

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED JOINT PETITION OF DUKE ENERGY INDIANA, )  
 LLC, INDIANA GAS COMPANY D/B/A VECTREN ENERGY )  
 DELIVERY OF INDIANA, INC., INDIANA MICHIGAN POWER )  
 COMPANY, INDIANA NATURAL GAS CORPORATION, )  
 INDIANAPOLIS POWER & LIGHT COMPANY, MIDWEST )  
 NATURAL GAS CORPORATION, NORTHERN INDIANA )  
 PUBLIC SERVICE COMPANY, LLC, OHIO VALLEY GAS )  
 CORP. AND OHIO VALLEY GAS, INC., SOUTHERN INDIANA )  
 GAS & ELECTRIC COMPANY D/B/A VECTREN ENERGY ) CAUSE NO. 45377  
 DELIVERY OF INDIANA, INC., AND SYCAMORE GAS )  
 COMPANYFOR (1) AUTHORITY FOR ALL JOINT ) (Consolidated under  
 PETITIONERS TO DEFER AS A REGULATORY ASSET ) Cause No. 45380)  
 CERTAIN INCREMENTAL EXPENSE INCREASES AND )  
 REVENUE REDUCTIONS OF THE UTILITY ATTRIBUTABLE )  
 TO COVID-19; AND (2) THE ESTABLISHMENT OF )  
 SUBDOCKETS FOR EACH JOINT PETITIONER IN WHICH )  
 EACH JOINT PETITIONER MAY ADDRESS REPAYMENT )  
 PROGRAMS FOR PAST DUE CUSTOMER ACCOUNTS, )  
 APPROVAL OF NEW BAD DEBT TRACKERS, AND/OR )  
 DETAILS CONCERNING THE FUTURE RECOVERY OF THE )  
 COVID-19 REGULATORY ASSET )

PETITION OF INDIANA OFFICE OF UTILITY CONSUMER )  
 COUNSELOR FOR GENERIC INVESTIGATION INTO COVID- )  
 19 IMPACTS TO BE CONDUCTED OVER TWO PHASES; ) CAUSE NO. 45380  
 EMERGENCY RELIEF PURSUANT TO IND. CODE § 8-1-2-113 )  
 TO RELIEVE INDIANA RATEPAYERS OF THE THREAT OF )  
 UTILITY SERVICE DISCONNECTION AND PAYMENT )  
 ARREARAGES DURING GLOBAL HEALTH AND ECONOMIC )  
 CRISIS )

**INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR’S**

**JUNE 10, 2020 RESPONSE**

Pursuant to Paragraph 3 of the Indiana Utility Regulatory Commission’s (“Commission”) May 27, 2020 Order in consolidated Cause Nos. 45380/45377, the Indiana Office of Utility Consumer Counselor (“OUCC”), by counsel, respectfully submits this Response (“June 10 Response”) to the

Joint Petitioners' May 8, 2020 Verified Joint Petition ("Joint Petition") filed in Cause No. 45377. The OUCC also incorporates and attaches its May 22, 2020 Response and Affidavits ("OUCC Affidavits") to this Response. In support hereof, the OUCC states as follows:

## **I. INTRODUCTION**

In response to the global public health and economic crisis created by the COVID-19 pandemic, Joint Petitioners seek to hold themselves financially harmless and further burden customers with increased utility rates. Paragraph 7 of the Joint Petition states that in Phase 1 of this Cause, Joint Petitioners seek "an expeditious order authorizing them to defer, and record in Account 182.3, all expenses, costs, reduced revenues ... including incremental expenses, expenditures incurred and/or reduced revenues, including, due to reduced customer load if applicable, from State directives or Commission orders and changed business practices resulting from the public health emergency caused by COVID-19." In addition to the OUCC's Affidavits, which are attached hereto, this Response highlights the reasons why Joint Petitioners are not entitled to the relief they seek and offers, given the severe and unusual nature of the customer crisis, the Commission more appropriate forms of relief.

## **II. LOST REVENUES FROM DECLINING SALES**

Joint Petitioners' request to defer reduced revenues from lower customer load and sales is not directly contemplated within the Accounting Standards Codification ("ASC") despite Joint Petitioners' attempt to suggest these guidelines apply to its requested relief. Instead, the ASC cited by Joint Petitioners relates to "lost revenues" as that term is used within Demand Side Management ("DSM") proceedings, and Joint Petitioners' request should not be confused with this distinct regulatory treatment. Further, Joint Petitioners' request for recovery of lost revenues from declining sales ignores the fact that declining sales is a risk all businesses face. Finally, Joint

Petitioners' fail to adequately support their request for extraordinary relief with substantial evidence. The OUCC's Affidavits, particularly Public's Exhibit B, detail other concerns with Joint Petitioners' request to defer lost revenues from declining sales that should be considered.

#### **A. Accounting Standards Codification 980**

In the affidavit of Angela Camp, NIPSCO supports Joint Petitioners' request for authority to defer lost revenues due to lost load as a regulatory asset by referencing Financial Accounting Standards Board ("FASB") Accounting Standards Codification 980-605-25-4 ("ASC 980"). Ms. Camp claims ASC 980 allows deferral and recovery of these lost revenues but authority from the Commission must first be received in order to satisfy generally accepted accounting principles ("GAAP"). However, Joint Petitioners' reference to ASC 980 is a red herring. There is no accounting standard that requires or specifically allows deferral of lost revenues due to declining sales or load as Joint Petitioners request.

ASC 980 provides for the deferral of incurred costs that would otherwise be recorded as operating expenses but does not contemplate similar treatment for revenues. Incurred cost is defined as a "cost arising from cash paid out or obligation to pay for an acquired asset or service." In contrast, Joint Petitioners are requesting authority to record revenues they have not earned and will never "earn" as that term is defined by GAAP. ASC 980 does not allow for "deferral" of the type of "lost revenues" for which Joint Petitioners are requesting special treatment in this Cause – revenues that have neither been billed nor earned.

While ASC 980 includes a section on revenue recognition (ASC 980-605-25), this guidance applies only to alternative revenue programs ("ARP").<sup>1</sup> ASC 980-605-25 identifies two

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<sup>1</sup> ASC 980-605-05-1 Overview and Background: This subtopic provides guidance for revenue recognition for entities with regulated operations, including alternative revenue programs and long-term power sales contracts.

types of ARP revenue programs to which the guidance applies: (Type A) effects of weather abnormalities or demand side management (“DSM”), and (Type B) utility incentive awards. To fall under the parameters of ASC 980-605, a utility must have a mechanism that permits automatic adjustments of future rates and under that existing mechanism, additional revenues must be recovered within 24 months following the end of the period in which they were recognized. Joint Petitioners’ request to recover lost revenues does not satisfy the requirements of ASC 980-605-25 and, therefore, ASC 980 does not apply to the kind of non-recurring allowance requested by Joint Petitioners.

## **B. Joint Petitioners’ Request is Distinct from DSM Lost Revenues**

Setting aside the fact that lost revenues related to DSM energy efficiency plans are explicitly provided for in statute, the very nature of DSM is fundamentally different than this situation. In DSM programs, the state, in allowing utilities to operate and recover DSM-related costs, does so under the premise of a public purpose for those programs: the conservation of resources used in generating electricity. Utilities are in the business of selling electricity, so a state-authorized program of reducing sales runs counter to the fundamental nature of utilities, and thus the provision for DSM lost revenues is intended to eliminate the mismatch between utility incentives and state energy efficiency goals. Factors outside of state control, such as abnormal weather or DSM activities that are not authorized by the state or run by utilities, are not compensated through a grant of “lost revenues”—rather these factors outside of state control are part of the risks that any business faces and are compensated through the return on equity (“ROE”) authorized by the Commission. Thus, allowing recovery of “lost revenues” related to state-authorized DSM programs is of a completely different nature and would not provide a precedent for granting recovery of “lost revenues” in this Cause. There is no such mismatch of utility and

state policy goals in the case of the current COVID-19 situation as pertains to utility sales. There is some mismatch as it pertains to the state-imposed disconnection moratorium and related matters, and the OUCC has proposed allowing deferral of such bad debt when matched to offsetting factors. But when it comes to the utility's fundamental economic motivation to sell electricity, there is no mismatch.

Moreover, the calculation of DSM lost revenues is entirely different than the calculation Joint Petitioners propose to use to defer lost sales revenues in this Cause. In DSM trackers, the estimated lost kWhs, and in some cases, kW, are multiplied by the lost margin, calculated as the retail rate less variable costs of the class of customer. This produces lost revenue to be billed and notably includes a lost profit component. No deferred revenue is booked in the DSM process. Lost DSM revenues are forecasted and recovered in a tracker proceeding and reconciled to actual revenues in an ongoing process. Joint Petitioners' request for lost sales revenues is not a program with specific rules and performance requirements like DSM, but a request to make up for a sales reduction caused by an extraordinary event.

### **C. Lost Sales Revenue is a Risk All Businesses Face**

"Lost revenue" is a common occurrence for most, if not all, businesses. During a cool summer, ice cream stores and public pools may lose revenue. During a warm winter, ski slopes may lose revenue. When a competitor comes out with a better product, manufacturers lose market share and revenue. Utilities, as with other businesses, also lose revenue every year from events such as manufacturers closing facilities or other kinds of businesses shutting down or from abnormal weather, and utilities are compensated for those kinds of revenue-related risks through the ROE granted by the Commission.

To be considered fundamentally different from the kinds of drops in revenue that all businesses expect and that are clearly compensated for under the ROE set for the utility, the COVID-19 pandemic would have to result in material impacts that require emergency relief, which notably, Joint Petitioners have not requested. The Commission could reasonably consider the grant of emergency relief in situations where the utility's ability to provide reliable service is impaired or the utility will experience (or could provide strong evidence of) a significant increase in its cost of capital. This grant of emergency relief could take the form of a provision for lost sales revenues, so long as it is offset by any compensating factors such as evidence of real expense reductions and capital cost deferrals by the utility. But outside of such effects, allowing for recovery of lost sales revenues runs counter to the regulatory compact in which utilities are expected to take on the risk of operating their utilities between rate cases in exchange for a return on equity significantly above the risk-free rate. No serious evidence has been presented in this Cause for the need for such emergency relief.

Joint Petitioners claim in Paragraph 7 of their Joint Petition that "access to capital might be more difficult or more expensive, particularly given utilities in other states may be perceived as less risky because such states addressed COVID-19 related costs incurred by many other utilities." Footnote 4 of the Joint Petition lists 21 states Joint Petitioners assert have addressed COVID-19 related costs. A review of actions taken by these 21 states shows that as of the date of this filing, no state listed in Joint Petitioners' Footnote 4 has authorized deferral of decreased revenues due to declining sales or load. The suggestion that the extraordinary relief requested in this Cause is necessary to ensure Indiana utilities are not perceived as riskier than those in other states is specious and should be rejected outright.

It is unclear how long the COVID-19 situation will impact utilities. As such, it is possible utilities will experience greater than expected revenues/margins during the second half of 2020 or during 2021 due to weather or other factors. As identified in the affidavit of Dr. Boerger, a number of the parent companies of Indiana utilities are forecasting no change to full-year 2020 earnings or significant changes to their business plans for the coming years. As such, there is no evidence for the kind of extreme relief requested pertaining to deferral to lost sales revenues. Indiana utilities should be expected to manage the current short-term fluctuations in load and sales as they do on a regular basis for weather and year-to-year economic fluctuations.

**D. Joint Petitioners' Request to Defer Lost Revenues from Declining Sales is Not Supported by Substantial Evidence**

Not only do Joint Petitioners fail to present evidence of their need for this extraordinary relief, the evidence available in the public domain indicates they do not have any need at all when viewed over the entire calendar year. None of the Joint Petitioners have presented evidence of the effects of the pandemic on their full year earnings. Public's Exhibit A, May 22, 2020, paragraph 10 summarizes AEP's and Duke's recent earnings releases, which are based upon full-year billing determinants and load projections that have been revised based upon the pandemic. These earnings releases conclude that the earnings estimate range will not be affected, only that these companies expect earnings in the lower half of the range. But in their regulatory filings, Joint Petitioners relied solely on billing determinant data from the month of April, which undoubtedly overstates the losses expected for the full year. And as further explained in Public's Exhibit A, increases in retail sales, such as have occurred during this period, provide a greater offset to the large reductions in industrial sales during the month due to residential rates recovering a larger amount of distribution costs on a per-unit basis. Additionally, ratchet provisions in many industrial rates further serve to reduce the effect of short-term reductions in demand.

While Joint Petitioners have seen short-term reductions in business sales, so have most of their business customers. But those customers do not have the luxury of seeking relief from the Commission for such sales reductions. It is not fair to these other businesses or to residential customers that Joint Petitioners be granted this kind of extraordinary relief when they have been granted return on equity rates that should require them to take on the kinds of risks that their customers have had to face. The Joint Petitioners expect to recover not only virtually every cost, but actually earn a profit in the form of carrying charges. Every penny Joint Petitioners have lost is a result of ratepayers who are suffering financial hardship due to the pandemic. Customers will never be made whole. They will need to dig out. Joint Petitioners do not want to dig out. Instead, they want their customers to bail them out.

Regulation was instituted as a substitute for competition and the free market. As such, regulation should not put a utility in a better position than other non-regulated entities. All businesses are suffering during this pandemic and utilities should not be made whole or be insulated from an economic downturn simply because they are regulated. Utilities do have a duty to provide safe, reliable utility service and should be able to recover necessary costs to ensure they are able to comply with this duty. However, Joint Petitioners have provided no evidence in this Cause that their ability to provide safe, reliable utility service has been impaired or that they need emergency, extraordinary relief at this time. In fact, their public statements to Wall Street minimize the effect of the pandemic. They have supported that they have sustained lost load for a short period of time but not that this condition will continue for any sustained period of time. Further, Joint Petitioners have not presented evidence of the kind of cost-saving efforts and deferrals of capital investments that their customers have surely been forced to implement. Such extraordinary

measures on the part of utilities should be a prerequisite for requesting the extraordinary relief sought in this Petition.

