

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE VERIFIED )  
PETITION OF INDIANAPOLIS POWER & )  
LIGHT FOR APPROVAL OF DEMAND SIDE )  
MANAGEMENT (DSM) PLAN, INCLUDING )  
ENERGY EFFICIENCY (EE) PROGRAMS, )  
AND ASSOCIATED ACCOUNTING AND )  
RATEMAKING TREATMENT, INCLUDING ) CAUSE NO. \_\_\_\_\_  
TIMELY RECOVERY, THROUGH IPL'S )  
EXISTING STANDARD CONTRACT RIDER )  
NO. 22, OF ASSOCIATED COSTS )  
INCLUDING PROGRAM OPERATING )  
COSTS, NET LOST REVENUE, AND )  
FINANCIAL INCENTIVES. )

**VERIFIED PETITION AND REQUEST FOR ADMINISTRATIVE NOTICE**

Indianapolis Power & Light Company (“Petitioner”, “IPL” or the “Company”) petitions the Indiana Utility Regulatory Commission (“Commission”) for approval of IPL’s Demand Side Management (“DSM”) Plan, including energy efficiency programs and associated accounting and ratemaking treatment, as summarized in the caption and further described below. In support of this Petition, IPL represents and shows the following:

**IPL’s Corporate Status and Operations**

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

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

### **Petitioner's "Public Utility" Status**

3. IPL is a "public utility" under Ind. Code § 8-1-2-1 and Ind. Code § 8-1-8.5-1 and an "electricity supplier" as that term is codified at Ind. Code § 8-1-8.5-10 ("Section 10"). IPL 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.

### **Overview of Plan**

4. IPL requests Commission approval of a DSM Plan for the three calendar year period of 2021 through 2023. The Section 10 plan is set forth in IPL's prefiled case-in-chief. The DSM Plan includes energy efficiency ("EE") goals; a portfolio of EE programs and other DSM Programs designed to achieve the EE goals and demand savings; program budgets and program costs; and evaluation, measurement and verification ("EM&V") procedures that include independent EM&V.

5. Approval of a three year plan aligns with the three year timeframe established in Section 10. Also, the multi-year plan is administratively efficient, promotes DSM/EE program market continuity and consistency in IPL's service territory, and facilitates building long term relationships with customers and local market actors. Implementation of the DSM Plan will

promote efficiency in the rendering and use of the retail energy service.

### **Energy Efficiency Goals and Demand Savings**

6. The DSM Plan is designed to achieve energy and demand savings as set forth in the Company's prefiled testimony and attachments. The DSM Plan goals are reasonably achievable, consistent with IPL's integrated resource plan ("IRP"), and designed to achieve an optimal balance of energy resources in IPL's service area.

### **DSM Plan Programs**

7. The DSM Plan includes offerings to all customer classes, including low income customers, and provides for industrial customer opt out in accordance with Section 10(p).

### **Program Budgets and Program Costs**

8. IPL's program budgets reflect the direct (including EM&V) and indirect costs of the DSM Plan programs. IPL estimates the program operating budgets associated with the Plan's savings goals to be approximately \$105.7 million over the three year period, not including net lost revenue and financial incentives. The total program operating budgets average approximately \$35.2 million for each year of the plan.

9. IPL requests authority to carry over into the next program year any unused and approved budget funds that remain unspent at the end of a plan year. In addition, IPL requests authority to carry over any unspent funds from its 2018-2020 DSM Plan approved in Cause No. 44945 into the 2021-2023 DSM Plan period. As explained in IPL's prefiled case-in-chief, consistent with current and past practice, IPL also requests the Commission continue to grant IPL spending flexibility of up to 10% of the portfolio direct costs for each year of the Plan; IPL proposes that such spending flexibility be exercised based on a consensus or majority vote of the

IPL DSM Oversight Board (“OSB”).

10. The net lost revenue and financial incentives associated with the DSM Plan and sought to be recovered are identified in IPL’s prefiled case-in-chief. So as to allow the Commission to have a complete picture of the DSM costs that will be reflected in IPL’s Standard Contract Rider No. 22 during the three DSM Plan years, IPL’s case-in-chief also presents the impact of the lost revenue which persists from DSM programs previously approved by the Commission (also referred to as legacy lost revenue).

### **EM&V**

11. The EM&V for the DSM Plan will be conducted by an independent evaluation vendor who will perform a process and an impact evaluation. The process evaluation will identify how well programs are implemented. The impact evaluation will examine the more technical effects of the programs such as energy savings.

