

FILED
November 8, 2023
INDIANA UTILITY
REGULATORY COMMISSION

VERIFIED REBUTTAL TESTIMONY

OF

NATALIE HERR COKLOW

ON BEHALF OF

INDIANAPOLIS POWER & LIGHT COMPANY

D/B/A AES INDIANA

CAUSE NO. 45911

IURC
PETITIONER'S
EXHIBIT NO. 12
12-19-23 DATE AT REPORTER

SPONSORING AES INDIANA ATTACHMENTS NHC-1R THROUGH NHC-4R

OFFICIAL
EXHIBITS

1 responds to certain recommendations in the testimony of witness Benjamin Inskeep filed
2 on behalf of Citizens Action Coalition Indiana, Inc. ("CAC") surrounding the exclusion of
3 some dues and memberships from the test year as well as Witness Inskeep's
4 recommendation regarding the removal of event fees included in the Indiana Chamber of
5 Commerce dues.

6 **Q5. Are you sponsoring any financial exhibits or attachments?**

7 A5. Yes. I am sponsoring the following attachments to my testimony.

- 8 • AES Indiana Attachment NHC-1R- revised MSFR 170 IAC 1-5-8(a)(23)
9 presenting updated dues and memberships for the test year.
- 10 • AES Indiana Attachment NHC-2R- CAC Data Request 4-3 addressing how the
11 lobbying portion of dues not included in the revenue requirement are
12 determined.
- 13 • AES Indiana Attachment NHC-3R- CAC Data Request 4-3, Attachment 1
14 calculating the lobbying portion of Edison Electric Institute ("EEI") dues not
15 included in the revenue requirement.
- 16 • AES Indiana Attachment NHC-4R- CAC Data Request 4-2, Attachment 2
17 calculating the lobbying portion of Indiana Energy Association ("IEA") dues
18 not included in the revenue requirement.

19 I am also sponsoring the revised versions of the AES Indiana Financial Exhibits which I
20 originally sponsored. As described further in AES Indiana witness Aliff's rebuttal
21 testimony, all schedules have been denoted with the "-R". As before, an index showing
22 which witnesses sponsor each schedule has been filed as the first page in the AES Indiana

Financial Exhibits. Witness Aliff's testimony also summarizes the changes to each Financial Exhibit.

Q6. Did you submit any workpapers?

A6. Yes. AES Indiana is submitting workpapers in electronic format that support the revised basic rate case schedules. I am sponsoring the workpapers that support the schedules that I sponsor.

Q7. Were the attachments and workpapers you are sponsoring prepared or assembled by you or under your direction and supervision?

A7. Yes.

2. SERVICE AGREEMENT WITH AES US SERVICES

Q8. OUCC Witness Lantrip (pages 2, 19, and 20) recommends that AES Indiana's adjustment on AES Indiana Financial Exhibit AESI-OPER, Schedule OM23 be approved, subject to the requirement that AES Indiana update the Commission as to the status of the service agreement remaining in place beyond the beginning of January 2024. Do you agree with Mr. Lantrip's recommendation?

A8. Yes. AES Indiana plans to file the renewed Service Agreement with the Service Company before the end of the year. This will be filed with the Commission in accordance with General Administrative Order 2016-5.

3. EMISSION ALLOWANCES INVENTORY IN RATE BASE

Q9. OUCC witness Armstrong (page 8) recommends that AES Indiana remove test year cutoff emission allowances inventory from materials and supplies inventory, which is based on a 13-month average. Do you agree with Ms. Armstrong's recommendation?

1 A9. While I disagree that emission allowances inventory should be excluded from rate base as
2 a general ratemaking principle, I do acknowledge that seasonal NOx allowance purchases
3 in the test year during a time of high market prices caused an increase in the balance that
4 is expected to continue to decrease post-test year as AES Indiana consumes these
5 allowances and is allocated zero cost allowances (assuming no further purchases). In order
6 to avoid controversy, AES Indiana has included an adjustment to our rebuttal exhibits on
7 AES Indiana Financial Exhibit AESI-RB, Schedule RB7-R to remove emission allowances
8 inventory from rate base, resulting in pro forma decrease to rate base of \$649,000.

