

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANAPOLIS)
POWER & LIGHT COMPANY D/B/A AES)
INDIANA (“AES INDIANA”) FOR (1) ISSUANCE)
TO AES INDIANA OF A CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY FOR)
THE ACQUISITION AND DEVELOPMENT BY A)
WHOLLY OWNED AES INDIANA SUBSIDIARY)
OF A SOLAR POWER GENERATING FACILITY)
AND BATTERY ENERGY STORAGE SYSTEM)
PROJECT TO BE KNOWN AS THE CROSSVINE)
PROJECT (“THE CROSSVINE PROJECT”); (2))
APPROVAL OF THE CROSSVINE PROJECT,)
INCLUDING A JOINT VENTURE STRUCTURE)
BETWEEN AN AES INDIANA SUBSIDIARY AND)
ONE OR MORE TAX EQUITY PARTNERS AND)
A CONTRACT FOR DIFFERENCES BETWEEN) CAUSE NO. 46113
AES INDIANA AND THE PROJECT COMPANY)
THAT HOLDS AND OPERATES THE SOLAR)
GENERATION AND STORAGE ASSETS, AS A)
CLEAN ENERGY PROJECT AND ASSOCIATED)
TIMELY COST RECOVERY UNDER IND. CODE)
§ 8-1-8.8-11; (3) APPROVAL OF ACCOUNTING)
AND RATEMAKING FOR THE CROSSVINE)
PROJECT, INCLUDING AN ALTERNATIVE)
REGULATORY PLAN UNDER IND. CODE §)
8-1-2.5-6 TO FACILITATE AES INDIANA’S)
INVESTMENT IN THE CROSSVINE PROJECT)
THROUGH A JOINT VENTURE; AND (4) TO)
THE EXTENT NECESSARY, ISSUANCE OF AN)
ORDER PURSUANT TO IND. CODE § 8-1-2.5-5)
DECLINING TO EXERCISE JURISDICTION)
OVER THE JOINT VENTURE, INCLUDING THE)
PROJECT COMPANY, AS A PUBLIC UTILITY.)

VERIFIED PETITION

Indianapolis Power & Light Company d/b/a AES Indiana (“AES Indiana” “IPL”,
“Company”, or “Petitioner”) hereby petitions the Indiana Utility Regulatory Commission
(“Commission”) to approve the acquisition and development of a solar power generating facility

and battery energy storage system project to be known as the Crossvine Project being undertaken by AES Indiana, and to authorize associated accounting and ratemaking, all as more specifically described below and in the Company's prefiled case-in-chief. In accordance with 170 IAC 1-1.1-8 and 1-1.1-9 of the Commission's Rules of Practice and Procedure, AES Indiana submits the following information in support of this Petition.

AES Indiana's Corporate Status and Operations

1. AES Indiana is a public utility corporation organized and existing under the laws of the State of Indiana with its principal office and place of business at One Monument Circle, Indianapolis, Indiana 46204. AES Indiana is engaged in rendering electric utility service in the State of Indiana.

2. AES Indiana provides retail electric utility service to approximately 526,000 retail customers located principally in and near the City of Indianapolis, Indiana, and in portions of the following Indiana counties: Boone, Hamilton, Hancock, Hendricks, Johnson, Marion, Morgan, Owen, Putnam, and Shelby Counties.

3. AES Indiana is part of The AES Corporation, a US-based energy company with global operations. AES US Services, LLC, which is the service company that supports AES Indiana and other AES affiliates, is headquartered in Indianapolis, Indiana.

4. In addition to AES's ownership, CDP Infrastructure Fund L.P., a wholly owned subsidiary of La Caisse de depot et placement du Quebec ("CDPQ"), also owns a minority equity interest in IPALCO, AES Indiana's immediate parent company.

Petitioner's "Public Utility" Status

5. AES Indiana is a "public utility" under Ind. Code §§ 8-1-2-1 and 8-1-8.5-1. AES Indiana is also an "energy utility" providing "retail energy service" as defined in Ind. Code §§ 8-1-2.5-2 and 3 and "public utility service" as defined in Ind. Code § 8-1-8.5-1. AES Indiana is also an "eligible business" as that term is defined in Ind. Code § 8-1-8.8-6. AES Indiana is subject to the jurisdiction of this Commission in the manner and to the extent provided by the Public Service Commission Act, as amended, and other pertinent laws of the State of Indiana.

