

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANAPOLIS POWER & LIGHT)
COMPANY D/B/A AES INDIANA (“AES INDIANA”))
FOR AUTHORITY TO INCREASE RATES AND)
CHARGES FOR ELECTRIC UTILITY SERVICE, AND)
FOR APPROVAL OF RELATED RELIEF,)
INCLUDING (1) REVISED DEPRECIATION RATES,) CAUSE NO. 45911
(2) ACCOUNTING RELIEF, INCLUDING)
DEFERRALS AND AMORTIZATIONS, (3))
INCLUSION OF CAPITAL INVESTMENTS, (4) RATE)
ADJUSTMENT MECHANISM PROPOSALS,)
INCLUDING NEW ECONOMIC DEVELOPMENT)
RIDER, (5) REMOTE DISCONNECT/RECONNECT)
PROCESS, AND (6) NEW SCHEDULES OF RATES,)
RULES AND REGULATIONS FOR SERVICE.)

**PETITIONER INDIANAPOLIS POWER & LIGHT COMPANY
SUBMISSION OF COMPLIANCE FILING**

Petitioner Indianapolis Power & Light Company d/b/a AES Indiana (“AES Indiana”), by counsel and in accordance with the Order in this Cause dated April 17, 2024, hereby files the attached compliance filing for the AES Customer Ecosystem Project approval.

Respectfully submitted,



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CERTIFICATE OF SERVICE

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

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INDIANAPOLIS POWER & LIGHT COMPANY

D/B/A AES INDIANA

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

1. INTRODUCTION

On November 6, 2023, AES Indiana launched a comprehensive suite of new systems, including a customer information system (CIS), meter data management (“MDM”), customer service management (“CSM”), field services management (“FSM”) applications, asset manager, and multi-resource scheduling tool. These systems, referred to as the ACE Project, are the backbone of the meter-to-cash processes and customer interactions and are operational. As of May 10, 2024, our new systems have generated over 3,000,000 customer invoices since the project went into service in November 2023.

AES Indiana is filing monthly compliance reports with the Indiana Regulatory Utility Commission (“IURC” or “Commission”) under Cause No. 45911 to inform the Commission of the implementation of the ACE Project pursuant to the Commission order in IURC Cause No. 45911 dated April 17, 2024 (page 25). This compliance filing reports on issues with the ACE Project, how the issues are being addressed, the number of customers affected, and other information requested by the Commission concerning the ACE Project.

2. ISSUES WITH THE ACE PROJECT AND NUMBER OF CUSTOMERS AFFECTED

As of May 10, 2024, there are 203 active tickets opened with four degrees of prioritization: 16 critical, 33 high, 68 medium, and 86 low. As used herein, the word “ticket” refers to a type of issue in the system that can impact one or multiple customers. As part of the initial implementation and to ensure broad visibility of the new system's operations, tickets were opened for system issues as well as non-system issues, such as end-user confusion, which were addressed through education and then closed. Once end-users became familiar with the system, tickets were issued as a way to allow for targeted resolution.

System issue tickets are prioritized using a shared matrix, as shown in Figure 1, which provides an overview of the issue resolution process.

Figure 1. Priority Matrix

		Impact		
		High (≥ 11 users) or (≥ 1 "Critical/A/B" Strategic C&I Customers) or (≥ 500 Territory C&I Customers) or (≥ 25% of residential customers)	Medium** (2-10 users) or (≥ 1 "C" Strategic C&I Customers) or (100-499 Territory C&I Customers) or (10% - 24% of residential customers)	Low (1 user) or (≥ 1 "D" Strategic C&I Customers) or (No Strategic C&I Customers) or (0-99 Territory C&I Customers) or (0% - 9% of residential customers)
Urgency	High (Action Blocked / No Workaround Possible)	P1 - Critical	P2 - High	P3 - Medium
	Medium (Action Blocked / Workaround guidance in hand)	P2 - High	P3 - Medium	P4 - Low
	Low (Action not blocked / end user inconvenience)	P3 - Medium	P4 - Low	P4 - Low

* Impact and Urgency are assigned based on the "highest" level identified in issue submissions. For example, if nine users and no customer impacts are identified, the Impact assigned is medium.

** Medium Impact also includes "Don't Know" responses on the issue submission form.

Less than ten percent of the total customer base has been impacted by some form of billing issue captured in the ticketing system at any given time. The predominant issue customers have experienced concern late or confusing bills due to bill print issues, where the information is accurate within the system, but the printed bill does not show the data correctly. These types of bill print problems are commonly referred to as out-of-balance ("OOB") bills.

The April and May priorities for solution fixes in the system are presented in Table 1 along with the estimated number of customers impacted.

Table 1. Current System Issues and Customer Impact*

Description of Issue	Customers Impacted as of May 10, 2024
Customers who have not received an invoice since going live in the new system	235
Customers with bills impacted by OOB	22,492
Complex bills (e.g., outdoor lighting) and large C&I customer billing data and process issues not displaying correctly on the bill	35-40
Unable to reissue bills when a bill was sent with inaccurate information	4,200

* Because customers may be affected by multiple issues, the numbers in this table are not additive.