### **Accounting and Ratemaking**

12. The books and records of IPL supporting the proposed DSM/EE Program Cost Rider Adjustment are kept in accordance with the Uniform System of Accounts for Electric Utilities as prescribed by the Commission and generally accepted principles (“GAAP”).

13. The DSM Plan cost recovery proposal includes a request for continued accounting and ratemaking procedures to recover costs through IPL Standard Contract Rider No. 22 (“Rider 22”), including the direct costs (including EM&V) and indirect costs of the energy efficiency and DSM programs, funds for emerging technology, net lost revenue, and the financial incentive.

14. With respect to the implementation mechanics of cost recovery via Rider 22, IPL

is not proposing to make any changes from the accounting and ratemaking treatment for the DSM Plan costs that is currently in effect. Consistent with current practice, costs will continue to be recovered contemporaneously through Rider 22 on a projected basis. Likewise, the DSM Rider will continue to include a reconciliation mechanism to correct for any variance between the forecasted program costs (including program operating costs, lost revenue and the financial incentive) and the actual program costs (including program operating costs, lost revenue and financial incentive based on the EM&V of the Plan programs).

15. IPL also does not propose to make any changes from the current methodology being used to allocate DSM costs between customer classes. The allocation of the DSM Plan costs will be allocated to customer classes as authorized in Cause No. 45029 based on the cost of service approved in that docket.

16. The DSM Plan includes and continues the reliance upon DSM full measure life tracking.

17. IPL's proposal for lost revenue recovery for the life of the measures reflects the actual reduced kWh or kW sales resulting from the DSM programs, as determined by the independent EM&V evaluator.

18. IPL requests authority to recover a tiered financial incentive through its Standard Contract Rider No. 22. As explained in the Company's case-in-chief, the financial incentive mechanism being proposed in this case maintains a similar performance tier structure as currently approved, but exchanges the net benefits-based (shared savings) calculation in favor of a simpler and transparent percentage-of-expenditures approach. Under the Company's proposal, the Income Qualified Weatherization program would be excluded from the financial incentive.

### **Oversight and Reporting**

19. Consistent with current practice and as discussed in IPL's prefiled case-in-chief, IPL proposes to continue to utilize its existing IPL OSB to oversee implementation of the 2021-2023 DSM Plan. IPL proposes the IPL OSB continue to have the ability to shift dollars within a program budget as needed as well as shift dollars among programs as long as the programs are found to be cost-effective and the overall 2021-2023 DSM Plan approved budget is not exceeded. In addition, as stated above, IPL proposes the OSB continue to be authorized to exercise spending flexibility to increase funding in the aggregate, without shifting dollars from other programs, by up to 10%, and to modify programs based on a review of initial program results as reported by an independent third-party evaluator and approve new cost-effective programs to fill marketplace needs as they arise so long as the new program would not increase total program operating costs above the spending level authorized by the Commission.

20. IPL proposes to report the status of the DSM Plan program implementation consistent with current practice as further detailed in IPL's prefiled case-in-chief.

### **DSM Rider 22**

21. In this docket, IPL requests Commission approval of the DSM Plan program cost and authority to recover such cost on a timely manner through IPL's ongoing annual DSM Rider 22 filings filed under Cause No. 43623 DSM-[X]. IPL does not seek approval of updated Standard Contract Rider No. 22 billing factors in this proceeding.

### **Applicable Law**

22. IPL considers the provisions of the Public Service Commission Act, as amended, including Ind. Code §§ 8-1-2-10, 12 and 42, and Ind. Code § 8-1-8.5-10, as well as 170 I.A.C. 4-

8-1 *et seq.*, to be applicable to the subject matter of this Petition,

23. Approval of the proposed DSM Plan and associated cost recovery is consistent with the long standing public policy and is consistent with the Energy Independence and Security Act (“EISA”) of 2007, which provides that the rates allowed to be charged by any electric utility shall “(i) align utility incentives with the delivery of cost-effective energy efficiency; and (ii) promote energy efficiency investments.” 16 U.S.C. § 2621(d)(17)(A). Further, EISA provides that states shall specifically consider the following as policy options: “(i) removing the throughput incentive and other regulatory and management disincentives to energy efficiency; (ii) providing utility incentives for the successful management of energy efficiency programs; [and] allowing timely recovery of energy efficiency-related costs [...]” 16 U.S.C. § 2621(d)(17)(B).

