

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANAPOLIS )  
POWER & LIGHT COMPANY FOR )  
APPROVAL OF DEMAND SIDE )  
MANAGEMENT ADJUSTMENT FACTORS ) CAUSE NO. 43623 DSM-20  
FOR ELECTRIC SERVICE FOR THE )  
BILLING MONTHS OF JANUARY )  
THROUGH DECEMBER 2021 )

**INDIANAPOLIS POWER & LIGHT COMPANY’S SUBMISSION OF  
REVISIONS TO VERIFIED PETITION, DIRECT TESTIMONY AND WORKPAPERS**

Petitioner Indianapolis Power & Light Company (“IPL”), by counsel, hereby gives notice of the following revision to the verified petition, direct testimony and workpapers. During subsequent review, a formula error was identified in the Total Business Segment line of Attachment KA-2 page 1 of 2. The individual program calculations are correct but the incorrect total flowed through to Attachment PJD-2 Pages 1 and 5, and in turn impacted the Non Opt-Out C&I factors. The correction has no impact on the residential factors.

A redline and clean copy of the revised Verified Petition and Testimony pages are attached hereto, along with clean copies of the Attachments. IPL will include clean copies in the court reporter copies offered into evidence at the hearing.

Respectfully submitted,



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Teresa Morton Nyhart (No. 14044-49)  
Jeffrey M. Peabody (No. 28000-53)  
Barnes & Thornburg LLP  
11 South Meridian Street  
Indianapolis, Indiana 46204  
Nyhart Telephone: (317) 231-7716  
Peabody Telephone: (317) 231-6465  
Facsimile: (317) 231-7433  
Nyhart Email: tnyhart@btlaw.com  
Peabody Email: jpeabody@btlaw.com

ATTORNEYS FOR APPLICANT  
INDIANAPOLIS POWER & LIGHT COMPANY

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served this 13th day of November, 2020, by email transmission, hand delivery or United States Mail, first class, postage prepaid to:

Karol Krohn  
Indiana Office of Utility Consumer Counselor  
Office of Utility Consumer Counselor  
115 West Washington Street, Suite 1500 South  
Indianapolis, Indiana 46204  
[infomgt@oucc.in.gov](mailto:infomgt@oucc.in.gov)  
[kkrohn@oucc.in.gov](mailto:kkrohn@oucc.in.gov)



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Jeffrey M. Peabody

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Indianapolis, Indiana 46204  
Nyhart Telephone: (317) 231-7716  
Peabody Telephone: (317) 231-6465  
Facsimile: (317) 231-7433  
Nyhart Email: [tnyhart@btlaw.com](mailto:tnyhart@btlaw.com)  
Peabody Email: [jpeabody@btlaw.com](mailto:jpeabody@btlaw.com)

ATTORNEYS FOR APPLICANT  
INDIANAPOLIS POWER & LIGHT COMPANY

	Non-Opt Out Customers	Opt-Out 2021 Customers	Opt-Out 2020 Customers	Opt-Out 2019 Customers	Opt-Out 2018 Customers	Opt-Out 2017 Customers	Opt-Out 2016 Customers
Tariff Class	\$/kWh	\$/kWh	\$/kWh	\$/kWh	\$/kWh	\$/kWh	\$/kWh
Rates RS, CW and EVX (with associated Rate RS service)	\$0.004990	--	--	--	--	--	--
Rates SS, SH, OES, UW, CW, and EVX (with associated Rate SS service)	<del>\$0.00783</del> <u>\$0.007963</u>	\$0.003920	\$0.003322	\$0.001443	\$0.000218	(\$0.000207)	\$0.000000
Rates PL, PH, HL, SL, and EVX (with associated Rate SL service)	<del>\$0.005215</del> <u>\$0.005298</u>	\$0.002675	\$0.002275	\$0.000909	\$0.000162	(\$0.000012)	\$0.000000
Rates MU-1 and APL	<del>\$0.005538</del> <u>\$0.005614</u>	\$0.002892	\$0.000000	\$0.000000	\$0.000000	(\$0.000000)	\$0.000000

11. A copy of the proposed Tariff is attached hereto as Exhibit A.

12. After taking into consideration the changes proposed in this Petition, and the DSM-19 factor currently in effect, an average residential customer using 1,000 kWh per month will experience a DSM adjustment of \$4.99 per month, which is a decrease of \$0.14 or 0.20% per month relative to the DSM factor and basic rates and charges currently in effect.