### **III. DEFERRED O&M RECOVERY**

Joint Petitioners also seek to defer expenses and costs they allege are incremental and due to the COVID-19 public health emergency. Joint Petitioners provide practically no evidence to support these proposed expenses, identifying only categories of costs with no associated amounts or sub-accounts. Joint Petitioners do not identify any reduced expenses or opportunities they have availed themselves of to mitigate any expense increases as a result of COVID-19. On its face, Joint Petitioners' proposal to defer "pension and financing costs" related to COVID-19 is an inappropriate overreach that does not merit further consideration at this time. Public's Exhibit B, included with the OUCC's Affidavits, describes prior Commission decisions that establish that authorization to defer an expense is not a guarantee of cost recovery in the future.

#### **A. Joint Petitioners Offer No Quantification of Alleged Incremental O&M**

Similar to Joint Petitioners' failure to present adequate evidence to support its request to defer lost revenues due to declining sales, they have similarly failed to present evidence supporting their request to defer incremental expenses they claim are associated with the pandemic. They provide no specific evidence or forecasts of these expenses and, more problematic, no evidence of their materiality.

Although this Commission has repeatedly stated that deferral does not guarantee ultimate cost recovery, the reality is that utility accountants will book any authorized regulatory asset as probable for future recovery. Therefore, the question of whether it is appropriate for Joint Petitioners to receive authority to defer must be tied to the question of whether the ultimate recovery would be appropriate. Given that authorization of a regulatory deferral makes future cost

recovery “probable,” the Joint Petition should have included specific evidence of costs incurred to date and reasonable projections thereof, and Joint Petitioners should have committed to provide and update this data on an ongoing basis until recovery is sought. Instead, they seek categorical approval to defer expenses in a vacuum. Without specific information by sub-account, the complete impact and nature of any incremental O&M cannot be determined by either the Commission or the OUCC or any other interested party. Joint Petitioners’ request is made even less clear by its proposal to book the entire deferral they request, both expenses and revenues, within a single account. For purposes of transparency and clarity, any deferred revenues and expenses should be booked into separate sub-accounts.

**B. The Joint Petition is Silent on Any Decreased Costs or Measures Joint Petitioners Have Taken to Mitigate the COVID-19 Impact**

In addition to the tremendous hardship faced by Hoosier families and businesses, the COVID-19 pandemic has disrupted the normal operating conditions of utilities in Indiana. The ultimate effect of this disruption is not yet clear, but the Joint Petitioners felt it incumbent to file for regulatory relief less than two months after Governor Holcomb’s Executive Order prohibiting utility service disconnections for non-payment. As they have been as yet unable to demonstrate the specific amount and type of relief they seek, it is likely that the Joint Petitioners have not yet identified or implemented each opportunity at their disposal to manage their expenses and capital costs such that any regulatory relief and further burden on customers could be alleviated.

By way of example, a May 13, 2020 Utility Dive article<sup>2</sup> highlighted the tax relief within the CARES Act, which Duke North America availed itself of:

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<sup>2</sup> <https://www.utilitydive.com/news/duke-ceo-decries-assault-on-natural-gas-as-shareholders-others-blast-com/577815/>

Duke also received \$572 million in receivable income tax under the Coronavirus Aid, Relief, and Economic Security (CARES) Act, something typical of many utilities and large corporations since the law passed, Jonathan Arnold, a principal on the Utilities & Power Research team at Vertical Research Partners, told Utility Dive in an email.

The CARES Act essentially accelerated the return of credits, as allowed under the Tax Cuts and Jobs Act of 2017, allowing big companies to claim those credits for either 2018 or 2019.

Regulatory relief that will ultimately increase customer rates is not the only avenue through which the Joint Petitioners can mitigate the impacts of the COVID-19 pandemic. They have access to sources of potentially significant aid through tax relief, as described above, or business interruption insurance, or options to internally manage costs such as deferring non-critical capital projects, reducing employee incentive payments, or taking advantage of lower interest rates for outstanding debt. Given the relative sophistication of Joint Petitioners, and many of their parent companies, the options available to them are substantial and could have a material effect on the regulatory relief they now seek. Making use of these options serves to offset, or potentially eliminate, the need to further burden already cash-strapped Hoosier families and businesses affected by the COVID-19 pandemic and economic crisis.

Utilities should be called upon to engage in thoughtful problem-solving during this time, especially in light of the hardship faced by many of their customers. According to a recent analysis<sup>3</sup>, Indiana residents are hurting 14th most financially among other states as a result of the COVID-19 pandemic. Nearly 9 out of 10 Americans are suffering financial stress. Indiana suffered a 16.9% unemployment rate in April with 24.4% of adults experiencing housing insecurity, 10.1% of Hoosiers suffer from food insecurity and Indiana's poverty rate stood at 13.1%. It is against this backdrop that the Commission should examine the utilities' deferral request for subsequent

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<sup>3</sup> [https://www.nwitimes.com/business/local/article\\_361c327c-1bf6-5a9c-8e82-8660a1478bbd.html](https://www.nwitimes.com/business/local/article_361c327c-1bf6-5a9c-8e82-8660a1478bbd.html)

recovery, and consider what internal tools Indiana utilities are employing to reduce the economic harm to its customers. For instance, the Commission must decide whether utilities should be allowed to recover costs for cleaning supplies and personal protection equipment when so many other businesses in Indiana incurred these very same expenses without any opportunity to recoup those costs. Deferral and ultimate recovery of any eligible incremental O&M should be considered only after these costs have been offset by reduced expenses or aid the utility availed itself of. Utilities that are not employing creative, customer-focused ways of mitigating the ratepayer impact of the COVID-19 impact should not be rewarded with regulatory assets set for “probable” future recovery in rates.

### **C. Deferral of “Pension and Financing Costs” is Unnecessary and Premature**

Joint Petitioners’ request to defer incremental “pension and financing costs” should be rejected outright. Joint Petitioners make no attempt to define “financing costs.” To the extent Joint Petitioners are requesting carrying costs on the amounts deferred to a regulatory asset, they have provided no basis for this relief. Joint Petitioners have not demonstrated they will experience financial harm resulting from deferral, and not immediate recovery, of its proposed relief. Joint Petitioners are not satisfied to recover every penny lost but potentially may be requesting to profit from these losses. During this time of unprecedented economic challenge, it is unconscionable to consider further burdening ratepayers with carrying charges.

Pension costs are different from other operating expenses included in a utility’s revenue requirement. While most operating expenses are based on short-term cost projections, pensions are based on long-term projections of the annual impact of providing a pension benefit to employees that will be paid out decades in the future. The cash contributions required for 2020 have already been set by the utility’s most recent actuarial reports and Joint Petitioners cannot yet

credibly claim they have experienced any required increase in cash contributions at this time. How the financial markets will perceive this pandemic emergency remains to be seen. It is too early to judge whether there will be any impact to a utility's pension costs. Finally, this Commission has already approved the inclusion of prepaid pension assets in utility rate bases, which fully compensates a utility to the extent its required cash contributions exceed its pension expense. Deferral of "pension and financing costs" in this Cause is unnecessary and premature to the detriment of ratepayers.

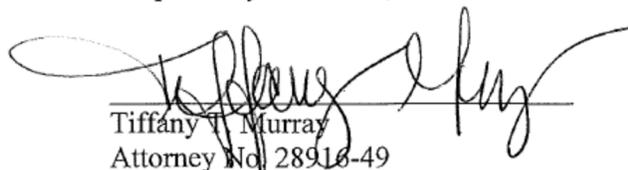
#### **IV. UNCOLLECTED REVENUES AS A RESULT OF THE DISCONNECTION MORATORIUM**

Joint Petitioners also seek to defer and recover certain revenues not collected from customers as a result of Governor Holcomb's disconnection moratorium. The OUCC understands that these revenues are uncollected base rates, charges, and fees ("uncollected revenues") from customers Joint Petitioners would have, under normal operating conditions, disconnected from service due to non-payment. To the extent Joint Petitioners adequately document these uncollected revenues related to the disconnection moratorium by month, customer class, and by sub-account, and offer extended and more forgiving customer payment arrangements, the OUCC does not object to recording these limited uncollected revenues starting from March 19, 2020, the date of Governor Holcomb's Executive Order establishing a utility service disconnection moratorium. As some accounts are paid and others are not, any ultimate deferral of the associated bad debt will be reviewed for reasonableness and prudence at the time recovery is sought and such recovery would have to result in just and reasonable rates, which can only be determined at the time the request for cost recovery is made. As noted above, any regulatory deferral authorized by this Commission should be net of reduced expenses or any other form of savings or relief a utility has availed itself of and consideration of any savings they did not undertake.

A number of states have continued utility service disconnection moratoriums for the duration of the COVID-19 public health emergency, and during this time, they have ordered utilities not to assess certain fees, such as late fees, that would otherwise apply to a customer's bill in order to mitigate outstanding arrearages. Likewise, throughout the nation, extended payment arrangements beyond the timeframes contemplated in rules for normal operating conditions have been instituted, either through some form of regulatory action or through voluntary utility action. An extended payment arrangement with flexible terms offers a customer the ability to make regular progress towards outstanding arrearages, and ultimately, to mitigate the amount of bad debt or uncollectible accounts a utility will write-off or collect from all of its remaining customers. Joint Petitioners should not continue to use the same "business as usual" practices during this unusual time and should extend the timeframe over which it typically converts an account in arrearage to an account that is uncollectible.

Joint Petitioners should be required to take all possible steps to mitigate any regulatory deferral authorized in this Phase of the Commission's investigation, and to document all steps taken for future review. Even if Joint Petitioners receive authority to defer uncollected revenue, such authority does not preclude the Commission from determining, when cost recovery is sought, that sharing of the deferral between the utility's shareholders and its customers is appropriate, given the unprecedented nature of the COVID-19 health and economic crisis and the impact this crisis is having on the global economy, including both regulated and unregulated enterprises.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

This is to certify that a copy of the *Utility Consumer Counselor's June 10, 2020 Response* has been served upon the following parties of record in the captioned proceeding by electronic service on June 9, 2020.

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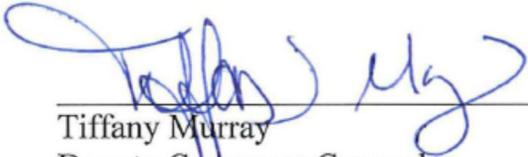
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 § 8-1-2-113 TO RELIEVE INDIANA RATEPAYERS OF THE )  
 THREAT OF UTILITY SERVICE DISCONNECTION AND )  
 PAYMENT ARREARAGES DURING GLOBAL HEALTH AND )  
 ECONOMIC CRISIS )**

**INDIANA UTILITY CONSUMER COUNSELOR'S  
RESPONSE TO VERIFIED JOINT PETITION**

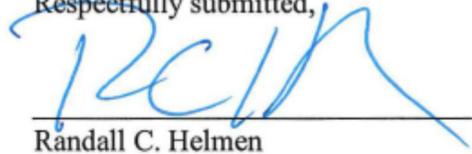
The Indiana Office of Utility Consumer Counselor (OUCC), by counsel, respectfully submits this Response to the Verified Joint Petition filed in Cause No. 45377. In support hereof, the OUCC states as follows:

1. On May 8, 2020, ten of Indiana’s investor owned energy utilities, including its five largest, (Joint Petitioners) filed a Verified Joint Petition (Joint Petition). On the same date the OUCC filed its Verified Petition for Generic Investigation Into COVID-19 Impacts (Generic Investigation).

2. In its Generic Investigation, the OUCC identifies specific expenses that have been impacted by the pandemic and are appropriate for consideration of the extraordinary relief requested by Joint Petitioners. These are costs and expenses directly related to suspended disconnections and unpaid fees.
3. The relief Joint Petitioners seek is, for the most part, a request for expedited findings allowing them to defer, for future recovery, various expenses, alleged lost revenues due to declining sales and reduced load, and “foregone revenues” due to various waived fees that far exceed the relief appropriate under sound regulatory practice.
4. The Joint Petitioners have offered several affidavits in support of their requested relief. However, those affidavits do not present sufficient evidence to support their request.
5. Joint Petitioners seek to inoculate themselves from any financial loss at the same time most residential, commercial and industrial customers are suffering greatly from economic catastrophe not of their own making.
6. Attached hereto is the affidavit of Peter Boerger (Exhibit A). He testifies that the Joint Petitioners remain financially healthy and have not established the need for the extraordinary relief of deferrals for lost revenues from declining sales or reductions in load.
7. Also attached hereto is the affidavit of Wes Blakley (Exhibit B). He testifies about the appropriate use of deferral accounting and explains that because authorization of accounting deferrals creates a presumption of probable recovery, the Joint Petitioners have not presented an adequate case for many of the deferrals they request. He also states that the Commission should follow its prior orders and find that future cost recovery of any authorized deferral is subject to a review for reasonableness and prudence.
8. Attached hereto is also the affidavit of Anthony Swinger (Exhibit C). He describes the unprecedented number of consumer comments the OUCC has received in opposition to the Joint Petition.
9. The Generic Investigation requested by the OUCC provides the appropriate vehicle and procedural roadmap to address all legitimate claims of utilities and ratepayers alike. The Joint Petition, on the other hand, does not invoke Ind. Code § 8-1-2-113 and the Commission’s related authority to institute emergency relief. While the OUCC saw fit to respond to Joint Petitioners’ affidavits submitted in this Cause, the magnitude of Joint Petitioners’ request cannot be adequately addressed within the expedited process contemplated in the Joint Petition. Rather, the OUCC’s responsive Affidavits explain how Joint Petitioners have not adequately demonstrated a need for the extraordinary and expedited relief they seek. The Generic Investigation properly seeks necessary, limited, emergency relief for extension of the disconnection moratorium, waiver of certain specific utility charges, and deferral authority for defined costs related to those two items only. An organized process with the exchange of formal testimony and an evidentiary hearing should be instituted for any other remaining issue the Commission decides should be heard.

