

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

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

**PETITIONER INDIANAPOLIS POWER & LIGHT COMPANY**  
**SUBMISSION OF COMPLIANCE FILING**

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

Respectfully submitted,



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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served this 17th day of July, 2024 via electronic mail, to:

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134084926v1

**AES Customer Ecosystem (“ACE”) Project  
Monthly Compliance Report  
IURC Cause No. 45911  
July 17, 2024**

## **1. INTRODUCTION**

On November 6, 2023, AES Indiana launched a comprehensive suite of new systems, including a customer information system (CIS), meter data management (“MDM”), customer service management (“CSM”), field services management (“FSM”) applications, asset manager, and multi-resource scheduling tool. These systems, referred to as the ACE Project, are the backbone of the meter-to-cash processes and customer interactions and are operational. As of July 11, 2024, the new systems have generated over 4,366,000 customer invoices since the project went into service in November 2023.

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

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

AES Indiana has continued to work with customers who have experienced delayed or inaccurate billing due to bill print issues after deploying the new systems. A governance process has been used within AES Indiana to track tickets, which manages the issues identified by customers and through the Company’s analysis. This process continues as part of hypercare for billing and normal business operations. While the deployment of the new systems yielded higher-than-expected issues, there is improvement, and the Company is on the path to more timely and accurate billing. The Company is seeing a lower daily count of bill print issues, has resolved the majority of billing issues, and has resumed normal business operations in the other parts of the meter-to-cash process.

Since the Company’s June 17, 2024, report, the ACE Project team has resolved/closed 204 tickets, including 19 critical priority items. As of July 11, 2024, there are 159 open tickets with four degrees of prioritization:

- 11 critical open tickets vs. 11 in June,
  - 2 critical open tickets specific to billing
- 30 high open tickets vs. 41 high last month,
  - 19 high open tickets specific to billing
- 73 medium open tickets vs. 71 medium last month, and
- 45 low open tickets vs. 64 low last month.

Progress has been made on the critical billing tickets, and there are now two open tickets, compared to eight shown in last month's report.

As used herein, the word "ticket" refers to a type of issue with the system that can impact one or multiple customers. System issue tickets are prioritized using a shared matrix, as shown in **Figure 1**, which provides an overview of the issue resolution process.

**Figure 1. Priority Matrix**

		Impact		
		<b>High</b> (>= 11 users) or (>=1 "Critical/A/B" Strategic C&I Customers) or (>= 500 Territory C&I Customers) or (>= 25% of residential customers)	<b>Medium**</b> (2-10 users) or (>=1 "C" Strategic C&I Customers) or (100-499 Territory C&I Customers) or (10% - 24% of residential customers)	<b>Low</b> (1 user) or (>=1 "D" Strategic C&I Customers) or (No Strategic C&I Customers) or (0-99 Territory C&I Customers) or (0% - 9% of residential customers)
Urgency	<b>High</b> (Action Blocked / No Workaround Possible)	P1 - Critical	P2 - High	P3 - Medium
	<b>Medium</b> (Action Blocked / Workaround guidance in hand)	P2 - High	P3 - Medium	P4 - Low
	<b>Low</b> (Action not blocked / and user inconvenience)	P3 - Medium	P4 - Low	P4 - Low

\* Impact and Urgency are assigned based on the "highest" level identified in issue submissions. For example, if nine users and no customer impacts are identified, the Impact assigned is medium.

\*\* Medium Impact also includes "Don't Know" responses on the issue submission form.

Two critical tickets are impacting billing. One ticket concerns scenarios where multiple bills are generated in the same bill cycle for some accounts, as opposed to one summary bill. This issue had previously been considered resolved. The team is investigating how the issue has impacted customers and is working to resolve the generation of multiple bills.

The other ticket concerns additional functionality to improve the ability to handle new out-of-balance ("OOB") invoices more quickly and efficiently. Both tickets have people focused on resolution, and actions are being taken to accelerate closure.

Tickets can be moved into the critical category to provide a greater sense of urgency due to the length of time they have been open without a resolution being identified and/or an upcoming business need to mitigate the impact on a customer and/or employee. Adjusting priorities is a normal part of incident management.

The May through July priorities for solution fixes in the system are presented in **Table 1** along with the estimated number of customers impacted.