### **Books and Records.**

13. The books and records of Petitioner supporting such data and calculations are kept in accordance with the Uniform System of Accounts for Electric Utilities prescribed by this

**Petitioner's Exhibit 2**  
**Cause No. 43623 DSM-20**

1

	Non-Opt Out Customers	Opt-Out 2021 Customers	Opt-Out 2020 Customers	Opt-Out 2019 Customers	Opt-Out 2018 Customers	Opt-Out 2017 Customers	Opt-Out 2016 Customers
Tariff Class	\$/kWh	\$/kWh	\$/kWh	\$/kWh	\$/kWh	\$/kWh	\$/kWh
Rates RS, CW and EVX (with associated Rate RS service)	\$0.004990	--	--	--	--	--	--
Rates SS, SH, OES, UW, CW, and EVX (with associated Rate SS service)	\$0.0078350 <a href="#">07963</a>	\$0.003920	\$0.003322	\$0.001443	\$0.000218	(\$0.000207)	\$0.000000
Rates PL, PH, HL, SL, and EVX (with associated Rate SL service)	\$0.0052150 <a href="#">05298</a>	\$0.002675	\$0.002275	\$0.000909	\$0.000162	(\$0.000012)	\$0.000000
Rates MU-1 and APL	\$0.0055380 <a href="#">05614</a>	\$0.002892	\$0.000000	\$0.000000	\$0.000000	(\$0.000000)	\$0.000000

2     **Q28. What effect will the requested DSM Adjustment Factor have on an average**  
3     **residential customer using 1,000 kWh per month?**

4     A28. An average residential customer using 1,000 kWh per month will experience a  
5     DSM adjustment of (\$0.14), which is a 2.7% decrease compared to the current  
6     DSM rates. An average residential customer using 1,000 kWh per month will  
7     experience an decrease of 0.12% of such a bill relative to the DSM factor and basic  
8     rates and charges currently in effect.

9     **Q29. If approved by the Commission, when does Petitioner propose to make the**  
10    **electric service DSM Adjustment Factors requested in this proceeding**  
11    **effective?**

	Non-Opt Out Customers	Opt-Out 2021 Customers	Opt-Out 2020 Customers	Opt-Out 2019 Customers	Opt-Out 2018 Customers	Opt-Out 2017 Customers	Opt-Out 2016 Customers
Tariff Class	\$/kWh	\$/kWh	\$/kWh	\$/kWh	\$/kWh	\$/kWh	\$/kWh
Rates RS, CW and EVX (with associated Rate RS service)	\$0.004990	--	--	--	--	--	--
Rates SS, SH, OES, UW, CW, and EVX (with associated Rate SS service)	\$0.007963	\$0.003920	\$0.003322	\$0.001443	\$0.000218	(\$0.000207)	\$0.000000
Rates PL, PH, HL, SL, and EVX (with associated Rate SL service)	\$0.005298	\$0.002675	\$0.002275	\$0.000909	\$0.000162	(\$0.000012)	\$0.000000
Rates MU-1 and APL	\$0.005614	\$0.002892	\$0.000000	\$0.000000	\$0.000000	(\$0.000000)	\$0.000000

11. A copy of the proposed Tariff is attached hereto as Exhibit A.

12. After taking into consideration the changes proposed in this Petition, and the DSM-19 factor currently in effect, an average residential customer using 1,000 kWh per month will experience a DSM adjustment of \$4.99 per month, which is a decrease of \$0.14 or 0.20% per month relative to the DSM factor and basic rates and charges currently in effect.