6. AES Indiana is also subject to the jurisdiction of the Federal Energy Regulatory Commission ("FERC").

7. As authorized by the Commission's Order, in Cause No. 42027, dated December 17, 2001, AES Indiana's transmission system is under the functional control of the Midcontinent Independent Transmission System Operator, Inc. ("MISO"), a FERC-approved regional transmission organization ("RTO"). AES Indiana's transmission system is used for the provision of open access nondiscriminatory transmission service pursuant to MISO's Open Access Transmission Tariff on file with FERC. Charges and credits are billed to AES Indiana as a member of MISO for functional operation of the transmission system, management of the MISO markets, and general administration of the RTO. As a MISO member, AES Indiana must also adhere to the federal reliability standards developed and enforced by the North American Electric Reliability Corporation ("NERC"), which is the electric reliability organization certified by FERC to establish and enforce reliability standards for the bulk power system. ReliabilityFirst ("RF") is one of eight NERC Regional Entities and is responsible for overseeing regional reliability standard development and enforcing compliance. AES Indiana's transmission facilities are wholly located within the RF region.

Relief Sought

8. As set forth and discussed in the Company's prefiled case-in-chief, AES Indiana requests the Commission issue to AES Indiana a certificate of public convenience and necessity ("CPCN") for the acquisition and development, by a wholly owned AES Indiana subsidiary, of a solar power generating facility and battery energy storage system project in Dubois County, Indiana (the "Crossvine Project" or "Project").

9. AES Indiana also requests the Commission approve the Crossvine Project, including the Membership Interest Purchase and Project Development Agreement ("MIPA"), a Joint Venture structure between an AES Indiana subsidiary and one or more tax equity partners, and the use of a Contract for Differences ("CfD") between AES Indiana and Crossvine Solar 1, LLC ("Project Company"), which holds and operates the solar generation and battery storage facility, as a Clean Energy Project. The Company requests accounting and ratemaking relief as summarized below. The accounting and ratemaking relief is consistent with Ind. Code § 8-1-8.8-11, Ind. Code § 8-1-2-42(a), and/or § Ind. Code 8-1-2.5-6. Solar energy and energy storage systems or technologies are listed as a clean energy resource, making the Crossvine Project a resource this statute was designed to encourage.¹ AES Indiana also proposes that the Commission maintain an ongoing review of the construction of the Crossvine Project as it proceeds.

10. The requested accounting and ratemaking authority, as explained in AES Indiana's prefiled case-in-chief, includes authority to record the Company's investment in the Crossvine Project as a regulatory asset. More specifically, AES Indiana requests approval an

¹ Ind. Code § 8-1-8.8-2, 10; § 8-1-37-4(a)(2) and (10).

Alternative Regulatory Plan (“ARP”) to facilitate AES Indiana’s investment in the Crossvine Project through the Joint Venture. The ARP allows AES Indiana to invest in the Crossvine Project in a way that reduces overall costs of the project for the benefit of AES Indiana’s customers. As explained in AES Indiana’s prefiled case-in-chief, approval of the ARP and declination of jurisdiction in accordance with Ind. Code §§ 8-1-2.5 and 2.6 furthers the continuing goal of the Commission in the provision of efficient and economic retail energy services, facilitates an environment whereby Indiana consumers will have available state-of-the-art technology and energy services, and otherwise serves the public interest.

11. The requested accounting and ratemaking relief also includes AES Indiana proposed deferral and timely cost recovery of carrying charges on and amortization of the regulatory asset in AES Indiana’s annual Environmental Compliance Cost Recovery Adjustment proceedings (“ECR”). In the Company’s next basic rate case, the unamortized balance of the regulatory asset in net original cost rate base and in the value of its rate base for purposes of Ind. Code § 8-1-2-6 (Valuation of Property).

12. AES Indiana also proposes timely cost recovery for the “CfD” to be administered in AES Indiana’s Fuel Adjustment Clause (“FAC”) proceedings.