9 **4. UTILITY MEMBERSHIP DUES**

10 **Q10. Please summarize the utility membership dues that CAC witness Inskeep mentions**
11 **specifically in his testimony.**

12 A10. CAC Witness Inskeep mentions dues of \$409,516 for EEI, \$289,427 for IEA, \$51,144 for
13 various local state chambers of commerce, and \$16,625 for Utility Solid Waste Activities
14 Group (“USWAG”) membership dues.²

15 **Q11. Do you have any comments on these figures?**

16 A11. Yes. First, I believe the amount of \$409,516 referenced by Mr. Inskeep for EEI is misstated.
17 Per Line 14 of the MSFR 170 IAC 1-5-8(a)(23) filed in this case, total EEI dues in the test
18 year were \$408,516. Second, the correct total of test year dues for IEA is \$263,146.73.
19 AES Indiana provided an updated IEA dues total in the response to CAC Data Request 4-
20 2.³ Per our response to CAC DR 4-2, the IEA dues of \$289,427.93 as presented on 170
21 IAC 1-5-8(a)(23) Line 22, was overstated by \$26,281.20. The overstatement was due to

² Inskeep p. 61.

³ Inskeep Attachment BI-3.

1 the reversal of an accrual of \$26,281.20 not being included in the overall expense amount.
2 The correct total of IEA dues included in the revenue requirement is \$263,146.73. This
3 presentation error was limited to the compilation of 170 IAC 1-5-8(a)(23) and did not
4 impact the test year expense included in the revenue requirement. Thus, the IEA amount
5 referenced by Mr. Inskeep is not correct. The revised MSFR attachment was revised and
6 filed with the Commission on October 10, 2023. I have also included it as AES Indiana
7 Attachment NHC-1R in my rebuttal testimony.

8 **Q12. CAC witness Inskeep (page 66) recommends, “The Commission should deny AES**
9 **Indiana’s request to include in its rates costs that are for utility membership**
10 **association dues, especially EEI, USWAG, IEA, and chamber of commerce**
11 **membership dues.” Does AES Indiana accept this recommendation?**

12 A12. No. First, these challenged membership dues included in direct testimony do not reflect
13 lobbying which is not permitted to be included in the revenue requirement. Second the
14 challenged dues contribute less than \$0.5 million to the revenue requirement and are
15 reasonable in amount. These are valid business expenses that should be included in the
16 revenue requirement. Lastly, these membership dues were accepted in AES Indiana’s prior
17 rate cases, Cause No. 45029 and 44576. I will address various points witness Inskeep
18 makes about EEI, IEA and USWAG membership dues below. AES Indiana witness Staton
19 addresses chambers of commerce dues in his rebuttal testimony.

20 **5. EEI MEMBERSHIP DUES**

21 **Q13. Please summarize witness Inskeep’s testimony as it relates to the EEI’s activities.**

22 A13. Witness Inskeep claims that “EEI is a trade association for utilities, and accordingly
23 undertakes activities to influence decisionmakers to adopt policies and positions beneficial

1 to utility shareholders and in opposition to interest of consumers. EEI engages in highly
2 political, advocacy-oriented, and influence activities, including funding outside political
3 and charitable contributions, litigation, regulatory advocacy, and efforts to shape the public
4 and decision-maker opinion, in addition to numerous other activities that principally serve
5 shareholders rather than ratepayer interests.”⁴

6 **Q14. Do you agree that the EEI membership costs included in the Company’s proposed**
7 **revenue requirement should be disallowed?**

8 A14. No. Witness Inskeep fails to mention all aspects of EEI’s activities and is instead focused
9 only on political advocacy work, which as stated below, is not included in the Company’s
10 proposed revenue requirement.

11 EEI is a trade organization that seeks to advance the interest of electric utilities in the
12 United States of America. The EEI founding constitution pledges to aid members to
13 generate and sell electric energy at the lowest possible price commensurate with safe and
14 adequate service. The primary benefits that AES Indiana receives through membership are:
15 1) EEI provides a variety of training courses through their expert staff specific to electric
16 utilities such as accounting, communications, customer solutions, energy supply,
17 environment, finance, human resource, grid security, internal controls, and state and
18 government relations and regulatory affairs. EEI is a main source of training courses for
19 AES Indiana employees; 2) EEI works with members on storm response and recovery; 3)
20 EEI was instrumental in the creation of the Electric Subsector Coordination Council
21 (“ESCC”). ESCC serves the principal liaison between the federal government and the

⁴ Inskeep, p. 62.