**Table 1. Current System Issues and Customer Impact\***

Description of Issue	Customers Impacted as of May 10, 2024	Customers Impacted as of June 13, 2024	Customers Impacted as of July 11, 2024
Customers who have not received an invoice since going live in the new system	235	32	158 <sup>1</sup>
Unique Customers with bills/invoices impacted by OOB	22,492	16,850	5,907
Complex bills (e.g., outdoor lighting) and large C&I customer billing data and process issues not displaying correctly on the bill	35-40	**50-75	35-40
Unable to reissue bills when a bill was sent with inaccurate information	4,200	728 unique customers	0

\* Because customers may be affected by multiple issues, the numbers in this table are not additive.

\*\* Additional complex bills / large C&I customers impacted by the new rates and rate functionality implemented to comply with the April rate order.

### **3. HOW THE ISSUES ARE BEING ADDRESSED**

Overall, AES Indiana has seen a reduction in out-of-balance billing. The Company continues to work across technical and business teams to address the issues customers are experiencing. Every day, there are recurring calls and working groups to bring together cross-functional teams to create the solutions needed collectively. The majority of the issues require technical code to be tested, validated by the business, and put into production to ensure correct functionality. Each week, the Company has closed approximately ten or more tickets.

The Company continues to work with customers to communicate and respond to inquiries proactively. In **Table 2**, the Company shows the targets established for measuring billing stabilization in the left column.

<sup>1</sup> The increase from June to July is due to the backlog of new meter installations getting updated in the CIS. Those backdated installs are awaiting their first billing. There are only two installations from before go-live which will be resolved on July 19, 2024. All other meters are newer installations.

**Table 2. Key Performance Indicators for Billing to Reach Stabilization**

Stability Measure	Performance as of May 10, 2024	Performance as of June 13, 2024	Performance as of July 11, 2024
Between ~50-100 OOB after the nightly batch run for 10 consecutive batch runs	~400 bills	~180 bills	~70 bills
Zero critical tickets open	16 open critical	8 open critical	2 open critical
Backlog of OOBs reduced to under 10k	31,096 bills	22,480 bills	Target achieved on July 3, 2024
No backlog of cancel/rebills	7,000 bills	2,718 bills	Target Achieved on July 10, 2024

AES Indiana is committed to resolving billing issues. To support the digital transformation, customer systems will have limited operations from August 29 to September 4, 2024.<sup>2</sup> Customers can still contact Customer Care representatives to inquire about a bill or request a move-in or move-out service. Payment options will not be available during this time. During this period, the Company will provide additional training opportunities to the billing staff.

The Company launched communications in mid-July promoting flexible, extended payment arrangement options to customers, if needed, ahead of the August 29 limited operations. Otherwise, customers can pay bills or make arrangements beginning September 4. The Company will continue to communicate extended payment options available for customers who may have been affected by the billing system through digital and printed channels.

At this time, AES Indiana continues to not disconnect service for nonpayment or apply late fees.

<sup>2</sup> These dates reflect a revision to the schedule reflected in Cause No. 45911 ACE Project Monthly Compliance Report dated June 17, 2024, p. 3.



#### **4. OTHER INFORMATION REQUESTED BY THE COMMISSION**

The Commission submitted additional questions on July 3, 2024. These questions are addressed individually in this section.

**Q1. In the public meeting on June 17th, AES Indiana (AES) used the words “credit” and “refund” interchangeably in reference to how customers were being made whole after billing issues. Please clarify whether AES was issuing refunds, meaning returning money directly back to customers, or providing bill credits to customer accounts, and what the timelines have been for issuance on either or both to customers?**

**A1.** All duplicate automatic payments that were deducted from customer bank accounts in error were applied (credited) to their AES Indiana accounts within one (1) to two (2) business days from the date of the payment(s). A refund was initiated if a customer contacted AES Indiana requesting the duplicate payment(s) be returned to them. The customer would have received it within fifteen (15) days, but in most cases, sooner if the customer opted to receive the refund electronically. The 15-day period is due to a waiting period from JPMC to see if the customer will opt into receiving the refund electronically before the default of a mailed check takes place.