13. AES Indiana also requests deferral authority for the costs incurred to develop the Crossvine Project (“Project Development Costs”) as a regulatory asset and to recover such costs in a future basic rate case. Further, in the event the Crossvine Project is not approved by the Commission, AES Indiana requests authority to defer and subsequently recover through rates prudently incurred Project Development Costs that are incurred prior to the date of the Commission Order.

14. The Commission previously declined to exercise its jurisdiction over the Crossvine Project as set forth in the Order in Cause No. 45977 dated February 21, 2024. The Company requests the Commission to continue to decline to exercise jurisdiction over the Project Company as a public utility. Finally, to the extent necessary, the Company requests the Commission to decline to exercise any jurisdiction over the Joint Venture as a public utility.

AES Indiana's Electric Utility System

15. AES Indiana owns and operates electric generating, transmission, and distribution plant, property, and equipment and related facilities, which are used and useful for the convenience of the public in the production, transmission, delivery, and furnishing of electric energy, heat, light, and power. AES Indiana has maintained and continues to maintain its properties in a reliable state of operating condition.

16. AES Indiana's property is classified in accordance with the Uniform System of Accounts ("USOA") as prescribed by FERC and approved and adopted by this Commission.

17. In order to continue to properly serve the public located in its service area and to execute its duties as a public utility, AES Indiana has made and continues to make numerous investments in its electric utility systems and resources.

18. AES Indiana also engages in power purchase transactions through MISO as necessary to meet the demands of its customers.

19. AES Indiana has the requisite managerial, operational, and financial ability to develop and manage the Crossvine Project.

AES Indiana's Integrated Resource Plan

20. Indiana's utility regulatory framework requires AES Indiana to submit an Integrated Resource Plan ("IRP") to the Commission every three years. Ind. Code § 8-1-8.5-3(e)(2); 170 Indiana Administrative Code ("IAC") 4-7-2.

The IRPs are subject to a rigorous stakeholder process. IRPs describe how the utility plans to deliver safe, reliable, and efficient electricity at just and reasonable rates. Further, these plans must be in the public interest and consistent with state energy and environmental policies. Each utility's IRP explains how it will use existing and future resources to meet customer demand. When selecting these resources, the utility must consider a broad range of potential future conditions and variables and select a combination that would provide reliable service in an efficient and cost-effective manner.²

21. AES Indiana's most recent IRP was submitted to the Commission on December 1, 2022 ("2022 IRP"). The study period for AES Indiana's 2022 IRP is 2023-2042. In accordance with the Commission's rules, AES Indiana's 2022 IRP includes a Preferred Resource Portfolio and a Short Term Action Plan for the three-year period following the IRP (2023-2025).³ The Short Term Action Plan includes adding up to 1,300 MW of installed capacity of wind, solar and storage for capacity and energy.⁴

22. Additionally, in 2024, AES Indiana updated the 2022 IRP analysis with current planning assumptions. The 2024 IRP Update demonstrates a need for additional battery energy storage resources resulting from an increase in the MISO Reserve Margin subsequent to the 2022 IRP. The Crossvine Project's hybrid solar + storage attributes help to fill this identified need and align with the results of the 2024 IRP Update.

²<https://www.in.gov/iurc/energy-division/electricity-industry/integrated-resource-plans/>

³ 170 IAC 4-7-2(c)(3); 170 IAC 4-7-4(1).

⁴ AES Indiana 2022 IRP Volume 1 at Section 10.1.

The Crossvine Project

23. The Crossvine Project is a solar and battery energy storage hybrid project located in Dubois County, Indiana. The solar component of the Crossvine Project will have a nameplate capacity of approximately 85 MW and the BESS component will have a storage capacity of approximately 85 MW /4 hours. The Project will contribute approximately 80 MW of UCAP to AES Indiana's winter capacity need as identified in AES Indiana's 2024 IRP Update. The Crossvine Project will interconnect at the existing CenterPoint Energy Indiana 138kV transmission line between Culley and Dubois at the new Holland substation.

24. On February 21, 2024, the Commission issued an Order in Cause No. 45977 declining to exercise its jurisdiction over Crossvine Solar 1, LLC and its construction, operation, and financing of the Crossvine Project, except as specifically stated within such Order.