**Request for Administrative Notice.**

24. Pursuant to 170 IAC 1-1.1-21, IPL requests administrative notice to be taken of IPL’s most recent IRP, which is the IRP filed with the Commission on December 16, 2019.

**Procedural and Other Matters**

25. IPL notified the other members of its DSM Oversight Board of its intent to file this Petition.

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

27. Pursuant to 170 IAC 1-1.1-15(b) of the Commission’s Rules of Practice and

Procedure, IPL requests the Commission promptly conduct a prehearing conference and preliminary hearing to establish a procedural schedule in this Cause. In accordance with 170 I.A.C. 1-1.1-15(e), IPL will seek to enter into a stipulation with the Indiana Office of Utility Consumer Counselor regarding a procedural schedule in lieu of a prehearing conference.

28. So that the DSM Plan may be timely implemented commencing January 1, 2021, IPL requests a final Commission order approving the relief sought in this Petition on or before December 15, 2020. In the event an order is not issued within this timeframe, IPL requests the Commission grant IPL interim authority to continue the existing DSM Plan programs and associated cost recovery on a pro rata basis.

**Petitioner's Authorized Representatives**

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

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

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

- (i) approving IPL's 2021-2023 DSM Plan;

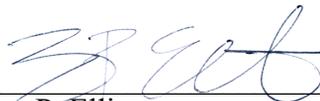
(ii) authorizing and approving IPL's proposed recovery, through the Standard Contract Rider No. 22, of the costs of the DSM Plan, including direct (including EM&V costs), and indirect costs of operating the programs, net lost revenue, and shared savings;

(iii) approving all accounting and ratemaking treatment requested by IPL, including the authority to defer the over and under recoveries of projected DSM/EE program costs through the Standard Contract Rider No. 22 pending reconciliation prior to the time the Commission issues an order authorizing IPL to recognize these costs through the ratemaking process; and

(iv) granting to IPL such other and further relief in the premises as may be appropriate and proper.

Dated this 23<sup>rd</sup> day of April 2020.

INDIANAPOLIS POWER & LIGHT COMPANY

By   
Zachary P. Elliot  
IPL Manager, Energy Efficiency Programs



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Teresa Morton Nyhart (No. 14044-49)  
Jeffrey M. Peabody (No. 28000-53)  
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Attorneys for Indianapolis Power & Light Company

VERIFICATION

I, Zachary P. Elliot, Manager, Energy Efficiency Programs, affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information and belief.

Dated: April 23, 2020.

A handwritten signature in blue ink, appearing to read 'ZP Elliot', written over a horizontal line.

Zachary P. Elliot

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that two copies of the foregoing was served this 23rd day of April, 2020, by email transmission, hand delivery or United States Mail, first class, postage prepaid to:

Office of Utility Consumer Counselor  
115 W. Washington Street, Suite 1500 South  
Indianapolis, Indiana 46204  
infomgt@oucc.in.gov

*A Courtesy Copy to:*

Jennifer A. Washburn  
Citizens Action Coalition of Indiana, Inc.  
1915 W. 18<sup>th</sup> Street, Suite C  
Indianapolis, Indiana 46202  
[jwashburn@citact.org](mailto:jwashburn@citact.org)

Joseph P. Rompala  
Lewis & Kappes, P.C.  
One American Square, Suite 2500  
Indianapolis, Indiana 46282-0003  
JRompala@lewis-kappes.com

and a courtesy copy to:

ATyler@lewis-kappes.com  
ETennant@Lewis-kappes.com



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Jeffrey M. Peabody

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**Indianapolis Power & Light Company  
2021-2023 DSM Plan  
Witness List and Filing Index<sup>1</sup>**

**I. Executive Summary**

Summary
<p>IPL’s 2021-2023 DSM Plan is comprised of eleven (11) programs, including seven (7) residential programs and four (4) programs targeting business customers. IPL projects that successful delivery of the cost effective 2021-2023 DSM Plan portfolio will require spending authority of \$105.7 million in program direct and indirect costs, and expects gross energy savings of 476,461 MWh over the three-year period. The annual average program direct and indirect costs are projected at \$35.2 million and the forecasted average annual gross energy impacts are 158,820 MWh. The average annual cost including lost revenues and financial incentives is approximately \$45.4 million. The Plan continues spending flexibility, carry over authority and the IPL Oversight Board. IPL seeks continued timely cost recovery through IPL’s existing annual Standard Contract Rider No. 22. The Company does not seek approval of new Rider factors in this proceeding.</p>

