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 THROUGH A PHASE-IN RATE ADJUSTMENT; AND FOR APPROVAL OF RELATED RELIEF, INCLUDING (1) REVISED DEPRECIATION RATES, INCLUDING COST OF REMOVAL LESS SALVAGE AND UPDATED DEPRECIATION EXPENSE; (2) ACCOUNTING RELIEF, INCLUDING DEFERRALS AND AMORTIZATIONS, (3) INCLUSION OF CAPITAL INVESTMENT, (4) RATE ADJUSTMENT MECHANISM PROPOSALS, INCLUDING A NEW PROPERTY TAX RIDER, AND (5) NEW SCHEDULES OF RATES, RULES AND REGULATIONS FOR SERVICE.	)	**CAUSE NO. 46258**

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR
PUBLIC EXHIBIT NO. 5 – REDACTED TESTIMONY OF OUCC WITNESS ROOPALI SANKA

Respectfully submitted,

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

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REDACTED TESTIMONY OF OUCC WITNESS ROOPALI SANKA
CAUSE NO. 46258
INDIANAPOLIS POWER & LIGHT COMPANY D/B/A AES INDIANA

NOTE: CONFIDENTIAL INFORMATION APPEARS IN [redacted]

I. INTRODUCTION

Q: Please state your name and business address.

A: My name is Roopali Sanka, and my business is 115 West Washington Street, Suite 1500 South, Indianapolis, Indiana 46204.

Q: By whom are you employed and in what capacity?

A: I am employed as a Utility Analyst in the Indiana Office of Utility Consumer Counselor's ("OUCC") Electric Division. A summary of my educational background and experience is included in Appendix A attached to my testimony.

Q: What is the purpose of your testimony?

A: My testimony addresses Indianapolis Power and Light Company d/b/a AES Indiana's ("AESI," "Petitioner," or "Company") requested adjusted test year Vegetation Management ("VM") expense of $44.452 million.[1] AESI seeks to substantially increase customer rates for VM based on flawed data. I explain why Petitioner's requested Distribution VM expense of $42.61 million is excessive and recommend the Indiana Utility Regulatory Commission ("Commission") deny the adjusted Distribution VM expense. The OUCC does not oppose the proposed adjusted Transmission VM expense. As a result, I recommend the Commission

[1] Direct Testimony of Cody A. Flint, page 14, Table CAF-3: Adjusted Test Year Distribution Vegetation Management Expense.

approve a combined unadjusted Distribution VM expense and adjusted test year 2026 Transmission VM expense at a total of $27.01 million.

Q: Please describe the review you conducted to prepare your testimony.

A: I reviewed the Petition and Petitioner's case-in-chief, primarily the direct testimonies of AESI witnesses Cody A. Flint and Michael L. Holtsclaw. I submitted data requests ("DR") and reviewed Petitioner's responses to DRs the OUCC and other parties submitted. I also researched and reviewed the Commission's latest "Investor-Owned Utilities ["IOUs"] Reliability Report Data for 2024," AESI's Electric Reliability Reports from 2015 through 2024, AESI's Annual Vegetation Management Reports filed in Cause No. 43663, and salient documents from AESI's last rate case (Cause No. 45911), including the Final Order, direct testimonies of Mr. Holtsclaw and AESI witness Chadwick M. Bocook, Industrial Group witness Michael P. Gorman, and my direct testimony addressing VM. Finally, I participated in case meetings and discussions with other OUCC Staff.

Q: To the extent you do not address a specific item, should that be construed to mean you or the OUCC agree with Petitioner's proposal?

A: No. The scope of my testimony is limited to the specific items addressed herein.

II. AESI'S VM PROGRAM AND REQUEST

Q: Please summarize AESI's VM Program.