The credit vs “refund” question must necessarily take processing time into account as well as the potential for customer confusion. For example, if AES Indiana were to unilaterally initiate a process to effectuate refunds by crediting customers’ bank accounts, the process would have taken up to fifteen (15) days to get funds into a customer’s account. This process would have resulted in funds being deposited into the customer’s bank account after the next scheduled autopay draw on the account, potentially causing additional customer confusion. The method AES Indiana implemented was designed such that customers who took no action would have the benefit of the funds no later than their next draft date. This was intended to reduce customer confusion and allowed customers who informed us that they preferred a refund check to have a check issued sooner. It also allowed the customer who opted not to receive the refund electronically to know that a refund check would be arriving if that is what they wanted to occur. This approach was also undertaken to reduce confusion as well as the potential for mailed checks to get lost or stolen. For further information, please see the response to Question 14.

**Q2. In the public meeting, AES indicated that it would provide to the Commission information regarding the number of total accounts that were in arrears/delinquent accounts.**

- a. What is that number/percentage of total accounts?**
- b. How does that compare to accounts that are in arrears on average?**
- c. How many customers have not paid their bills at all (whether they have received a bill or not) since the ACE Project implementation?**

**A2.** The status of arrears changes seasonally. **Table 3** shows the most up-to-date data on arrears, with June for each year represented. The year 2020 was included to show the



variability in accounts receivable (“AR”) over time following the COVID-19 pandemic, during which AES Indiana had suspended dunning and late fees. Additionally, the monthly bill of a residential customer (1,000 kWh) has increased by 13% from 2020 to 2024 in accordance with the Commission’s orders in the Company’s rate case and rider filings, which would impact the amount in arrears.

**Table 3. Customer Accounts in Arrears**

Total AR 31+ Days in Arrears						
	C&I Dollars	C&I Accounts	Residential Dollars	Residential Accounts	Total Dollars	Percentage of Customers in Arrears
June 2020	\$4,353,006	4,101	\$19,118,923	83,804	\$23,471,929	18.69%
June 2021	\$1,980,065	3,078	\$11,607,708	80,095	\$13,587,772	17.69%
June 2022	\$3,080,182	3,447	\$15,378,916	86,340	\$18,459,098	19.09%
June 2023	\$2,639,439	3,838	\$18,178,388	88,937	\$20,817,826	19.73%
June 2024	\$9,865,787	6,244	\$30,384,798	101,663	\$40,250,585	22.95%

- The number of C&I accounts in arrears as of June 2024 is 6,244 and the total number of residential accounts in arrears as of June 2024 is 101,663 as shown in **Table 3**. The total percentage in arrears as of June 2024 is 22.95% also shown in **Table 3**. Arrears are driven by multiple factors including having paused late fees and disconnects since October 2023.
- The average number of C&I accounts in arrears as of the end of June from 2020 through 2023 is 3,616 and the average number of residential accounts in arrears as of the end of June from 2020 through 2023 is 84,794.
- The total number of residential and C&I customers that have not paid a bill since the ACE Project implementation is 10,459, of which 7,299 are for bills prior to implementation (August-October).

**Q3. Has there been a change in the projected stabilization (as defined by AES) timeline of Q3 since the public meeting?**

- a. **What is the timeline for sharing the after action report that includes the root cause analysis?**
- b. **Does AES have a timeline for when it expects the billing system to produce no or minimal out-of-balance bills, have no open critical tickets, and no backlog of out of-balance bills or canceled/rebilled bills?**

A3. The Company is continuing to make progress on stabilization. There has not been a change in the projected stabilization of Q3 2024. As reflected in **Table 2**, some of the measures have already been achieved as a part of the stabilization approach.

- a. After stabilization is completed in Q3 2024, the Company will share a plan for the root cause analysis work with the Commission. The anticipated timing is early Q4.
- b. Out-of-balance bills are a part of normal utility billing operations. The Company has seen a higher-than-usual amount, but with the progress toward stabilization, it currently sees, on average, less than 80 a day, which is within the stabilization target. While tickets are also a part of standard business operations, the number of tickets has decreased over the past two months. The Company anticipates the system will see tickets arise as a part of normal system behavior.