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**Petitioner's Exhibit 2**  
**Cause No. 43623 DSM-20**

1

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Tariff Class	\$/kWh	\$/kWh	\$/kWh	\$/kWh	\$/kWh	\$/kWh	\$/kWh
Rates RS, CW and EVX (with associated Rate RS service)	\$0.004990	--	--	--	--	--	--
Rates SS, SH, OES, UW, CW, and EVX (with associated Rate SS service)	\$0.007963	\$0.003920	\$0.003322	\$0.001443	\$0.000218	(\$0.000207)	\$0.000000
Rates PL, PH, HL, SL, and EVX (with associated Rate SL service)	\$0.005298	\$0.002675	\$0.002275	\$0.000909	\$0.000162	(\$0.000012)	\$0.000000
Rates MU-1 and APL	\$0.005614	\$0.002892	\$0.000000	\$0.000000	\$0.000000	(\$0.000000)	\$0.000000

2     **Q28. What effect will the requested DSM Adjustment Factor have on an average**  
3     **residential customer using 1,000 kWh per month?**

4     A28. An average residential customer using 1,000 kWh per month will experience a  
5     DSM adjustment of (\$0.14), which is a 2.7% decrease compared to the current  
6     DSM rates. An average residential customer using 1,000 kWh per month will  
7     experience an decrease of 0.12% of such a bill relative to the DSM factor and basic  
8     rates and charges currently in effect.

9     **Q29. If approved by the Commission, when does Petitioner propose to make the**  
10    **electric service DSM Adjustment Factors requested in this proceeding**  
11    **effective?**

Indianapolis Power & Light Company  
Determination of DSM-20 Adjustment Factor  
Projected Program Operating Costs For the Billing Period of January 2021 through December 2021

Line

1	Projected Program Operating Costs and Shared Savings <u>Residential DSM Programs</u>
2	Appliance Recycling
3	Demand Response
4	Efficient Products
5	Income Qualified Weatherization
6	Multifamily
7	Peer Comparison Report
8	School Education
9	Indirect Costs
10	Grand Total Residential
11	<u>Business DSM Programs</u>
12	Custom
13	Demand Response
14	Prescriptive
15	Small Business Direct Install
16	Indirect Costs
17	Grand Total Business
18	Grand Total Residential and Business DSM Program Costs
19	Financial Incentives (2)
20	Grand Total DSM Program Costs with Financial Incentives

Detail by Customer Charge Type-Allocation (1)				
RS, CW	SS, SH, OES UW, CW	PL, PH, HL, SL		
Residential	Small C&I	Large C&I	Lighting	Total
\$ 774,779			\$ 698	\$ 775,477
\$ 4,083,745			\$ 3,679	\$ 4,087,424
\$ 3,905,722			\$ 3,518	\$ 3,909,240
\$ 4,903,354			\$ 4,417	\$ 4,907,771
\$ 927,994			\$ 836	\$ 928,830
\$ 1,138,375			\$ 1,025	\$ 1,139,400
\$ 564,930			\$ 509	\$ 565,439
\$ 999,100			\$ 900	\$ 1,000,000
<u>\$ 17,297,999</u>			<u>\$ 15,582</u>	<u>\$ 17,313,581</u>
	\$ 1,543,451	\$ 2,994,232	\$ 42,208	\$ 4,579,891
	\$ 21,139	\$ 41,009	\$ 578	\$ 62,726
	\$ 3,334,888	\$ 6,469,548	\$ 91,198	\$ 9,895,635
	\$ 535,272	\$ 1,038,405	\$ 14,638	\$ 1,588,315
	\$ 67,401	\$ 130,756	\$ 1,843	\$ 200,000
	<u>\$ 5,502,151</u>	<u>\$ 10,673,949</u>	<u>\$ 150,467</u>	<u>\$ 16,326,567</u>
\$ 17,297,999	\$ 5,502,151	\$ 10,673,949	\$ 166,049	\$ 33,640,148
\$ 1,367,465	\$ 652,170	\$ 1,265,183	\$ 19,067	\$ 3,303,885
<u>\$ 18,665,464</u>	<u>\$ 6,154,321</u>	<u>\$ 11,939,132</u>	<u>\$ 185,116</u>	<u>\$ 36,944,033</u>

(1) See Petitioner's Attachment KA-1 for allocation percentages.