1 electric power industry, with the mission of coordinating efforts to prepare for, and to
2 respond to, national-level disasters and threats to critical infrastructure; 4) EEI works with
3 members on cyber security issues which are essential to understand in order to maintain
4 grid security; 5) EEI partners with other associations, education institutions, and organized
5 labor to continue to attract and retain quality talent to the electric utility industry; 6) EEI
6 provides conferences and training tailored to specific roles in an electric utility, such as
7 accounting, business diversity, transmission, distribution, metering, mutual assistance,
8 regulatory accounting, national key accounts, occupational safety and health, FERC
9 reporting, fixed asset accounting, and internal controls. Conferences attended by AES
10 Indiana employees for professional development and learning are primarily through EEI
11 events such as these; 7) EEI coordinates and facilitates specific member groups and task
12 forces to tackle industry issues such as when new accounting pronouncements are
13 proposed. EEI has helped organize its members to discuss the impacts of the new rules and
14 whether specific considerations should be made for nuances of public utilities. On many
15 occasions, EEI has written formal recommendations to the Financial Accounting Standards
16 Board to modify the proposed rules (based upon collective views of its member
17 professionals) so that they result in a reasonable financial statement presentation for
18 electric utility transactions; 8) EEI hosts dozens of committees for member company
19 employees to convene with peers to share information. These committees range from
20 communications, customer solutions, regulatory, energy delivery, energy supply,
21 engineering, environment, finance, government relations, legal, security, and technology;
22 Finally, 9) EEI provides various reports on data including typical bills, handbook for
23 electricity, metering, financial review, statistical yearbook, and weekly electric output. All

1 of these services directly or indirectly benefit customers, making AES Indiana's
2 membership in the organization reasonable.

3 **Q15. Please summarize witness Inskeep's testimony (page 62-63) as to why AES Indiana**
4 **should not include EEI dues in the revenue requirement.**

5 A15. Witness Inskeep states that "EEI does not appear to separately account for regulatory
6 advocacy and public relations activities. Regulatory advocacy and public relations
7 activities are categories of cost incurred by a utility membership association designed to
8 influence decisionmakers and the public, which AES Indiana should not be allowed to
9 recover in rates."⁵ In addition, he claims that "the costs of EEI membership are not
10 necessary for AES Indiana to provide safe and reliable service and should be removed from
11 rates."⁶

12 **Q16. Do you agree that the EEI costs included in the Company's proposed revenue**
13 **requirement should be disallowed?**

14 A16. No. The EEI services discussed in Q/A 14 above are essential for safe and reliable service
15 and these services benefit AES Indiana and its ratepayers directly and indirectly. It is
16 essential for AES Indiana to have an organization that aids the utility on safety and storm
17 response issues, reliability, accounting and finance guidance, environmental/regulatory
18 rules and guidance, and a knowledgebase to train and help develop employees. Without
19 EEI, AES Indiana would most likely still need an organization(s) or in-house employees
20 to provide these services and information and would incur additional costs for them. In
21 addition, witness Inskeep is ignoring the fact that EEI does provide information on their

⁵ Inskeep p. 62-63.

⁶ Inskeep p. 63.

1 invoice informing members of the estimate of the lobbying and charitable portion of their
2 annual membership dues, and those have not been included in the revenue requirement.

3 This information and the associated calculations were supplied to intervenors via the
4 response to data request CAC 4-3 and CAC 4-3 Attachment 1 which are included with my
5 rebuttal as AES Indiana Attachments NHC-2R and NHC-3R. AES Indiana Attachment
6 NHC-3R shows that a total of \$68 thousand was attributed to EEI lobbying and charitable
7 contributions and is not included in the revenue requirement in this case. AES Indiana's
8 membership in EEI is a prudent and reasonable expense that benefits AES Indiana and its
9 customers. Therefore, Mr. Inskeep's proposed disallowance should be rejected.

10 **6. USWAG MEMBERSHIP DUES**

11 **Q17. Please summarize witness Inskeep's testimony as it relates to his concerns regarding**
12 **USWAG membership dues.**

13 A17. Witness Inskeep claims that "USWAG promotes and litigates contentious political and
14 policy viewpoints that many individual utility customers find highly objectionable and do
15 not want to fund through their electric bills that they are compelled to pay"⁷.

16 **Q18. Do you agree that the USWAG costs included in the Company's proposed revenue**
17 **requirement should be disallowed?**

18 A18. No. Witness Inskeep again omits mentioning the many benefits USWAG membership
19 provides. AES Indiana benefits from participation in USWAG in the following ways:
20 USWAG provides its members with in-depth analysis of proposed and final rules, policy
21 and guidance documents, and legislation related to waste that may affect the energy

⁷ Inskeep, p. 62.

1 industry. These regulatory and legislative activities are numerous and complex.
2 Participation in USWAG allows AES Indiana to track, understand, and implement
3 necessary compliance initiatives in a more cost effective and timely manner. USWAG also
4 offers a range of technical and operational resources, including training webinars,
5 workshops, and individual member support to facilitate member compliance efforts. AES
6 Indiana would require additional direct or consulting resources to track, understand, and
7 address environmental waste requirements if not for its participation in USWAG and
8 access to associated USWAG resources. Mr. Inskeep provides no support for his opinion
9 that “USWAG promotes and litigates contentious political and policy viewpoints that many
10 individual utility customers find highly objectionable.”⁸ Without some support – either
11 examples of specific litigation or customer complaints – I cannot respond to Mr. Inskeep’s
12 opinion. Therefore, Mr. Inskeep’s proposed cost disallowance should be rejected.

