

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 )  
RELATED RELIEF, INCLUDING (1) REVISED )  
DEPRECIATION RATES, (2) ACCOUNTING ) CAUSE NO. 45911  
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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INDIANAPOLIS POWER & LIGHT COMPANY  
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## **CERTIFICATE OF SERVICE**

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

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

## **1. INTRODUCTION**

On November 6, 2023, AES Indiana (“AES Indiana” or “the Company”) 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 December 13, 2024, the new systems have generated more than six million 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 reached full stabilization. As of August 15, 2024, AES Indiana has moved all the systems from hypercare into a phase known as “Sustain”, a part of normal business operations. At this phase of the project, Sustain maintains increased technical staff to support addressing tickets at all levels.

With respect to the Sustain phase, as of December 13, 2024, there are 172 open tickets with four degrees of prioritization:

- 1 critical open ticket vs. 0 critical open in November,
  - 1 critical open ticket specific to billing vs 0 critical in November
- 21 high open tickets vs. 21 high last month,
  - 3 high open tickets specific to billing vs 6 high in November
- 97 medium open tickets vs. 86 medium last month, and
- 53 low open tickets vs. 61 low last month.

The overall net increase in ticket count is a result of an increase in items identified as medium priority. Medium and low priority items impact internal operations and have associated manual work arounds until the incident is resolved. The new item identified as critical is related to an integration between the Company’s applications. The timing of new construction customer billing

is impacted by this critical open ticket. The accuracy of the customer bills has not been impacted. The Company is working to quickly resolve this issue.

**Table 1** shows the number of customers who have experienced some latency in their billing cycle. The customer counts are not unique because some customers may be affected by multiple issues, so the numbers in this table are not additive. Similarly, customers with out-of-balance (“OOB”) bills, where the Company withholds their bill until the print is revised to define the charges clearly, are not the same customers throughout the months reported below.

**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 Impacted as of August 19, 2024	Customers Impacted as of September 13, 2024	Customers Impacted as of October 15, 2024	Customers Impacted as of November 12, 2024	Customers Impacted as of December 13, 2024
Customers who have not received an invoice since going live in the new system	235	32	158 <sup>1</sup>	106	50	0	0	0
Unique Customers with bills/invoices impacted by OOB	22,492	16,850	5,907	5,484	5,028	5,333	2,477	2,389
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	35-40	5-10	5-10	5-10	5-10
Unable to reissue bills when a bill was sent with inaccurate information	4,200	728 unique customers	0	20-30***	0	0	0	0

### 3. HOW THE ISSUES ARE BEING ADDRESSED

The Company continues to work across technical and business teams to address the issues customers are experiencing. The root cause analysis mentioned in the November ACE Monthly Compliance Report remains on schedule. In **Table 2**, the Company shows the targets achieved 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 were awaiting their first billing. 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	Performance as of August 13, 2024
Between ~50-100 OOB after the nightly batch run for 10 consecutive batch runs	~400 bills	~180 bills	~70 bills	<b>Target Achieved July 23, 2024</b>
Zero critical tickets open	16 open critical	8 open critical	2 open critical	<b>Target Achieved August 13, 2024</b>
Backlog of OOBs reduced to under 10k	31,096 bills	22,480 bills	<b>Target Achieved July 3, 2024</b>	
No backlog of cancel/rebills	7,000 bills	2,718 bills	<b>*Target was achieved on July 10<sup>th</sup> and additional issue found later in July that had to be resolved via cancel/rebill</b>	<b>Target Re-Achieved August 15, 2024</b>

#### 4. CUSTOMER COMMUNICATIONS AND PROJECT ADVANCEMENT

AES Indiana recognizes the vital role energy plays in customers' daily lives and the broader community. As such, during the transition to the new billing system AES Indiana did not charge any late payments or perform any disconnections regardless of whether the customer had been impacted by an ACE Project defect or not. The Company's priority is to ensure that all customers have access to safe and reliable energy while navigating challenges that may impact their ability to stay current with payments. This report is reporting on the issues related to hypercare. The Company also continues to work on other phases of work such as disconnects, late payments, and enhanced reporting. The status of the disconnect process is provided below.

