

FILED  
June 30, 2021  
INDIANA UTILITY  
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANAPOLIS )  
POWER & LIGHT COMPANY D/B/A AES )  
INDIANA FOR APPROVAL OF REGIONAL )  
TRANSMISSION ORGANIZATION ("RTO") )  
ADJUSTMENT FACTORS FOR ELECTRIC )  
SERVICE FOR THE BILLING MONTHS OF )  
OCTOBER 2021 THROUGH SEPTEMBER )  
2022. )

CAUSE NO. 44808 RTO-5

IURC  
PETITIONER'S

EXHIBIT NO.

DATE

9-13-21

REPORTER

PETITIONER'S SUBMISSION OF DIRECT TESTIMONY OF  
ANNOCHA M. ABRAM

Indianapolis Power & Light Company d/b/a AES Indiana ("AES Indiana", "IPL" or "Petitioner"), by counsel, hereby submits the direct testimony and attachments of Annocha M. Abram.

Respectfully submitted,



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 PETITIONER  
INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served this 30th day of June, 2021, by email transmission, hand delivery or United States Mail, first class, postage prepaid to:

Lorraine Hitz  
Office of Utility Consumer Counselor  
115 W. Washington Street, Suite 1500 South  
Indianapolis, Indiana 46204  
[infomgt@oucc.in.gov](mailto:infomgt@oucc.in.gov)  
[LHitz@oucc.IN.gov](mailto:LHitz@oucc.IN.gov)



---

Jeffrey M. Peabody

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](mailto:tnyhart@btlaw.com)  
Peabody Email: [jpeabody@btlaw.com](mailto:jpeabody@btlaw.com)

ATTORNEYS FOR PETITIONER  
INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

**VERIFIED DIRECT TESTIMONY OF ANNOCHA M. ABRAM  
SENIOR ACCOUNTANT IN REGULATORY ACCOUNTING  
CAUSE NO. 44808 RTO-5**

1   **Q1.   Please state your name, employer and business address.**

2   A1.   My name is Annocha M. Abram. I am employed by AES U.S. Services, LLP ("Service  
3       Company"), which is a wholly-owned subsidiary of the AES Corporation. The Service  
4       Company is located at the headquarters of Indianapolis Power & Light Company d/b/a  
5       AES Indiana ("AES Indiana" or the "Company") at One Monument Circle, Indianapolis,  
6       Indiana 46204. The Service Company provides accounting, legal, human resources,  
7       information technology, and other corporate services to the businesses owned by AES  
8       Corporation in the United States of America, including AES Indiana.

9   **Q2.   What is your position with the Service Company?**

10  A2.   I am a Senior Accountant in the Regulatory Accounting department.

11  **Q3.   Please summarize your work experience with AES Indiana and the Service Company.**

12  A3.   I began employment with the Service Company in May 2014. During my tenure with the  
13       Service Company, I have worked in Regulatory Accounting on various AES Indiana and  
14       Dayton Power & Light Company (now doing business as AES Ohio) regulatory filings and  
15       the associated accounting entries for both companies. I am responsible for the various  
16       general ledger entries, the reconciliation of regulatory asset and liability accounts, the  
17       computation and tracking of various costs for regulatory filings, and the preparation of  
18       supporting schedules for these filings. These regulatory filings for AES Indiana have  
19       included these annual Regional Transmission Organization ("RTO-X") adjustment  
20       proceedings in Cause No. 44808 and filings related to the Fuel Adjustment Clause (Cause

No. 38703-FAC XX), and AES Indiana's most recent Basic Rate Case Proceedings (Cause Nos. 44576 and 45029).

**Q4. Please summarize your educational qualifications.**

A4. I hold a Master's Degree with a Specialization in Accounting from Indiana Wesleyan University and a Bachelor's Degree in Finance from Indiana University-Purdue University of Indianapolis.

**Q5. Have you previously testified before the Indiana Utility Regulatory Commission ("Commission")?**

A5. Yes.

**Q6. What is the purpose of your testimony in this proceeding?**

A6. The purpose of my testimony is to describe the calculation and the content of the RTO adjustment.

**Q7. Are you sponsoring any Attachments?**

A7. Yes. I am sponsoring AES Indiana Attachment AMA-1, Schedules 1 through 7 and AES Indiana Attachment AMA-2. I also sponsor AES Indiana Attachment AMA-3, which is a copy of the verified petition including the tariff sheets.

**Q8. Were these attachments prepared or assembled by you or under your direction and supervision?**

A8. Yes.

**Q9. Are you submitting any workpapers?**

1 A9. Yes. I am submitting workpapers in their native format that support the attachments  
2 included with my testimony.

3 **Q10. Are you providing any additional supporting documentation to the Office of Utility  
4 Consumer Counselor (“OUCC”)?**

5 A10. Yes. We are providing an audit package to the OUCC that includes the support requested  
6 by the OUCC for both the forecasted and historical RTO charges and credits, for which  
7 AES Indiana is seeking recovery in this filing, as well as our kWh forecast and state income  
8 tax rate calculations.

9 **Q11. Please summarize the relief AES Indiana is requesting in this proceeding.**

10 A11. AES Indiana requests approval of RTO Adjustment factors to be applicable for bills  
11 rendered during the billing cycles of October 2021 through September 2022. The prefiled  
12 direct testimony of AES Indiana Witness Kimberly Aliff in this proceeding explains the  
13 regulatory precedent upon which AES Indiana is authorized to have an RTO Adjustment  
14 Rider with annual rate adjustments. The RTO Adjustment is calculated on an annual basis  
15 for each rate class to timely recover the excess (or deficit) of an estimate of the  
16 Midcontinent Independent System Operator, Inc. (“MISO”) non-fuel costs and credits  
17 (“NFC”), net of revenues, to be billed by MISO compared to the amount of such NFC, net  
18 of revenues, approved to be included in the determination of basic charges for services. As  
19 Witness Aliff explains, on December 5, 2018, in its Final Order in Cause No. 45029 (the  
20 “2018 Base Rate Order”), the Commission approved AES Indiana’s request to update the  
21 embedded level of MISO NFC to \$30.8 million (\$35.4 million of costs net of \$4.6 million  
22 of revenues). In this proceeding, AES Indiana is seeking to recover: (1) its estimated MISO  
23 NFC, net of revenues, which exceed amounts included in base rates, for the billing cycles

1 of October 2021 through September 2022; and (2) a reconciliation of actual MISO NFC,  
2 net of revenues, for the period of May 2020 through April 2021.