**II. IPL Case-In-Chief**

IPL Witnesses		
Name	Position	Major Subject Area
Zac Elliot	IPL Manager, Energy Efficiency Programs	<ul style="list-style-type: none"> <li>▪ Describe 2021-2023 DSM Plan.</li> <li>▪ DSM Plan programs and costs.</li> <li>▪ Policy considerations related to DSM planning, including recovery of reasonable lost revenues and financial incentives.</li> <li>▪ Summarize planning approach which lead to 2021-2023 DSM Plan.</li> </ul>

<sup>1</sup> This Index of the Company’s case-in-chief is intended to highlight issues and is not an exhaustive list of IPL’s proposals in this proceeding. A complete account of IPL’s requested relief can be found in IPL’s petition, testimony, and attachments.

Erik Miller	IPL Senior Research Analyst	<ul style="list-style-type: none"> <li>▪ Cost and benefit analysis.</li> <li>▪ DSM Plan energy efficiency goals.</li> <li>▪ Impact of DSM Plan on electric rates and customer bills.</li> <li>▪ Evaluation, Measurement and Verification (“EM&amp;V”).</li> </ul>
Kimberly Aliff	IPL Senior Regulatory Analyst in Regulatory Affairs	<ul style="list-style-type: none"> <li>▪ Cost recovery through Standard Contract Rider No. 22.</li> <li>▪ Financial Incentive calculation.</li> <li>▪ Calculation of lost revenues.</li> <li>▪ Bill impacts of DSM Plan.</li> </ul>

### III. FILING INDEX

Subject	Summary	Witness/Other Reference
Statutory Authority.	IC 8-1-8.5-10.	Verified Petition, ¶ 22.
DSM Plan	The 2021-2023 DSM Plan is set forth in IPL’s case-in-chief with details compiled in Attachment ZE-2 and further supported by IPL’s workpapers.	<ul style="list-style-type: none"> <li>▪ Elliot</li> </ul>

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FILING INDEX SUMMARY Continued												
Energy Efficiency Goals	<p style="text-align: center;"><b><u>Table ZE-2</u></b></p> <table border="1" data-bbox="604 331 1078 569"> <thead> <tr> <th>Year</th> <th>Energy Efficiency Goals (kWh)</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>158,150,811</td> </tr> <tr> <td>2022</td> <td>158,828,774</td> </tr> <tr> <td>2023</td> <td>159,481,900</td> </tr> <tr> <td><b>Total</b></td> <td><b>476,461,486</b></td> </tr> </tbody> </table> <p>The above table reflects gross energy savings; net savings are shown in Table EM-4 (Miller testimony). Demand savings are shown in Attachment ZE-2 (Elliot testimony).</p>	Year	Energy Efficiency Goals (kWh)	2021	158,150,811	2022	158,828,774	2023	159,481,900	<b>Total</b>	<b>476,461,486</b>	<ul style="list-style-type: none"> <li>▪ Elliot</li> <li>▪ Miller</li> </ul>
Year	Energy Efficiency Goals (kWh)											
2021	158,150,811											
2022	158,828,774											
2023	159,481,900											
<b>Total</b>	<b>476,461,486</b>											
Programs	<p><i>Residential</i> Appliance Recycling Demand Response Efficient Products Multifamily School Education Home Energy Reports Income Qualified Weatherization <i>C&amp;I</i> Custom Demand Response Prescriptive Small Business Direct Install</p>	<ul style="list-style-type: none"> <li>▪ Elliot</li> <li>▪ Attachment ZE-2 (Program Details)</li> </ul>										
Program Budgets and Costs	<p>The annual average program direct and indirect costs are projected at \$35,240,057. See Table ZE-4 for complete budget.</p>	<ul style="list-style-type: none"> <li>▪ Elliot</li> </ul>										
Spending Flexibility and Carry Over Authority	<p>Consistent with current practice, IPL seeks to continue spending flexibility and carryover authority under OSB oversight.</p>	<ul style="list-style-type: none"> <li>▪ Elliot</li> </ul>										
Reasonableness of Plan	<p>The overall reasonableness of the DSM Plan is shown by the Company's case-in-chief and considerations of the factors enumerated in Section 10(j).</p>	<ul style="list-style-type: none"> <li>▪ Elliot</li> </ul>										