WHEREFORE, the OUCC respectfully opposes the relief requested by Joint Petitioners and offers the affidavits of Peter Boerger, Wes Blakley, and Anthony Swinger in support hereof.

Respectfully submitted,



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Randall C. Helmen  
Attorney. No. 8275-49  
Chief Deputy Consumer Counselor

## CERTIFICATE OF SERVICE

This is to certify that a copy of the *Utility Consumer Counselor's Affidavits* has been served upon the following parties of record in the captioned proceeding by electronic service on May 22, 2020.

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**INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR'S**  
**VERIFIED AFFIDAVIT OF PETER M. BOERGER, PH.D.**

1. My name is Peter M. Boerger, and I am employed by the Indiana Office of Utility Consumer Counselor ("OUCC") as a Senior Utility Analyst. My business address is 115 W Washington Street, Suite 1500S, Indianapolis, IN 46204.
2. This Affidavit is being filed with the Indiana Utility Regulatory Commission ("Commission") in opposition to the extraordinary relief requested by Joint Petitioners pertaining to deferral and recovery of decreased sales revenues.
3. This Affidavit will address the conceptual basis upon which deferrals of decreased sales revenue could under certain circumstances reasonably be granted within Indiana's system of utility regulation, the extent to which Joint Petitioners have not provided evidence sufficient to justify deferral of decreased sales revenues in this Cause. It will also highlight the OUCC's readiness to review and support requests for emergency relief related to decreased sales revenues if and when utilities present evidence of impending material harm to financial health.
4. As a trained economist and policy analyst and having worked for the OUCC in various capacities over a total of 12 years across a range of cases, I have the breadth and depth of experience to address the reasonableness of the Joint Petitioners' request to defer and recover decreased sales revenues presented in this proceeding.
5. Deferral of decreased sales revenues is extraordinary relief under Indiana's system of regulation. Indiana's investor-owned utilities, such as the Joint Petitioners in this Cause, are granted rates of return on equity far exceeding the risk-free rate of return on federal government obligations, such as 10-year Treasury bonds which currently yield less than 1%. In return, utilities and their shareholders agree to take on the risk of operating the business, with one of those risks being unexpected short-term declines in revenue. Thus, short-term declines in revenue are not, by themselves, reason for allowing deferral of revenues. For longer-term, structural declines in revenue, Indiana's regulatory system allows utilities to seek relief through increases in base rates. Thus, as with short-term declines, longer-term declines in revenue, by themselves, also do not require extraordinary relief.
6. As extraordinary relief, the granting of deferral for decreased sales revenues should require a high evidentiary bar. Assuming the cause of reduced sales revenue is outside of the utility's control, as is the case with the COVID-19 pandemic, granting such relief should be only authorized to the extent consumers are also benefited. Such would be the case in preventing declines in the reliability of utility service or significant increases in the cost of capital for the utility. And even then, the utility should be required to show it has taken reasonable steps to reduce expenses and defer discretionary capital projects before seeking relief. In addition, before relief is granted, the Commission should consider the utilities' revenues as a whole, including revenues from various trackers, and also the utilities receipt of outside sources of funds.

7. The affidavits presented by the Joint Petitioners quantify some revenue effects, such as for late payment fees and convenience charges. However, the materiality of those charges is not discussed. Pertaining to lost sales, most affidavits present effects only in terms of billing determinants, not in terms of lost sales revenues—or more to the point, lost margins. Northern Indiana Public Service Company's ("NIPSCO") affidavit of Angela Camp, presents a table ("NIPSCO Table") on page 10 translating percentage change in billing determinants to dollar effect on "operating income," which can be thought of as margin. But even there, materiality as to the effect of declines in sales revenue on its ability to provide reliable service or an adverse effect on its cost of capital is not addressed.
8. The NIPSCO Table also provides a window into why judgments based upon changes in billing determinants can be misleading. That table shows, for NIPSCO electric, a 1% increase in residential kWh sales provides two thirds more margin to the utility than a 1% drop in industrial sales would decrease margin. This effect is likely the case for all electric and gas utilities since residential customers fund the distribution system, on average, to a larger extent than industrial customers. For electric utilities, this effect will result in margin reductions being smaller than would be indicated by the overall reduction in billing determinants, since residential sales have been increasing during the pandemic. For gas utilities, to the extent that reductions in residential gas sales during April can be judged to be due to the pandemic, the effect would work in the opposite direction.
9. Beyond the inadequacy of using billing determinants as the basis for making decisions about deferring decreased sales revenue for future recovery, the billing determinant declines presented in Joint Petitioners' affidavits likely represent the highest monthly effect for this year, considering that restrictions on commercial operations are in the process of being relaxed. Thus, it is likely the billing determinant effects shown in Joint Petitioners' affidavits significantly over represent COVID-19 effects for the entire year.
10. Recent earnings releases from publicly traded parent companies of Indiana electric utilities provide full-year estimates for Wall Street that evidence little full-year financial effect from the COVID-19 pandemic. American Electric Power's ("AEP") Chairman, President and Chief Executive Officer Nicholas K. Akins was quoted in AEP's first quarter earnings release on May 6, 2020:

Our load projections for the year have been revised based on the economic impacts of the pandemic. We now expect residential load to grow by 3% for the year, but we are anticipating commercial and industrial load declines of 6% and 8%, respectively. In response, we've cut our planned operating and maintenance expense by \$100 million. In addition, we are shifting \$500 million of our planned 2020 capital spending to future years to support our credit metrics. We still plan to invest \$33 billion in capital over the next five years, exclusive of the North Central wind projects. Based on unfavorable weather in the first quarter, our updated load forecast and the actions we have taken, we expect to be in the lower half of our existing 2020 operating earnings guidance range of \$4.25 to \$4.45 per share.

There are a few things worth noting in this quote. First, AEP is reporting billing determinant effects over the entire year that are smaller than effects reported by Indiana Michigan Power in its affidavit pertaining to April alone. Second, those full-year sales reductions for AEP are estimated by AEP to have no effect on the earnings estimate range for the full year, rather a small guidance change to the lower half of the range. Third, unfavorable weather is presented here as a factor alongside COVID-19 effects in affecting full year earnings, and clearly weather is a factor utilities are routinely expected to deal with as it affects margin collection and earnings. Fourth, planned capital expenditures over the next five years do not appear to be affected by the COVID-19 pandemic. And finally, this quote evidences actions AEP is taking to reduce the effects of the pandemic outside of seeking state regulatory relief—reducing expenses and deferring capital spending. In the case of AEP, those actions have allowed AEP to deal with COVID-19 effects in a way that does not appear to have resulted in the need for regulatory relief.

An article from S&P Global Market Intelligence<sup>1</sup> on the first quarter earnings results of Duke Energy Corp. (“Duke Energy”) published on May 12, 2020 reported:

Duke Energy on May 12 said it expects retail electric sales to fall 3% to 5% for full year 2020 based on a gradual economic recovery, which would negatively impact the company’s 2020 earnings per share by 25 cents to 35 cents.

The article goes on to quote Duke Energy Executive Vice President and Chief Financial Officer (“CFO”) Steven Young as saying:

‘We’ve looked at many different types of forecasts as to how the economy responds to this unprecedented situation. We have a base case and the base case reflects that there is a recovery of the economy in the latter part of 2020,’ Duke Energy Executive Vice President and CFO Steven Young told S&P Global Market Intelligence prior to the company’s first-quarter 2020 earnings call. ‘I don’t think it’s an overly optimistic case, as it does show deep drops in the second quarter and drops also in the third quarter. It’s not until late in the third quarter that things start to pull back.’

The “not overly optimistic” case Mr. Young is referring to in that quote is found later in that article:

For full year 2020, Duke Energy is projecting a 2% to 4% increase in residential sales, which make up 33% of total electric sales, a 6% to 9% drop in commercial volumes and 7% to 10% drop in industrial volumes. Despite these headwinds, the company continues to target full-year 2020 adjusted EPS in the range of \$5.05 to \$5.45 and reaffirmed its 4% to 6% EPS growth forecast through 2024.

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<sup>1</sup> <https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/duke-energy-prepared-for-worst-case-economic-scenario-cfo-says-58584329>

Finally, the article reports:

Duke Energy has outlined \$350 million to \$450 million in cost cuts tied to reductions in operations and maintenance and other expenses.

Summarizing, Duke Energy is presenting to Wall Street essentially the same story seen above for AEP. Namely, full-year drops in commercial and industrial sales are ameliorated by increased residential sales and by actions ordered by the Indiana utility's parent company to reduce costs, resulting in no change from its pre-COVID-19 projected earnings range for the year.

While effects will vary by utility, these recent reports from parent companies of two Indiana electric utilities do not evidence a need for the kind of extraordinary sales revenue-related relief requested in the Joint Petition.

11. Many, if not all Joint Petitioners, could have, but did not in their Joint Petition, present effects of the COVID-19 pandemic on full-year earnings. These utilities, especially the ones owned by large multi-state holding companies, have the ability to prepare full-year earnings estimates, as evidenced by the parent company earnings releases in the preceding section. Yet, as noted above, none of the Joint Petitioners chose to present full-year earnings projections, relying instead on billing determinant numbers for the month of April. Those April numbers likely far overstate the effects for the entire year. If there were truly a financial situation calling for extraordinary relief deferring decreased sales revenue, these utilities should have presented such in their affidavits.
12. I can report the OUCC stands ready to cooperate with Indiana utilities on true needs that might result from the COVID-19 pandemic. The OUCC's Petition filed in Cause No. 45380 calls for the Commission to allow using ". . . regulatory accounting, such as the use of regulatory assets and liabilities, for any impacts related to the continuation of the service disconnection moratorium, waiver of fees, and expanded customer payment arrangements . . ." which provides for deferral of what is likely most of the direct costs related to the COVID-19 pandemic. The OUCC recognizes this is a difficult situation that needs to be addressed, and is ready to work with any utilities that are truly facing situations where drops in sales revenues are leading to inability to serve customers reliably or will result in material declines in financial metrics leading to significant increases in the cost of capital for the utility. However, the affidavits presented by the Joint Petitioners do not provide evidence of those kinds of real needs pertaining to decreases in sales revenues, and thus have not provided evidence sufficient to justify action regarding deferral and recovery of decreased sales revenue at this time.

I affirm, under the penalties of perjury, that the foregoing statements are based on my personal knowledge and are true and correct to the best of my knowledge, information, and belief.



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Peter M. Boerger, Ph.D

**INDIANA UTILITY CONSUMER COUNSELOR'S**  
**VERIFIED AFFIDAVIT OF WES R. BLAKLEY**

1. My Name is Wes Blakley, I am a Senior Utility Analyst in the Electric Division for the Office of Utility Consumer Counselor ("OUCC"). As a Senior Utility Analyst, I review requests for relief and testify before the Indiana Utility Regulatory Commission ("Commission") concerning accounting and ratemaking treatment in numerous types of utility cases, including rate cases, tracker mechanism cases and certificate of public convenience and necessity ("CPCN") cases. I have over 29 years of experience in Indiana on utility ratemaking.
2. In their Cause No. 45377 Petition, Joint Petitioners request to:

... defer and record in Account 182.3 for future recovery the incremental expenses, including bad debt expense incurred, and reduced revenues, including the waiver of late fees and reductions due to reduced customer load if applicable, from State Directives or Commission orders and changed business practices resulting from the public health emergency caused by COVID-19.<sup>1</sup>
3. My affidavit offers clarity on the accounting guidelines that apply to Joint Petitioners' requested deferral and I explain that, under these guidelines, Commission authorization to create a regulatory asset or liability makes future cost recovery of that deferral probable. As a result, the Commission should both carefully define the expenses it authorizes Joint Petitioners to defer due to the COVID-19 pandemic, and also send a clear message that future recovery of an accounting deferral is not guaranteed and is subject to review for reasonableness, necessity, and prudence. The OUCC's Verified Affidavit of Peter Boerger explains why Joint Petitioners have not adequately demonstrated a need for the extraordinary relief it requests by seeking deferral authority for decreased revenues due to declining sales.
4. Joint Petitioners refer to the Financial Accounting Standards Board Accounting Codification ("ASC") 980-340-25-1 as the basis from which it should receive general authority to defer as a regulatory asset, costs associated with the COVID-19 pandemic. ASC 980-340 permits the Commission to authorize incurred costs to be deferred as a regulatory asset based on the probability of future recovery. The amount of Joint Petitioners' costs and the extent of the period over which these costs will accumulate are not known at this time.
5. The Commission can grant regulatory asset treatment of an existing expense; however, consistent with ASC 980-340, providing a utility with authority to create a regulatory asset does not guarantee recovery of that asset. While future cost recovery is probable, the Commission must review the deferred costs to determine if they are proper and reasonable,

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<sup>1</sup> Joint Petitioners' Cause No. 45377 Petition at Paragraph 8.

as well as effects on the utility and ratepayer of allowing recovery, at the next rate proceeding.