13 **Q19. On page 63, Mr. Inskeep states “USWAG membership dues were not transparently**
14 **presented in AES Indiana’s case-in-chief, including its MSFR 170 IAC 1-5-8(a)(23),**
15 **and CAC only became aware that these costs were embedded in EEI dues through**
16 **AES Indiana’s response to data requests.” Please respond.**

17 A19. AES did not intentionally embed USWAG dues in EEI. The MSFR requires a schedule of
18 trade, social, and service organization dues paid during the test year and recorded to utility
19 operations. USWAG dues are in fact paid through EEI. MSFR 170 IAC 1-5-8(a)(23) was
20 prepared by detailing membership dues paid to each vendor from our general ledger
21 accounting system. Because USWAG dues are in fact paid through the EEI vendor, they
22 were not listed separately within the MSFR. When the question was raised in CAC’s data

⁸ Inskeep, p. 62

1 request 3-6 (Attachment BI-3), the dues were presented clearly to witness Inskeep. The
2 dues were also provided in CAC's data request, Attachment 1, page 7 (Attachment BI-3)
3 which is the EEI invoice showing the USWAG dues.

4 **7. IEA MEMBERSHIP DUES**

5 **Q20. Please summarize CAC witness Inskeep's testimony as it relates to his concerns**
6 **regarding IEA membership dues.**

7 A20. Witness Inskeep claims that "IEA promotes a utility agenda through its lobbying,
8 regulatory affairs, and public relations that benefits utility shareholders, often to the
9 detriment of the captive ratepayers served by member utilities" and that "IEA lobbies and
10 promotes contentious political and policy viewpoints that many individual utility
11 customers find highly objectionable and do not want to fund through their electric bill."⁹

12 **Q21. Do you agree that the IEA costs included in the Company's proposed revenue**
13 **requirement should be disallowed?**

14 A21. No. First, AES Indiana and IEA both recognize that there is a lobbying portion of the
15 membership dues paid by its members. As shown in the response to CAC DR 4-2,
16 Attachment 2 and presented as AES Indiana Attachment NHC-4R in my rebuttal testimony,
17 15% of membership dues are estimated to be for lobbying purposes. This portion of the
18 annual membership dues are not included in the revenue requirement in this proceeding.

19 Second, IEA, like the other organizations mentioned above, provides many benefits beyond
20 legislative and regulatory activity. The primary benefits to AES Indiana and its customers
21 are education, knowledge-sharing amongst members, and efficient stakeholder

⁹ Inskeep, p. 64.

1 engagement. IEA is an educational resource for the electric and gas industries. A key
2 benefit for AES Indiana and its customers includes sharing best practices and knowledge
3 transfer between utilities. IEA accomplishes this through engaging member companies at
4 every level from CEOs to technical staff, often-times using committees. Through
5 committees, member company employees convene with their peers to set policy directions
6 as well as share information. The IEA has more than twenty committees with subject matter
7 experts who advise on issues. In addition, the IEA hosts an annual educational conference
8 for its stakeholders where notable panelists include the Chairman of the Indiana Utility
9 Regulatory Commission, the Office of the Utility Consumer Counselor, and the Director
10 of the Office of Energy Development. Furthermore, the IEA is the industry's Indiana point
11 of contact for company leaders on timely issues such as storm response and restoration and
12 cybersecurity threats. During weather events, IEA staff and other member companies
13 coordinate as necessary and provide strategic communication support to ensure state
14 leaders have up-to-date information on safety and restoration efforts. As cybersecurity risks
15 grow, AES Indiana and other IEA member companies are working together for knowledge
16 sharing and to pool other resources in the face of cyber incidents or attacks that exceed the
17 capacity of individual member companies to respond. This dynamic and collaborative
18 relationship between IEA and its member utilities is what keeps Indiana at the forefront of
19 sound energy policy and best business practices that benefit customers. Accordingly, like
20 the other memberships addressed above, membership in IEA is a prudent and reasonable
21 expense that benefits AES Indiana and its customers and should be allowed in this rate
22 case.