As the ACE Project has achieved full stabilization and the Company has continued to resolve outstanding tickets, the Company began communicating to all customers on September 4, 2024 that late payment charges and disconnections for non-payment would resume as early as November 2024. After three months of proactive communications and a dedicated call campaign, the Company began providing notice of projected late payment charges beginning with bills distributed on December 9, 2024. Late payment charges, which will be charged on a go forward basis, are assessed on the customers' bill date following an unpaid bill or in default of an installment agreement. Disconnects are planned to begin in February of 2025. This approach was designed to encourage early action and provide customers with time to plan and address outstanding balances. The Company's intent is to foster proactive communication and support customers ensuring that disconnection is always a last resort.

To encourage customers to act on their account before disconnections resume, the Company has communicated through a variety of channels, including a call campaign by the customer service team in early November, a second call campaign planned for January, social media messages, *Smarter Together* quarterly newsletter, bill inserts for September, October, November, December, and January 2025, and messages on the bills.

The Company currently has 22,213 customers on an installment agreement, with 56% of the current active installment agreements having been established since announcing the return of charging late fees and disconnections beginning on September 4, 2024. **Table 3** represents the percentage of customers on an installment agreement per year and the average installment agreement per customer.

**Table 3. Customers on Installment Agreements per Year**

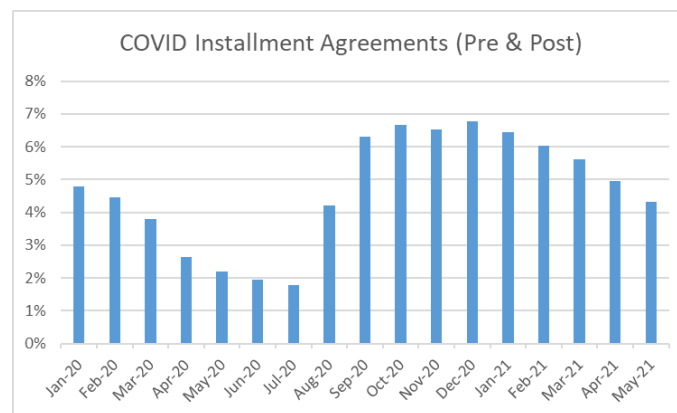
Year	2019	2020	2021	2022	2023	2024
% of Customers	5%	4%	4%	4%	4%	5%
Average Installment Agreement	\$348	\$458	\$360	\$412	\$436	\$768

The higher average installment agreement dollar amount in 2024 is related to a few factors including a longer period of delay in resuming late fees and disconnects, new base rates as a result of Cause No. 45911, and adjustments to riders and FAC factors.

The Company's communications regarding installment agreements, late fees, and disconnections follows the approach the Company took during and after the pandemic. Additionally, The Company anticipates the percentage of customers who elect to take advantage of installment agreements to follow a similar pattern as what occurred during the pandemic.

**Chart 1** shows the percentage of customers on installment agreements per month over a 17-month period before and after the pandemic. The Company deferred charging late fees and disconnections for the period of March 14 through August 12, 2020 and resumed those activities beginning September 2020.

**Chart 1. Customers on Installment Agreements by Month During Pandemic**



31.4% of the current overall active installment agreements have been impacted to some degree within the past year by a billing defect associated with the ACE Project implementation. Further, 12% of those customers established an installment agreement within 30 days of the defect having been resolved and supplied an accurate bill.

Furthermore, the Company proactively promoted the following utility assistance resources:

- Energy Assistance Program (EAP): One-time benefit program to help assist income-qualified customers with utility bills.
- United Way of Central Indiana's Winter Assistance Fund (WAF): Opening January 1, 2025, income-eligible customers in Marion County who do not qualify for EAP can apply for WAF, supported by AES Indiana, among others.
- AES Indiana's Power of Change: Assists income-qualified customers, regardless of approval or denial from EAP or WAF, with a one-time grant for electric bill assistance.

The Utilities Unite for Customers continues to provide essential support to the community through cross social media promotion and customer emails. AES Indiana also updated the payment assistance webpage (see **Figure 1**). Now, it includes all nine translated pieces of utility assistance information, ensuring that our diverse customer base can easily access the help they need. This

ongoing commitment to inclusivity and support underscores our dedication to serving every member of the community.