6. Prior Commission orders support this understanding. The Commission's Final Order at page 7 in Cause No. 40980 dated November 12, 1998 established criteria the Commission would use when examining requests for recovery of accounting deferrals:

In considering such requests, it is necessary to consider the balance struck between the utility and its ratepayers by approving such a request. For example, the gravity of the financial event involved and its impact upon the utility is appropriate to consider, as well as the impact such accounting and/or ratemaking treatment will have upon the utility's ratepayers. Further, it is necessary for the utility requesting such extraordinary treatment to be able to demonstrate with convincing evidence that the financial event is in fact occurring, and that such financial impact is fixed, known and measurable. If all of these elements are established, a utility might receive approval for such an extraordinary request.

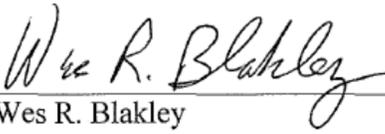
*See also Cause No. 43743, Duke Energy Indiana Inc., July 14, 2010, Final Order at 16 – 17 (“The Commission will consider the reasonableness and appropriateness of any actual recovery of the amount deferred in this proceeding in the Petitioner’s next rate case in which all parties may present evidence with respect to the issue.”) and Cause No. 44075, Indiana Michigan Power Company, February 13, 2013, Final Order at 73 (“The accounting proposed by the Company to record under- or over-recoveries on a monthly basis as a regulatory asset or liability addresses both of these situations ... Other parties to the subsequent rate case will retain the ability to challenge the reasonableness of the storm expenses included in the reserve account. By following that approach, the Commission is once again able to consider issues associated with the Reserve in the context of a rate case in which it has before it a variety of issues to consider in establishing I&M's revenue requirement and setting its rates.”)*

7. More recently, the Commission has affirmed its prior rationale on reviewing accounting deferrals for reasonableness before such deferrals can be recovered from customers. In its March 11, 2020 Final Order in Cause No. 45235, the Commission found at page 116 that “all deferred costs will be subject to review for reasonableness before being reflected in rates...”
8. The COVID-19 pandemic is an extraordinary and fast-moving event the size and extent of which is unknown. Without an eye towards rate mitigation, a broad authorization of deferral authority for as yet undetermined costs will almost certainly have extreme adverse effects on ratepayers. Because deferral authority comes with the expectation of “probable” cost recovery, the Commission should limit Joint Petitioners’ deferral to only those direct costs associated with unpaid customer bills, waived charges and expanded payment arrangements from the date of Governor Holcomb’s Executive Order prohibiting utility service disconnections for non-payment and the date on which the service disconnection

moratorium ends. Joint Petitioners also request deferral authority for “incremental O&M” they identify as being related to COVID-19; however, their affidavits do not specify the materiality of these expenses nor do they identify what steps Joint Petitioners have taken to mitigate any temporary increase in expenses. It would be inappropriate at this stage to authorize deferral authority of these unspecified “incremental O&M” costs because doing so makes future cost recovery probable.

9. Further, the Commission should send a clear message in its order that any deferral authorized in this Cause is not guaranteed cost recovery and is subject to further review for reasonableness and prudence, including consideration of the impacts of other sources of relief such as tax treatment or financial incentives such as through the CARES Act or other federal or state programs, before a final decision regarding cost recovery can be made. In order to enable proper review in the future, Joint Petitioners must appropriately document, by month if necessary, the kinds and specific amounts of deferred costs that have accumulated in any authorized regulatory deferral so that when cost recovery is sought, the Commission and any interested party can easily identify monthly accumulations in order to evaluate their reasonableness and prudence.

I affirm, under the penalties of perjury, that the foregoing statements are based on my personal knowledge and are true and correct to the best of my knowledge, information, and belief.

  
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Wes R. Blakley  
Senior Utility Analyst

**INDIANA UTILITY CONSUMER COUNSELOR'S  
VERIFIED AFFIDAVIT OF ANTHONY F. SWINGER**

1. My name is Anthony F. Swinger. I am the Director of External Affairs for the Indiana Office of Utility Consumer Counselor ("OUCC"). My business address is 115 W. Washington St., Suite 1500 South, Indianapolis, Indiana 46204. I joined the OUCC in 2000 and have served in my current position since 2008.
2. I am responsible for, among other things, the oversight of consumer comments received by this agency. This includes all case-specific comments from residential, commercial, and industrial consumers that the OUCC may receive by email, mail, or fax, or via the agency's website.
3. On Monday, May 11, 2020, the OUCC issued a news release announcing the filing of its Verified Petition for Generic Investigation Into COVID-19 Impacts with the Indiana Utility Regulatory Commission ("IURC") in Cause No. 45380.
4. On the same day, the Citizens Action Coalition of Indiana ("CAC") issued a news release in response to the Cause No. 45377 petition filed by ten investor-owned energy utilities seeking COVID-19 ratemaking authority.
5. Following the issuance of both press releases, all major Indianapolis media outlets produced news stories regarding these two causes. These causes also generated extensive coverage in additional media markets throughout Indiana, including statewide coverage by the Associated Press and Indiana Public Broadcasting. National coverage included an article at Newsweek.com.
6. On May 11, 2020, the OUCC began receiving a large number of consumer emails regarding utility rates and the economic challenges caused by the COVID-19 pandemic. The vast majority of these emails expressed strong opposition to the utilities' Cause No. 45377 petition, particularly the recovery of lost revenues from decreased sales and reduced load.
7. As of May 19, 2020, the OUCC has received 1,633 such consumer emails.
8. 45 of the emails received to date are included with this affidavit as Attachment A. These include three letters from Indiana state legislators to the IURC, on which the OUCC was courtesy copied.
9. The remaining 1,588 emails have been received via [www.oneclickpolitics.com](http://www.oneclickpolitics.com) and are largely similar to each other in content. I have visited this site and it appears emails sent via the site are being simultaneously directed to the OUCC, the IURC, and the office of Gov. Eric Holcomb. Five of these emails, representative of correspondence received from various different service areas, are included with this

affidavit as Attachment B. Filing all of these emails at this time would be logistically challenging given current working arrangements due to the pandemic.

10. The OUCC continues to receive such correspondence and intends to file all emails and additional comments with the Commission at a future date.
11. In a docketed case before the IURC, it is the OUCC's standard practice to file written consumer comments the agency has received. This filing normally occurs when the OUCC files its case-in-chief.
12. Given the magnitude of IURC Cause Nos. 45377 and 45380 and the unprecedented economic pressures being faced by residential, commercial, and industrial utility consumers throughout Indiana due to the COVID-19 pandemic, the OUCC believes it is appropriate to bring these comments to the IURC's attention as soon as possible in light of the extraordinary relief sought by the utilities in Cause No. 45377.
13. The number of comments received on this matter within a very short timeframe amplifies the need for these comments to be brought to the IURC's attention without delay.
14. To provide some perspective for the scale of consumer interest in Cause Nos. 45377 and 45380, the OUCC received and filed approximately 770 written consumer comments in Duke Energy's pending rate case (IURC Cause No. 45253). In addition, the OUCC received and filed approximately 530 written consumer comments in Indiana Michigan Power's (I&M's) recent rate case (IURC Cause No. 45235). In both cases, the comments were received over a period of several months. In less than two weeks, the OUCC has received more than double the number of consumer emails in the Cause Nos. 45377 and 45380 COVID-19 dockets than those received in either of these large base rate cases.

I affirm, under the penalties of perjury, that the foregoing statements are based on my personal knowledge and are true and correct to the best of my knowledge, information, and belief.



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Anthony F. Swinger

# State of Indiana

# Senate

Senator John Ruckelshaus  
200 W. Washington Street  
Indianapolis, IN 46204  
Senate: (317) 232-9808  
S30@iga.in.gov

Committees:  
Environmental Affairs  
Health and Provider Services  
Insurance and Financial Institutions

May 14, 2020

Indiana Utility Regulatory Commission  
101 W. Washington St., Suite #1500e  
Indianapolis, IN 46204

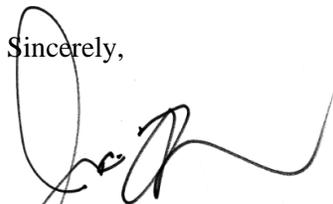
Dear Members of the Indiana Utility Regulatory Commission:

I write to ask the Indiana Utility Regulatory Commission (IURC) to refrain from conducting a hearing at this time on the joint petition (cause no. 45377) filed on May 8, 2020. This petition includes a number of requests by Indiana utilities which would have devastating effects on consumers if granted during the current health pandemic.

Every day, Hoosiers are navigating the challenging health and economic impacts of the COVID-19 crisis, and a move by Indiana utilities to hike consumers' rates at this time, as outlined in their joint petition, would be a mistake. Rather, these utility entities should devise plans to guide Hoosier businesses and consumers back to good financial standing to avoid disruptions to service after the suspension on disconnections expires on June 4, 2020, per the Governor's executive order.

The full economic consequences of COVID-19 will not be known in the near future. I encourage the IURC to refrain from conducting a hearing for this petition until more information is available regarding the severity of these consequences and allowing time for the economy to stabilize. In the meantime, I hope Indiana utilities will focus their efforts to create plans to see their customers out of this challenging time.

Sincerely,



John Ruckelshaus  
State Senator  
Indiana State Senate

CC: Indiana Office of Utility Consumer Counselor  
115 W. Washington St., Suite 1500 South  
Indianapolis, Indiana 46204



**STATE OF INDIANA**  
**HOUSE OF REPRESENTATIVES**

THIRD FLOOR STATE HOUSE  
INDIANAPOLIS, INDIANA 46204

COMMITTEES:  
WAYS AND MEANS  
LOCAL GOVERNMENT

May 14, 2020

Chairman Jim Huston  
Indiana Utility Regulatory Commission  
101 West Washington Street  
Indianapolis, Indiana 46204

Dear Chairman Huston,

The pandemic has had an unprecedented impact on households across the state. Due to the variety of challenges that Hoosiers are facing during this difficult time, I am surprised that the utility companies have petitioned the IURC to raise rates.

Generally, I have concerns regarding the financial condition of the utility companies. Given Governor Holcomb's executive order that prohibits disconnections I have several questions that need to be answered:

1. What is the percentage of people not paying?
2. Is revenue lost entirely or simply delayed?
3. If the utilities are granted a rate increase will they forgive any and all balances?
4. Should ratepayers who paid on time be subject to the rate increase?
5. Is this a temporary increase or permanent?
6. Will they expect to see a surge in revenue as we re-open? If so, would that mitigate the need to increase rates?
7. What have they done to help consumers pay?
8. When they receive late payments, what does that money go to and will they impose a late fee once we reopen?
7. Lastly, what financial adjustments have the companies made to weather this period?

I feel these questions should be thoroughly answered before any decision is made to raise rates during this challenging time for all Hoosiers. Please respond by Friday, May 22nd with any information you have on the issues I raised and please share the questions that the IURC will consider while reviewing the petition.

Sincerely,

A handwritten signature in black ink, appearing to read "Cherrish S. Pryor".

Cherrish S. Pryor, Democratic Floor Leader  
State Representative  
House District 94

Cc; Anthony Swinger, Office of the Utility Consumer Counselor

Cause No. 45380  
OUCC Exhibit C Attachment A  
Page 3 of 59



**STATE OF INDIANA**  
**HOUSE OF REPRESENTATIVES**

THIRD FLOOR STATE HOUSE  
INDIANAPOLIS, INDIANA 46204

Cause No. 45380  
OUCC Exhibit C Attachment A

Page 4 of 59  
CHERRISH S. PRYOR  
Democratic Floor Leader  
200 West Washington Street  
Indianapolis, IN 46204

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COMMITTEES:  
WAYS AND MEANS  
LOCAL GOVERNMENT

May 19, 2020

Chairman Jim Huston  
Indiana Utility Regulatory Commission  
101 West Washington Street  
Indianapolis, Indiana 46204

Dear Chairman Huston,

Due to the number of utility companies that have petitioned the IURC and the unprecedented circumstances imposed by the pandemic, I urge the IURC to hold statewide public hearings on proposed rate increases.

The pandemic has financially affected millions of households across the state. According to the Department of Workforce Development, a record 140,000 unemployment claims were filed in the second week of the stay at home order, and the agency has since received roughly 100,000 claims per week. The IURC should solicit feedback from communities on the impact rate increases would have on families working to recover their jobs and finances.

In addition to responding to my questions detailed in my May 14<sup>th</sup> letter, please also share how the IURC will approach public hearings and comments.

Sincerely,

A handwritten signature in cursive script that reads "Cherrish S. Pryor".

Cherrish S. Pryor, Democratic Floor Leader  
State Representative  
House District 94

Cc: Indiana Black Legislative Caucus  
Anthony Swinger, Office of the Utility Consumer Counselor

**From:** [johna.seaton](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** RE: Vectren filing for states increases due to covid 19 shutdown  
**Date:** Wednesday, May 13, 2020 12:36:29 PM

---

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I find it absolutely disgusting that ANY utility service that provides essential services would do this to its customers that are already struggling with issues from the shutdown.

I understand that their profit margins have decreased due to the no shutoff services policy that was put in place, but why should we as customers, have to foot the bill.

Vectren is only postponing payments of these accounts. Those customers are still going to have to make up payments on their bills, so Vectren will get their money back.

My main issue is that if an increase is passed, it will be a permanent increase. Never have I seen an increase permitted for a special reason or project, eg. Upgrading lines, upgrading systems, and now making up lost profits where the rates go back down after the upgrade or special request is paid for. The same will apply for this requested increase as well. If approved, it will go into place and never end. So, I will pay for this supposed shortfall for the rest of my life as a customer. IS THIS FAIR? ABSOLUTELY NOT!!!!