3 **Q12. Please describe AES Indiana Attachment AMA-1 Schedule 1.**

4 A12. AES Indiana Attachment AMA-1 Schedule 1 shows the calculation of AES Indiana's  
5 proposed factors.

6 • Line 1 on this schedule shows the forecasted net MISO costs over/(under) base for the  
7 twelve months ended September 30, 2022, which is detailed on AES Indiana  
8 Attachment AMA-1 Schedule 2.

9 • Line 2 shows the forecasted net MISO jurisdictional revenues (over)/under base for the  
10 twelve months ended September 30, 2022, which is detailed on AES Indiana  
11 Attachment AMA-1 Schedule 3.

12 • Line 3 shows the RTO adjustment factor reconciliation for the twelve months ended  
13 April 30, 2021, which is detailed on AES Indiana Attachment AMA-1 Schedule 4.

14 • Line 4 is the sum of Lines 1 through 3, which represents the proposed revenue  
15 requirement for this proceeding.

16 • Line 5 is the MWh sales forecasted for the twelve months ended September 30, 2022.  
17 These sales are detailed by month on AES Indiana Attachment AMA-2, Schedule 1.

18 • Line 6 presents the per kWh result of dividing the net MISO charge/(credit) from Line  
19 4 by the estimated MWh sales (Line 5) to determine the RTO adjustment factors  
20 applicable to each customer class.

- Line 7 presents the proposed RTO adjustment factors, modified to provide the recovery of the Indiana Utility Receipts Tax (“URT”).
- Line 8 is the blended Indiana state income tax rate for the twelve months ended September 30, 2022, used in the computation of the URT adjustment on Line 7.

**Q13. Please describe AES Indiana Attachment AMA-1 Schedules 2 through 7.**

A13. AES Indiana Attachment AMA-1 Schedule 2 shows the forecasted total MISO NFC. This schedule illustrates AES Indiana’s forecasted MISO NFC (Line 13) for the twelve-month forecasted period ending September 2022 (the “Forecast Period”), as well as the authorized MISO NFC amounts included in AES Indiana’s base rates pursuant to the 2018 Base Rate Order (Line 14). The current forecasted MISO NFC is compared to the amount in base rates and the resulting difference is reflected on Line 15. The resulting forecasted under-collection of \$3.9 million is then allocated to customer classes based upon the demand allocation factors approved in the 2018 Base Rate Order. These per customer amounts are carried forward to AES Indiana Attachment AMA-1 Schedule 1, Line 1.

AES Indiana Attachment AMA-1 Schedule 3 is similar to Schedule 2, except Schedule 3 shows the forecasted total MISO Revenues. This schedule shows AES Indiana’s forecasted Revenues (Line 13) for the Forecasted Period. MISO revenues are then adjusted on Line 14 to the net amount AES Indiana realizes after URT. The current forecasted revenues (after URT) are compared to the amount in base rates and the resulting difference is reflected on Line 16. The resulting forecasted over-collection of \$0.8 million is then allocated to customer classes based upon the demand allocation factors approved in the 2018 Base Rate Order. These per customer amounts are carried forward to AES Indiana Attachment AMA-1 Schedule 1, Line 2.

1        AES Indiana Attachment AMA-1 Schedule 4 is a summary of the RTO under/(over)  
2        collection for the months of May 2020 through April 2021 (the “Reconciliation Period”).  
3        It calculates the under/(over) recovery balance to be included in the current RTO factor  
4        determination. Schedule 4 starts by taking seven-twelfths of the over/(under) collection  
5        from the Schedule 4 in AES Indiana’s RTO-4 filing and five-twelfths of the over/(under)  
6        collection from the Schedule 4 in AES Indiana’s RTO-3 filing with the RTO carryover  
7        under/(over) collection, which represents the historical net over/(under) collection from  
8        customers during the Reconciliation Period. The over/under collection from RTO-3 was  
9        reflected in rates from October 2019 through September 2020, while the over/under  
10       collection from RTO-4 was reflected in rates from October 2020 through September 2021.  
11       Schedule 4 then adds the over/(under) collection of MISO charges for the Reconciliation  
12       Period calculated on AES Indiana Attachment AMA-1 Schedule 5. Next, the (over)/under  
13       collection of Net MISO Jurisdictional Revenues for the Reconciliation Period derived from  
14       AES Indiana Attachment AMA-1 Schedule 6 is added. Finally, Schedule 4 subtracts actual  
15       RTO rider billings from the Reconciliation Period, net of URT, from AES Indiana  
16       Attachment AMA-1 Schedule 7 to determine the net under/(over) recovery. This net over  
17       recovery of \$1.4 million is carried forward to AES Indiana Attachment AMA-1 Schedule  
18       1, Line 3 and represents a reduction to the proposed RTO factors.

19       AES Indiana Attachment AMA-1 Schedule 5 is similar to AES Indiana Attachment AMA-  
20       1 Schedule 2, except Schedule 5 is for the historical Reconciliation Period, while Schedule  
21       2 is for a future forecasted period. Schedule 5 illustrates the history of MISO NFC for the  
22       Reconciliation Period as compared to the amount of such items included in AES Indiana’s  
23       base rates to determine the net amount over/(under) the amount in base rates for the



1 historical Reconciliation Period, excluding RTO rider billings. In this case, the amount of  
2 costs over the base of \$3.3 million represents an under collection, which is carried forward  
3 to AES Indiana Attachment AMA-1 Schedule 4, Line 2.