A: AESI's VM plan is a cycle-based program designed to manage trees and other vegetation around distribution and transmission lines.[2] As Mr. Flint stated, the goal of the plan is to maintain the reliability of the system by clearing vegetation on its

[2] Flint Direct, page 4, lines 3-19.

system to prevent outages and equipment damage.[3] The Transmission VM Program manages vegetation on transmission lines through a five-year cyclical program for its 345kV lines and a reliability hot spot approach for its 138kV lines.[4] AESI stated its aim is to improve system reliability on its Distribution VM Program, which manages vegetation on distribution circuits.[5]

Q: What amount is AESI requesting for VM expense?

A: AESI is requesting $44.452 million for its adjusted 2026 future test year VM expense– $42.6 million[6] for distribution VM expense and $1.8 million[7] for the transmission system. By comparison, the unadjusted test year VM expense for 2026 is $25.806 million – $25.168 million distribution and $638,000 transmission.[8] This is an $18.645 million increase over the unadjusted test year.[9] For perspective, the proposed annual distribution VM expense of $42.6 million is $27.6 million more than the 2022 test year VM expense of approximately $15.0 million, a 184% increase in four years.[10]

AESI's proposal to move its existing four-year VM cycle to a five-year cycle uses an extended trim method.[11] With the five-year cycle, AESI would perform VM on

[3] Flint Direct, page 4, lines 3-8.
[4] Flint Direct, page 4, lines 8-14.
[5] Flint Direct, page 4, lines 14-19.
[6] Flint Direct, page 14, lines 11-14.
[7] Flint Direct, page 18, lines 7-10.
[8] AES Indiana Financial Exhibit AESI-OPER: Schedule OM12, p. 49.
[9] AES Indiana Financial Exhibit AESI-OPER: Schedule OM12, p. 49.
[10] *Indianapolis Power and Light*, Cause No. 45911, Direct Testimony of Chadwick M. Bocook, page 4, line 16 - page 6, line 13 and Table 1.
[11] Flint Direct, page 4, lines 17-19.

735 miles per year on average rather than 918 miles per year on average with the current four-year cycle.[12]

Q: Why is AESI requesting an increase in its VM expense compared to the historical base period?

A: According to Mr. Flint, AESI proposes to continue using the extended trimming specification that it began using as of its last rate case.[13] However, AESI stated costs were significantly under-estimated since its last rate case, with increased labor costs and increased costs due to the extended trimming specification.[14] The proposed expanded trim increases the clearance distance from conductors and requires more labor-intensive practices.[15] The differences between these types of trim specifications are explained further below. AESI stated these changes increase the average cost per mile of trimming compared to the historical base period.[16]

Q: How has AESI performed the trimming and how has this affected its VM costs?

A: In 2022, AESI trimmed 14 circuits using the extended trimming specification and 32 circuits using the Box Cut specification. In 2023 it had trimmed 31 circuits using the extended trimming specification and did not trim circuits using the prior Box Cut specification.[17] Over the same period, actual VM spending exceeded historic budgets – for example, $16.0 million spent versus $13.1 million budgeted in 2022;

[12] Flint Direct, page 13, lines 1-3.
[13] Flint Direct, page 12, lines 10-21.
[14] Flint Direct, page 6, line 8 to page 7, line 19, and page 9, lines 3-9.
[15] Flint Direct, page 6, lines 8 to page 9, line 2.
[16] Flint Direct, page 6, lines 14 to page 7, lines 1-3.
[17] OUCC Attachment RS-1: Response to OUCC Request 1-3.

$15.4 million spent versus $13.1 million budgeted in 2023; and $26.34 million spent versus $25.91 million budgeted in 2024 as shown below.[18]

Table 1

OUCC DR 1-15 Table 1:

Year	Budget	Actuals
2020	12,210,084	12,808,195
2021	13,071,013	12,362,719
2022	13,071,013	16,003,499
2023	13,071,013	15,423,419
2024	25,906,883	26,339,483

III. ANALYSIS OF DISTRIBUTION VM TRIM SPECIFICATIONS

Q: Please explain the difference in trimming between the Box Cut specification and the extended trimming specification.