23 **8. INDIANA CHAMBER OF COMMERCE MEMBERSHIP DUES**

1 **Q22. On page 65 of Inskeep's testimony he states that AES Indiana membership dues for**
2 **the Indiana Chamber of Commerce included 'swanky' and 'lavish' event fees totaling**
3 **\$3,645. What is his recommendation?**

4 A22. Witness Inskeep recommends that these events not be included in the revenue requirement.

5 **Q23. Does AES Indiana agree with this recommendation?**

6 A23. While AES Indiana does not agree with Mr. Inskeep's characterization of the Chamber of
7 Commerce events, AES Indiana does accept the recommendation to remove these costs
8 from the revenue requirement. It is not AES Indiana's intention to include events such as
9 these in the revenue requirement. Other similar events were removed from the revenue
10 requirement in our original filing and AES Indiana agrees that these events totaling \$3,645
11 should also be removed. As such, an adjustment has been made to AES Indiana Financial
12 Exhibit AESI-OPER, Schedule OM22-R (line 14) resulting in a larger pro forma
13 adjustment (decrease to operating expense) to miscellaneous expense items.

14 **9. SUMMARY AND RECOMMENDATIONS**

15 **Q24. Please summarize your testimony and conclusions.**

16 A24. The following summarizes my testimony:

- 17 • AES Indiana accepts witness Lantrip's recommendation regarding the Service
18 Agreement as discussed above.
- 19 • AES Indiana accepts witness Armstrong's recommendation to remove emission
20 allowances inventory from rate base for the test year due the decrease in the balance
21 after the test year end. However, I would note that AES Indiana does not agree to

1 remove emissions allowances inventory from rate base in all future basic rate case
2 proceedings.

3 • The membership dues for EEI, IEA, USWAG and chambers of commerce totaling
4 \$739,432 should be included in the revenue requirement in this proceeding. To
5 reiterate, the identified lobbying portion of these dues were not included in the
6 revenue requirement in AES Indiana's original filing.

7 • AES Indiana accepts witness Inskeep's recommendation to remove two Indiana of
8 Chamber of Commerce events totaling \$3,645 from the revenue requirement and
9 has made an adjustment to the financial exhibits filed with rebuttal.

10 **Q25.** Does this conclude your pre-filed rebuttal testimony?

11 **A25.** Yes.

VERIFICATION

I, Natalie Herr Coklow, Manager in Regulatory Accounting for AES US Services, LLC, affirm under penalties for perjury that the foregoing representations are true to the best of my knowledge, information, and belief.

Natalie Herr Coklow

Natalie Herr Coklow

Dated: November 8, 2023

AES Indiana
Twelve Months Ended December 31, 2022
Trade, Social, and Service Organization Memberships Recorded to Utility Operations

Line No.	Classification	Amount	Line No.
1	AICPA	\$ 141.75	1
2	Air & Waste Management Association	77.36	2
3	American Society for Industrial Security	234.00	3
4	Arbor Day Foundation	75.00	4
5	ASIS International ONLINE	666.90	5
6	ASIS Intl Online	424.00	6
7	Association of Energy Professionals Membership	1,750.00	7
8	Better Business Bureau Indiana	4,111.00	8
9	Builders Association of Greater Indianapolis	1,095.00	9
10	Center for Energy Workforce Development	3,684.85	10
11	Central Indiana Corporate Partnership	27,500.00	11
12	Chartered Financial Analyst Institute	250.95	12
13	Downtown Indy	40,000.00	13
14	Eddison Electric Institute	408,516.13	14
15	Greater Indiana Clean City Participation	3,087.00	15
16	Greater Mooresville Chamber of Commerce	1,100.00	16
17	Illinois CPA Society	590.00	17
18	Illuminating Engineering	450.00	18
19	Indiana Chamber of Commerce	36,894.00	19
20	Indiana Chapter of International Association of Electrical Inspectors	295.00	20
21	Indiana CPA Society	430.00	21
22	Indiana Energy Association	263,146.73	22
23	Indiana Geographic Information Council	250.00	23
24	Indiana Manufacturer Society	11,989.20	24
25	Indiana Manufactures Association	11,989.20	25
26	Indiana Society of Professional Land Surveyors	495.00	26
27	Indiana State BAR Association	149.33	27
28	Indianapolis Chamber of Commerce	2,750.00	28
29	Institute for Electrical and Electronics Engineers	245.00	29
30	Institute of Electrical and Electronics Engineers	2,039.50	30
31	International Association of Electrical Inspectors	345.00	31
32	International Health Services Global Inc	9,458.04	32
33	International Society of Automation	175.00	33
34	Lawrence Chamber of Commerce	3,200.00	34
35	Midwest Energy Association	14,285.21	35
Line No.	Classification	Amount	Line No.
36	Midwest Energy Efficiency Alliance	9,740.00	36
37	NASBA	632.60	37
38	National Fire Protection Association	175.00	38
39	National Society for Professional Engineers	5,107.00	39
40	North American Electric Reliability Corporation	400.00	40
41	ONEZONE INC	2,200.00	41
42	Pike County Chamber of Commerce	5,000.00	42
43	Project Management Institute	293.00	43
44	Smart Electric Power Alliance	6,666.64	44
45	Society for Human Resource Management	2,264.77	45
46	Society of Utility and Regulatory Financial Analysts	100.00	46
47	The American Society of Civil Engineers	275.00	47
48	The Greater Indianapolis Progress Committee	5,000.00	48
49	The International Information System Security Certification Consortium	125.00	49
50	The National Board of Boiler and Pressure Vessel Inspectors	4,660.00	50
51	UMS Group Inc	78,750.00	51
52	UW Center for Cooperatives Registrations	150.00	52
53	Visit Indy	7,500.00	53
54	Total	\$ 980,929.15	54

AES Indiana Responses to CAC DR Set 4

Data Request CAC DR 4 - Q3

Please refer to MSFR 170 IAC 1-5-8(a)(23).