4 AES Indiana Attachment AMA-1 Schedule 6 is similar to AES Indiana Attachment AMA-  
5 1 Schedule 3, except Schedule 6 is for the historical Reconciliation Period, while Schedule  
6 3 is for the Forecasted Period. Schedule 6 illustrates the history of MISO Revenues for the  
7 Reconciliation Period and compares them to the amount of such items included in AES  
8 Indiana's base rates to determine the net amount (over)/under the amount in base rates for  
9 the historical Reconciliation Period. Column C of that schedule calculates the URT for  
10 each month and then Column D shows the MISO revenues AES Indiana realizes after URT.  
11 The authorized RTO amount for revenues included in base rates is shown on Line 14. The  
12 historical revenues (after URT) are compared to the amounts in base rates and in this case  
13 the revenues were above the amount included in base rates, representing an over-collection  
14 of \$1.9 million, which is reflected on Line 15. Such amount is then allocated to customer  
15 classes based upon the demand factors authorized in AES Indiana's 2018 Base Rate Order  
16 in Cause No 45029 on Line 17 and then carried forward to AES Indiana Attachment AMA-  
17 1 Schedule 4, Line 3.

18 AES Indiana Attachment AMA-1 Schedule 7 is the history of RTO adjustment factor  
19 Revenue received from and/or (credited to) the customers during the Reconciliation Period  
20 from each customer classification. The net RTO Revenue received from and/or (credited  
21 to) the customers was then multiplied by the URT rates in effect for each year in Lines 14  
22 through 26. Line 39, the net billings/(credits) after reduction for URT, which in this case  
23 is a net debit of \$2.3 million, is carried to Line 4, by customer class, on AES Indiana

Attachment AMA-1 Schedule 4 and represents a decrease in the amount that would otherwise be reflected going forward.

**Q14. Please describe AES Indiana Attachment AMA-2 Schedule 1.**

A14. AES Indiana Attachment AMA-2 Schedule 1 is AES Indiana's forecasted MWh sales by customer classification for the period during which the factors proposed in this filing would be in effect.

**Q15. How was the state income tax rate used in the calculation of the Utility Receipts Tax adjustments applied to the proposed factors on AES Indiana Attachment AMA-1 Schedule 1 and AES Indiana Attachment AMA-1 Schedule 3 calculated?**

A15. AES Indiana uses a calendar year for tax filing purposes. Because state income tax rates change during the calendar year, a blended rate is computed in accordance with the Indiana Form IT-20 ("Indiana Corporate Adjusted Gross Income Tax Return") instructions addressing how a calendar-year taxpayer, like AES Indiana, should calculate the Indiana State Income Tax Rate applicable to it for the tax years ending on December 31st. The tax rate used on Schedule 1 and Schedule 2 is an average of three months at the 2021 blended State income tax rate and nine months at the 2022 blended state income tax rate. The resulting tax rate is presented on the last line of Schedule 1 and Line 17 on Schedule 3.

**Q16. How was the state income tax rate applied to the historical revenues for the respective factors on AES Indiana Attachment AMA-1 Schedule 6 and AES Indiana Attachment AMA-1 Schedule 7 calculated?**

1 A16. The historical URT revenue adjustments for the months in 2020 utilize the 2020 blended  
2 state income tax rate and historical URT revenue adjustments for the months in 2021 utilize  
3 the 2021 blended state income tax rate.

4 **Q17. Can you identify the components of the \$1.4 million over recovery in the**  
5 **Reconciliation Period as reflected on AES Indiana Attachment AMA-1 Schedule 4,**  
6 **Line 5?**

7 A17. The biggest factor is due to the under/(over) recovery balance from prior filings. In  
8 addition, the jurisdictional revenues received from MISO were approximately \$1.9 million  
9 higher than base rates. These over-recoveries were partially offset by the under-collection  
10 of net MISO Costs over base of \$3.3 million and a credit to customers under the RTO rider  
11 of approximately \$2.3 million, which were intended to flow back the prior over-recovery.

12 **Q18. Please summarize the RTO adjustment factors proposed in this proceeding.**

13 A18. As shown on AES Indiana Attachment AMA-1 Schedule 1, the resulting RTO adjustment  
14 factors per kWh as modified to recover Indiana Utility Receipts Tax are:

15 **Table 1: Proposed Rates**

16

17

Residential RS, CW, EVX	C&I – Small SS, SH, OES, UW, CW, EVX	C&I –Large PL,HL	C&I –Large SL, PH, EVX	Lighting MU-1, APL
\$0.000135	\$0.000131	\$0.000112	\$0.000119	\$0.000083

1 **Q19. What effect will the requested RTO adjustment have on an average residential**  
2 **customer using 1,000 kWh per month?**

3 A19. An average residential customer using 1,000 kWh per month will experience an RTO  
4 adjustment of \$0.14, which is a 0.14% increase of such bill relative to the basic rates and  
5 charges in effect. In relation to the factor currently in effect, an average residential  
6 customer using 1,000 kWh per month will experience a \$0.38 increase or 0.39%.

7 **Q20. If approved by the Commission, when does Petitioner propose to make effective for**  
8 **electric service the RTO adjustment factors requested in this proceeding?**

9 A20. The RTO adjustment factors, as shown on the proposed Tariff, a copy of which is attached  
10 to the Petition as Exhibit A, would be effective for all bills rendered for electric services  
11 beginning with the first billing cycles for the October 2021 billing month (Regular Billing  
12 District 41 and Special Billing District 01), which begins September 30, 2021, or the first  
13 full billing cycle following the Commission's Order. Such adjustment factors, upon  
14 becoming effective, shall remain in effect for approximately one year or until replaced by  
15 different adjustment factors approved in a subsequent filing.

16 **Q21. Does that conclude your prefiled direct testimony?**

17 A21. Yes.

### Verification

I, Annocha M. Abram, Senior Accountant, affirm under penalties for perjury that the foregoing representations are true to the best of my knowledge, information, and belief.

Dated this 30<sup>th</sup> day of June 2021.