<b>FILING INDEX SUMMARY Continued</b>		
Oversight	IPL proposes to maintain the current composition of the IPL OSB, which includes voting members from IPL, OUCC and CAC.	▪ Elliot
<i>Section 10(j)(1)</i> Projected changes in customer consumption of electricity resulting from Plan	The annual projected energy and demand savings presented in Attachment ZE-2 best describe the changes to customer consumption of electricity resulting from implementation of the 2021-2023 DSM Plan.	▪ Elliot
<i>Section 10(j)(2)</i> A cost and benefit analysis of the plan, including the likelihood of achieving the goals of the energy efficiency programs included in the plan.	<p>The cost and benefit analysis was performed using the Participant Cost Test (“PCT”), Utility Cost Test (“UCT”), Ratepayer Impact Measure (“RIM”) Test and the Total Resource Cost Test (“TRC”).</p> <p>As presented in Table EM-1, the three-year DSM Plan is cost effective at the overall Portfolio level, with a UCT score of 1.71 and TRC score of 1.60.</p> <p>The Residential Portfolio has a UCT of 0.95 when including the benefits and costs from the Income Qualified Weatherization (“IQW”) program. The Residential Portfolio has a UCT score of 1.08 with the IQW program removed from the calculation.</p> <p>The Business Portfolio is cost effective with a UCT score of 1.90 and TRC score of 1.77.</p>	▪ Miller

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<b>FILING INDEX SUMMARY Continued</b>		
<p><i>Section 10(j)(3)</i> Whether the plan is consistent with the following:</p> <p>(A) The state energy analysis developed by the Commission under section 3 of this chapter.</p> <p>(B) The electricity supplier's most recent long-range integrated resource plan submitted to the Commission.</p>	<p>IPL has considered the consistency with the state energy analysis and provided the State Utility Forecasting Group ("SUFG") with information related to IPL's DSM Plan development for consideration by SUFG in the development of their Indiana Electricity Forecast.</p> <p>The proposed portfolio in this DSM Plan is designed to be consistent with the IPL 2019 IRP. Table EM-4 (Miller testimony) compares the forecasted level of DSM Plan net savings to the level of net savings selected by IPL's 2019 IRP. Overall, the net energy savings in the proposed 2021-2023 DSM Plan are slightly greater by 17 GWhs over the three-year planning period, which is consistent with the amount of DSM selected in the IRP process.</p> <p>In summary, the DSM Plan portfolio of programs has been modeled in DSMore™ and is cost effective according to the UCT and TRC test using the same avoided costs modeled in the IRP.</p> <p>Based on the results of IPL's analyses, the proposed portfolio in this DSM Plan is consistent with the Company's 2019 IRP.</p>	<ul style="list-style-type: none"> <li>▪ Elliot</li> <li>▪ Miller</li> </ul>

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<p><i>Section 10(j)(4)</i> The inclusion and reasonableness of procedures to evaluate, measure, and verify the results of the energy efficiency programs included in the plan, including the alignment of the procedures with applicable environmental regulations, including federal regulations concerning credits for emission reductions.</p>	<p>IPL's Plan includes independent EM&amp;V and IPL will use the OSB approved <i>IPL Evaluation Framework</i> (Attachment EM-1) as the guiding document with the third party evaluator.</p> <p>The IPL evaluation plans are designed to meet or exceed the evaluation elements required by 170 IAC 4-8-4</p> <p>EM&amp;V on utility DSM/EE programs is typically performed at levels specified by the utility based on current, known, requirements. EM&amp;V standards and protocol regarding federal regulations for emission credit reductions are not known at this time. When those requirements are known, IPL will work with both its independent evaluation vendor and OSB to incorporate the requirements needed to comply with any federal and/or state emissions credit plan.</p>	<ul style="list-style-type: none"> <li>▪ Miller</li> </ul>

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<b>FILING INDEX SUMMARY Continued</b>		
<p><i>Section 10(j)(5)</i> Any undue or unreasonable preference to any customer class resulting, or potentially resulting, from the implementation of an energy efficiency program or from the overall design of a plan.</p>	<p>IPL has made every effort to offer a robust and diverse group of cost-effective DSM programs for all customers, including income qualified customers.</p> <p>IPL expects no undue or unreasonable preference to any customer will result or potentially result from the implementation of the EE programs or from the overall design of the DSM Plan.</p>	<ul style="list-style-type: none"> <li>▪ Elliot</li> </ul>
<p><i>Section 10(j)(6)</i> Comments provided by customers, customer representatives, the office of utility consumer counselor, and other stakeholders concerning the adequacy and reasonableness of the plan, including alternative or additional means to achieve energy efficiency in the electricity supplier's service territory.</p>	<p>IPL meets regularly with the IPL DSM OSB and trade allies and considered their input in the development of the proposed DSM Plan.</p> <p>Stakeholder input was also received and considered by IPL as part of the IRP Stakeholder process.</p> <p>Additional input will be received through the participation of the OUCC and any intervenors in this docketed process.</p>	<ul style="list-style-type: none"> <li>▪ Elliot</li> </ul>