**Q4. How has AES been communicating with customers with limited to no internet access to advise them of the changes or issues?**

A4. AES Indiana understands that not all customers have access to the internet, so the Company is intentional about leveraging non-digital communication channels to ensure customers are informed. Most recently, AES Indiana communicated flexible extended payment options to better support the unique needs of customers, including three, six, nine, and twelve-month plans, to all residential and C&I customers via an email and is targeting to mail a printed letter with the same information to all residential and C&I customers in July. The Company has also communicated via five direct mail campaigns to customers who have experienced an issue with the billing system. Additionally, the Company has shared updates about the system upgrade in every bill insert and/or *Smarter Together* newsletter since October 2023. Similar to direct mail communications, the Company has performed three outbound call campaigns to inform customers of billing issues with their accounts. AES Indiana also hosted a community meeting with nine partners on March 1, 2024, to provide updates on recent system upgrades, discuss customer impacts and concerns, and work together to inform and educate partners on how they can best support the people in their communities.

**Q5. What are AES's plans for communicating future changes to customers with limited to no internet access?**

A5. The Company is committed to continuing to share updates through its communication tools—including print, phone, and in-person channels—to reach customers with limited to

no internet access. As part of the overall communications strategy, the Company will host additional conversations with community partners, the next one taking place in Q3.

**Q6. Multiple customers have called the Indiana Utility Regulatory Commission (IURC or Commission) and its Consumer Affairs Division (CAD) stating that they cannot get in touch with AES and have had over 30-minute hold times.**

- a. Does AES have more of an in-depth set of data showing calls abandoned vs calls answered per month?
- b. Does AES know how many calls had hold times over 15 minutes and over 30 minutes?

A6. At go-live in November 2023, the legacy account number conversion impacted a customer's ability to perform self-service via the telephony solution or interactive voice response ("IVR"), and web service did not function properly. This functionality drove more calls than anticipated to the contact center. The legacy account number conversion issue was resolved in late November/early December while self-service continues to improve.

These two issues are primary drivers in abandonment rates and answer times. It resulted in requiring customers to speak to a customer service team member to complete many transactions that would have otherwise been completed through our self-service channels.

- a. For context, the nine-month (January 2023 through September 2023) average prior to the ACE go-live for calls to queue, calls answered, calls abandoned, and abandon percentage are shown in **Table 4**.

Please see **Table 5** for the number of calls to queue, calls answered, calls abandoned, and abandon percentage after go-live, from November 2023 through June 2024.

The call statistics for June have stabilized and are lower than the nine-month average preceding go-live.

**Table 4. Nine-Month Average (Pre-Go-Live) Call Statistics**

	Calls to Queue	Calls Answered	Calls Abandoned	Abandon %
Nine-Month Avg (Jan-Sept 2023)	87,566	76,221	11,344	12.9%

**Table 5. November 2023 through June 2024 Call Statistics**

	<b>Calls to Queue</b>	<b>Calls Answered</b>	<b>Calls Abandoned</b>	<b>Abandon %</b>
November 2023	148,088	82,634	65,454	44.2%
December 2023	116,241	72,535	43,706	37.6%
January 2024	114,687	83,607	31,080	27.1%
February 2024	105,986	78,536	27,450	25.9%
March 2024	104,374	85,900	18,474	17.7%
April 2024	99,997	86,798	13,199	13.2%
May 2024	89,340	81,657	7,683	8.6%
June 2024	79,109	72,148	6,961	8.8%

- b. Please see **Table 6** for the average hold times over 15 and 30 minutes prior to the ACE go-live (January 2023 through September 2023). Historically these numbers have had some fluctuations.

As shown in **Table 7**, the number of calls over 15 and 30 minutes for May and June have stabilized and are lower than the nine-month average preceding go-live.

**Table 6. Nine-Month Average (Pre-Go-Live) Number of Calls Per Month Greater than 15 and 30 Minutes**

	<b>&gt;15 Minutes</b>	<b>&gt;30 Minutes</b>
Nine-Month Avg (Jan-Sept 2023)	5,723	1,471

**Table 7. November 2023 through June 2024 Number of Calls Over 15 and 30 Minutes**

	<b># of Calls with Answer Times &gt; 15 Minutes</b>	<b># of Calls with Answer Times &gt; 30 Minutes</b>
November 2023	41,775	17,771
December 2023	27,834	10,850
January 2024	19,355	7,213
February 2024	15,147	5,099
March 2024	10,632	2,491
April 2024	6,558	2,120
May 2024	3,419	751
June 2024	3,548	1,007

- Q7. Customers have claimed that the AES dedicated ACE project help line at 317-261-2085 would transfer to the regular customer service center after playing a prerecorded ACE project explanation.**
- a. How were the customer service representatives handling the ACE project line specially prepared for these calls?**
  - b. How did they handle these calls differently from the regular AES customer service callers?**

**A7.** The dedicated ACE line was established to understand the customer experience of those impacted by the new systems. We have continued to monitor call volumes, hold times, and average handle times to inform the Company's customer communications and identify training opportunities for the customer service team.