25. AES Indiana, through a wholly owned subsidiary, AES Indiana Devco Holdings 4, LLC ("AES Indiana DevCo") has entered into a MIPA with Crossvine Solar Holdings, LLC ("Seller"), a subsidiary of Lightsource Renewable Energy US ("Lightsource bp") which is developing the Crossvine Project through Crossvine Solar 1, LLC, a special purpose entity (also referred to as "ProjectCo"). To construct the Project, AES Indiana proposes to enter into an Engineering, Procurement and Construction ("EPC") Agreement with a qualified contractor based on a competitive solicitation that has already been conducted.

26. The Crossvine Project is designed to qualify for a 40% Investment Tax Credit. The commercial operation date ("COD") for the Project is June 2027.

27. ProjectCo will ultimately be owned by Joint Venture, LLC. The Joint Venture, LLC will be jointly owned by a subsidiary of AES Indiana (AES Indiana Sponsor) and by one or

more Tax Equity Partners (“TEP”). AES Indiana Sponsor will be the managing member of the Joint Venture, LLC and AES Indiana will control AES Indiana Sponsor with respect to this role.

28. The Joint Venture investment structure reduces the overall cost of the Crossvine Project for the benefit of AES Indiana’s customers.

29. After the Crossvine Project’s COD, ProjectCo will generate and sell electricity to MISO on a merchant basis. Its price will effectively be fixed through the use of the CfD between AES Indiana and ProjectCo.

30. Once the TEP’s internal rate of return is reached (“Flip Date”), AES Indiana, through the AES Indiana Sponsor member of Joint Venture LLC, will have an option to purchase the TEP’s membership interest in Joint Venture, LLC. In this proceeding, AES Indiana does not seek approval of any amounts related to the purchase of the TEP’s membership interests in the Joint Venture, LLC should AES Indiana exercise this option following the Flip Date. The Company will keep the Commission apprised of AES Indiana Sponsor’s plans regarding the exercise of this option as the time nears and will request Commission approval and cost recovery as necessary or appropriate in a separately docketed proceeding.

Applicable Law

31. AES Indiana considers the provisions of the Public Service Commission Act, as amended, to be applicable to the subject matter of this Petition, including Ind. Code §§ 8-1-8.5-1 *et seq.*, 8-1-8.8-11, 8-1-2-0.6, 10, 14, and 42(a), and 8-1-2.5-5 and 6. AES Indiana elects to become subject to Ind. Code §§ 8-1-2.5-5 and 6 for purposes of the ARP proposed below and further detailed in AES Indiana’s case-in-chief testimony.

32. In accordance with the Commission’s General Administrative Order (“GAO”)

2023-03 (“Electric Generation CPCN Guidelines”), AES Indiana submitted a notice of intent to file a CPCN application on July 26, 2024.

33. The proposed Project and associated requests for relief are consistent with Indiana energy policy and reasonably consider each of five attributes of electric utility service enumerated in Ind. Code § 8-2-1-0.6, namely: reliability, affordability; resiliency, stability; and environmental sustainability. In accordance with GAO 2023-04, these “Five Pillars” are discussed in the Company’s prefiled case-in-chief. An index of the Company’s testimony on the Five Pillars is included with Witness Garavaglia’s testimony.

Procedural and Other Matters

34. AES Indiana is filing its case-in-chief contemporaneous with its Petition, including direct testimony, attachments and workpapers. An index of the filing is attached to this Petition as Exhibit A.

35. A motion for protective order and supporting affidavits is being filed contemporaneous with this Petition to protect certain confidential, proprietary, competitively sensitive and/or trade secret information included with AES Indiana’s filing from public disclosure.

36. In accordance with 170 IAC 1-1.1-9(a)(8), AES Indiana and the Indiana Office of Utility Consumer Counselor (“OUCC”) have agreed on the following procedural schedule to satisfy the 240 day schedule provided in Ind. Code § 8-1-8.5-5 and the scheduling guidelines set forth in the Commission’s GAO 2023-03.

a. Schedule:

