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October 28, 2024

Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway, 3rd Floor
Lansing MI 48909

Re: Case No. U-20359
Indiana Michigan Power Company

Dear Ms. Felice:

Enclosed for filing please find Indiana Michigan Power Company's *IM Plugged In* Pilot Program Semi-Annual Progress Report - October 2024. If you have any questions, please contact me.

Thank you.

Sincerely,

Dykema Gossett PLLC

Richard J. Aaron

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of	)	
INDIANA MICHIGAN POWER COMPANY	)	
for Authority to Increase Its Rates for the Sale of	)	Case No. U-20359
Electric Energy and for Approval of Depreciation	)	
Accrual Rates and Other Related Matters.	)	
	)	

**INDIANA MICHIGAN POWER COMPANY’S
IM PLUGGED IN PILOT PROGRAM SEMI-ANNUAL PROGRESS REPORT
OCTOBER 2024**

In accordance with the January 23, 2020, Order approving the Settlement Agreement in this case, Indiana Michigan Power Company (I&M) submits its semi-annual *IM Plugged In* pilot program report. In the January 23, 2020, Order, the Michigan Public Service Commission (MPSC) approved the *IM Plugged In* pilot program proposed by I&M as modified per the Settlement Agreement. Thereafter, in Case No. U-21461, the MPSC issued an order on July 2, 2024, approving I&M’s request to continue the IM Plugged In program.

Executive Summary

This semi-annual *IM Plugged IN* progress report covers the period between April 1, 2024, and September 30, 2024, and summarizes; 1) I&M’s marketing and outreach campaigns; 2) the effects of the program on charging behaviors and 3) impacts of program design on customer interest and participation. Building on the momentum achieved in 2023, the *IM Plugged In* pilot program experienced measurable increases in customer interest and

applications – demonstrating the effectiveness of marketing strategies and outreach efforts. The Program has seen application growth of over 10.3% from the last reporting period. During this reporting cycle, I&M provided \$17,300 in incentives to support customer EV charger installations.

Program Design Influence

The *IM Plugged IN* Pilot has shown evidence, over the duration of the program, that it has influenced participation, customer buying decisions, as well as charging behaviors of EV owners. Below summarizes a 2024 questionnaire that is part of the application process.

1. Did the IM Plugged IN rebate offer influence your decision to participate in the pilot program?

Answer	Respondents	Percent
YES	299	81%
NO	68	19%

2. Did the IM Plugged IN rebate offer influence your decision to purchase an electric vehicle?

Answer	Respondents	Percent
YES	167	37%
NO	200	63%

Electric Vehicle (EV) Charging Behaviors

Increased EV adoption throughout our service territory brings significant opportunities but is not void of challenges, including additions of substantial load growth, meeting customers' growing needs and managing grid impacts particularly during peak times. Through September of 2024 participants have shifted 74% of their charging load to Off Peak billing hours which reduces strain on the grid during peak hours in addition to

providing rate relief for customers who are on EV tariffs. The table below summarizes usage diversity by tariff.

TARIFF	PARTICIPANTS	TOTAL kWh	ON PEAK%	OFF PEAK%
RS Whole House PEV (057)	30	358.260	34%	66%
RS Separately Metered PEV (058)	1	245	79%	21%
RS Submeter PEV (059)	156	426.773	22%	78%
GS Stand-Alone PEV (219)	5	55.971	33%	67%
GS Submeter PEV (220)	5	16.368	64%	36%

**January through September of 2024*

Program Components

I&M's *IM Plugged In* pilot program consists of several elements that each play an important role in encouraging plug-in electric vehicle (PEV or EV) adoption in a way that optimizes the overall electric system. The elements include:

1. Residential and small commercial PEV charging,
2. Multi-Unit Dwelling (MUD) PEV charging,
3. Commercial and industrial fleet and workplace PEV charging,
4. Interstate corridor PEV charging, and
5. EV education and technical development.

In Case No. U-20359, the MPSC approved the IM Plugged IN pilot program with a limited duration of either 1) a term of 4.5 years from the date of the January 23rd Order; or 2) the effective date of a Commission order in I&M's next base rate case filing. The pilot program has an overall spending cap of \$675,000. Thereafter, on July 2, 2024 in Case No. U-21461, the MPSC approved the continuation of the IM Plugged IN program, including deferral of associated costs.