A: Mr. Flint stated the Box Cut specification requires the removal of limbs and vegetation within ten feet of power lines, as well as trimming around poles and equipment.[19] In contrast, he stated the extended trimming specification extends the trimming to 15 feet on the sides and below the lines, and it requires the removal of overhanging branches on multi-phase lines and overhanging limbs from the most failure-prone species over single-phase lines.[20]

Q: Please explain the financial difference between the Box Cut specification and the extended trimming specification.

A: Mr. Flint stated that in 2022, the average cost to perform trimming using the Box Cut method was about <CONFIDENTIAL> [redacted] <CONFIDENTIAL> per mile.[21] By comparison, the extended trim specification averaged

[18] OUCC Attachment RS-2: Response to OUCC DR 1-15.
[19] Flint Direct, page 8, line 6 – page 9, line 2, including Figure CAF-1.
[20] Flint Direct, page 8, line 6 – page 9, line 2, including Figure CAF-1.
[21] OUCC Attachment RS-6-C: Confidential response to OUCC Request 1-19.

<CONFIDENTIAL> [redacted] <CONFIDENTIAL> per mile, or about <CONFIDENTIAL> [redacted] <CONFIDENTIAL> more per mile than the Box Cut.[22] These figures reflect tree trimming costs only and exclude expenses related to customer notifications or auditing.

Q. Did AESI claim reliability benefits from using the extended trimming specification instead of the Box Cut method?

A. Yes. Mr. Flint claimed his analysis demonstrates the extended trimming specification is more effective in reducing customer interruptions and customer minutes interrupted versus the Box Cut specification.[23] Mr. Flint's evaluation is based on data from 12 circuits trimmed under the extended trimming specification and 20 circuits trimmed under the historical Box Cut specification.[24] While claiming the data clearly demonstrates the superiority of the extended trimming specification, Mr. Flint provided no detail in testimony regarding the design of his analysis and evaluation.

Q: What reliability metrics did AESI use to support its VM extended cut proposal?

A: AESI provided circuit-level before-and-after reliability data, Customer Interruptions ("CI") and Customer Minutes Interrupted ("CMI").[25] CI represents the number of customers who experience an outage event, while CMI is the total

[22] OUCC Attachment RS-6-C: Confidential response to OUCC Request 1-19.
[23] Flint Direct, page 9, line 10 – page 10, line 7.
[24] Flint Direct, page 9, lines 10-13.
[25] Workpaper CAF-1.

number of minutes customers were without power across all interruptions. These metrics directly measure outage frequency (CI) and outage duration (CMI).

Q: Has AESI established causation between the extended trim method and reliability performance?

A: No. Workpaper CAF-1, as provided by Mr. Flint, presents raw interruption counts without storm normalization, cause coding, or controls for other concurrent reliability projects. Without normalizing the data for weather and external events, it is not possible to attribute changes in CI or CMI directly to trimming practices. The absence of this basic analytical step makes the results unreliable as evidence of causal improvement. At a minimum, an objective analysis should control for weather (using Major Event Day ("MED")-adjusted metrics, concurrent reliability work, access class (roadside vs. backyard), customer/feeder size, species mix, and the time since the last trim. If those are isolated or controlled, they can explain differences that are being attributed to the trim method.

Q: Do the circuit-level results in Workpaper CAF-1 show reliable and persistent improvements?

A: No. While many circuits presented in CAF-1 show improvements in CMI and CI one-year post-trim with the extended cut implementation, several circuits show otherwise. For example Geist 4, Prospect 4, and Crestview 2, actually worsened.[26] Others, such as Guion 8, improved in the first year but also worsened by year two, falling from 271,410 CMI (base) to 129,098 after one year, but then rose to 295,266 two years post-trim.[27] Castleton 3 and Millersville 1 both show higher CMI following extended trimming, while Eagledale 2 and Geist 5 display inconsistent

[26] Workpaper CAF-1: 'Improvement in Circuit Cuts' tab.
[27] Workpaper CAF-1: 'Improvements in Circuit Cuts' tab

trends across years.[28] These circuit-level anomalies show that the application of the extended trim specification does not consistently yield reliability improvements. If trimming were the only factor influencing circuit performance, those results would not be expected. This demonstrates that the results are highly variable and inconsistent. Because AESI has not shown these outcomes are consistent, it cannot be concluded whether the extended trim method provides additional reliable systemwide benefits over the Box Cut.