3. HOW THE ISSUES ARE BEING ADDRESSED

AES Indiana is working across technical and business teams to address the issues customers are experiencing. Every day, there are recurring calls and working groups to bring together cross-functional teams to create the solutions needed collectively. The majority of the issues require technical code to be put into production, tested, and validated by the business to ensure correct functionality. While this was done before going live, unexpected system behaviors emerged, which are being addressed. Each week, the Company has closed approximately five to ten tickets.

To support the customer experience during the cutover process, the Company proactively stopped late payment charges and disconnections in October 2023. This decision was informed by what other utilities have done when implementing a new CIS system and leveraging best practices shared by our system integrator.

The following list shows additional actions taken to limit the impact to the customer experience:

- A business and IT team was established to get bills/invoices distributed to customers.
- Added additional processes for reviewing bills before distributing or releasing them to the customer.
- Direct customer communications through bill insert, mobile messaging, emails, social media and established a direct line for customers to call specific to billing issues.
- Weekly one-on-one engagement with certain large C&I customers.
- Participated in five media interviews during the month of April including the President of AES Indiana doing an in-depth podcast interview with the Indianapolis Business Journal regarding system issues.

In Table 2 the Company shows the targets established for measuring billing stabilization. The Company is focused on billing count, instead of customer count, due to the focus on the billing system as a whole and reaching consistency with billing issuance.

Table 2. Key Performance Indicators for Billing to Reach Stabilization

Stability Measure	Current Performance as of May 10, 2024
Between ~50-100 OOB after the nightly batch run for 10 consecutive batch runs	~400 bills
Zero Critical tickets open	16 open critical
Backlog of OOBs reduced to under 10K	31,096 bills ¹
No backlog of cancel/rebills	7,000 bills

¹ Some customers have multiple OOBs.

4. OTHER INFORMATION REQUESTED BY THE COMMISSION

The Commission submitted additional questions on May 6, 2024. These questions are addressed individually in this section.

Q1. Is the ACE Project currently fully operational? If not, when does AES Indiana expect it to be fully operational, and what ongoing issues are preventing the ACE Project from becoming fully operational?

A1. Yes, the ACE Project is fully operational. The applications were deployed and began operating on November 6, 2024. Since then, the system has been in a hypercare period, which is typical for any large billing system implementation. During this hypercare period, application issues have been discovered and are being addressed to improve the system's operability. Table 2 above shows the targets established for measuring billing stabilization.

Q2. What issues has AES Indiana had with the ACE Project overall?

A2. As is typical with a CIS deployment, the Company experienced some issues with the billing system with regards to transferring information to bill print. See Table 1 above for Current Issues.

Q3. How has AES Indiana been handling the issues with the ACE Project?

A3. AES Indiana has created teams composed of business and IT specialists to analyze, fix, validate/test, and develop communication plans. See also the section on How The Issues Are Being Addressed above.

Q4. How many tickets has AES Indiana received regarding issues with the ACE Project?

A4. In Section 2, Issues with the ACE Project and Number of Customers Affected, we describe the process of opening a ticket and the current number of open tickets. In total, the Company has opened 2,010 tickets, including non-system issue tickets, as noted above. Of those tickets, 191 were critical tickets. In Table 1 above, we show the current issues impacting customers from open tickets the teams are working to resolve.

Q5. When does AES Indiana estimate the issues with the ACE Project will be fully resolved?

A5. Critical and high priority tickets in all areas, with the exception of billing issues set forth in Table 1 above, have been resolved since March 2024. We continue to focus on resolving the critical and high priority billing issues and working to reach stabilization in the second quarter 2024.

Q6. How many AES customers have been affected and what types of issues have those customers experienced?

A6. See Table 1 above.

Q7. How has AES Indiana addressed customer issues? How has AES Indiana communicated with customers about these issues, and how have resolutions to specific tickets been communicated to customers?

A7. In the section on How The Issues Are Being Addressed, the Company shared the channels used to communicate with customers. Additionally, certain large C&I customers have had dedicated personnel to work with them through any billing delays or issues they are experiencing.

Q8. Has AES Indiana performed a root cause analysis on the issues with the ACE Project? If not, why not? If yes, what were the results?

A8. As part of the implementation process, AES Indiana has analyzed the causes of the issues in order to resolve the issues and reach stabilization. As the focus has been on issue resolution and reaching stabilization, AES Indiana did not perform a Root Cause Analysis as defined by AES Indiana witness Holcomb Baird in Cause No 38703 FAC 133-S1.²

Q9. How is AES Indiana handling new meter requests?

A9. New meter requests are being handled by the AES Indiana construction team. The average speed of answer for our construction team is currently less than 90 seconds. The Construction team processes new meter requests, provides status updates to the customer inquiries, provides updates to our builder partners, and works collaboratively with our meter services and operations teams to ensure each request is fulfilled under our operating targets. At the deployment of ACE we recognized a delay in meter deployment and adapted by adding additional customer support resources for continuity of service and continuous improvement.

² See AES Indiana Witness Baird Direct Testimony QA 10: An RCA, short for Root Cause Analysis, is a structured, data-supported, investigative process designed to uncover the physical, human, and latent factors behind an undesirable event occurring within a given system.