Our bills are already some of the highest in the tristate. I am a senior citizen that lives on social security. I work very hard to conserve electricity to keep my bill down, but as I sit in the dark every night, keep my thermostat no higher than 65° in the winter, keep everything unplugged that I dont use, only to still have a bill \$100 plus, there is something seriously wrong. There is nothing more that I can do to make my bill more affordable, except to completely shut off my service. This increase is just another financial burden. Are you proud of this? Are you proud of Vectren and this state putting economics and profits above the welfare of the citizens of this state.

Vectren's supposed loss of revenue is the cost of operating a business, but paying back the loss should not fall on the backs of people that are already struggling to make ends meet. I'm sure the CEO and board of directors aren't struggling to pay their bills or put groceries on the table.

Please do the right thing. Please do the moral and ethical thing. DONOT approve this increase. It only serves Vectren. They want to make up their loss off the backs of their customers.

Respectfully,  
Johna Vaughan  
Evansville, IN

[Sent from Yahoo Mail on Android](#)

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** OUCC\_Contact\_2361  
**Date:** Friday, May 15, 2020 12:12:42 PM

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## Formstack Submission For: [OUCC\\_Contact\\_2361](#)

Submitted at 05/15/20 12:12 PM

<b>Title:</b>	Mr.
<b>Name:</b>	James Beierlein
<b>Email:</b>	sandrasloft@gmail.com
<b>Address:</b>	18145 Old State Rd Evansville, IN 47725
<b>Telephone (Best number to reach you between 8:00 am and 4:30 pm, Eastern Time, Monday through Friday)::</b>	(812) 455-9633
<b>Type of phone::</b>	Mobile
<b>If you do not have telephone service,:</b>	
<b>If providing comments on a specific case, please indicate</b>	Vectren and most or all Indiana utilities Covid rate increases

**the cause  
number and/or  
name of utility::**

Raising rates due to Corona virus

Many citizens are presently jobless. Many companies are going broke and will fold. I know several business owners that are dipping into their IRAs to survive. They are sacrificing their retirement to just keep their businesses above water. But poor utility companies need to take more money from their customers to please their share holders.

These companies must be grossly mismanaged to be totally dependent on your commission to dig them out of every jam they get into. Sounds like a bunch of spoiled snowflake teenagers run these companies. I guess that is why Vectren is the highest charging monopoly around.

**Your  
Comments::**

Why do they expect ordinary citizens to dig deeper to afford dividends to utility share holders when we little people already cannot make ends meet? This so called pandemic has caused everyone to sacrifice. Why can't the snowflake monopoly utilities do their share too?

I am sure a one time dividend cut of a few pennies won't be the end of the world. Or maybe a one time little cut in bonuses would bring these arrogant mis-managers back down to earth.

We are all in this together.  
I don't need you to contact me I have had my say and have now vented..  
Deny them this time  
I am sure the Utility mis-managers have a safe space to crawl into.  
Thank you  
Jim

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** OUCC\_Contact\_2361  
**Date:** Wednesday, May 13, 2020 6:47:38 AM

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## Formstack Submission For: [OUCC\\_Contact\\_2361](#)

Submitted at 05/13/20 6:47 AM

<b>Title:</b>	Mrs.
<b>Name:</b>	Vsnrssa Shepard-Smith
<b>Email:</b>	vshepardsmith@gmail.com
<b>Address:</b>	1325 Watertree Rd 1325 Watertree Rd Terre Haute, IN 47803
<b>Telephone (Best number to reach you between 8:00 am and 4:30 pm, Eastern Time, Monday through Friday)::</b>	(931) 444-0633
<b>Type of phone::</b>	Mobile
<b>If you do</b>	

not have  
telephone  
service,:

**If providing  
comments  
on a specific  
case, please  
indicate the  
cause  
number  
and/or  
name of  
utility::**

Duke energy

**Your  
Comments::**

The news just reported about a proposed rate hike due to covid-19. I'm asking this be rejected. We are not socialists. I have been fortunate to work, pay my bills and conserve energy during this terrible time. I should not be punished for an inevitable natural process. Electricity is not more scarce. The problem is an opportunistic money grab from bullies. It will hurt the general population more in the long run and many are worse off than myself. I feel they just want our stimulous money, when they should have insurance for their loss. Please say no!

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** OUCC\_Contact\_2361  
**Date:** Friday, May 15, 2020 6:00:21 PM

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## Formstack Submission For: [OUCC\\_Contact\\_2361](#)

Submitted at 05/15/20 6:00 PM

<b>Title:</b>	Ms.
<b>Name:</b>	Cynthia Zimmerman
<b>Email:</b>	cindyjz1018@gmail.com
<b>Address:</b>	2502 Viceroy Lane Lebanon, IN 46052
<b>Telephone (Best number to reach you between 8:00 am and 4:30 pm, Eastern Time, Monday through Friday)::</b>	(765) 484-8278
<b>Type of phone::</b>	Home
<b>If you do not have telephone service,:</b>	
<b>If providing comments on a specific case, please indicate the cause number and/or name of utility::</b>	Vectren
<b>Your Comments::</b>	Please, no rate increases for them due to lost revenue from the virus.

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** OUCC\_Contact\_2361  
**Date:** Wednesday, May 13, 2020 8:34:25 AM

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## Formstack Submission For: [OUCC\\_Contact\\_2361](#)

Submitted at 05/13/20 8:34 AM

<b>Title:</b>	Mrs.
<b>Name:</b>	Karla Kappler
<b>Email:</b>	kkapp6961@aol.com
<b>Address:</b>	6961 Green Hill Drive Evansville , IN 47711
<b>Telephone (Best number to reach you between 8:00 am and 4:30 pm, Eastern Time, Monday through Friday)::</b>	(812) 867-6767
<b>Type of phone::</b>	Home
<b>If you do not have</b>	

telephone  
service,:

**If providing  
comments  
on a specific  
case, please  
indicate the  
cause  
number  
and/or  
name of  
utility::**

Utility Companies asking to recover costs and charge customers for energy that they didn't use.

**Your  
Comments::**

The request made by Indiana Utility Companies including Duke Energy, Indianapolis Power & Light, Vectren, and Northern Indiana Public Service Company on or about May 13, 2020, to recover costs associated with COVID-19 for losses incurred NOT energy used by the consumer should be DECLINED. If the Indiana Regulatory Commission allows utilities to raise rates to cover their losses, then a precedent for other utilities and companies to do the same will be set causing additional monetary losses to consumers who are already paying for losses due to COVID-19 through job losses, lower income, and possible loss of life. Insurance companies will also be raising rates to cover the costs of COVID-19. Why are we, the consumers, being asked to cover the cost of a utility company's business? Costs across the state's entire economy will be affected. The utility companies should NOT expect to profit from this, they should suffer the same as the consumers and other businesses. We should not be expected to pay for their costs associated with NON-ENERGY related costs. PLEASE REFUSE THIS REQUEST!

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** OUCC\_Contact\_2361  
**Date:** Thursday, May 14, 2020 8:52:37 AM

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## Formstack Submission For: [OUCC\\_Contact\\_2361](#)

Submitted at 05/14/20 8:52 AM

<b>Title:</b>	Mr.
<b>Name:</b>	Jeff Butrum
<b>Email:</b>	<a href="mailto:jeff.butrum@johnstonesupply.com">jeff.butrum@johnstonesupply.com</a>
<b>Address:</b>	23 S Iroquois Dr. 23 S Iroquois Dr. Evansville, IN 47714
<b>Telephone (Best number to reach you between 8:00 am and 4:30 pm, Eastern Time, Monday through Friday)::</b>	(812) 305-1998
<b>Type of phone::</b>	Mobile
<b>If you do not have telephone service,:</b>	
<b>If providing</b>	

**comments on a  
specific case,  
please indicate  
the cause  
number and/or  
name of  
utility::**

**Your  
Comments::**

I wasn't able to find a specific cause no. for what I'm concerned about, but I'm sure you'll know to which case it applies. We, here in Southern Indiana who have been able to continue to pay our monthly bills, and those who haven't, can hardly afford a rate increase to recover lost revenue due to Covid 19. Vectren and Duke Energy, and any other utility that asks for more of our hard earned money right now, should be ashamed.

I would think whatever they say they've lost, is probably still owed to them by consumers who haven't been able to keep up, and that money will be recovered in due time, for the most part.

Please! Please don't allow rate increases at this time, as we're all suffering a little or, in some cases, a lot right now.

Thank you.

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** OUCC\_Contact\_2361  
**Date:** Tuesday, May 12, 2020 3:15:49 PM

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## Formstack Submission For: [OUCC\\_Contact\\_2361](#)

Submitted at 05/12/20 3:15 PM

<b>Title:</b>	Mr.
<b>Name:</b>	Robert Ragland
<b>Email:</b>	<a href="mailto:rags@reagan.com">rags@reagan.com</a>
<b>Address:</b>	5912 n 450 Leesburg , IN 46538
<b>Telephone (Best number to reach you between 8:00 am and 4:30 pm, Eastern Time, Monday through Friday)::</b>	(574) 453-7290
<b>Type of phone::</b>	Home
<b>If you do not have telephone service,:</b>	
<b>If providing comments on a specific case, please indicate the cause number and/or</b>	Indiana Utilities charge increase

**name of utility::**

**Your Comments::**

Please do not allow any rate increase just recently re requested by the Indiana Utilities. I am a NIPSCO customer in Kosciusko County for 30 years....and I grew up in Marion County.

These companies first need to reduce staff, excessive costs, future plannings and refinance their costs and expenses, etc... to get their costs in line just as other companies do and not put anymore burden on Indiana taxpayers.  
VOTE NO!

Thank you,

Robert A. Ragland

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** OUCC\_Contact\_2361  
**Date:** Tuesday, May 12, 2020 3:07:28 PM

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## Formstack Submission For: [OUCC\\_Contact\\_2361](#)

Submitted at 05/12/20 3:07 PM

<b>Title:</b>	Mr.
<b>Name:</b>	Robert Parrin
<b>Email:</b>	bobparrin@aol.com
<b>Address:</b>	620 Forest Blvd INDIANAPOLIS, IN 46240
<b>Telephone (Best number to reach you between 8:00 am and 4:30 pm, Eastern Time, Monday through Friday)::</b>	(317) 475-1533
<b>Type of phone::</b>	Home
<b>If you do not have telephone service,:</b>	
<b>If providing comments on a specific case,</b>	

**please indicate  
the cause  
number and/or  
name of utility::**

**Your  
Comments::**

Like many people do, I sit down at my desk at the beginning of every month and set up my bills for payment based on my cash flow and the due dates of the bill. I pay with electronic funds transfer, a cost saving to the supplier.

IPL is the only supplier of goods and services that I use that use that does not allow a bill to be scheduled for a due date. The only choice is to pay the day you go online on the IPL web site. So I either pay weeks early or take the chance that I will remember to pay it on the due date.

I have pointed this out to IPL several times and get no response. That's not surprising given that IPL is a monopoly. But that's why you exist, the voice of the consumer to add at least a little market force on the regulated utility.

Programmatically adding this feature is simple. It's even included in off-the-shelf business software. Thanks for listening and good luck with IPL.

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** OUCC\_Contact\_2361  
**Date:** Wednesday, May 13, 2020 8:19:28 PM

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## Formstack Submission For: [OUCC\\_Contact\\_2361](#)

Submitted at 05/13/20 8:19 PM

<b>Title:</b>	Mr.
<b>Name:</b>	Jerry Webb
<b>Email:</b>	<a href="mailto:jwebb@shambaugh.com">jwebb@shambaugh.com</a>
<b>Address:</b>	3923 Thomas Jefferson Rd Lafayette, IN 47909
<b>Telephone (Best number to reach you between 8:00 am and 4:30 pm, Eastern Time, Monday through Friday)::</b>	(260) 740-1931
<b>Type of phone::</b>	Mobile
<b>If you do not have</b>	

**telephone  
service,:**

**If providing  
comments  
on a specific  
case, please  
indicate the  
cause  
number  
and/or  
name of  
utility::**

**Your  
Comments::**

In regard to Duke Energy filing to recoupe losses due to Covid19 I wish to express as everyone know everybody has taken a loss not just the utility companies. Is every aspect of business staying above the loss line is no guarantee. But asking everyone to pay for losses is ridiculous in a time like this. I am not in a position to be guaranteed for my finances to be In the green all the time. Some of the losses are because of deceased people or people who lost their jobs by orders of the state government and now the utility is asking to beat people down even more. I am fortunate and am an essential person with no loss of income and pay my bills. My concern is for those not as fortunate as myself. I ask for an audit of Duke Energy to know just how much loss vs federal funding they received. Ples be mindful everybody is hurting without an equivalent bailout that the utility companies are asking for. What business is next to ask to not be affected?

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** OUCC\_Contact\_2361  
**Date:** Tuesday, May 12, 2020 9:05:43 AM

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## Formstack Submission For: [OUCC\\_Contact\\_2361](#)

Submitted at 05/12/20 9:05 AM

<b>Title:</b>	Mr.
<b>Name:</b>	Chris Hawes
<b>Email:</b>	cwhawes09@gmail.com
<b>Address:</b>	976 N Bolton Indianapolis, IN 46219
<b>Telephone (Best number to reach you between 8:00 am and 4:30 pm, Eastern Time, Monday through Friday)::</b>	(765) 366-2757
<b>Type of phone::</b>	Mobile
<b>If you do not have telephone service,:</b>	
<b>If providing comments on a specific case,</b>	

**please indicate  
the cause  
number and/or  
name of utility::**

IPL, Duke Energy, et. al COVID-19 rate increase

**Your  
Comments::**

I am a customer of IPL and Duke. Approval to charge customers lost revenue as a result of the pandemic should not be granted. The utility companies in no way should be allowed to recategorize lower energy sales as an 'expense' and then charge us for it later. This is unconscionable.