GAO	Proposed	Date	Action
Day 0	Day 0	Thurs., Aug. 29, 2024	AES Indiana Petition & Filing of Case in Chief.
Day 84 (wk. 12)	Day 90 (90 days)	Wed., Nov. 27, 2024	OUCG and any intervenor's Filing of Case in Chief.
Day 105 (wk. 16)	Day 112 (22 days)	Thurs., Dec. 19, 2024	AES Indiana Petitioner's Rebuttal.
Day 126 (wk. 18)	Day 139-140 (27-28 days)	Tues.-Wed., Jan. 15-16, 2025 (2 days)	Evidentiary hearing.
Day 140 (wk. 20)	Day 145 (5-6 days)	Tues., Jan. 21, 2025	AES Indiana proposed order/post hearing brief.
Day 154 (wk. 22)	Day 160 (15 days)	Wed., Feb. 5, 2025	OUCG and any intervenor proposed orders/briefs.
Day 161 (wk. 23)	Day 169 (9 days)	Fri., Feb. 14, 2025	AES Indiana Reply.
Day 240 (wk. 34)	Day 244 (75 days)	Wed., Apr. 30, 2025	Stipulated day "240" to conclude on the regular Commission conference day following actual day 240 (Sat., Apr. 26).

- b. Service. The parties will provide same day service filings via email, hand delivery or large file transfer.
- c. Discovery. Discovery is available to all parties and shall be conducted on an informal basis. Any response or objection to a discovery request shall be made within nine (9) calendar days of the receipt of such request until December 19, 2024. Thereafter, any response or objection to a discovery request shall be made within five (5) calendar days of the receipt of such request. Any discovery communication received after noon on a Friday or state holiday, or after 5:00 p.m. on any other business day shall be deemed to have been received the following business day. There will be blackout dates for discovery from November 28, 2024, through December 1, 2024, and December 21, 2024, through January 1, 2025. Dates designated as "blackout dates" shall not be included in determining the number of days provided for responding to a discovery request. The last discovery response due date shall be two (2) business days before the evidentiary hearing. The Parties may conduct discovery through electronic means. Subject to the protection of confidential information, all parties will be served with discovery requests and responses.

Publication of Notice

37. AES Indiana will publish notice of the filing of this Petition in accordance with Ind. Code § 8-1-2.5-6(d). In accordance with 170 IAC 1-1.1-9 (c), following publication of the

notice, AES Indiana will certify to the Commission that the publication has occurred, listing the names of the newspapers and the county or counties in which the notice was published. In accordance with 170 IAC 1-1.1-9(d), AES Indiana will certify to the Commission that a substantially similar notice was posted on AES Indiana website. AES Indiana will file the Publisher's Affidavits associated with the notices once all such affidavits have been received and offer the Publisher's Affidavits into evidence.

Petitioner's Authorized Representatives

38. The names and address of AES Indiana's attorneys in this matter who are duly authorized to accept service of papers in this Cause on behalf of AES Indiana are:

Teresa Morton Nyhart (Atty. No. 14044-49)
Mark R. Alson (Atty. No. 27724-64)
Nermy J. Winner (Atty. No. 38591-49)
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With courtesy copy to:

Kevin Greene
AES US Services LLC
One Monument Circle
Indianapolis, Indiana 46204
Phone: (317) 403-9395
Email: kevin.greene@aes.com

WHEREFORE, AES Indiana respectfully requests the Commission to promptly publish notice, make such investigation and hold such hearings as are necessary and advisable, and thereafter make and enter an order in this Cause:

(i) Issuing a certificate of public convenience and necessity to AES Indiana for the Crossvine Project;

(ii) Approving the Crossvine Project, including the MIPA, Joint Venture structure and CfD, as a Clean Energy Project and authorizing timely cost recovery as proposed by AES Indiana;

(iii) Approving AES Indiana requested accounting and ratemaking relief, including its alternative regulatory plan as set forth above and further detailed in AES Indiana's case-in-chief;

(iv) Declining to exercise jurisdiction as requested by AES Indiana, including declination of jurisdiction over ProjectCo and to the extent necessary, the Joint Venture; and

(v) Granting to AES Indiana such other and further relief in the premises as may be appropriate and proper.

Dated this 29th day of August 2024.

INDIANAPOLIS POWER & LIGHT COMPANY
d/b/a/ AES INDIANA

By

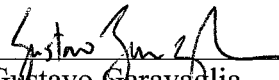


Gustavo Garavaglia
Vice President and CFO of AES Indiana

VERIFICATION

I, Gustavo Garavaglia, Vice President and CFO of AES Indiana affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information and belief.