(2) See Petitioner's Attachment KA-2 for the 2021 financial incentives, allocated based upon the percentages on Petitioner's Attachment KA-1.



Indianapolis Power & Light Company  
Determination of DSM-20 Adjustment Factor  
For the Billing Period of January 2021 through December 2021

**Rate Calculation for costs applicable to Non Opt-Out Customers <sup>(1)</sup>**

1	Grand Total Forecasted Costs and Financial Incentives for 2021 (PJD - 2 , Page 1, Line 20)
2	Grand Total Costs to be Recovered from both Opt-Out 2021 & Non Opt-Out Customers (PJD-2, Page 4, Line 15)
3	Forecasted Lost Revenue (Jan-Dec 2021) (PJD-7 Lines 6, 60, 61, and 62) <sup>(2)</sup>
4	Total Costs applicable to Non Opt-Out Customers
5	/ Estimated Sales (MWh)
6	DSM Adjustment Factor (mills per kWh) for Non Opt-Out Customers
7	DSM Adjustment Factor (mills per kWh) Adjusted for Utility Receipts Tax for Non Opt-Out Customers

Detail by Customer Charge Type					
SS, SH, OES		PL, PH, HL			
UW, CW		SL			
Residential	Small C&I	Large C&I	Lighting	Total	
\$ 18,665,464	\$ 6,154,321	\$ 11,939,132	\$ 185,116	\$ 36,944,033	
\$ (911,603)	\$ 6,653,847	\$ 13,517,237	\$ 224,614	\$ 19,484,095	
\$ 8,396,846	\$ 707,301	\$ 1,317,076	\$ 26,361	\$ 10,447,584	
\$ 26,150,707	\$ 13,515,469	\$ 26,773,445	\$ 436,091	\$ 66,875,712	
5,319,882	1,722,795	5,129,034	78,838	12,250,549	
\$ 4.916	\$ 7.845	\$ 5.220	\$ 5.531		
\$ 4.990	\$ 7.963	\$ 5.298	\$ 5.614		

(1) Represents costs applicable to those customers who have not opted out of IPL's DSM programs.

(2) Represents estimated lost revenue for measures installed in 2021 and for residential customers represents lost revenues for all measures installed after June 2017.

Calculation of Financial Incentives  
Program Year 2021 (forecast)

2021		
<u>Program</u>	<u>Total Direct Costs*</u>	<u>12% Target Incentive</u>
<u>Residential</u>		
Appliance Recycling	\$ 775,477	\$ 93,057
Demand Response	\$ 4,087,424	\$ 490,491
Efficient Products	\$ 3,909,240	\$ 469,109
Income Qualified Weatherization	\$ 4,907,771	N/A
Multifamily	\$ 928,830	\$ 111,460
Home Energy Reports	\$ 1,139,400	\$ 136,728
School Education	\$ 565,439	\$ 67,853
Total Residential Segment	<u>\$ 16,313,581</u>	<u>\$ 1,368,697</u>
<u>Business</u>		
Custom	\$ 4,579,891	\$ 549,587
Demand Response	\$ 62,726	\$ 7,527
Prescriptive	\$ 9,895,635	\$ 1,187,476
Small Business Direct Install	\$ 1,588,315	\$ 190,598
Total Business Segment	<u>\$ 16,126,567</u>	<u>\$ 1,935,188</u>
Grand Totals	<u>\$ 32,440,148</u>	<u>\$ 3,303,885</u>

\*Total direct costs include (but are not limited to) program administrative costs, vendor administrative costs and customer rebates and incentives.