Annocha M. Abram  
Annocha M. Abram

AES INDIANA  
Determination of RTO Adjustment Factors  
For the Billing Period of October 1, 2021 through September 30, 2022

Line No.	(A)	Detail by Customer Charge Type				
		<u>Residential</u> RS, CW, EVX	<u>C&amp;I - Small</u> SS, SH, OES, UW, CW, EVX	<u>C&amp;I - Large</u> PL, HL	<u>C&amp;I - Large</u> SL, PH, EVX	<u>Lighting</u> MU-1, APL
		(B)	(C)	(D)	(E)	(F)
1	Forecasted Net MISO Costs Over/(Under) Base for the Twelve Months Ended September 30, 2022 (Sch. 2, Line 17)	\$ 1,662,331	\$ 551,762	\$ 689,507	\$ 993,564	\$ 16,044
2	Forecasted Net MISO Jurisdictional Revenues (Over)/Under Base for the Twelve Months Ended September 30, 2022 (Sch. 3, Line 19)	\$ (346,482)	\$ (115,005)	\$ (143,715)	\$ (207,090)	\$ (3,344)
3	RTO Adjustment Factor Reconciliation for Twelve Months Ended April 30, 2021 (Sch. 4, Line 5)	\$ (619,568)	\$ (205,523)	\$ (233,262)	\$ (374,485)	\$ (6,229)
4	Grand Total Net MISO -- Charge/(Credit)	\$ 696,281	\$ 231,235	\$ 312,530	\$ 411,989	\$ 6,471
5	Forecasted Sales (MWh) for the Twelve Months Ended September 30, 2022 (Attachment AMA-2, Sch. 1, Line 10)	5,234,803	1,799,143	2,841,476	3,522,494	79,039
6	RTO Adjustment Factor per kWh (Line 4 / Line 5 / 1000)	\$ 0.000133	\$ 0.000129	\$ 0.000110	\$ 0.000117	\$ 0.000082
7	RTO Adjustment Factor per kWh Adjusted for URT [Line 6 Divided by (1-(1.4% URT Rate/(1-State Tax)))]	\$ 0.000135	\$ 0.000131	\$ 0.000112	\$ 0.000119	\$ 0.000083
8	State Income Tax Rate - Blended for Years 2021 / 2022					4.94%

AES INDIANA  
Forecasted Total Midcontinent Independent System Operator (MISO) Costs  
For the Twelve Months Ended September 30, 2022

Line No.	(A)	MISO Non-Fuel Costs (B)
	Month:	
1	October-21	3,208,524
2	November-21	3,208,524
3	December-21	3,208,524
4	January-22	3,301,293
5	February-22	3,301,293
6	March-22	3,301,293
7	April-22	3,301,293
8	May-22	3,301,293
9	June-22	3,301,293
10	July-22	3,301,293
11	August-22	3,301,293
12	September-22	3,301,293
13	Total	\$ 39,337,209
14	Base RTO Cost from IURC Cause No. 45029 (for 12 months)	\$ 35,424,000
15	Net Costs Over/(Under) Base - Line 10 minus Line 11	\$ 3,913,209

Allocation to Customer Class Based Upon Demand Factors from IURC Cause No. 45029						
Line No.	(C)	Residential RS, CW, EVX	C&I - Small SS, SH, OES, UW, CW, EVX	C&I - Large PL, HL	C&I - Large SL, PH, EVX	Lighting MU-1, APL
		(D)	(E)	(F)	(G)	(H)
16	Demand Factor Split	42.48%	14.10%	17.62%	25.39%	0.41%
17	Net Charge/(Credit) by Class (to Sch. 1, Line 1)	\$ 1,662,331	\$ 551,762	\$ 689,507	\$ 993,564	\$ 16,044
						\$ 3,913,209

AES INDIANA  
Forecasted Total Midcontinent Independent System Operator (MISO) Revenues  
For the Twelve Months Ended September 30, 2022

Line No.	(A)	MISO Jurisdictional Revenues (B)
	Month:	
1	October-21	\$ 473,301
2	November-21	473,301
3	December-21	473,301
4	January-22	458,040
5	February-22	458,040
6	March-22	458,040
7	April-22	458,040
8	May-22	458,040
9	June-22	458,040
10	July-22	458,040
11	August-22	458,040
12	September-22	458,040
13	Total	\$ 5,542,263
14	Net Revenues After Reduction for URT	\$ 5,460,636
15	Base RTO Revenue from IURC Cause No. 45029 (for 12 months)	\$ 4,645,000
16	Net Jurisdictional Revenues (Over)/Under Base - Line 15 minus Line 14	\$ (815,636)
17	State Income Tax Rate - Blended for Year 2021/2022	4.94%

Allocation to Customer Class Based Upon Demand Factors from IURC Cause No. 45029						
Line No.	(C)	Residential RS, CW, EVX	C&I - Small SS, SH, OES, UW, CW, EVX	C&I - Large PL, HL	C&I - Large SL, PH, EVX	Lighting MU-1, APL
		(D)	(E)	(F)	(G)	(H)
18	Demand Factor Split	42.48%	14.10%	17.62%	25.39%	0.41%
19	Net Charge/(Credit) by Class (to Sch. 1, Line 2)	\$ (346,482)	\$ (115,005)	\$ (143,715)	\$ (207,090)	\$ (3,344)
						\$ (815,636)



**AES INDIANA**  
**Summary of the RTO Adjustment Reconciliation Period**  
**For the Months of May 2020 through April 2021**

Line  
No.

(A)

Detail by Customer Charge Type					
<u>Residential</u> RS, CW, EVX	<u>C&amp;I - Small</u> SS, SH, OES, UW, CW, EVX	<u>C&amp;I - Large</u> PL, HL	<u>C&amp;I - Large</u> SL, PH EVX	<u>Lighting</u> MU-1, APL	<u>Total</u>
(B)	(C)	(D)	(E)	(F)	(G)
\$ (2,161,882)	\$ (717,574)	\$ (896,713)	\$ (1,292,142)	\$ (20,866)	\$ (5,089,177)
\$ 1,400,182	\$ 464,750	\$ 580,772	\$ 836,879	\$ 13,514	\$ 3,296,098
\$ (807,554)	\$ (268,044)	\$ (334,960)	\$ (482,670)	\$ (7,794)	\$ (1,901,022)
\$ 949,687	\$ 315,346	\$ 417,638	\$ 563,447	\$ 8,917	\$ 2,255,035
\$ (619,568)	\$ (205,523)	\$ (233,262)	\$ (374,485)	\$ (6,229)	\$ (1,439,066)

**AES INDIANA**  
**History of Total MISO Costs**  
**For the Twelve Months Ended April 30, 2021**

Line No.	(A)	MISO Non-Fuel Costs (B)
	Month:	
1	May-20	2,907,542
2	Jun-20	2,910,692
3	Jul-20	2,805,923
4	Aug-20	3,384,102
5	Sep-20	5,896,236
6	Oct-20	2,702,719
7	Nov-20	2,576,747
8	Dec-20	3,096,361
9	Jan-21	3,301,313
10	Feb-21	2,792,880
11	Mar-21	3,311,523
12	Apr-21	3,034,059
13	Total	\$ 38,720,098
14	Base MISO Cost from IURC Cause No. 45029	\$ 35,424,000
15	Actual Net MISO Costs Over/(Under) Base	\$ 3,296,098