- a) For membership association dues amounts, please provide an itemized list of adjustments made by AES Indiana to the total membership dues paid to account for the portion of membership dues that were associated with lobbying for each organization. Please provide documentation relied on by AES Indiana to make each determination for the amount to exclude from revenue requirement.
- b) Please refer to line 51, "UMS Group Inc." Please describe in detail why AES Indiana is a member of UMS Group Inc. and the benefits to ratepayers provided by AES Indiana's membership in UMS Group Inc.
- c) Please refer to lines 24. Please describe in detail why AES Indiana is a member of the Indiana Manufacturer Society, provide a website to this organization, and explain in detail any benefits to ratepayers provided by AES Indiana's membership in Indiana Manufacturer Society.

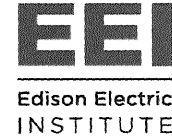
Objection:

Response:

- a) EEI and IEA dues are identified as lobbying and membership per the invoice. See also the response to CAC DR 4-1, subpart b. For the allocation of EEI dues attributed to lobbying and contributions and not included in the revenue requirement, see CAC DR 4-3 Attachment 1. For IEA dues allocated to lobbying and not included in the revenue requirement, see CAC DR 4-2 Attachment 2.
- b) UMS is a Substation Best Practice Collaborative group that shares best practices, new technologies, research, new ideas, and general knowledge about building and maintaining electrical substations. AES Indiana customers will benefit from AES Indiana being able to implement grid solutions that are in accordance with industry and market standards.
- c) The MSFR reference should have been to the "Indiana Manufacturers Association", not "Indiana Manufacturers Society". AES Indiana is a founding member of the Indiana Manufacturers Association ("IMA"), which was formed in 1901. The IMA supports and promotes quality jobs in the state. The association's work furthers Indiana's effort to compete for all types of manufacturing facilities and jobs across the country and globe. The IMA's work fosters customer/community growth and economic development and this in turn benefits AES Indiana customers by maintaining or growing the base over which the Company's fixed costs of providing service is spread in the ratemaking process. The website for the organization is <https://www.indianamfg.com/>.

Invoice for Membership Dues

	Amount	Company	S&P Desc	Trading Partner
AES Indiana	468,153.46	U564	1188100014	US23
AES Ohio	207,804.22	U564	1143100014	USDY
	2,443.80	U564	1153100014	USDY
AES US Gen	484,241.55	U564	1188100014	US25
	1,161,644.00			



MR. ANDRÉS R. GLUSKI
PRESIDENT & CEO
AES CORPORATION
4300 WILSON BLVD.
ARLINGTON, VA 22203-1830

Date	Invoice Number
11/16/2021	DUES202201

Payment due on or before 1/31/2022

Description	Total
2022 EEI Membership Dues for:	
Lobbying	
Line 1 13% 133,739.71	
Line 2 20% 20,575.40	
Regular Activities of Edison Electric Institute ¹	\$1,028,767
Industry Issues ²	\$102,877
Restoration, Operations, and Crisis Management Program ³	\$15,000
2022 Contribution to The Edison Foundation, which funds the Institute for Electric Innovation ⁴	\$15,000
Charitable 1.29%	
AES Indiana Annual Total: \$468,153.46, Lobbying \$62,170.78, Charitable \$6,039.18, \$399,943.50 membership	
Total	\$1,161,644

- 1 The portion of 2022 membership dues relating to influencing legislation and political campaign activity, including activities covered by Section 162(e) of the Internal Revenue Code (IRC) and contributions to groups organized under IRC sections 527 and 501(c)(4), is estimated to be 13%.
- 2 The portion of the 2022 industry issues support relating to influencing legislation and political campaign activity, including activities covered by IRC Section 162(e) and contributions to groups organized under IRC sections 527 and 501(c)(4), is estimated to be 20%.
- 3 The Restoration, Operations, and Crisis Management Program is related to improvements to industry-wide responses to major outages (e.g., National Response Event); continuity of industry and business operations; and EEI's all hazards (storms, wildfires, cyber, pandemic, etc.) support and coordination of the industry during times of crises. No portion of this assessment is allocable to influencing legislation.
- 4 The Edison Foundation is an IRC 501(c)(3) educational and charitable organization. Contributions are deductible for federal income tax purposes to the extent provided by law. Please consult your tax advisor with respect to your specific situation.