Dated: August 29, 2024



Gustavo Garavaglia



**Indianapolis Power & Light Company d/b/a AES Indiana
Crossvine Project Filing Index¹**

I. AES Indiana Witness Index

AES Indiana Witnesses		
Name	Position	Major Subject Area
Gustavo Garavaglia	Vice President and Chief Financial Officer of IPALCO and AES Indiana and Vice President and Chief Financial Officer of the US Utilities.	<ul style="list-style-type: none">▪ AES Indiana's ongoing work to meet need for electricity within its service area.▪ Overview of Project and of relief sought.▪ Project is Clean Energy Project.▪ Overview of AES Indiana's resource portfolio.▪ Commission approval of the Project serves the public convenience and necessity.▪ The Company's proposed Joint Venture structure.▪ The Company's proposal to use a Capacity Agreement and Contract for Differences ("CfD").▪ Consistency with Indiana energy policy and the Five Pillars.

¹ This Index of the Company's case-in-chief is intended to highlight issues and is not an exhaustive list of the Company's requests in this proceeding. A complete account of the Company's requested relief can be found in the Company's filing in this Cause, including the petition, case-in-chief, and workpapers.

	AES Indiana Witnesses continued	
Melanie Raney	AES US Services, Senior Manager, M&A and Business Development.	<ul style="list-style-type: none"> ▪ AES Indiana All-Source Request for Proposal (“RFP”). ▪ RFP bid evaluation. ▪ Overview of Project. ▪ Project Development. ▪ Project Selection. ▪ Best Estimate of Project Cost.
Matthew R. Thibodeau	Senior Vice President, Sargent & Lundy (“S&L”).	<ul style="list-style-type: none"> ▪ All-Source RFP process. ▪ S&L role as 3rd party facilitator of RFP.
Erik K. Miller	AES Indiana Director, Resource Planning.	<ul style="list-style-type: none"> ▪ AES Indiana’s 2022 IRP. ▪ Updated IRP Analysis. ▪ RFP Ranking Analysis Modeling. ▪ Consistency with 2022 IRP and 2024 IRP Update. ▪ Levelized Cost of Energy. ▪ Consideration of Resource Alternatives. ▪ Final Director’s Report for 2022 IRP. ▪ Statewide Analyses. ▪ Five Pillars.
Nicholas M. Miller	AES US Services, LLC, Senior Manager, Regulatory Tax.	<ul style="list-style-type: none"> ▪ Investment Tax Credits. ▪ Joint Venture and TEP overview and structure. ▪ Other tax issues.
Garrett Sherwood	AES US Services, LLC Renewable Energy Manager.	<ul style="list-style-type: none"> ▪ Construction management and Project timeline.
Meredith C. Stone	Concentric Energy Advisors, Inc. Senior Project Manager.	<ul style="list-style-type: none"> ▪ RFP Phases 2 & 3 Ranking Analysis – Present Value Revenue Requirements (“PVRR”) modeling.

	AES Indiana Witnesses continued	
Matthew D. Fields	AES Indiana Senior Manager, Federal Regulatory and RTO Policy.	<ul style="list-style-type: none"> ▪ GAO 2022-01. ▪ FERC and MISO issues. ▪ Project interconnection costs.
Kimberly Aliff	AES Indiana Revenue Requirements Manager, Regulatory Affairs.	<ul style="list-style-type: none"> ▪ Accounting and ratemaking, including alternative regulatory plan (“ARP”) to facilitate investment in Joint Venture. ▪ Deferral and timely cost recovery of carrying charges and amortization of the regulatory asset. ▪ Deferral and proposed recovery of Project Development Costs. ▪ Declination of jurisdiction over Joint Venture, including ProjectCo, as a public utility. ▪ Timely cost recovery for CfD. ▪ Gross financing cost savings. ▪ Estimated customer bill impact. ▪ Ongoing review.