Allocation to Customer Class Based Upon Demand Factors from IURC Cause No. 45029						
Line No.	(C)	Residential RS, CW, EVX	C&I - Small SS, SH, OES, UW, CW, EVX	C&I - Large PL, HL	C&I - Large SL, PH EVX	Lighting MU-1, APL
		(D)	(E)	(F)	(G)	(H)
16	Demand Factor Split	42.48%	14.10%	17.62%	25.39%	0.41%
17	Net Charge/(Credit) by Class (to Sch. 4, Line 2)	\$ 1,400,182	\$ 464,750	\$ 580,772	\$ 836,879	\$ 13,514
						\$ 3,296,098

AES INDIANA  
Total Midcontinent Independent System Operator (MISO) Revenues  
For the Twelve Months Ended April 30, 2021

Line No.	(A)	MISO Jurisdictional Revenues (B)	URT (C)	Net Revenues (D)
	Month:			
1	May-20	593,841	(8,786)	585,055
2	June-20	406,003	(6,007)	399,996
3	July-20	617,308	(9,133)	608,175
4	August-20	768,171	(11,365)	756,806
5	September-20	790,688	(11,698)	778,990
6	October-20	522,422	(7,729)	514,693
7	November-20	464,080	(6,866)	457,214
8	December-20	422,778	(6,255)	416,523
9	January-21	437,081	(6,446)	430,635
10	February-21	537,845	(7,932)	529,913
11	March-21	563,537	(8,311)	555,226
12	April-21	520,472	(7,676)	512,796
13	Total	\$ 6,644,227	\$ (98,205)	6,546,022
14	Base MISO Revenue from IURC Cause No. 45029			\$ 4,645,000
15	Actual Net Jurisdictional Revenues (Over)/Under Base (Line 15 minus Line 14)			\$ (1,901,022)

Allocation to Customer Class Based Upon Demand Factors from IURC Cause No. 45029							
Line No.		Residential RS, CW, EVX	C&I - Small SS, SH, OES, UW, CW, EVX	C&I - Large PL, HL	C&I - Large SL, PH EVX	Lighting MU-1, APL	Total
	(E)	(F)	(G)	(H)	(I)	(J)	(K)
16	Demand Factor Split	42.48%	14.10%	17.62%	25.39%	0.41%	100.00%
17	Net Charge/(Credit) by Class (to Sch. 4, Line 3)	\$ (807,554)	\$ (268,044)	\$ (334,960)	\$ (482,670)	\$ (7,794)	\$ (1,901,022)

**AES INDIANA**  
**History of RTO Adjustment Factor Revenue Received/(Credited)**  
**For the Twelve Months Ended April 30, 2021**

Line No.	(A)	Rate Order 45029					Total
		<u>Residential</u> RS, CW, EVX	<u>C&amp;I - Small</u> SS, SH, OES, UW, CW, EVX	<u>C&amp;I - Large</u> PL, HL	<u>C&amp;I - Large</u> SL, PH, EVX	<u>Lighting</u> MU-1, APL	
		(B)	(C)	(D)	(E)	(F)	(G)
1	May-20	\$ (29,565)	\$ (9,869)	\$ (26,558)	\$ (27,855)	\$ 0	\$ (93,847)
2	Jun-20	\$ (37,016)	\$ (11,929)	\$ (29,208)	\$ (34,864)	\$ (1)	\$ (113,017)
3	Jul-20	\$ (49,485)	\$ (15,217)	\$ (34,783)	\$ (41,234)	\$ (0)	\$ (140,719)
4	Aug-20	\$ (44,629)	\$ (14,534)	\$ (35,100)	\$ (39,368)	\$ 0	\$ (133,631)
5	Sep-20	\$ (42,228)	\$ (14,022)	\$ (35,242)	\$ (39,313)	\$ 0	\$ (130,806)
6	Oct-20	\$ (75,339)	\$ (30,369)	\$ (39,059)	\$ (57,295)	\$ (1,279)	\$ (203,341)
7	Nov-20	\$ (77,474)	\$ (28,630)	\$ (31,510)	\$ (51,205)	\$ (1,374)	\$ (190,193)
8	Dec-20	\$ (113,221)	\$ (35,900)	\$ (42,847)	\$ (55,404)	\$ (1,513)	\$ (248,885)
9	Jan-21	\$ (143,777)	\$ (42,707)	\$ (30,167)	\$ (57,083)	\$ (1,326)	\$ (275,059)
10	Feb-21	\$ (143,846)	\$ (42,793)	\$ (39,935)	\$ (55,834)	\$ (1,194)	\$ (283,602)
11	Mar-21	\$ (121,161)	\$ (40,691)	\$ (38,422)	\$ (57,010)	\$ (1,201)	\$ (258,485)
12	Apr-21	\$ (86,182)	\$ (33,413)	\$ (41,072)	\$ (55,434)	\$ (1,164)	\$ (217,264)
13	Totals	\$ (963,925)	\$ (320,074)	\$ (423,903)	\$ (571,898)	\$ (9,051)	\$ (2,288,850)
<b>URT</b>							
14	May-20	\$ 437	\$ 146	\$ 393	\$ 412	\$ (0)	\$ 1,388
15	June-20	\$ 548	\$ 176	\$ 432	\$ 516	\$ 0	\$ 1,672
16	July-20	\$ 732	\$ 225	\$ 515	\$ 610	\$ 0	\$ 2,082
17	August-20	\$ 660	\$ 215	\$ 519	\$ 582	\$ (0)	\$ 1,977
18	September-20	\$ 625	\$ 207	\$ 521	\$ 582	\$ (0)	\$ 1,935
19	October-20	\$ 1,115	\$ 449	\$ 578	\$ 848	\$ 19	\$ 3,008
20	November-20	\$ 1,146	\$ 424	\$ 466	\$ 758	\$ 20	\$ 2,814
21	December-20	\$ 1,675	\$ 531	\$ 634	\$ 820	\$ 22	\$ 3,682
22	January-21	\$ 2,120	\$ 630	\$ 445	\$ 842	\$ 20	\$ 4,057
23	February-21	\$ 2,121	\$ 631	\$ 589	\$ 823	\$ 18	\$ 4,183
24	March-21	\$ 1,787	\$ 600	\$ 567	\$ 841	\$ 18	\$ 3,812
25	April-21	\$ 1,271	\$ 493	\$ 606	\$ 818	\$ 17	\$ 3,204
26	URT Totals	\$ 14,238	\$ 4,728	\$ 6,265	\$ 8,451	\$ 134	\$ 33,815
27	May-20	\$ (29,128)	\$ (9,723)	\$ (26,165)	\$ (27,443)	\$ 0	\$ (92,458)
28	June-20	\$ (36,468)	\$ (11,752)	\$ (28,775)	\$ (34,349)	\$ (1)	\$ (111,345)
29	July-20	\$ (48,753)	\$ (14,992)	\$ (34,268)	\$ (40,624)	\$ (0)	\$ (138,638)
30	August-20	\$ (43,969)	\$ (14,319)	\$ (34,581)	\$ (38,785)	\$ 0	\$ (131,654)
31	September-20	\$ (41,604)	\$ (13,815)	\$ (34,721)	\$ (38,732)	\$ 0	\$ (128,871)
32	October-20	\$ (74,224)	\$ (29,919)	\$ (38,481)	\$ (56,448)	\$ (1,260)	\$ (200,332)
33	November-20	\$ (76,328)	\$ (28,206)	\$ (31,044)	\$ (50,447)	\$ (1,354)	\$ (187,379)
34	December-20	\$ (111,546)	\$ (35,369)	\$ (42,213)	\$ (54,584)	\$ (1,490)	\$ (245,203)
35	January-21	\$ (141,656)	\$ (42,077)	\$ (29,722)	\$ (56,241)	\$ (1,306)	\$ (271,002)
36	February-21	\$ (141,725)	\$ (42,162)	\$ (39,346)	\$ (55,010)	\$ (1,176)	\$ (279,419)
37	March-21	\$ (119,374)	\$ (40,091)	\$ (37,855)	\$ (56,169)	\$ (1,184)	\$ (254,673)
38	April-21	\$ (84,911)	\$ (32,920)	\$ (40,466)	\$ (54,616)	\$ (1,147)	\$ (214,060)
39	Net Revenue/(Credits) After Reduction for URT (to Sch. 4, Line 4)	\$ (949,687)	\$ (315,346)	\$ (417,638)	\$ (563,447)	\$ (8,917)	\$ (2,255,035)