Q: How did AESI design its analysis comparing the extended trimming specification to the Box Cut specification?

A: For its analysis, AESI selected the data from circuits trimmed using its extended trimming specification. It was discovered through OUCC data requests excluded from Mr. Flint's testimony that AESI had selected the 12 worst-performing circuits at the beginning of 2022.[29] AESI did not then use worst-performing circuits to evaluate the Box Cut. Instead, AESI selected 20 circuits with the oldest documented trimming dates that had been trimmed by the Box Cut specification.[30] These two non-overlapping sets were then used to compare the reliability outcomes of the trimming specifications against one another.

Q: Did AESI select a representative sample of circuits to evaluate the extended trim specification when performing its analysis?

A: No. What AESI does not indicate is the selection criteria upon which the Company based its projected reliability metrics. This is not a randomized or representative sample of AESI's full distribution system. The 12 worst performing circuits only

[28] Workpaper CAF-1: 'Improvement in Circuit Cuts' tab.
[29] OUCC Attachments RS-1 and RS-3: Responses to OUCC Requests 1-3 and 15-5.
[30] Flint Direct, page 9, lines 10-13.

represent 4.56%[31] and the 20 circuits with the oldest documented trimming dates only represent 7.66%[32] of the Company's distribution system. These are extremes, not a representative sample of the 3,674 miles of distribution subject to VM.

Q: Is this comparison an accurate way to measure one trim specification against another?

A: No. The "worst" group is defined by performance, and the "oldest" group is defined by time i.e., since the last trim was performed. The oldest circuits would not have been the worst-performing, nor would they have been trimmed as a "hot spot." AESI compared two different things by selecting the worst-performing circuits to represent the extended trimming specification data (with the most room to improve), while selecting the oldest untrimmed circuits to represent the Box Cut specification data (the oldest, and presumably less troublesome or hot-spot circuits). This design ensures the extended trimming specification group would likely show larger percentage improvements, while the Box Cut specification group would not. Due to the bias in the selection of the data, the differences observed cannot be attributed solely to the difference in trim method.

Q: Can this analysis be reasonably extrapolated to the entire distribution VM system?

A: No, the improvements measured from the worst 12 circuits, and 20 oldest circuits cannot be generalized to the rest of the system. This analysis does not demonstrate the practice will deliver proportional benefits system-wide. Circuits closer to the median or average reliability level have less room for improvement, and any gains would be materially smaller. AESI's extrapolation of 40–60% improvement across

[31] Flint Direct, page 9, lines 4-5 (12 circuits: 167.39/3674 = 4.56% and 20 circuits: 281.58/3674 = 7.66%).
[32] OUCC Attachment RS-1: Response to OUCC Request 1-3d.

its entire 3,674 miles of distribution system assumes that the worst-case gains are typical. Moreover, AESI did not include all circuits in its study on which it performed the trimming specifications. In 2022, AESI performed extended cut on 14 circuits and Box Cut on 32 circuits, but only 12 extended cut and 20 box cut circuits were included in the study. The omission of a substantial portion of the data pool raises concerns that results were selectively curated to support AESI's case.[33]

Q: Has AESI acknowledged that other factors besides VM affect reliability outcomes?