Indianapolis Power & Light Company d/b/a AES Indiana
AES Indiana 2023 Basic Rate Case
Cause No. 45911
AES Indiana Attachment NHC-3R
Page 1 of 4

AES Indiana Allocation

1,161,644	Total Invoice
40.30%	AES Indiana %
468,153.46	AES Indiana Portion of Expense

Lobbying Portion

133,739.71	Line 1	13% per footnote 1
20,575.40	Line 20	20% per footnote 2
154,315.11	Total	

13.28%	Lobbying %
1.29%	Charitable %
\$15,000	per footnote 4

EEI AES Invoice Coding

85.43%	Membership
13.28%	Lobbying
1.29%	Charitable
399,943.50	Membership
62,170.78	Lobbying (FERC 426.4, not in revenue requirement)
6,039.18	Charitable (FERC 426.1, not in revenue requirement)
468,153.46	

992,328.89	Total Membership Portion
82,694.07	Total Monthly Membership

2022 EEI Dues Calculation (Allocation)

Revenues		Dues	2022	
			%	Share
AES Indiana	1,352,985		45.81%	184,432
AES Ohio	651,200		22.05%	88,768
Total Regulated	2,004,185			
DPLER	-		0.00%	-
DPL Energy, LLC	9,300		0.31%	1,268
US GEN	939,738		31.82%	128,100
Total Non Regulated	949,038			-
Total	2,953,223	402,569	100.00%	402,569

Number of Electric Customers				
AES Indiana	511,541		49.08%	90,317
AES Ohio	530,670		50.92%	93,695
Total Regulated	1,042,211			
DPLER	-		0.00%	-
US GEN	-		0.00%	-
Total Non Regulated	-			-
Total	1,042,211	184,012	100.00%	184,012

Generating Capacity				
AES Indiana	3,518		31.45%	136,313
AES Ohio	-		0.00%	-
Total Regulated	3,518			
Non Regulated	7,668		68.55%	297,090
Total	11,186	433,404	100.00%	433,404

1,019,984

Total Dues:		Company Share:		
Based on Revenues	402,569	AES Indiana	40.3008%	411,062
Based on Customers	184,012	AES Ohio	17.8888%	182,463
Based on Capacity	433,404	Non Regulated - DPLER	0.0000%	-
	1,019,984	Non Regulated - DPL Energy, LLC	0.1243%	1,268
		Non Regulated - US GEN	41.6861%	425,191
			100.00%	1,019,984

Total Dues per Invoice 1,161,644.00

Allocated Share:		
AES Indiana	40.301%	468,153.46
AES Ohio	17.889%	207,804.22
DPL Energy, LLC	0.124%	1,443.80
US GEN	41.686%	484,242.53
	100.000%	1,161,644.00

2022 MEMBER DUES FORMULA WORKSHEET

AES Corporation	
Revenue (in thousands of dollars)	\$ 2,953,223
1st \$2B @	
0.1576	315,233
\$2B to \$4B @	
0.0916	87,335
	<u>402,569</u>
Customers	1,042,211
1st 500K @	
0.2588	129,415
500K to 1.7M @	
0.1007	54,597
	<u>184,012</u>
Generation Capacity (in kW)	11,186,000
1st 3M kW@	
0.0462	138,687
3M kW to 10M kW @	
0.0393	275,449
Over 10M kW @	
0.0162	19,267
	<u>433,404</u>
Total Original Dues Calculated	\$ 1,019,984
Rounding Differences	\$ 8,783
Total Regular Activity Invoiced Dues	\$ 1,028,767

EEI Dues Calculation
Data for computation of membership dues

	<u>Total</u>
Revenues	
AES Indiana	1,352,985 tab .5
AES Ohio (Transmission & Distribution)	<u>651,200</u>
Total Regulated	<u>2,004,185</u>
Generation Segment	-
Other	<u>9,300</u>
Total Unregulated DPL Inc Subs	<u>9,300</u>
Other US GEN businesses	<u>939,738</u>
Total US GEN	<u>939,738</u>
Total Unregulated (DPL subs & US GEN)	<u>949,038</u>
Total	<u>2,953,223 *</u>

*(Dollars are in thousands)

Number of Electric Customers	
AES Indiana	511,541
AES Ohio	<u>530,670</u>
Total Regulated	<u>1,042,211</u>

Total Customers 1,042,211

(1) Unregulated customers are not considered for computation of the 2018 EEI dues.