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Formstack, 11671 Lantern Road, Suite 300, Fishers, IN 46038

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** OUCC\_Contact\_2361  
**Date:** Wednesday, May 13, 2020 6:22:00 PM

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## Formstack Submission For: [OUCC\\_Contact\\_2361](#)

Submitted at 05/13/20 6:21 PM

<b>Title:</b>	Mrs.
<b>Name:</b>	Christina Todd
<b>Email:</b>	ooley todd29@gmail.com
<b>Address:</b>	1510 Crekside Lane Greenwood, IN 46142
<b>Telephone (Best number to reach you between 8:00 am and 4:30 pm, Eastern Time, Monday through Friday)::</b>	(317) 801-5239
<b>Type of phone::</b>	Mobile
<b>If you do not have</b>	

telephone  
service,:

**If providing  
comments  
on a specific  
case, please  
indicate the  
cause  
number  
and/or  
name of  
utility::**

**Your  
Comments::**

Hello,  
I want to provide a comment regarding the rate increase request from several utilities due to lost revenue during the COVID pandemic. While I have paid my bills each month on time, it is understandable others have not. The federal government directed this to be allowable, so I should not be responsible for picking up this slack. That defeats the entire intent of what the federal government directed! Again it is not my responsibility as a consumer to make up the deficit directed by the federal government. Please work to encourage the federal regulatory commission to deny further consideration of this request! What are other ways I, as a consumer, can push back against this request? Thank you. Christina Todd

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** OUCC\_Contact\_2361  
**Date:** Wednesday, May 13, 2020 4:34:22 PM

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## Formstack Submission For: [OUCC\\_Contact\\_2361](#)

Submitted at 05/13/20 4:34 PM

<b>Title:</b>	Mrs.
<b>Name:</b>	Lisa Davis
<b>Email:</b>	irish_lass717@yahoo.com
<b>Address:</b>	418 Cleveland Ave Princeton, IN 47670
<b>Telephone (Best number to reach you between 8:00 am and 4:30 pm, Eastern Time, Monday through Friday)::</b>	(812) 386-6564
<b>Type of phone::</b>	Home
<b>If you do not have</b>	

telephone  
service,:

**If providing  
comments  
on a specific  
case, please  
indicate the  
cause  
number  
and/or  
name of  
utility::**

Indiana Utilities Petition 45377 to charge consumers for lost revenue & "bad debt expense incurred"

**Your  
Comments::**

I am against this petition. Although utility companies were ordered not to disconnect services for non-payment, when this order is withdrawn, these utilities will be able to disconnect for non-payment, collect monies owed, and charge a reconnect fee to resume utilities. Regarding the loss from businesses closed, we've all suffered loss. Other business have suffered loss as well with no recourse for losses, why should utilities be favored over them. It's a risk of doing business. Also, the working employees have gone without normal paychecks with unemployment providing only a fraction of their normal wages. We've done without to make ends meet. We are suffering too, and they propose to add more hardship on top of it in demanding we pay for their losses as well? That is ludicrous! We've paid our utility bills on time and see this as insult to injury. Please deny this petition for the sake of the average working consumer who has already lost so much through this pandemic,

Sincere Thanks,  
Lisa Davis

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** OUCC\_Contact\_2361  
**Date:** Saturday, May 16, 2020 8:08:33 AM

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## Formstack Submission For: [OUCC\\_Contact\\_2361](#)

Submitted at 05/16/20 8:08 AM

<b>Title:</b>	Mr.
<b>Name:</b>	Britton Shoellhorn
<b>Email:</b>	dainwei@gmail.com
<b>Address:</b>	PO Box 1024 Greenwood, IN 46142
<b>Telephone (Best number to reach you between 8:00 am and 4:30 pm, Eastern Time, Monday through Friday)::</b>	(937) 679-9074
<b>Type of phone::</b>	Mobile
<b>If you do not have telephone service,:</b>	
<b>If providing</b>	

**comments on a specific case, please indicate the cause number and/or name of utility::**

All utilities in Indiana

**Your Comments::**

Please do not allow utility companies to raise their rates furring these unprecedented times. Our fellow Hoosiers are already suffering. This is sickening that they are attempting to prey on Hoosiers during this. There should be no rate hikes for at least five years while we recover from something that has damaged our society.

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [UCC Consumer Info](#)  
**Subject:** OUCC\_Contact\_2361  
**Date:** Wednesday, May 13, 2020 12:14:43 PM

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## Formstack Submission For: [OUCC\\_Contact\\_2361](#)

Submitted at 05/13/20 12:14 PM

<b>Title:</b>	Mrs.
<b>Name:</b>	Kristina Anderson
<b>Email:</b>	tysthe1@gmail.com
<b>Address:</b>	19 S Lynhurst Dr Indianapolis, IN 46241
<b>Telephone (Best number to reach you between 8:00 am and 4:30 pm, Eastern Time, Monday through Friday)::</b>	(317) 603-1249
<b>Type of phone::</b>	Home
<b>If you do not have telephone service,:</b>	
<b>If providing comments on a specific case, please indicate the cause number and/or</b>	Lights, Gas,& water

**name of utility::**

hello

I believe it is wrong of the utility companies to request to raise orices due to the pandemic. People who are struggling to pay now should not have to make up the difference of what these companies are loosing.

The utility Companies should be applying for the low interest loans that are being offered to companies that are affected by the pandemic.

I also believe that the disconnects should remain off limits for now as the utility companies will recoop those lost monies as people can afford to pay the bills when they get stimulus checks, unemployment, or go back to work.

Affordable payment arrangements should be made with residents that can't pay now before they are disconnected.

We have no choice in who to buy utilities from so everyone will need to settle up their bills to continue utility service when this is done.

Raising utility rates only means the utility companies will get their money twice. From us now and then when people get back to work.

Thank you, Kristina Anderson

**Your Comments::**

**From:** [Justin Yannotti](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** COVID 19 Utility Increase  
**Date:** Tuesday, May 12, 2020 7:51:42 PM

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Justin Yannotti  
3370 Black Forest Ln  
Indianapolis, IN 46239  
[Justin.Yannotti@outlook.com](mailto:Justin.Yannotti@outlook.com)  
317-296-4965

To Whom It May Concern:

I am writing in response to the following article: <https://www.ibj.com/articles/indiana-utilities-seek-permission-to-charge-consumers-for-revenue-lost-as-result-of-pandemic?fbclid=IwAR1cAGl6GO2sVkgMZwBGZy9RqbBGdkU6qn0D3pt1Fn9pXumSjPHOCYTvQGo>

Utility companies have been asking for rate increases for the most ridiculous things over the last few years, and some of it I agree may have been needed. As an essential business utility companies are NEEDED, not wanted. Why should everyday consumers be responsible for the shortcomings of the utility companies when we are ALL Feeling the effects of COVID 19.

Companies all over the country, not just in Indiana are seeing increased costs associated with COVID-19. Increased healthcare costs, increased time off, increased sick time use and any other expense incurred from this crisis is not something unique to Indiana Utilities. Everyone is feeling it. Why should they feel like they need a special bail out? Please think twice before approving this.

Justin Yannotti  
Indianapolis, Indiana – Marion County Indiana  
Indianapolis Power and Light Customer  
Citizens Energy Customer

**From:** [Dawn R Stitzer](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Do not raise  
**Date:** Tuesday, May 12, 2020 7:21:18 PM

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Indiana utility does not need to raise. Other states for the past two months lowered the prices of utilities by the order of governor 50 percent. Because here in Indiana the utilities did not raise it at all. My bill used to be 85 00 because you let them raised it three times it got to be 136.00 a month. That two high it needs to be based on how much people un other states are paying size of home people that make less than 85.000 a year should pay 125 00 people less than 85.000 that make 65 000 100.000 and year and peiole that make less pay 75. A month people not social security or SSI or disabltly pay 50.00 that should be far

**From:** [jeff thomas](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Duke energy rate hikes  
**Date:** Wednesday, May 13, 2020 5:59:01 AM

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Just as the covid 19 stuff started i got a letter from duke raising my rates on my bill from 180 dollars a month to 220 dollars a month. Im currently on budget billing how can you budget 60 extra dollars a month. Let alone giving them more per month on a monthly basis. They just had state wide storms causing some outages. But we as consumers also are taking it on the chin for this my roof needs replaced my insurance only paying partial replacement due to outdated old shingles. We are responsible for the rest as consumer's creating hardships on consumer' is the only thing this will accomplish duke energy is a for profit buisness and probably applied for grants due to covid please check for grants and government monies before saying that they can add additional consumer monies to this please.

**From:** [Aaron Abbott](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Duke Energy  
**Date:** Wednesday, May 13, 2020 6:33:07 PM

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### To Whom It May Concern:

Utility companies have been asking for rate increases for the most ridiculous things over the last few years, and some of it I agree may have been needed. As an essential business utility companies are NEEDED, not wanted. Why should everyday consumers be responsible for the shortcomings of the utility companies when we are ALL Feeling the effects of COVID 19. Companies all over the country, not just in Indiana are seeing increased costs associated with COVID-19. Increased healthcare costs, increased time off, increased sick time use and any other expense incurred from this crisis is not something unique to Indiana Utilities. Everyone is feeling it. Why should they feel like they need a special bail out? Please think twice before approving.

**From:** [Staci Bray](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Indiana utilities - Please reject joint petition #45377  
**Date:** Monday, May 11, 2020 2:29:02 PM

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Re: Indiana utilities - Please reject joint petition #45377

Dear Utility Consumer Counselor,

Indiana's monopoly utilities want to charge customers like me for the energy that they did not sell because of the COVID19 global pandemic.

Indiana should be protecting Hoosiers by extending the shut-off moratorium and putting in place a freeze on rate increases until this economic and health crisis has ended.

Indiana needs to create a Utility Affordability Task Force to address the financial cliff that is coming once emergency orders are lifted, specifically how can we ensure customers can stay connected and afford their utility bills once the moratorium on utility disconnects ends.

Please reject this act of greed by the utilities and work to ensure that all Hoosiers have uninterrupted access to essential utility services and are able to remain comfortably and safely in their own homes.

Sincerely,  
Staci Bray  
[sab03@aol.com](mailto:sab03@aol.com)  
3520, E Fall Creek Pkwy N Dr Apt A Indianapolis, IN 46205 Constituent

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**From:** [Daphne](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** IPL raising rates by using trackers and their attempted theft (recovery)  
**Date:** Friday, May 15, 2020 11:02:11 PM

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Hello,

I am very concerned that IPL has been allowed to raise their rates at all, though it's not as much as they wanted. I am livid that this has been allowed. Having to pay for services never received is THEFT. Most people are struggling enough. Even though my husband and I have been lucky enough to have never been late in 20 plus years we have had IPL service. I'm sure their CEOs have MORE THAN ENOUGH money and obscenely high salaries to solve this themselves. Why, why have they been allowed to even get the amount they did? It is THEFT!

**From:** [Kay Herndon](#)  
**To:** [UCC Consumer Info](#)  
**Date:** Wednesday, May 13, 2020 6:49:42 PM

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To Whom It May Concern:

Utility companies have been asking for rate increases for the most ridiculous things over the last few years, and some of it I agree may have been needed. As an essential business utility companies are NEEDED, not wanted. Why should everyday consumers be responsible for the shortcomings of the utility companies when we are ALL Feeling the effects of COVID 19. Companies all over the country, not just in Indiana are seeing increased costs associated with COVID-19. Increased healthcare costs, increased time off, increased sick time use and any other expense incurred from this crisis is not something unique to Indiana Utilities. Everyone is feeling it. Why should they feel like they need a special bail out? Please think twice before approving.

**From:** [Marissa Cottrell](#)  
**To:** [UCC Consumer Info](#)  
**Date:** Wednesday, May 13, 2020 6:35:07 PM

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To Whom It May Concern:

Utility companies have been asking for rate increases for the most ridiculous things over the last few years, and some of it I agree may have been needed. As an essential business utility companies are NEEDED, not wanted. Why should everyday consumers be responsible for the shortcomings of the utility companies when we are ALL Feeling the effects of COVID 19.

Companies all over the country, not just in Indiana are seeing increased costs associated with COVID-19. Increased healthcare costs, increased time off, increased sick time use and any other expense incurred from this crisis is not something unique to Indiana Utilities. Everyone is feeling it. Why should they feel like they need a special bail out? Please think twice before approving.

**From:** [Becky Merriman](#)  
**To:** [UCC Consumer Info](#)  
**Date:** Wednesday, May 13, 2020 7:04:44 PM

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To Whom It May Concern:

Utility companies have been asking for rate increases for the most ridiculous things over the last few years, and some of it I agree may have been needed. As an essential business utility companies are NEEDED, not wanted. Why should everyday consumers be responsible for the shortcomings of the utility companies when we are ALL Feeling the effects of COVID 19.

Companies all over the country, not just in Indiana are seeing increased costs associated with COVID-19. Increased healthcare costs, increased time off, increased sick time use and any other expense incurred from this crisis is not something unique to Indiana Utilities. Everyone is feeling it. Why should they feel like they need a special bail out? Please think twice before approving

**From:** [Sanders, Alyson](#)  
**To:** [UCC Consumer Info](#)  
**Cc:** [Rivera, Olivia](#)  
**Subject:** New Inquiry 128911 CRM:0219000000533  
**Date:** Tuesday, May 12, 2020 2:14:18 PM

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This correspondence is regarding an inquiry the Consumer Affairs Division of the Indiana Utility Regulatory Commission received involving Duke Energy Indiana, LLC. Please review the information contained here and respond directly to this email. For tracking purposes, please keep all subsequent correspondence in the same email thread.