**Figure 1. Updated Webpage Screenshot (aesindiana.com/payment-assistance)**

## Quick Reference Guides

This webpage offers essential information for the 2024-2025 winter season, available in a single PDF that has been translated into multiple languages for accessibility. As part of the Utilities Unite for Customers initiative, these PDF guides also include water utility details from Citizens Energy Group (separate from AES Indiana), aiming to provide comprehensive utility assistance information for all of Central Indiana in one convenient place.


If you or someone you know needs a quick reference to financial assistance programs this winter, these PDFs are great to share in both digital and printed formats.

Please find below PDFs to specific languages:

- [English](#)
- [Burmese](#)
- [Falam Chin](#)
- [Hakha Chin](#)
- [French](#)
- [Pashto](#)
- [Dari](#)
- [Haitian Creole](#)
- [Spanish](#)

The Company has continued communicating to customers that disconnections and late fees for nonpayment will resume soon. The communications were made via bill messages (see **Figure 2**), social media (see **Figure 3**), bill insert (see **Figure 4**), bill messages, website, and a community resource day in partnership with Citizens Energy Group. A key part of the Company's communications strategy includes the availability of extended payment plans. The Company is committed to supporting customers facing financial hardships by offering flexible extended payment options – 3-, 6-, 9-, or 12-month options and up to 36-month options – that work for their unique circumstances. In resuming the disconnect process, the Company will continue to comply with the winter moratorium requirements.

Figure 2. Customer Bill Message on December Bills



Account Number	
Due Date	12/26/2024
Amount Due	\$159.78

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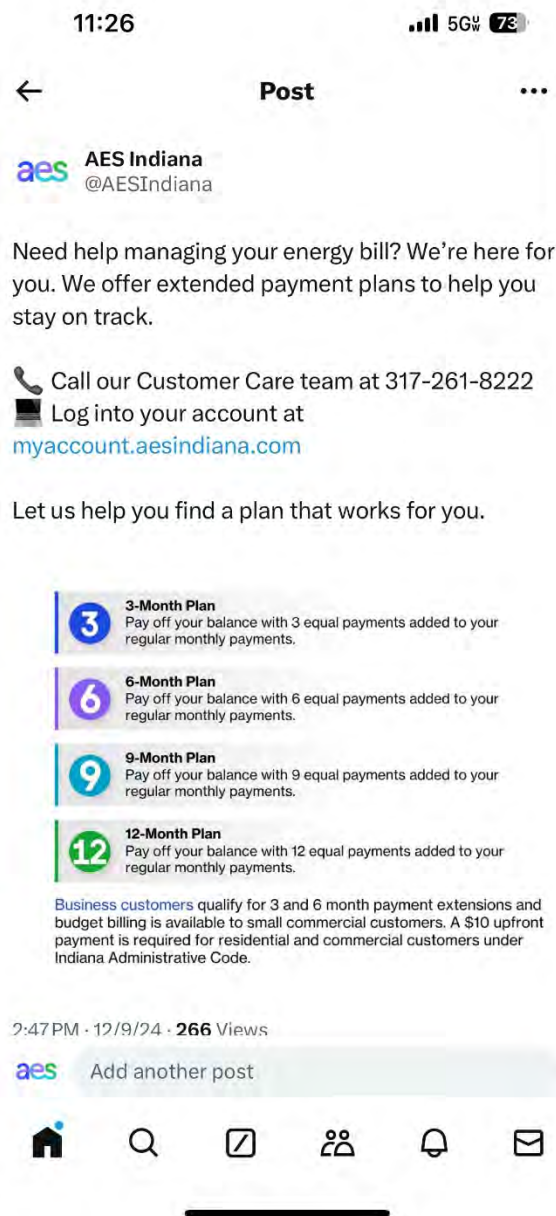
Monthly Account Summary	Billing Date: 12/03/2024
Previous Balance	\$187.41
11/18/2024 Payment - Thank You	-187.41
Metered Electric and Other Services	149.33
State Tax	10.45
<b>Total Account Balance</b>	<b>\$159.78</b>