Calls were not transferred to the regular (regular, meaning a customer service agent who handles multiple types of customer inquiries) customer service center representatives. Calls received through the ACE billing line are directed to Customer Service Credit team members. Customer Service Credit team members are trained as specialists regarding billing-related inquiries. At AES Indiana, 35 agents are dedicated to serving the billing needs of customers.

Dedicating a line to ACE billing concerns better positioned the Company to focus on customers impacted by the new systems and the associated call volumes. This approach enabled the Company to better understand its outward customer communications as the response rate is an indication of message clarity and being informative and these factors help shape future messages. A low response rate would suggest that the messaging is informative and provides customers with what they need to know. In contrast, a high response rate would indicate a lack of message clarity or needed communications improvements. This ACE dedicated line launched with an all-customer communication, and demonstrated less than a 1% response rate (number of inquiries relative to the number of customers who received a communication), indicating both message clarity and guidance to customers were effective.

This effort also enabled the Company to identify call patterns and isolate any spikes in calls to understand and shape additional communications that would be helpful for customers.

The second benefit of dedicating a specific line for ACE billing concerns was enabling the Company to evaluate the quality of customer service responses to ACE billing issues. The Quality Assurance team reviews ACE billing calls to monitor process compliance, inform the training team of customer service training needs, and otherwise manage this process.

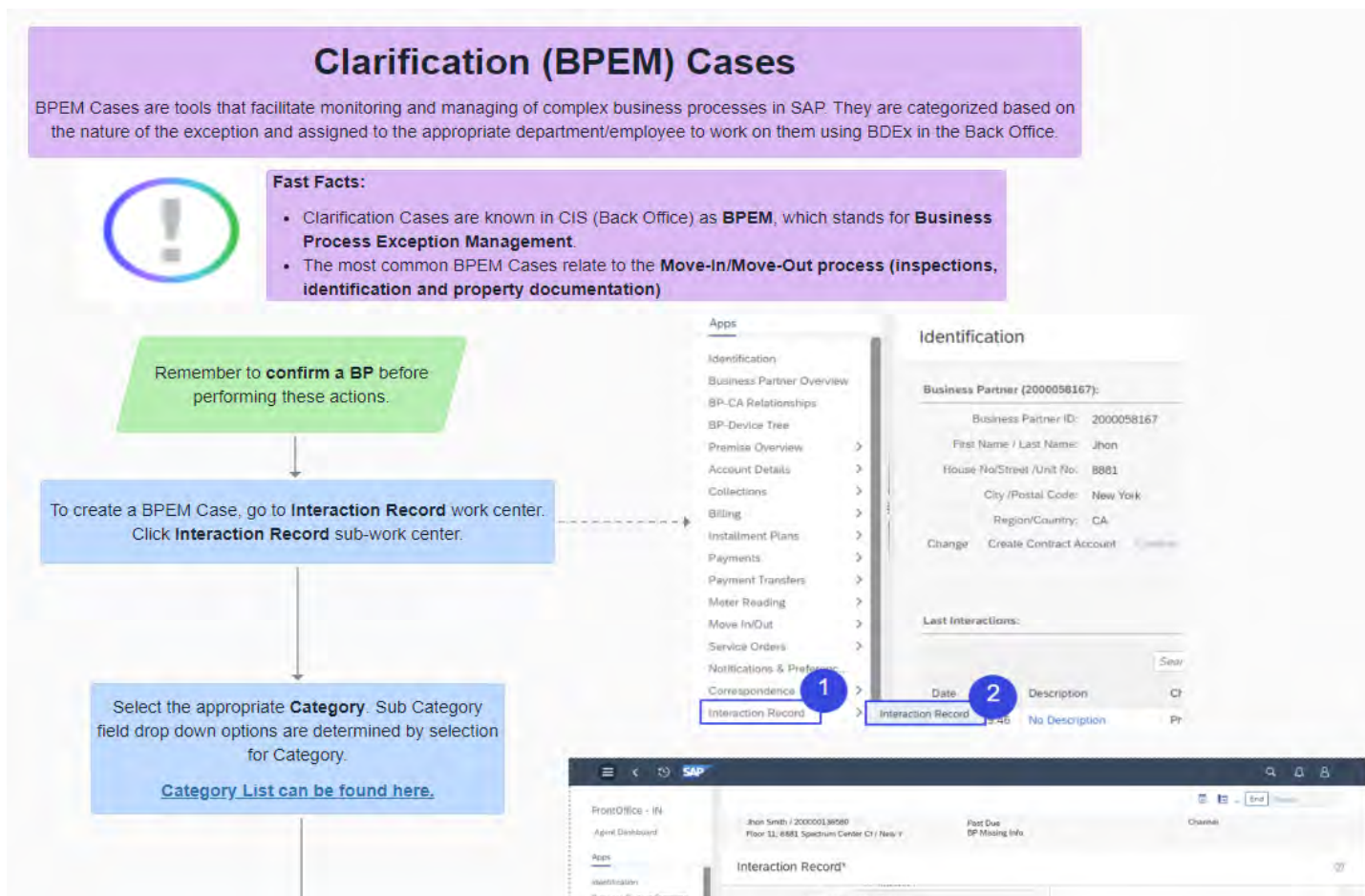
- a. To prepare the Customer Service Credit team for handling ACE billing inquiries, Customer Service Credit team members completed, on average, 120 hours of training prior to going live. The Company has since regularly updated the knowledge management platform and work guides. Agents are notified in real-time