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Case: 128911  
Created On: 5/12/2020 1:26 PM  
Assigned Date: 5/12/2020 2:03 PM  
Case Type: Inquiry  
Industry: Electric  
**Hot Case Type:**  
Case Category: Billing Dispute  
Case Detail 1: Rates  
Case Detail 2:  
Contact Method: Online  
Assigned Analyst: Alyson Sanders

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Customer Type: Residential  
Customer: Rhonda Reynolds  
Business Phone:  
Home Phone: 812-917-2058  
Contact Phone: 812-917-2058  
Service Address: 1620 GARFIELD AVE  
City, State, ZIP: Terre Haute , IN , 47804  
Email: rfpadp@gmail.com

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Case Description: They do not need a rate increase. Covid has affected everyone's income. They know they will get all of their money sooner rather than later. The rate increase would not make up for what people still owe. They will have no problem shutting people off who don't pay and then they will get all the fees and reconnect charges as well. They've sent me several emails talking about how we are all in this together. Make them stand on their words. Thank you for listening.

Sincerely,

**From:** [Sanders, Alyson](#)  
**To:** [UCC Consumer Info](#)  
**Cc:** [Rivera, Olivia](#)  
**Subject:** New Inquiry 128912 CRM:0219000000536  
**Date:** Tuesday, May 12, 2020 2:52:18 PM

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This correspondence is regarding an inquiry the Consumer Affairs Division of the Indiana Utility Regulatory Commission received involving Duke Energy Indiana, LLC. Please review the information contained here and respond directly to this email. For tracking purposes, please keep all subsequent correspondence in the same email thread.

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Case: 128912  
Created On: 5/12/2020 2:14 PM  
Assigned Date: 5/12/2020 2:27 PM  
Case Type: Inquiry  
Industry: Electric  
**Hot Case Type:**  
Case Category: Billing Dispute  
Case Detail 1: Rates  
Case Detail 2:  
Contact Method: Online  
Assigned Analyst: Alyson Sanders

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-----  
Customer Type: Residential  
Customer: Jarrad Klitz  
Business Phone:  
Home Phone:  
Contact Phone: 812-564-0635  
Service Address: 209 w Eaton Street  
City, State, ZIP: Carlisle , IN , 47838  
Email: shs\_baseball6@yahoo.com

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----  
Case Description: Tired of Duke trying to raise utility prices every year

Sincerely,

Alyson Sanders  
Consumer Affairs Division

Indiana Utility Regulatory Commission  
101 West Washington Street, Suite 1500 E  
Indianapolis, IN 46204  
317-232-2717  
AlSanders@urc.IN.gov

**From:** [Sanders, Alyson](#)  
**To:** [UCC Consumer Info](#)  
**Cc:** [Rivera, Olivia](#)  
**Subject:** New Inquiry 128913 CRM:0219000000538  
**Date:** Tuesday, May 12, 2020 3:38:49 PM

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This correspondence is regarding an inquiry the Consumer Affairs Division of the Indiana Utility Regulatory Commission received involving Duke Energy Indiana, LLC. Please review the information contained here and respond directly to this email. For tracking purposes, please keep all subsequent correspondence in the same email thread.

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Case: 128913  
Created On: 5/12/2020 2:58 PM  
Assigned Date: 5/12/2020 3:36 PM  
Case Type: Inquiry  
Industry: Electric  
**Hot Case Type:**  
Case Category: Billing Dispute  
Case Detail 1: Rates  
Case Detail 2:  
Contact Method: Online  
Assigned Analyst: Alyson Sanders

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-----  
Customer Type: Residential  
Customer: Melissa Williams  
Business Phone:  
Home Phone:  
Contact Phone: 812-251-9297  
Service Address: 975 South 450 East  
City, State, ZIP: Hillsdale , IN , 47854  
Email: mmwilliams@uhhg.org

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Case Description: I have paid my bill and will continue to do so. I do not feel that a rate increase is fair because the company is losing money. We the people should not bail you out. My hair Salon has been closed for 2 months... we they re open they will not charge me a higher rate because they lost money. How is this fair? Signed  
RN

Sincerely,

**From:** [Sanders, Alyson](#)  
**To:** [UCC Consumer Info](#)  
**Cc:** [Rivera, Olivia](#)  
**Subject:** New Inquiry 128915 CRM:0219000000541  
**Date:** Tuesday, May 12, 2020 4:02:05 PM

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This correspondence is regarding an inquiry the Consumer Affairs Division of the Indiana Utility Regulatory Commission received involving Duke Energy Indiana, LLC. Please review the information contained here and respond directly to this email. For tracking purposes, please keep all subsequent correspondence in the same email thread.

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Case: 128915  
Created On: 5/12/2020 3:20 PM  
Assigned Date: 5/12/2020 3:42 PM  
Case Type: Inquiry  
Industry: Electric  
**Hot Case Type:**  
Case Category: Billing Dispute  
Case Detail 1: Rates  
Case Detail 2:  
Contact Method: Online  
Assigned Analyst: Alyson Sanders

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Customer Type: Residential  
Customer: Lolita Batchelor  
Business Phone: 812-264-8850  
Home Phone: 812-264-8850  
Contact Phone: 812-264-8850  
Service Address: 8150 Gospel Grove Ave  
City, State, ZIP: Terre Haute , IN , 47803  
Email: lolitambatchelor@gmail.com

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Case Description: i hear that duke energy is asking for a rate increase to recoup loses during the Pandemic. After years of record profits and loss of humanity and basic customer service a deplore you not to grant this rate increase and cause further suffering on the working class people.

Sincerely,

**From:** [Sanders, Alyson](#)  
**To:** [UCC Consumer Info](#)  
**Cc:** [Rivera, Olivia](#)  
**Subject:** New Inquiry 128918 CRM:0219000000544  
**Date:** Wednesday, May 13, 2020 8:37:44 AM

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This correspondence is regarding an inquiry the Consumer Affairs Division of the Indiana Utility Regulatory Commission received involving Duke Energy Indiana, LLC. Please review the information contained here and respond directly to this email. For tracking purposes, please keep all subsequent correspondence in the same email thread.

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Case: 128918  
Created On: 5/13/2020 8:32 AM  
Assigned Date: 5/13/2020 8:33 AM  
Case Type: Inquiry  
Industry: Electric  
**Hot Case Type:**  
Case Category: Billing Dispute  
Case Detail 1: Rates  
Case Detail 2:  
Contact Method: Online  
Assigned Analyst: Alyson Sanders

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Customer Type: Residential  
Customer: Greg Trotman  
Business Phone:  
Home Phone:  
Contact Phone: 248-880-8187  
Service Address: 143 Edgewater Drive  
City, State, ZIP: Noblesville , IN , 46062  
Email: gtrot223@yahoo.com

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Case Description: I want to state my opinion on the rate hike request in the news recently. The utilities do not need to raise utility rates especially at a time when their customers are faced with a global pandemic. They also just won approval and received a 15% increase. They need to do like other businesses and individuals to get through these tough times and instead of transferring problems onto their customers, take some responsibility and run their business in a way that aligns with the needs of their customers and communities. Just passing the problem along does nothing and anyone can do that.

**From:** [Sanders, Alyson](#)  
**To:** [UCC Consumer Info](#)  
**Cc:** [Rivera, Olivia](#)  
**Subject:** New Inquiry 128920 CRM:0219000000547  
**Date:** Wednesday, May 13, 2020 10:13:44 AM

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This correspondence is regarding an inquiry the Consumer Affairs Division of the Indiana Utility Regulatory Commission received involving Duke Energy Indiana, LLC. Please review the information contained here and respond directly to this email. For tracking purposes, please keep all subsequent correspondence in the same email thread.

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Case: 128920  
Created On: 5/13/2020 9:56 AM  
Assigned Date: 5/13/2020 10:09 AM  
Case Type: Inquiry  
Industry: Electric  
**Hot Case Type:**  
Case Category: Billing Dispute  
Case Detail 1: Rates  
Case Detail 2:  
Contact Method: Online  
Assigned Analyst: Alyson Sanders

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-----  
Customer Type: Residential  
Customer: Donald Dicus  
Business Phone:  
Home Phone: 812-878-5183  
Contact Phone: 812-878-5183  
Service Address: 648 Helen Ave  
City, State, ZIP: Terre Haute , IN , 47802  
Email: ddicus1979@yahoo.com

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Case Description: I'm upset about the sheer audacity and greed displayed by Duke Energy seeking to raise rates due to supposed losses during the covid outbreak. I have been paying on time regularly throughout this ordeal. They should be seeking help from governmental means not consumers. This is greed and robbery at its finest. I would request there be action against this being implemented. Thank you and good day.

**From:** [Sanders, Alyson](#)  
**To:** [UCC Consumer Info](#)  
**Cc:** [Rivera, Olivia](#)  
**Subject:** New Inquiry 128927 CRM:0219000000550  
**Date:** Wednesday, May 13, 2020 4:16:48 PM

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This correspondence is regarding an inquiry the Consumer Affairs Division of the Indiana Utility Regulatory Commission received involving Indiana Michigan Power Company. Please review the information contained here and respond directly to this email. For tracking purposes, please keep all subsequent correspondence in the same email thread.

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Case: 128927  
Created On: 5/13/2020 3:49 PM  
Assigned Date: 5/13/2020 4:09 PM  
Case Type: Inquiry  
Industry: Electric  
**Hot Case Type:**  
Case Category: Billing Dispute  
Case Detail 1: Rates  
Case Detail 2:  
Contact Method: Online  
Assigned Analyst: Alyson Sanders

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Customer Type: Residential  
Customer: Allen Delafuente  
Business Phone:  
Home Phone: 602-695-5204  
Contact Phone: 602-695-5204  
Service Address: 48 mill stone drive Apt A  
City, State, ZIP: Elkhart , IN , 46514  
Email: adelafuente86@gmail.com

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Case Description: I&M / Aep Should NOT be allowed to increase rates based on losses during a pandemic!! This is reprehensible, Utility companies generate enough profit to offset losses this year that they may have incurred as a result of the pandemic.

I respectfully request that you not allow utility companies to raise rates at this time. This is a time when we are all suffering financially and we need to simply absorb losses this year and move forward!!

**From:** [Sanders, Alyson](#)  
**To:** [UCC Consumer Info](#)  
**Cc:** [Rivera, Olivia](#)  
**Subject:** New Inquiry 128929 CRM:0219000000553  
**Date:** Thursday, May 14, 2020 8:48:51 AM

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This correspondence is regarding an inquiry the Consumer Affairs Division of the Indiana Utility Regulatory Commission received involving Indiana Michigan Power Company. Please review the information contained here and respond directly to this email. For tracking purposes, please keep all subsequent correspondence in the same email thread.

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Case: 128929  
Created On: 5/13/2020 5:10 PM  
Assigned Date: 5/14/2020 8:47 AM  
Case Type: Inquiry  
Industry: Electric  
**Hot Case Type:**  
Case Category: Billing Dispute  
Case Detail 1: Rates  
Case Detail 2:  
Contact Method: Online  
Assigned Analyst: Alyson Sanders

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Customer Type: Residential  
Customer: Robert Hagle  
Business Phone: 574-298-6228  
Home Phone: 574-298-6228  
Contact Phone: 574-298-6247  
Service Address: 1310 Enchanted Forest Street  
City, State, ZIP: South Bend , IN , 46637  
Email: ncvanlinda@gmail.com

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Case Description: They were already granted a retroactive rate increase now they want extra due to people unable to pay?? This is WRONG it's not our fault the country was shut down and that unemployment is overwhelmed and people have no income They need to be "in This with us " not expecting extra and take the loss like we all have

Sincerely,

**From:** [Carolyn Herz](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Oppose IURC petition no. 45377  
**Date:** Monday, May 11, 2020 2:53:17 PM

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Re: Oppose IURC petition no. 45377

Dear Utility Consumer Counselor,

I am an IPL customer. I have always paid my bills on time and in full, including during the COVID-19 pandemic.

In their petition no. 45377, monopoly utility companies, including IPL, want to charge us customers extra for their expenses incurred as a result of the pandemic, which is not the fault of us customers.

In their petition, the utility companies state that their actions during the pandemic "were made solely for the benefit of Joint Petitioners' customers" (paragraph 5). These utility companies are owned by wealthy investors, including investors from other states and foreign nationals. Forcing us ordinary Hoosiers to cover their pandemic expenses is not acting at all for the benefit of us customers, and certainly not solely for our benefit.

Utility investors' desire to maximize their own personal wealth should not take precedence over the well-being of us ordinary Hoosiers.

Indiana should be protecting Hoosiers by extending the shut-off moratorium and putting in place a freeze on rate increases until this economic and health crisis has ended.

Love of money is the root of all evil. Please reject this act of greed by the utilities.

Sincerely,  
Carolyn Herz  
[chsattysci@gmail.com](mailto:chsattysci@gmail.com)  
3105 Lehigh Ct. Indianapolis, IN 46268 Constituent

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**From:** [Donna Groves](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Re: COVID-19 Consumer Comments  
**Date:** Monday, May 18, 2020 1:09:17 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image002.png](#)

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I will tell you now I will not pay additional money. I am barely staying alive now and Vectren is seeking legal ways to continue to get more money. They make millions in profits, pay CEOs and other management huge bonuses. Who is standing up for those of us who are suffering too. We are expected to live within our means why can't they be expected to do so as well.? I am so tired of being taxes and charges to death. Its ridiculous. Stop allowing these companies to rob us from having even a small sense of comfort. I will move out of the state before I pay any company extra.