**Message Center**

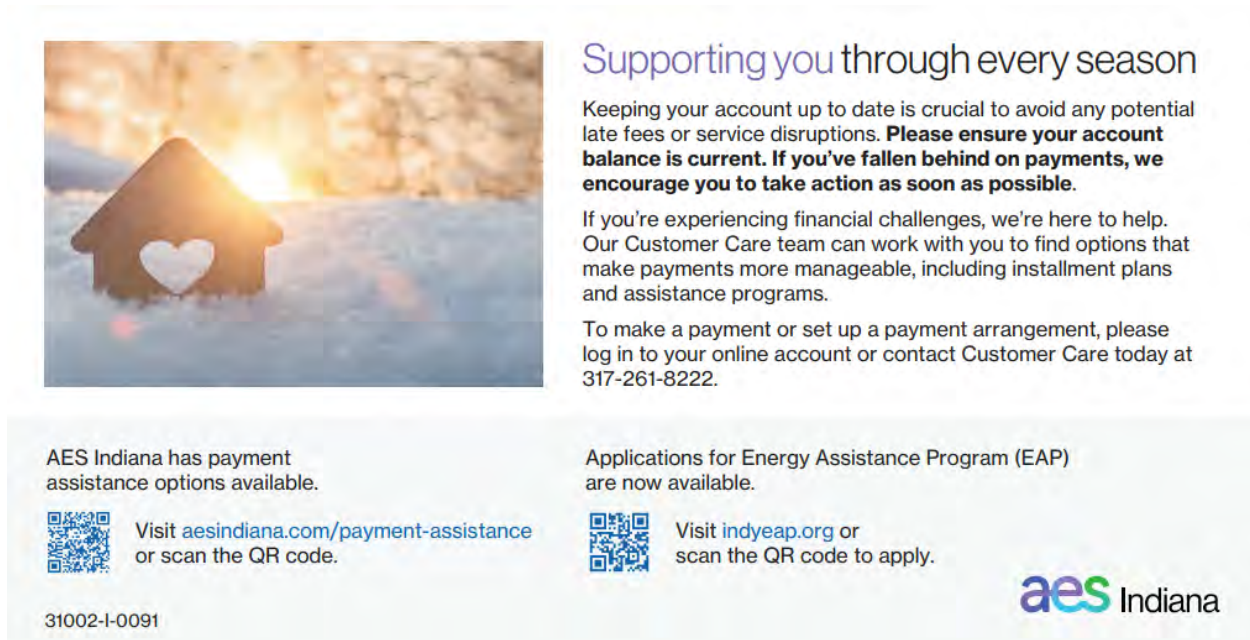
Keeping your account up to date is crucial to avoid any potential late fees or service disruptions. Please ensure your account balance is current. We encourage you to take action as soon as possible. To make a payment or set up a payment arrangement, log in to your online account or contact us at 317-261-8222.

Total Number of Services	1
Total Services Billed	1

Figure 3. Social Media Message on Facebook, Instagram, and X on 12/9/24



**Figure 4. December Bill Insert**



**Supporting you through every season**

Keeping your account up to date is crucial to avoid any potential late fees or service disruptions. **Please ensure your account balance is current. If you've fallen behind on payments, we encourage you to take action as soon as possible.**

If you're experiencing financial challenges, we're here to help. Our Customer Care team can work with you to find options that make payments more manageable, including installment plans and assistance programs.

To make a payment or set up a payment arrangement, please log in to your online account or contact Customer Care today at 317-261-8222.


AES Indiana has payment assistance options available.

Visit [aesindiana.com/payment-assistance](https://aesindiana.com/payment-assistance) or scan the QR code.

Applications for Energy Assistance Program (EAP) are now available.

Visit [indyep.org](https://indyep.org) or scan the QR code to apply.

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Throughout November and early December, the company proactively garnered five media interviews (two on WISH-TV, one on FOX59/CBS4, one on RTV6, and one on WTHR) regarding winter assistance and energy efficiency. Each media outlet was provided with information on extended payment plans along with other utility payment assistance programs.

In addition, the Company will reach out to specific media outlets that initially covered the announcement of resuming disconnections to offer an update story in mid-January.

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

No other information was requested by the Commission for this report.