II. Index of Issues and Requests

Subject	General	Witness/Other Reference
Statutory Authority	<ul style="list-style-type: none"> • IC 8-1-8.5 (CPCN). • IC 8-1-8.8-11 (Clean Energy Project and financial incentives). • IC 8-1-2.5-5 (Declination of Jurisdiction). • IC 8-1-2.5-6 (Alternative Regulatory Plan). • IC 8-1-2-10, 14 & 42(a) (Other Accounting & Ratemaking Authority). • IC 8-1-2-0.6 (Five Pillars). 	<ul style="list-style-type: none"> ▪ Petition, ¶ 31.
Case Timeline	<ul style="list-style-type: none"> • 240 Days. 	<ul style="list-style-type: none"> ▪ IC 8-1-8.5-5(b). ▪ Petition, ¶ 36.
Notice	<ul style="list-style-type: none"> • AES Indiana will publish notice. 	<ul style="list-style-type: none"> ▪ IC 8-1-2.5-6(d). ▪ Petition, ¶ 37. ▪ Aliff, Q/A 15.
AES Indiana characteristics	<ul style="list-style-type: none"> • Corporate status and service area. 	Petition, ¶¶ 1-4, 15-19.

	FILING INDEX SUMMARY Continued	
	Crossvine Project Description	
Project	<ul style="list-style-type: none"> • The Crossvine Project is a solar and battery energy storage hybrid project located in Dubois County, Indiana. • The solar component of the Crossvine Project will have a nameplate capacity of approximately 85 MW and the BESS component will have a storage capacity of approximately 85 MW /4 hours. • The facility is expected to become commercially operable in June 2027. • A subsidiary of Lightsource Renewable Energy US (“Lightsource bp”) is the project developer. 	<ul style="list-style-type: none"> ▪ Petition, ¶¶ 23-30. ▪ Garavaglia, Q/As 15, 16. (overview of Project). ▪ Raney, Q/A 24-30. (Project description/development). ▪ Erik Miller, QA 35 (Project description). ▪ Nick Miller, Q/As 12-21 (ITCs and Joint Venture structure). ▪ Sherwood (Project management and timeline).
	IC 8-1-8.5 – Certificate of Public Convenience and Necessity (CPCN)	
AES Indiana Request	<ul style="list-style-type: none"> • AES Indiana requests the Commission to issue a CPCN for the acquisition and development of a solar power generating facility and battery energy storage system project known as the Crossvine Project through the transactions and joint venture described in AES Indiana’s testimony. 	<ul style="list-style-type: none"> ▪ Petition, ¶ 8. ▪ Garavaglia, Q/A 17 (overview of relief sought). ▪ Nick Miller, Q/As 20-22. (Joint Venture structure).
IC 8-1-8.5-1	<ul style="list-style-type: none"> • AES Indiana is a public utility. 	<ul style="list-style-type: none"> ▪ Petition ¶ 5.
IC 8-1-8.5-4	<ul style="list-style-type: none"> • Consideration of resource options. 	<ul style="list-style-type: none"> ▪ Erik Miller, Q/As 43-49. ▪ AES Indiana’s 2022 IRP (included with Erik Miller testimony).

	FILING INDEX SUMMARY Continued	
IC 8-1-8.5-5(b)(1)	<ul style="list-style-type: none"> • Best Estimate. 	<ul style="list-style-type: none"> ▪ Raney, Q/As 34-47.
IC 8-1-8.5-5(e)	<ul style="list-style-type: none"> • Estimated costs are, to the extent commercially practicable, the result of competitively bid engineering, procurement, or construction contracts • Reliability and solicitations of competitive bids to obtain purchased power capacity and energy from alternative suppliers. • The Commission should find this statutory requirement is satisfied or decline to exercise it. 	<ul style="list-style-type: none"> ▪ Raney, Q/As 13-23, 27, 47. ▪ Thibodeau, Q/As 14-18. ▪ Stone (Concentric PVRR modeling).
IC 8-1-8.5-5(b)(2)	<ul style="list-style-type: none"> • Consistency with AES Indiana’s 2022 IRP and Commission’s analysis for expansion of electric generating capacity. 	<ul style="list-style-type: none"> ▪ Erik Miller.
IC 8-1-8.5-5(b)(3)	<ul style="list-style-type: none"> • Public Convenience and Necessity. 	<ul style="list-style-type: none"> ▪ Garavaglia, Q/As 22-24.
IC 8-1-8.5-6	<ul style="list-style-type: none"> • Ongoing review. 	<ul style="list-style-type: none"> ▪ Aliff, Q/A 38.
	IC 8-1-8.8-11 --Clean Energy Project	
Request	<ul style="list-style-type: none"> • AES Indiana requests Commission approval of the Crossvine Project as a “Clean Energy Project” and associated accounting and ratemaking. 	<ul style="list-style-type: none"> ▪ Petition ¶ 9. ▪ Garavaglia, Q/As 17-18. (overview of relief sought). ▪ Aliff, (accounting and ratemaking).