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<b>FILING INDEX SUMMARY Continued</b>		
<p><i>Section 10(j)(7)</i> The effect, or potential effect, in both the long term and the short term, of the plan on the electric rates and bills of customers that participate in energy efficiency programs compared to the electric rates and bills of customers that do not participate in energy efficiency programs.</p>	<p>IPL considered stakeholder perspectives when analyzing the cost effectiveness of the 2021-2023 DSM Plan including those of participating customers and non-participating customers. This type of effect is directionally measured by the RIM test which is also called the “non-participant test.” While typically energy efficiency programs score less than one under the RIM test, this test is limited for measuring DSM because it fails to indicate whether rates (over the long term) will increase more than they otherwise would if programs were not implemented. The UCT provides a better indicator of the long run impact to customers by measuring the utility’s revenue requirements from the DSM programs. Finally, the Participant Test measures the bill impact to program participants.</p> <p>Estimated bill impact with and without legacy lost revenues is shown in Tables KA-1 and KA-2 (Aliff testimony).</p>	<ul style="list-style-type: none"> <li>▪ Miller</li> <li>▪ Aliff</li> </ul>

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<p><i>Section 10(j)(8)</i> The lost revenues and financial incentives associated with the plan and sought to be recovered or received by the electricity supplier.</p>	<p>IPL requests authorization to recover lost revenues incurred for all programs for the full measure life or until new basic rates are placed into effect following the Company’s next base rate case, whichever is sooner. IPL will true-up lost revenues based on the most current EM&amp;V when the final annual EM&amp;V report for each Program Year is filed with the Commission.</p> <p>IPL is proposing to earn a financial incentive on all programs except the Income Qualified Weatherization program.</p> <p>The financial incentive mechanism being proposed in this case maintains a similar performance tier structure as currently approved, but exchanges the net benefits-based (shared savings) calculation in favor of a simpler and transparent percentage-of-expenditures approach with a cap and floor.</p> <p>The 3-year total amount of financial incentives forecast in this filing is approximately 14% less than the total financial incentives that were forecast in the Settlement Agreement approved in Cause No. 44945.</p> <p>The DSM lost revenues reflected in IPL’s billing for retail service under Rider 22, including any reconciled amount of over/under recovery, will continue to be included in the FAC earnings test.</p> <p>To ensure the financial incentives can be retained, IPL proposes that its authorized net operating income for purposes of the FAC earnings test be adjusted by the actual amount of financial incentives earned.</p>	<ul style="list-style-type: none"> <li>▪ Elliot (policy)</li> <li>▪ Aliff (calculation)</li> <li>▪ Miller (net energy and demand savings used to forecast lost revenues)</li> </ul>

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<b>FILING INDEX SUMMARY Continued</b>		
<p><i>Section 10(j)(9)</i> The electricity supplier's current integrated resource plan and the underlying resource assessment.</p>	<p>The Company seeks Administrative Notice of its current integrated resource plan.</p> <p>IPL Witness Miller discussed the Company's IRP modeling of DSM and explains the proposed Plan is consistent with the IRP.</p>	<ul style="list-style-type: none"> <li>▪ Petition</li> <li>▪ Miller</li> </ul>
<p><i>Section 10(j)(10)</i> Any other information the Commission considers necessary.</p>	<p><i>To be provided upon Commission request</i></p>	
<p>Program Cost Recovery</p>	<p>IPL is seeking the same annual cost recovery mechanism as what has been previously authorized by the Commission most recently in Cause No. 44945. IPL proposes to continue to use the forecast and reconciliation method currently approved for program operating costs, lost revenues and financial incentives.</p>	<ul style="list-style-type: none"> <li>▪ Aliff</li> </ul>
<p>Scorecard and Reporting</p>	<p>IPL proposes to continue its scorecard reports to the OSB and Commission. IPL will also continue to submit a final EM&amp;V report on or before July 1 of each year that summarizes the prior year DSM efforts and evaluated results.</p>	<ul style="list-style-type: none"> <li>▪ Elliot</li> </ul>