of changes to the knowledge management application. The knowledge management application is used during every interaction with customers to ensure that agents follow proper procedures.

**Figure 2** illustrates an example of the knowledge management application used within Customer Care for a Business Process Exception Management (“BPEM”) case. BPEM is the internal ticketing system for managing customer tickets.

**Figure 2. Customer Service Knowledge Management**



In addition to keeping the knowledge management application current, the training team provides email alerts for changes or further clarification, as shown in **Figure 3**.

**Figure 3. Email Alert Example**

To: IPL CS Reps <[iplcsreps@aes.com](mailto:iplcsreps@aes.com)>  
 Cc: IPL CS Leadership Team <[iplcsleadershipteam@aes.com](mailto:iplcsleadershipteam@aes.com)>  
 Subject: Informer: Return Check Fee Reversals

Good morning, Team,

Happy Friday!

The leadership team has received inquiries regarding the reversal of return check fees.

When trying to cancel the \$20 return check fee, the system also reverses the payment made.

If you run into this issue, please direct a BPEM case to Elaine Mason – Masone00 to have the \$20 return check waived. The case can be categorized as demonstrated below:

Categories

\* Category 1:

\* Category 2:

**When submitting the case, please make sure to leave a detailed note.**

You can also direct an email to [aesindianacredit@aes.com](mailto:aesindianacredit@aes.com).

Please reach out to the Expert Hub or your TL with any questions.

The Company team leaders review email alerts with team members during team meetings and one-to-one coaching to reinforce proper procedures.

- b. Customer Service Credit team members review customer billing inquiries with the customer to confirm the Company is addressing the customers' concern. The action taken by the agent is dependent upon the nature of the customer inquiry.

If there is a known ACE-related billing issue regarding the customer account, the account has been noted accordingly within the system to inform the agent on how to instruct the customer, and the processes are defined within the knowledge management application. For more complex or new scenarios, agents are instructed to submit a BPEM, as noted in the example in **Figure 2**. The BPEM case is then routed to a member of the Billing team for investigation.

As the Billing team evaluates BPEM cases, if the agent identifies a new or unknown error, a ticket is created for technical support. Otherwise, the Billing team will make any necessary account corrections.

Once the investigation has concluded, the BPEM is updated and the agent who submitted the BPEM case is notified and contacts the customer.



**Q8. When customers call the dedicated AES billing line and request a supervisor call back because they cannot get their issues resolved, what is the expected timeframe for when the supervisors will reach back out to the customers?**

A8. Customers should expect to receive a supervisor's callback within two days. With the ACE implementation, callback times were longer. AES Indiana is committed to reducing the time it takes to follow up with a customer.