AES INDIANA  
Forecast of MWH Sales  
For the Twelve Months Ended September 30, 2022

		Cause 45029					
Line No.	(A)	<u>Residential</u> RS, CW, EVX	<u>C&amp;I - Small</u> SS, SH, OES, UW, CW, EVX	<u>C&amp;I - Large</u> PL, HL	<u>C&amp;I - Large</u> SL, PH, EVX	<u>Lighting</u> MU-1, APL	Total
		(B)	(C)	(D)	(E)	(F)	(G)
1	October-21	335,878	128,303	229,889	282,848	7,737	984,655
2	November-21	397,979	129,390	204,480	250,957	8,232	991,037
3	December-21	542,298	159,115	223,211	275,353	8,957	1,208,934
4	January-22	618,324	178,303	226,145	277,161	8,778	1,308,712
5	February-22	512,534	156,796	212,463	272,826	7,169	1,161,787
6	March-22	403,243	142,116	217,516	278,629	7,038	1,048,542
7	April-22	311,501	125,434	222,686	270,416	5,517	935,554
8	May-22	331,455	134,528	236,952	289,774	5,010	997,720
9	June-22	432,851	157,083	260,551	313,737	4,363	1,168,586
10	July-22	512,961	176,445	284,418	349,374	4,742	1,327,940
11	August-22	486,612	170,882	271,382	353,880	5,455	1,288,211
12	September-22	349,167	140,747	251,784	307,541	6,042	1,055,280
13	Totals	5,234,803	1,799,143	2,841,476	3,522,494	79,039	13,476,956

FILED  
June 30, 2021  
INDIANA UTILITY  
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANAPOLIS )  
POWER & LIGHT COMPANY D/B/A AES )  
INDIANA FOR APPROVAL OF REGIONAL )  
TRANSMISSION ORGANIZATION (“RTO”) ) CAUSE NO. 44808 RTO-5  
ADJUSTMENT FACTORS FOR ELECTRIC )  
SERVICE FOR THE BILLING MONTHS OF )  
OCTOBER 2021 THROUGH SEPTEMBER )  
2022. )

**VERIFIED PETITION FOR APPROVAL OF RTO ADJUSTMENT FACTORS**

Indianapolis Power & Light Company d/b/a AES Indiana (“AES Indiana” or “Petitioner”) hereby petitions the Indiana Utility Regulatory Commission (“Commission”) for approval of a rate adjustment to be reflected in its Standard Contract Rider No. 26 (Regional Transmission Organization (“RTO”) Adjustment) to be made effective commencing with the October 2021 billing cycle or the first full billing cycle following the Commission’s Order in this proceeding. The factors will remain in effect for approximately twelve months or until superseded by different factors approved by the Commission.

**Petitioner’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. Petitioner is engaged in rendering electric utility service in the State of Indiana.

2. AES Indiana renders retail electric utility service to more than 500,000 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. 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 public utility service. AES Indiana has maintained and continues to maintain its properties in a reliable state of operating condition.

**Petitioner's "Public Utility" and Regulated Status.**

3. Petitioner is a "public utility" within the meaning of Ind. Code § 8-1-2-1 and 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.

4. AES Indiana is a member of the Midcontinent Independent System Operator, Inc. ("MISO"), an RTO operated under the authority of the Federal Energy Regulatory Commission ("FERC"), which has functional control over AES Indiana's transmission system and the dispatching of AES Indiana's generating units.