A: Yes. In response to OUCC DR 1-3, AESI stated the worst-performing circuits were identified using metrics that include MEDs, non-MEDs, outage frequency, duration, and customer experience.[34] This is important because it demonstrates that the reliability results in workpaper CAF-1, which presents performance changes as attributable to trimming, does not account for these other contributing factors. The results of the circuits that do not show a consistent improvement, as mentioned above, underscore the point that extended trimming by itself did not yield improvements and other variables must be considered when evaluating reliability performance. Mr. Flint's Workpaper CAF-1 fails to consider these important factors. The workpaper containing the Interruption Cost Estimate ("ICE") calculations does not provide reliable support for adopting the proposed extended trim method. The results are varied and inconsistent and, in some cases, worsened after trimming. Moreover, the analysis does not control for key drivers such as storm activity, concurrent reliability work, and feeder characteristics, which

[33] OUCC Attachment RS-1: Response to OUCC Request 1-3.
[34] OUCC Attachment RS-3: Response to OUCC Request 15-5a.

undermines its credibility as evidence of causal improvement. AESI has not shown its proposed changes will deliver sustained, cost-effective improvements in reliability.

Q: Has AESI performed a formal cost-benefit analysis comparing extended trimming against a four-year Box Cut cycle?

A: No. In response to OUCC DR 27-9, the Company acknowledged it had not conducted a cost-benefit study, instead relying solely on the ICE Calculator and Workpaper CAF-1.[35] Similarly, in response to OUCC DR 27-12, the Company confirmed it had not performed benefit and cost calculations for a four-year Box Cut cycle, again defaulting to ICE Calculator assumptions.[36] These admissions demonstrate AESI has not provided the type of analysis necessary to establish that extended trimming is the least-cost and most-beneficial approach for its customers.

Q: Please explain AESI's ICE Calculator used to calculate its projected reliability benefits?

A: AESI used the ICE Calculator to quantify projected reliability benefits from its proposed VM Program. In Workpaper CAF-1, AESI modeled reductions in CI and CMI assuming 40-60% improvement scenarios as a result of it representing an estimated range of potential reductions in CI and CMI if the extended trimming

[35] OUCC Attachment RS-4: Response to OUCC DR 27-9.
[36] OUCC Attachment RS-5: Response to OUCC DR 27-12.

specification performs as expected. Then AESI applied these inputs in the ICE Calculator to estimate projected reliability metrics.[37]

Q: Do you take issue with the ICE Calculator?

A: No, I do not take issue with AESI using the ICE Calculator. However, I do take issue with AESI's inputs into the ICE Calculator.

Q: AESI uses a 40-60% improvement assumption[38] as an input in the ICE Calculator. Do you agree with this approach?

A: No. The 40-60% "improvements in circuits cut" assumption is not based on representative storm-normalized system data. AES calculated "improvement" as the percentage reduction in CI and CMI one and two years after trimming compared to the year prior. For the 12 extended-trim circuits, this amounted to roughly a 60% average reduction. AESI then applied that same 40–60% assumption across all 3,674 circuit miles in its ICE Calculator modeling. It comes from a small, biased set of circuits with highly variable outcomes. By hardcoding a 40-60% improvement into the ICE model, AESI assumes the very outcome it seeks to prove.[39] The improvement was layered on top of an already skewed dataset, rather than grounded in actual circuit performance data reflective of AESI's entire system.

Q: What results does the ICE model produce regarding system-level impact?

A: AESI's ICE outputs project only a small system improvement, reducing the System Average Interruption Duration Index from 84.9 to about 74.7 and the System Average Interruption Frequency Index from 1.034 to 0.91.[40] The Customer

[37] Workpaper CAF-1.
[38] Flint Direct, p. 11, lines 14-16.
[39] OUCC Attachment RS-3: Response to OUCC Request 15-5.
[40] Workpaper CAF-1: ICE Calculation Input Values.

Average Interruption Duration Index remains essentially unchanged. Even using AESI's unsupported assumptions, the marginal reductions demonstrate the extended trim cycle produces very limited systemwide benefits.

Q: Given the design flaw, are the results of AESI's evaluation reliable?

A: No. The results of AESI's evaluation should not be considered reliable. Because the two groups start from different baselines and were not randomized or matched, the analysis cannot demonstrate how much of the observed change is due to the extended trimming specification versus the change being due to the selection of the circuits (worst vs. oldest) or other uncontrolled factors. As a result, extrapolating those results to the entire distribution system would not produce a reliable evaluation.