On Mon, May 18, 2020, 11:59 AM UCC Consumer Info <[uccinfo@oucc.in.gov](mailto:uccinfo@oucc.in.gov)> wrote:

Thank you for contacting the Indiana Office of Utility Consumer Counselor (OUCC) with your comment regarding the recently filed COVID-19 utility cases.

The OUCC is the state agency representing consumer interests before the Indiana Utility Regulatory Commission (IURC). Our office is asking for an IURC investigation into the coronavirus's impact on utility rates and services. You can learn more about our request at <https://www.in.gov/oucc/2941.htm>.

We will make sure your comments are filed with the IURC so they are included in the formal case records.

We will be providing updates on these cases through our monthly newsletter, and will add you to our subscription list. We will also provide updates on our social media accounts via [Twitter](#), [Facebook](#) and [Instagram](#).

We appreciate your comment and thank you again for contacting us.



Indiana Office of Utility Consumer Counselor

115 West Washington Street

Suite 1500 South

Indianapolis, IN 46204

1-888-441-2494

317-232-2494



**From:** [Wyvonna Perry](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Utilitie  
**Date:** Wednesday, May 13, 2020 6:36:18 PM

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To Whom It May Concern:

Utility companies have been asking for rate increases for the most ridiculous things over the last few years, and some of it I agree may have been needed. As an essential business utility companies are NEEDED, not wanted. Why should everyday consumers be responsible for the shortcomings of the utility companies when we are ALL Feeling the effects of COVID 19. Companies all over the country, not just in Indiana are seeing increased costs associated with COVID-19. Increased healthcare costs, increased time off, increased sick time use and any other expense incurred from this crisis is not something unique to Indiana Utilities. Everyone is feeling it. Why should they feel like they need a special bail out? Please think twice before approving.

Email is

[uccinfo@oucc.in.gov](mailto:uccinfo@oucc.in.gov)

**From:** [Denaë Ball](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Utilities charging more  
**Date:** Wednesday, May 13, 2020 6:55:56 PM

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To Whom It May Concern:

Utility companies have been asking for rate increases for the most ridiculous things over the last few years, and some of it I agree may have been needed. As an essential business utility companies are NEEDED, not wanted. Why should everyday consumers be responsible for the shortcomings of the utility companies when we are ALL Feeling the effects of COVID 19. Companies all over the country, not just in Indiana are seeing increased costs associated with COVID-19. Increased healthcare costs, increased time off, increased sick time use and any other expense incurred from this crisis is not something unique to Indiana Utilities. Everyone is feeling it. Why should they feel like they need a special bail out? Please think twice before approving.

Peace and Blessings,  
Denaë Killebrew

**From:** [cindy.mcguill](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Utilities hike  
**Date:** Wednesday, May 13, 2020 6:56:46 PM

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\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Email the Indiana office of utility consumer counselor office. Copy and paste this to make it easy

To Whom It May Concern:

Utility companies have been asking for rate increases for the most ridiculous things over the last few years, and some of it I agree may have been needed. As an essential business utility companies are NEEDED, not wanted. Why should everyday consumers be responsible for the shortcomings of the utility companies when we are ALL Feeling the effects of COVID 19. Companies all over the country, not just in Indiana are seeing increased costs associated with COVID-19. Increased healthcare costs, increased time off, increased sick time use and any other expense incurred from this crisis is not something unique to Indiana Utilities. Everyone is feeling it. Why should they feel like they need a special bail out? Please think twice before approving.

The public is watching.

[Sent from Yahoo Mail for iPhone](#)

**From:** [Daphne Walker](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Utilities  
**Date:** Wednesday, May 13, 2020 7:11:16 PM

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\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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To Whom It May Concern:

Utility companies have been asking for rate increases for the most ridiculous things over the last few years, and some of it I agree may have been needed. As an essential business utility companies are NEEDED, not wanted. Why should everyday consumers be responsible for the shortcomings of the utility companies when we are ALL Feeling the effects of COVID 19. Companies all over the country, not just in Indiana are seeing increased costs associated with COVID-19. Increased healthcare costs, increased time off, increased sick time use and any other expense incurred from this crisis is not something unique to Indiana Utilities. Everyone is feeling it. Why should they feel like they need a special bail out? Please think twice before approving.

--

Daphne Walker

**From:** [Brian wentz](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Utility companies  
**Date:** Wednesday, May 13, 2020 8:16:59 AM

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To Whom It May Concern:

I am writing in response to the following article:

[https://www.ibj.com/articles/indiana-utilities-seek-permission-to-charge-consumers-for-revenue-lost-as-result-of-pandemic?  
fbclid=IwAR1cAGl6GO2sVkGMZwBGZy9RqbBGdkU6qn0D3pt1Fn9pXumSjPHOCYTvQGo](https://www.ibj.com/articles/indiana-utilities-seek-permission-to-charge-consumers-for-revenue-lost-as-result-of-pandemic?fbclid=IwAR1cAGl6GO2sVkGMZwBGZy9RqbBGdkU6qn0D3pt1Fn9pXumSjPHOCYTvQGo)

Utility companies have been asking for rate increases for the most ridiculous things over the last few years, and some of it I agree may have been needed. As an essential business utility companies are NEEDED, not wanted. Why should everyday consumers be responsible for the shortcomings of the utility companies when we are ALL Feeling the effects of COVID 19. Companies all over the country, not just in Indiana are seeing increased costs associated with COVID-19. Increased healthcare costs, increased time off, increased sick time use and any other expense incurred from this crisis is not something unique to Indiana Utilities. Everyone is feeling it. Why should they feel like they need a special bail out? Please think twice before approving this.

Brian Wentz overcharged frontline  
worker  
Danville, Indiana – Hendricks County Indiana  
Duke power

**From:** [Robert Conaway](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Utility increase  
**Date:** Wednesday, May 13, 2020 6:58:46 PM

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To Whom It May Concern:

Utility companies have been asking for rate increases for the most ridiculous things over the last few years, and some of it I agree may have been needed. As an essential business utility companies are NEEDED, not wanted. Why should everyday consumers be responsible for the shortcomings of the utility companies when we are ALL Feeling the effects of COVID 19.

Companies all over the country, not just in Indiana are seeing increased costs associated with COVID-19. Increased healthcare costs, increased time off, increased sick time use and any other expense incurred from this crisis is not something unique to Indiana Utilities. Everyone is feeling it. Why should they feel like they need a special bail out? Please think twice before approving.

Thank you  
Robert Conaway

Sent from my iPhone

**From:** [Becky Merriman](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Utility rate increase  
**Date:** Wednesday, May 13, 2020 7:07:15 PM

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To Whom It May Concern:

Utility companies have been asking for rate increases for the most ridiculous things over the last few years. and some of it I agree may have been needed. As an essential business utility companies are NEEDED, not wanted. Why should everyday consumers be responsible for the shortcomings of the utility companies when we are ALL Feeling the effects of COVID 19.

Companies all over the country, not just in Indiana are seeing increased costs associated with COVID-19. Increased healthcare costs, increased time off, increased sick time use and any other expense incurred from this crisis is not something unique to Indiana Utilities. Everyone is feeling it. Why should they feel like they need a special bail out? Please think twice before approving.[o](#)

**From:** [DAVID PLOTT](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Utility Revenue Rate Request  
**Date:** Wednesday, May 13, 2020 7:39:13 PM

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To Whom It May Concern:

Utility companies have been asking for rate increases for the most ridiculous things over the last few years, and some of it I agree may have been needed. As an essential business utility companies are NEEDED, not wanted. Why should everyday consumers be responsible for the shortcomings of the utility companies when we are ALL Feeling the effects of COVID 19.

Companies all over the country, not just in Indiana are seeing increased costs associated with COVID-19. Increased healthcare costs, increased time off, increased sick time use and any other expense incurred from this crisis is not something unique to Indiana Utilities. Everyone is feeling it. Why should they feel like they need a special bail out? Please think twice before approving.

Sent from Xfinity Connect Application

**From:** [Caleb Spencer](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Vectren rate increase  
**Date:** Wednesday, May 13, 2020 8:56:31 PM

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I strongly oppose vectren requesting a rate increase. This has absolutely got to stop. My family freezes during winter and hot during summer. We have all H.E. appliances and our Bill's are still averaging \$265 month.

Thanks

Caleb Spencer

**From:** [Amanda Joseph](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Don't allow Indiana utilities to profit from the COVID19 pandemic  
**Date:** Thursday, May 14, 2020 9:16:37 PM

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Re: Don't allow Indiana utilities to profit from the COVID19 pandemic

Dear Utility Consumer Counselor,

Indiana's monopoly utilities want to profit off of COVID19 by charging customers like me for the energy that they did not sell because of the pandemic. Please do not allow this to happen!

Hoosiers are struggling with the impacts of COVID19 right now because of record unemployment, food insecurity, disproportionate health impacts by race and zip code, and unanticipated financial obligations due to the pandemic. The most vulnerable Hoosiers are particularly hard hit: people on low- or fixed-incomes, i.e. senior citizens, people with disabilities, and children.

We are just beginning to understand the extent and length of the economic fallout resulting from the pandemic. In order to protect Hoosiers, I call on you to extend the utility disconnect moratorium until new consumer protection guidelines are put in place. Those guidelines should include the elimination of utility deposit requirements and flexible, reasonable payment plans that are based on the customer's ability to pay.

Sincerely,  
Amanda Joseph  
joseph4@iupui.edu  
2807 Northgate Blvd apt 1 FORT WAYNE, IN 46835 Constituent

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**From:** [Virginia Poston](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Indiana utilities should not be allowed to profit from COVID19 pandemic!  
**Date:** Monday, May 11, 2020 9:23:53 PM

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Re: Indiana utilities should not be allowed to profit from COVID19 pandemic!

Dear Utility Consumer Counselor,

It's bad enough that our utility rates are already some of the highest in the nation.

Indiana's monopoly utilities want to charge customers like me for the energy that they did not sell because of the COVID19 global pandemic.

Indiana should be protecting Hoosiers by extending the shut-off moratorium and putting in place a freeze on rate increases until this economic and health crisis has ended.

Indiana needs to create a Utility Affordability Task Force to address the financial cliff that is coming once emergency orders are lifted, specifically how can we ensure customers can stay connected and afford their utility bills once the moratorium on utility disconnects ends.

Please reject this act of greed by the utilities and work to ensure that all Hoosiers have uninterrupted access to essential utility services and are able to remain comfortably and safely in their own homes.

Sincerely,  
Virginia Poston  
vspother@gmail.com  
729 N Sonntag Ave Evansville, IN 47712 Constituent

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**From:** [Valerie Terman](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Indiana utilities should not be allowed to profit from COVID19 pandemic!  
**Date:** Monday, May 11, 2020 9:26:31 PM

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Re: Indiana utilities should not be allowed to profit from COVID19 pandemic!

Dear Utility Consumer Counselor,

Indiana's monopoly utilities want to charge customers like me for the energy that they did not sell because of the COVID19 global pandemic.

Indiana should be protecting Hoosiers by extending the shut-off moratorium and putting in place a freeze on rate increases until this economic and health crisis has ended.

Indiana needs to create a Utility Affordability Task Force to address the financial cliff that is coming once emergency orders are lifted, specifically how can we ensure customers can stay connected and afford their utility bills once the moratorium on utility disconnects ends.

Please reject this act of greed by the utilities and work to ensure that all Hoosiers have uninterrupted access to essential utility services and are able to remain comfortably and safely in their own homes.

Sincerely,  
Valerie Terman  
[valerieterman@yahoo.com](mailto:valerieterman@yahoo.com)  
3004 lake shore Dr, #E Indianapolis, IN 46205 Constituent

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**From:** [Kolby Smethers](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Reject the opportunism of Indiana utilities  
**Date:** Monday, May 11, 2020 9:57:23 PM

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Re: Reject the opportunism of Indiana utilities

Dear Utility Consumer Counselor,

Indiana's monopoly utilities want to opportunistically profit off of customers like me by charging us for the energy that they did not sell because of the COVID19 global pandemic.

Hoosiers are suffering enough right now because of record unemployment, food insecurity, disproportionate health impacts by race and zip code, and unanticipated financial obligations due to the pandemic.

Please reject the utilities' attempt to exploit Hoosiers. Extend the utility shut-off moratorium and freeze any rate increases until this economic and health crisis has ended.

Sincerely,  
Kolby Smethers  
[kgsmethers@gmail.com](mailto:kgsmethers@gmail.com)  
10866 Trailwood Drive Fishers, IN 46038 Constituent

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**From:** [Kathryn Sturm](#)  
**To:** [UCC Consumer Info](#)  
**Subject:** Reject the opportunism of Indiana utilities  
**Date:** Friday, May 15, 2020 10:31:18 PM

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Re: Reject the opportunism of Indiana utilities

Dear Utility Consumer Counselor,

Indiana's monopoly utilities want to opportunistically profit off of customers like me by charging us for the energy that they did not sell because of the COVID19 global pandemic.

Hoosiers are suffering enough right now because of record unemployment, food insecurity, disproportionate health impacts by race and zip code, and unanticipated financial obligations due to the pandemic.

Please reject the utilities' attempt to exploit Hoosiers. Extend the utility shut-off moratorium and freeze any rate increases until this economic and health crisis has ended.

Sincerely,  
Kathryn Sturm  
kas2105@gmail.com  
7518 Marshall Place Merrillville, IN 46410 Constituent

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