**Relief Sought By Petitioner.**

5. In Cause No. 44576, the Commission approved AES Indiana's proposed Standard Contract Rider No. 26 (RTO Adjustment). *Indianapolis Power & Light Co.*, Cause No. 44576 (IURC 3/16/2016) ("44576 Order"). The 44576 Order (at 79) authorized AES Indiana's use of the RTO Adjustment to timely recover the excess (or deficit) of an estimate of MISO non-fuel costs and credits ("NFC"), net of revenues, which are billed pursuant to MISO tariffs, compared to the net NFC embedded in base rates. In AES Indiana's most recent rate case, Cause No. 45029 (IURC 10/31/2018) ("45029 Order"), the Commission approved two modifications to the RTO Adjustment. The first modification changed the base amount of MISO Non-fuel costs and

revenues used to calculate the RTO charge or credit on the tariff to \$35.424 million and \$4.645 million respectively. The second modification, based upon the cost of service study, is that one factor would be calculated for those Large C&I customers taking service at secondary voltage (Rates SL and PH) and another for those taking service at primary voltage or higher (Rates PL and HL).

6. Petitioner requests Commission approval of revised RTO Adjustment factors for the billing months of October 2021 through September 2022. AES Indiana is seeking to recover: (1) its estimated MISO NFC, net of revenues, which exceed amounts included in base rates for the billing cycles of October 2021 through September 2022 and (2) a reconciliation of actual MISO NFC, net of revenues, for the period of May 2020 through April 2021.

7. AES Indiana's proposed factors are reflected in the clean and redlined copy of AES Indiana's RTO Adjustment tariff, Standard Contract Rider No. 26, attached hereto as Attachment A.

**Procedural Schedule and Request for Hearing.**

8. AES Indiana is filing its case-in-chief contemporaneous with its Petition, including direct testimony, attachments and workpapers.

9. AES Indiana requests that the Commission approve a procedural schedule agreed to by AES Indiana and the OUCC in lieu of conducting a prehearing conference. The agreed schedule is intended to allow for a Commission Order on or before September 22, 2021, which is eight days prior to the September 30, 2021 start of the October 2021 billing month. The agreed procedural schedule is as follows:



<b>Date</b>	<b>Event</b>
August 18, 2021	OUCC/Intervenors File Case-in-Chief
August 25, 2021	Petitioner's Rebuttal Testimony
Week of September 13, 2021	Hearing

**Governing Statutes.**

10. AES Indiana considers that the provisions of the Public Service Commission Act, as amended, including Indiana Code §§ 8-1-2-10, 12, 38, 39 and 42 are, or may be, applicable to the subject matter of this Petition.

**Petitioner's Counsel.**

11. The names and addresses of Petitioner's duly authorized representatives to whom all correspondence and communication concerning this Petition should be sent, are as follows:

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

WHEREFORE, Petitioner Indianapolis Power & Light Company d/b/a AES Indiana respectfully requests the Commission make such investigation and hold such hearings as are necessary or advisable and thereafter issue an Order in this Cause:

(a) Approving the requested factors to be reflected in Petitioner's RTO Adjustment and approving the revised RTO Adjustment tariff as shown in Attachment A;

(b) Authorizing Petitioner to make such RTO Adjustment factors effective commencing with the October 2021 billing cycle (which begins September 30, 2021) and to allow such factors to remain in place as requested herein;

(c) Granting to Petitioner such other and further relief as may be appropriate.

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA



---

Chad Rogers  
Senior Manager, Regulatory & RTO Policy



---

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 PETITIONER

**Verification**

I, Annocha M. Abram, Senior Accountant, affirm under penalties for perjury that the foregoing representations are true to the best of my knowledge, information, and belief.

Dated this 30<sup>th</sup> day of June 2021.

Annocha M. Abram  
Annocha M. Abram

Indianapolis Power & Light Company  
d/b/a AES Indiana  
One Monument Circle, Indianapolis, Indiana

Attachment AMA-3  
Page 8 of 12  
P.L.R.C. No. E-18

~~3rd~~ 4th Revised No. 179.9  
Superseding  
~~2nd~~ 3rd Revised No. 179.9

STANDARD CONTRACT RIDER NO. 26  
REGIONAL TRANSMISSION ORGANIZATION ADJUSTMENT  
(Applicable to Rates RS, UW, CW, SS, SH, OES, SL, PL, PH, HL, MU-1, APL, CSC, and EVX)

In addition to the rates and charges set forth in the above mentioned Rates, a Regional Transmission Organization (RTO) Adjustment applicable for approximately twelve (12) months or until superseded by a subsequent factor shall be made in accordance with the following provisions:

- A. The RTO Adjustment shall be calculated by multiplying the KWH billed by an Adjustment Factor per KWH established according to the following formula:

$$RTO = \frac{NFC - (\$A - \$B)}{S} \quad (\text{For each rate class})$$

where:

1. "NFC" is the estimate of the net Non-Fuel Costs billed by the Midcontinent Independent System Operator ("MISO") for the annual period beginning October ~~2020~~ 2021 including but not limited to the following charge types:
  - (a) Schedule 10 – ISO Cost Recovery Adder and Schedule 10-FERC – FERC Annual Charges Recovery, or any successor provisions, of the Open Access Transmission and Energy Markets Tariff for the MISO ("MISO TEMT") or any successor tariff;
  - (b) Schedule 16 – Financial Transmission Rights Administrative Service Cost Recovery Adder, or successor provision, of the MISO TEMT or any successor tariff;
  - (c) Schedule 17 – Energy and Operating Reserve Markets Market Support Administrative Cost Recovery Adder, or successor provision, of the MISO TEMT or any successor tariff;
  - (d) Schedule 24 – Control Area Operator Cost Recovery, or successor provision, of the MISO TEMT or any successor tariff;
  - (e) Schedule 26 –Network Upgrade Charge from MISO Transmission Expansion Plan; or any successor tariff;
  - (f) Schedule 26-A –Real Time MVP Distribution Amount; or any successor tariff;
  - (g) Costs that are not otherwise recovered by MISO through other charges and are socialized for recovery from all market participants including Company ("uplift costs"), including the Real Time Revenue Neutrality Uplift Amount, and Real Time Miscellaneous Amount billed by MISO.
2. "A" is the \$35,424,000 of MISO Non-Fuel Costs included in the determination of basic charges for service in Cause No. 45029.
3. "B" is the \$4,645,000 of MISO transmission revenues included in the determination of basic charges for service in Cause No. 45029.
4. "S" is the estimated kilowatt-hour sales, for the same estimated period set forth in "NFC" consisting of the net sum in kilowatt-hours of:

Indianapolis Power & Light Company

d/b/a AES Indiana

One Monument Circle, Indianapolis, Indiana

~~3rd~~ 4th Revised No. 179.91

Superseding

~~2nd~~ 3rd Revised No. 179.91

STANDARD CONTRACT RIDER NO. 26 (continued)

- (a) Net generation,
- (b) Purchases and
- (c) Interchange-in, less
- (d) Inter-system Sales,
- (e) Energy Losses and Company Use

B. The RTO Adjustment Factor as computed above for each rate class shall be further modified to allow the recovery of utility receipts taxes and other similar revenue-based tax charges occasioned by the RTO Adjustment revenues.