IV. AFFORDABILITY AND AESI'S INCREASING COST TRENDS

Q: How has AESI's VM spending changed over time?

A: As explained above**,** AESI's VM spending has spiked over the past five years as shown in Table 1 above.

Q: Based on AESI's increased VM spend, lack of reliability of the study, and its lack of a cost-benefit analysis, is AESI's request justified?

A: No, without robust system-level analysis proving this strategy will significantly reduce outages, the Company's proposal shifts more costs onto customers without providing adequate assurance of benefits when compared to the approved budgets AESI already has for VM. Maintaining the current expenditure level is the more prudent course until AESI can demonstrate, with comprehensive and consistent data, that a greater amount is warranted.

Q: Does your recommendation support affordability for customers?

A: Yes. Without sufficient support in the form of an adequate cost-benefit analysis to increase spending on VM, maintaining the current level for the VM expense will reduce the financial burden on customers.

V. RECOMMENDATIONS

Q: Please summarize your recommendations to the Commission in this Cause.

A: I recommend the Commission:

1. Deny AESI's proposed $44.452 million for its adjusted 2026 test year VM expense;
2. Maintain the unadjusted distribution VM expense authorized in Cause No. 45911; and
3. Approve the adjusted transmission test year VM expense proposed in this proceeding, for a total of $27.01 million for VM expense.

Q: Does this conclude your testimony?

A: Yes.

APPENDIX TO TESTIMONY OF
OUCC WITNESS ROOPALI SANKA

Q: Please describe your educational background and experience.

A: I hold a bachelor's degree in Energy Engineering from Indiana University Purdue University of Indianapolis. In August 2022, I began my employment with the OUCC as a Utility Analyst II in the electric division and work on demand side management ("DSM"); evaluation, measurement, & verification ("EM&V"); certificates of public convenience and necessity ("CPCN"). Additionally, I attended Scott Hempling's 'Fundamentals of Utility Law' course in 2023, and I attended energy related conferences, which focus on the current and future challenges facing the energy market.

Q: Have you previously testified before the Indiana Utility Regulatory Commission?

A: Yes.

Indianapolis Power & Light Company
d/b/a AES Indiana
Cause No. 46258
AES Indiana Responses to OUCC DR Set 1

Data Request OUCC DR 1 - 3

Please refer to Petitioner's Direct Testimony of Cody A. Flint p. 10, line 11 through p. 11, line 3, and Workpaper CAF-1 where AES Indiana compares the performance of 12 circuits trimmed under the extended trimming specification to 20 circuits trimmed under the Box Cut specification.
a. Please state whether the circuits selected for comparison (the 12 circuits trimmed using the extended trimming specification and the 20 circuits trimmed using the Box Cut specification) were randomly selected or if any selection criteria or screening methodology was used for each sample, respectively. If AES Indiana used any selection criteria or screening methodology, please explain in detail and please provide the screening methodology or selection criteria along with all supporting analyses and data.
b. Please provide the total number of distribution circuits that were eligible for inclusion in the analysis of extended trimming benefits (i.e., all circuits trimmed with the extended method in 2022 and 2023).
c. Please provide the total number of Box Cut circuits eligible for inclusion during the same study timeframe.
d. Please provide the total line miles covered by the 20 Box Cut circuits and provide the average number of line miles per circuit.

Objection:

AES Indiana objects to the request on the grounds and to the extent the request is overly broad and unduly burdensome, particularly to the extent the request seeks copies of selection criteria and screening methodology and "all supporting analyses and data". Subject to and without waiver of the foregoing objection, AES Indiana provides the following response.