Generating Capacity	
AES Indiana	3,518
AES Ohio	<u>-</u>
Total Regulated	<u>3,518</u>

Other US GEN businesses	<u>7,668</u>
Total Unregulated	<u>7,668</u>

Total Capacity 11,186

Indianapolis Power & Light Company d/b/a AES
Indiana AES Indiana 2023 Basic Rate Case

Cause No. 45911

AES Indiana Attachment NHC-4R

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MEMBERSHIP DUES STATEMENT

Date: November 15, 2021

To : [REDACTED]
Director, Government Affairs
AES Indiana
One Monument Circle
Indianapolis, IN 46204

FIRST QUARTER 2022 DUES STATEMENT

Quarterly Dues Assessment: \$92,398.50

Please make checks payable to:

Indiana Energy Association, Inc.

Please remit to:

Indiana Energy Association, Inc.
One American Square
Suite 1600
Indianapolis, Indiana 46282

cc: [REDACTED]

85% = 100% - 15%

The Indiana Energy Association, Inc. is a 501(c)(6) trade organization under the Internal Revenue Code. Contributions to the Indiana Energy Association, Inc. may be deductible as ordinary and necessary business expenses subject to restrictions imposed as a result of association lobbying activities. The Indiana Energy Association estimates that the non-deductible portion of your dues allocable to lobbying to be 15%.

$\$92,398.50 \times 0.85 = \$78,538.74$ 1/

Indianapolis Power & Light Company d/b/a AES
Indiana AES Indiana 2023 Basic Rate Case

Cause No. 45911

AES Indiana Attachment NHC-4R

Page 2 of 4



Vendor: 10076135
GL Account: 1153100010
Co Code: US22

MEMBERSHIP DUES STATEMENT

Date: March 15, 2022
To : [REDACTED]
Director, Government Affairs
AES Indiana
One Monument Circle
Indianapolis, IN 46204

SECOND QUARTER 2022 DUES STATEMENT

Quarterly Dues Assessment:	\$92,398.50
2021 Carryover Credit	(60,009.65)
Total Second Quarter Dues Assessment	<u>\$32,388.85</u>

Please make checks payable to:

Indiana Energy Association, Inc.

Please remit to:

Indiana Energy Association, Inc.
One American Square
Suite 1600
Indianapolis, Indiana 46282



5/9/2022

The Indiana Energy Association, Inc. is a 501(c)(6) trade organization under the Internal Revenue Code. Contributions to the Indiana Energy Association, Inc. may be deductible as ordinary and necessary business expenses subject to restrictions imposed as a result of association lobbying activities. The Indiana Energy Association estimates that the non-deductible portion of your dues allocable to lobbying to be 15%.

$$\$32,388.85 * 0.85 = \$27,530.52 \quad 1/$$

$$85\% = 100\% - 15\%$$



VENDOR: 10076135
GLAC: 1153100010
CO CODE: US22

MEMBERSHIP DUES STATEMENT

Date: June 15, 2022
To : Courtney Arango
Director, Government Affairs
AES Indiana
One Monument Circle
Indianapolis, IN 46204

THIRD QUARTER 2022 DUES STATEMENT

Quarterly Dues Assessment: \$92,398.50

Please make checks payable to:

Indiana Energy Association, Inc.

Please remit to:

Indiana Energy Association, Inc.
One American Square
Suite 1600
Indianapolis, Indiana 46282

Mail Flat
6/15/22

The Indiana Energy Association, Inc. is a 501(c)(6) trade organization under the Internal Revenue Code. Contributions to the Indiana Energy Association, Inc. may be deductible as ordinary and necessary business expenses subject to restrictions imposed as a result of association lobbying activities. The Indiana Energy Association estimates that the non-deductible portion of your dues allocable to lobbying to be 15%.

$$\$92,398.50 * 0.85 = \$78,538.73 \quad 1/$$

$$85\% = 100\% - 15\%$$

Indianapolis Power & Light Company d/b/a AES
Indiana AES Indiana 2023 Basic Rate Case
Cause No. 45911
AES Indiana Attachment NHC-4R
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MEMBERSHIP DUES STATEMENT

Date: September 15, 2022

To : [REDACTED]
Director, Government Affairs
AES Indiana
One Monument Circle
Indianapolis, IN 46204

FOURTH QUARTER 2022 DUES STATEMENT

Quarterly Dues Assessment: **\$92,398.51**

Please make checks payable to:

Indiana Energy Association, Inc.

Please remit to:

Indiana Energy Association, Inc.
One American Square
Suite 1600
Indianapolis, Indiana 46282

CC: [REDACTED]

$\$92,395.51 \times 0.85 = \$78,538.74$

1/

85% = 100% - 15%

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