**Q9. It is CAD's understanding that the term "ticket" may be used interchangeably through customer specific tickets and system issue tickets. Customers have called and stated that their customer specific tickets are being closed and no follow-up communication is being provided. When a customer calls and a customer specific ticket is opened regarding their concerns, how is the resolution to that ticket being communicated?**

A9. Please see the response to A7, subpart b. The customer service agent who creates the customer ticket will follow up with the customer once the ticket has been resolved/closed.

In May 2024, a gap was identified in the overall management of BPEM closure and customer follow-up. Since that time, team leaders review open BPEMs and ensure proper follow-up by the customer service agent is incorporated into their daily responsibilities.

**Q10. If AES closed a system issue ticket, how were customers with related open customer specific tickets informed of the system issue ticket resolution?**

A10. Please see the response to Question 7, subpart b. When a customer service agent has placed a BPEM case for review and the review is completed, the BPEM case is closed, and the customer service agent is notified to contact the customer through the channel that the customer has requested (email or phone).

If a new trend is identified in customer tickets, an evaluation is performed, and the Communications team is notified to prepare a broader communication message.

**Q11. CAD has experienced long response times regarding meter test results. Did the system update affect the company's capability to perform meter tests? If so, when can we expect a fix?**

A11. The system update did not affect the Company's capability to perform meter tests. The issue was related to the post-test follow up process. Under the new system, the Company representative handling a case submitted to the CAD must check the system for the meter test results. This is a change from the legacy system processing of the results. This process change slowed the Company's response to the CAD. This challenge has since been resolved through process improvements and training.

**Q12. CAD understands that AES is not currently disconnecting for non-payment and plans to offer extended payment arrangements to customers once the billing issues are corrected. How will customers be notified of their payment arrangement options?**

A12. While the date to resume dunning is still undetermined, AES Indiana is supporting customers with extended payment arrangement options that are similar to actions taken to support customers during COVID, with these communication methods. The Company plans to notify customers using the sequenced approach listed below.

- Customers with registered emails
- Mailed printed letter
- Social Media posts
- Updates to the dedicated ACE page on [AESIndiana.com/system-upgrade](https://AESIndiana.com/system-upgrade)

This is part of AES Indiana's intentional communications approach to communicate to customers in a variety of ways so there is ongoing awareness of the extended payment options that are available to them.

**Q13. Please confirm, as the ACE Project is rolled out to the other AES operating companies, AES Ohio and AES El Salvador, whether AES Indiana customer information will be separate from that of the other operating companies, as well as how AES Indiana is and will be protecting customer information.**

A13. Both AES Indiana and Ohio leverage the same SAP instance. The data for each utility is separated by legal entity, and security processes are leveraged to ensure that users have the most restrictive access needed to complete their jobs. AES El Salvador is hosted in a separate instance of SAP, not a shared environment with AES Indiana and AES Ohio. Data security and data privacy are taken very seriously at AES. Alongside the governance processes for data security, the Company has carefully managed the IT Governance Controls ("ITGC"), which manages access to information within the system and limits that access to role provisioning.

**Q14. At the public meeting, there was a discussion regarding potential negative effects on its customers (such as banking overdraft fees and negative impacts on credit scores). Since that meeting, has AES engaged in an effort to research and inform affected customers and to address issues and appropriately compensate or reimburse those customers?**

A14. Yes. AES Indiana is currently in the process of reaching out to all 114 impacted customers to apologize for the error that resulted in duplicate payments being deducted from their bank accounts. The Company is also confirming with these customers if they were assessed any fees by their financial institutions, such as overdraft fees. AES Indiana will reimburse customers for these fees by a mailed check upon receipt of documentation showing the fee(s) assessed.

AES Indiana does not report monthly payment history to third-party credit bureaus and is unaware of any customers' credit scores that this situation would have negatively impacted. It is only when an account's final invoice is left unpaid for approximately 75 days from the date of that invoice that a report would be made to the credit bureaus upon a write-off of the balance. Due to AES Indiana's dunning and collection processes being deactivated since October 2023 for the ACE Project go-live, no new reporting to credit bureaus has taken place, only updates to existing reports that had already occurred before October 2023. However, if any impacted customers need documentation from AES Indiana stating that the overdraft may have been caused by the duplicate payments drafted in error, this can and will be provided if requested.