Response:

a. The 12 circuits selected for the extended trimming specification were identified as the worst-performing circuits at the beginning of 2022. The 20 circuits selected for trimming under the box cut method were those located within map sections that had the oldest documented trimming dates.

b. All AES circuits were eligible for the extended trimming specification, with the exception of those that had been trimmed within the past few years, as the anticipated impact would not justify the associated expenditure. In 2022, 14 circuits were trimmed under the extended trimming specifications, while 32 circuits were maintained using the box cut method. In 2023, 31 circuits were trimmed under the extended specifications, and no circuits were trimmed using the box cut method.

c. All AES circuits were eligible for the box cut trimming specification, with the exception of those that had been trimmed within the past few years. At the time, AES Indiana had recently transitioned from a grid-section-based trimming approach to a circuit-based methodology. As a

result, circuits were prioritized for trimming based on the average time since the last trim across all grid sections comprising each circuit.

d. 281.58 miles were trimmed under the box trim method, with an average circuit length of 14.08 miles.

Data Request OUCC DR 1 - 15

Please provide a table of the budgeted and actual vegetation management spend for each calendar year between 2020 to2024.

Objection:

Response:
Below is a table of the budgeted and actual transmission and distribution vegetation management spend for each calendar year.

OUCC DR 1-15 Table 1:

Year	Budget	Actuals
2020	12,210,084	12,808,195
2021	13,071,013	12,362,719
2022	13,071,013	16,003,499
2023	13,071,013	15,423,419
2024	25,906,883	26,339,483

Indianapolis Power & Light Company
d/b/a AES Indiana
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AES Indiana Responses to OUCC DR Set 15

Data Request OUCC DR 15 - 5

Please refer to AES Indiana's response to OUCC Data Request 1-3, subsection a. How many circuits in total does AES Indiana manage?

a. On what metric(s) were the worst-performing circuits identified?

i. Please provide a list of all circuits and performance.

b. Please provide the total number of distribution circuits and the total number of transmission circuits AES Indiana manages.

c. Please explain why AES Indiana input the twelve worst performing circuits for extended trimming specification into the ICE calculator to represent determine AES Indiana's total vegetation management spend forecast.

Objection:

Response:

AES Indiana has approximately 500 distribution circuits, including underground.

a. The worst-performing circuits were identified through several factors including Major Event Days ("MED"), non-MED, frequency, duration, and customer experience.

i. See OUCC DR 15-5 Attachment 1 for a list of all circuits and performance for the first three quarters of 2021, which was the period reviewed for purposes of selecting the circuits for extended trimming.

b. AES Indiana's line clearing department manages vegetation on approximately 433 distribution circuits, 100 138 kV circuits, and 12 345 kV circuits.

c. AES Indiana utilized data from the 12 worst-performing circuits trimmed in 2022, as this represents the earliest available dataset appropriate for evaluating the performance of the extended trimming specification relative to the box trimming approach. To capture a broader range of circuit conditions, AES Indiana applied an improvement range of 40% to 60%, reflecting not only the impact on the worst-performing circuits but also the potential benefits for circuits that have historically demonstrated more moderate reliability challenges.

OUCC Attachment RS-3 contains an Excel file

Indianapolis Power & Light Company
d/b/a AES Indiana
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AES Indiana Responses to OUCC DR Set 27

Data Request OUCC DR 27 - 9

Please reference Petitioner's Direct Testimony of Cody A. Flint and provide the benefit cost ratio of the box cut vs. the extended cut trim specification.
a. Please provide all analysis, calculations, and/or data to support the benefit cost ratio.

Objection:
AES Indiana objects to the request on the grounds and to the extent the request calls for a calculation, analysis, compilation, or study that AES Indiana has not performed and to which AES Indiana objects to performing. AES Indiana further objects to the request on the grounds and to the extent the request is vague and ambiguous with respect to the term "benefit cost ratio". AES Indiana assumes the reference means the incremental benefits and incremental costs associated with extended trimming and responds on that basis.

Response:
As explained in AES Indiana witness Flint's testimony (p. 12), the ICE Calculator estimates the total incremental benefits to customers from the extended trimming specification to be between $94.1 million to $140 million, for the years 2026 through 2030. The estimated incremental expense associated with the extended trimming specification over the five-year cycle is $87.21 million (calculated as the $17.442 million shown on OM12, line 1 x five years). This would provide a benefit cost ratio ranging from 1.07 on the low end to 1.61 on the high end. Please see the confidential workpapers for Schedule OM-12 and Workpaper CAF-1 for the supporting data.