	FILING INDEX SUMMARY Continued	
IC 8-1-8.8-6	<ul style="list-style-type: none"> AES Indiana is an “eligible business.” 	<ul style="list-style-type: none"> Petition ¶ 5. Garavaglia, Q/A 19.
IC 8-1-8.8-2, 10	<ul style="list-style-type: none"> The Crossvine Project falls within definition of “Clean Energy Project.” 	<ul style="list-style-type: none"> Garavaglia, Q/A 18.
IC 8-1-8.8-11	<ul style="list-style-type: none"> The Crossvine Project, including associated Joint Venture structure and CfD, is reasonable and necessary. 	<ul style="list-style-type: none"> Garavaglia, Q/As 15-16, 22-42. Erik Miller (resource planning analyses). Raney, Q/As 24, 28, 41, 44. (Project description and competitive selection process). Nick Miller, Q/As 19-33. (Joint venture structure). See also CPCN index above.

	FILING INDEX SUMMARY Continued	
	ACCOUNTING AND RATEMAKING	
IC 8-1-8.8-11(a)(1), (4); 8-2-2.5-6; also IC 8-1-2-10, 14.	<ul style="list-style-type: none"> • AES Indiana’s requests for approval pursuant to Ind. Code § 8-1-2.5-6 of the alternative regulatory plan (“ARP”) to facilitate the establishment of the Crossvine Joint Venture structure and the reflection in AES Indiana’s net original cost rate base of its investment in the Project. The proposed ARP is in the public interest. • AES Indiana proposes deferral and timely cost recovery of carrying charges on and amortization of the regulatory asset in AES Indiana’s annual Environmental Compliance Cost Recovery Adjustment proceedings (“ECR”). • AES Indiana proposes timely cost recovery for the Contract for Differences (“CfD”) to be administered in AES Indiana’s Fuel Adjustment Clause (“FAC”) proceedings. • In accordance with Ind. Code § 8-1-8.8-11(B) the Company’s proposed accounting and ratemaking will result in a gross financing costs savings over the life of the Project. • AES Indiana requests deferral and future recovery of Project Development Costs. 	<ul style="list-style-type: none"> ▪ Petition, ¶¶ 10-13. ▪ Aliff, (accounting and ratemaking; public interest). ▪ Garavaglia, Q/As 26-35. (CfD).

	DECLINATION OF JURISDICTION IC 8-1-2.5-5	
Request	<ul style="list-style-type: none"> AES Indiana asks the Commission to continue to decline to exercise jurisdiction over the ProjectCo and that the Commission, to the extent necessary also decline to exercise jurisdiction over the joint venture, as a public utility. 	<ul style="list-style-type: none"> Petition, ¶14. Aliff, Q/A 22.
	<ul style="list-style-type: none"> The public interest will be served by the Commission declining to exercise jurisdiction as requested by AES Indiana. 	<ul style="list-style-type: none"> Aliff, Q/A 22.
	GAO 2022-01 AND INTERCONNECTION	
	<ul style="list-style-type: none"> The Company compiled the information sought in GAO 2022-01 in <u>AES Indiana Attachment MF-1</u>. Project interconnection is well underway. GIAs have been signed. Interconnection costs and congestion and curtailment risk for the Crossvine Project are reasonable. 	<ul style="list-style-type: none"> Fields.
	FIVE PILLARS	
IC 8-1-2-0.6 IC 8-1-8.5-4(b)(4)	<ul style="list-style-type: none"> Five Pillars of electric utility service. 	<ul style="list-style-type: none"> Garavaglia, Q/As 36-42. Index required by GAO 2023-04 is found in Garavaglia testimony at Q/A 42.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served this 29th day of August 2024, by electronic transmission or United States Mail, first class, postage prepaid on:

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