<u>\$ (393,404)</u>
	Grand Total	<u><u>\$ (12,335,835)</u></u>	<u><u>\$ (4,720,772)</u></u>	<u><u>\$ (12,861,590)</u></u>

AFFIRMATION

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

A handwritten signature in black ink, appearing to read "Gregory T. Bennett", is written over a horizontal line.

By:
Indiana Office of
Utility Consumer Counselor

April 20, 2023
Date

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing *Indiana Office of Utility Consumer Counselor Public's Exhibit No. 1 Pre-Filed Testimony OUCC Witness Gregory T. Guerrettaz* has been served upon the following counsel of record in the captioned proceeding by electronic service on April 20, 2023.

Teresa Morton Nyhart
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Deputy Consumer Counselor

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