Indianapolis Power & Light Company
d/b/a AES Indiana
Cause No. 46258
AES Indiana Responses to OUCC DR Set 27

Data Request OUCC DR 27 - 12

Please reference Petitioner's Direct Testimony of Cody A. Flint and please provide all ICE Calculator input parameters, assumptions, and supporting documentation used to develop the $94.1M-$140M benefit estimate as stated by AES Indiana witness Mr. Flint on p. 12, lines 1-3, including interruption frequency, duration, CI, CMI, and assumed % reduction for the box cut circuits.

a. Provide the same benefit and cost calculations for the current 4-year Box Cut cycle for the same period.

Objection:

AES Indiana objects to the request on the grounds and to the extent the request is overly broad and unduly burdensome, particularly to the extent the request seeks "all" input parameters, assumptions, and supporting documentation. AES Indiana objects to the request on the grounds and to the extent the request solicits information previously provided. AES Indiana further objects to the request on the grounds and to the extent the request seeks information that is confidential, proprietary, competitively-sensitive, and/or trade secret. AES Indiana further objects to the request on the grounds and to the extent the request seeks an analysis, compilation, calculation, or study that AES Indiana has not performed and to which AES Indiana objects to performing. AES Indiana also objects to the request on the grounds and to the extent the request mischaracterizes AES Indiana's current distribution vegetation management practices. Subject to and without waiver of the foregoing objection, AES Indiana provides the following response.

Response:

AES Indiana notes the reference to the current "4-year Box Cut cycle" mischaracterizes AES Indiana's distribution vegetation management practice. AES Indiana clarifies that its current distribution vegetation management cycle exceeds 4 years, and that AES Indiana began use of the extended trimming specification on its distribution system in 2022.

AES Indiana has not performed benefit and cost calculations assuming a four-year Box Cut cycle. The analysis performed in the ICE Calculator estimates the <u>incremental</u> benefit of extended trimming specification compared to the boxcut trimming specification over a five-year cycle. Please refer to Workpaper CAF-1 for all ICE Calculator input parameters, assumptions, and supporting documentation.

Data Request OUCC DR 1 - 19

Please refer to Petitioner's Direct Testimony of Cody A. Flint p. 9, lines 7-9. Please quantify how much more the extended trimming specification costs per mile ($/mile) compared to the Box Cut specification.

a. Please provide the cost ($/mile) difference broken down by tree density or urban/suburban setting.

Objection:

AES Indiana objects to the Request on the grounds and to the extent the Request solicits information that is confidential, proprietary, competitively sensitive and/or trade secret. Subject to and without waiver of the foregoing objections, AES Indiana provides the following response.

Response:

a. AES Indiana does not currently maintain a cost-per-mile breakdown based on tree density or distinctions between urban and suburban environments. In 2022, the average cost to perform trimming using the box cut method was approximately $[redacted] per mile. By comparison, the expanded trimming specification averaged $[redacted] per mile. These figures reflect trimming costs only and do not include expenses related to customer notifications or auditing.

In 2024, AES Indiana conducted a pilot study involving five circuits totaling 57 miles to evaluate the cost-effectiveness of a hybrid approach. This method combined a 10-foot box cut with overhang removal on bucket-accessible trees. The average cost per mile for this approach was approximately $[redacted]. For context, the overall average trimming cost per mile across all work completed in 2024 was $[redacted].

AFFIRMATION

I affirm, under the penalties for perjury, that the foregoing representations are true and correct to the best of my information and belief.

Roopali Sanka
Utility Analyst II
Indiana Office of Utility Consumer Counselor
Cause No. 46258

September 9, 2025
Date

CERTIFICATE OF SERVICE

This is to certify that a copy of the Indiana Office of Utility Consumer Counselor Public Exhibit No. 5 – Redacted Testimony of OUCC Witness Roopali Sanka has been served upon the following in the above-captioned proceeding by electronic service on September 9, 2025:

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