C. The RTO Adjustment Factor may be further modified to reflect the difference between the actual and estimated Non-Fuel costs and RTO Adjustment revenues during the period May ~~2019~~ 2020 through April ~~2020~~ 2021.

D. The RTO Adjustment Factor to be effective for all bills beginning with the date below will be:

	<del>\$(0.000248)</del> <u>0.000135</u> per KWH for Rates RS, CW, and EVX (with associated Rate RS service)
Rate SS	<del>\$(0.000254)</del> <u>0.000131</u> per KWH for Rates SS, SH, OES, UW, CW, and EVX (with associated service)
	<del>\$(0.000177)</del> <u>0.000112</u> per KWH for Rate HL
	<del>\$(0.000177)</del> <u>0.000112</u> per KWH for Rate PL
service)	<del>\$(0.000224)</del> <u>0.000119</u> per KWH for Rates SL and PH, and EVX (with associated Rate SL
	<del>\$(0.000184)</del> <u>0.000083</u> per KWH for Rates MU-1 and APL

STANDARD CONTRACT RIDER NO. 26  
REGIONAL TRANSMISSION ORGANIZATION ADJUSTMENT  
(Applicable to Rates RS, UW, CW, SS, SH, OES, SL, PL, PH, HL, MU-1, APL, CSC, and EVX)

In addition to the rates and charges set forth in the above mentioned Rates, a Regional Transmission Organization (RTO) Adjustment applicable for approximately twelve (12) months or until superseded by a subsequent factor shall be made in accordance with the following provisions:

- A. The RTO Adjustment shall be calculated by multiplying the KWH billed by an Adjustment Factor per KWH established according to the following formula:

$$RTO = \frac{NFC - (\$A - \$B)}{S} \quad (\text{For each rate class})$$

where:

1. "NFC" is the estimate of the net Non-Fuel Costs billed by the Midcontinent Independent System Operator ("MISO") for the annual period beginning October 2021 including but not limited to the following charge types:
  - (a) Schedule 10 – ISO Cost Recovery Adder and Schedule 10-FERC – FERC Annual Charges Recovery, or any successor provisions, of the Open Access Transmission and Energy Markets Tariff for the MISO ("MISO TEMT) or any successor tariff;
  - (b) Schedule 16 – Financial Transmission Rights Administrative Service Cost Recovery Adder, or successor provision, of the MISO TEMT or any successor tariff;
  - (c) Schedule 17 – Energy and Operating Reserve Markets Market Support Administrative Cost Recovery Adder, or successor provision, of the MISO TEMT or any successor tariff;
  - (d) Schedule 24 – Control Area Operator Cost Recovery, or successor provision, of the MISO TEMT or any successor tariff;
  - (e) Schedule 26 –Network Upgrade Charge from MISO Transmission Expansion Plan; or any successor tariff;
  - (f) Schedule 26-A –Real Time MVP Distribution Amount; or any successor tariff;
  - (g) Costs that are not otherwise recovered by MISO through other charges and are socialized for recovery from all market participants including Company ("uplift costs"), including the Real Time Revenue Neutrality Uplift Amount, and Real Time Miscellaneous Amount billed by MISO.
2. "A" is the \$35,424,000 of MISO Non-Fuel Costs included in the determination of basic charges for service in Cause No. 45029.
3. "B" is the \$4,645,000 of MISO transmission revenues included in the determination of basic charges for service in Cause No. 45029.
4. "S" is the estimated kilowatt-hour sales, for the same estimated period set forth in "NFC" consisting of the net sum in kilowatt-hours of:

Indianapolis Power & Light Company  
d/b/a AES Indiana  
One Monument Circle, Indianapolis, Indiana

4th Revised No. 179.91  
Superseding  
3rd Revised No. 179.91

STANDARD CONTRACT RIDER NO. 26 (continued)

- (a) Net generation,
  - (b) Purchases and
  - (c) Interchange-in, less
  - (d) Inter-system Sales,
  - (e) Energy Losses and Company Use
- B. The RTO Adjustment Factor as computed above for each rate class shall be further modified to allow the recovery of utility receipts taxes and other similar revenue-based tax charges occasioned by the RTO Adjustment revenues.
- C. The RTO Adjustment Factor may be further modified to reflect the difference between the actual and estimated Non-Fuel costs and RTO Adjustment revenues during the period May 2020 through April 2021.
- D. The RTO Adjustment Factor to be effective for all bills beginning with the date below will be:
  - \$0.000135 per KWH for Rates RS, CW, and EVX (with associated Rate RS service)
  - \$0.000131 per KWH for Rates SS, SH, OES, UW, CW, and EVX (with associated Rate SS service)
  - \$0.000112 per KWH for Rate HL
  - \$0.000112 per KWH for Rate PL
  - \$0.000119 per KWH for Rates SL and PH, and EVX (with associated Rate SL service)
  - \$0.000083 per KWH for Rates MU-1 and APL



### CERTIFICATE OF SERVICE

The undersigned certifies that two copies of the foregoing were served by electronic transmission and/or hand delivery on the Office of Utility Consumer Counselor, 115 W. Washington Street, Suite 1500 South, Indianapolis, Indiana 46204; [infomgt@oucc.in.gov](mailto:infomgt@oucc.in.gov).

Dated this 30th day of June 2021.



---

Jeffrey M. Peabody

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](mailto:tnyhart@btlaw.com)  
Peabody Email: [jpeabody@btlaw.com](mailto:jpeabody@btlaw.com)

ATTORNEYS FOR PETITIONER