1. Residential And Small Commercial PEV Charging

The *IM Plugged In* pilot program is available to residential and small commercial customers under the provisions of the Company's Tariff RS/PEV and GS/PEV respectfully. This program offers a \$500 incentive to participating residential and small commercial customers in I&M's service territory with proof of a qualifying PEV purchase on or after the approval date of this program, subject to the *IM Plugged In* spending cap. Customers can apply for the program by completing the *IM Plugged In* Electric Vehicle Charging Equipment Rebate Application Form.¹

Residential & Small Commercial Program Status: Between April 1, 2024, and September 30, 2024, I&M saw growth in customer interest, resulting in sixty-four (64) total applications. This was a 10.3% increase when compared to the fifty-eight (58) applications received for the previous 6-month reporting cycle. A total of twenty-four (24) approved applications resulted in I&M paying a total of \$12,000 in incentives, which were issued to customers through September 2024. Thirty-nine (39) applications remained open as of September 30, 2024, and are eligible for an incentive and/or the discounted rate.

2. Multi-Unit Dwelling (MUD) PEV Charging

MUD Program Details: The *IM Plugged In* MUD pilot program is available to commercial customers who own and operate multi-unit dwelling facilities. The purpose of the program is to encourage the adoption of PEVs by promoting charging behaviors that allow I&M to

¹ <https://www.indianamichiganpower.com/clean-energy/electric-cars/>

integrate the increased electric usage in a way that benefits all customers. Under I&M's MUD program, I&M provides the opportunity to take advantage of one of two incentive options to offset some of the costs of establishing PEV charging systems for their tenants.

The incentive options include:

- A \$2,500 rebate for the first port installed and \$500 for each additional port installed, subject to the aggregate spending cap; and,
- Suspension of Contribution in Aid of Construction (CIAC) subject to the aggregate spending cap.

MUD Program Status: Between April 1, 2024, and September 30, 2024, no new applications resulted from inquiries during the current reporting period. While no new applications were received, I&M's marketing and outreach efforts persist to continue ongoing conversations with interested parties. Each interaction provides an opportunity for in-house I&M staff to offer education on existing charger technology, available incentives and to provide energy service expertise.

3. Commercial and Industrial Fleet and Workplace PEV Charging

Fleet/Workplace Program Details: The Fleet/Workplace program is available to commercial and industrial customers. The purpose of the program is to encourage the adoption of PEVs by promoting charging behaviors that allow I&M to integrate the increased electric usage in a way that benefits all customers. Under I&M's Fleet/Workplace program, I&M would provide customers with the opportunity to take advantage of one of two incentive options to offset some of the costs of establishing a fleet of PEVs. The incentive options include:

- A \$2,500 rebate for the first port installed and \$500 for each additional port installed, subject to the aggregate spending cap; and,
- Suspension of Contribution in Aid of Construction (CIAC) subject to the aggregate spending cap.

Fleet/Workplace Program Status: I&M received two (2) inquiries during the current reporting period. The first inquiry was to pay out \$2,500 rebate plus an additional \$500 for the additional port installed. The second request was to suspend CIAC in the amount of \$2,300. I&M continued to work directly with commercial and industrial customers to share the benefits of the commercial and industrial electric fleet vehicle program and workplace charging program.

4. Interstate Corridor PEV Charging

I&M's Interstate Corridor PEV Charging program supports the Michigan Department of Environment, Great Lakes, and Energy (EGLE) *Charge Up Michigan Program*, an EV Charger Placement project, that aims to build the infrastructure for DC fast charging stations in the state of Michigan to ensure feasibility of all long-distance trips for electric vehicle (EV) users, within the state, and to neighboring states and Canada. Applications are first submitted to I&M to review for; (1) alignment with EGLE identified site/node locations; (2) alignment with IM service territory; and (3) impact on current and future load requirements on I&M energy infrastructure. Once reviewed and approved, developers are notified to apply to *Charge Up Michigan Program* for further review and ultimate approval. EGLE will accept and process applications on a first come, first serve basis until funding is exhausted. Of the 75 location nodes that EGLE has determined that need additional DC fast charging stations, only one node (#18) is within I&M's service territory.

Interstate Corridor Program Status: Between April 1, 2024, and September 30, 2024, IM received no inquiries, and paid no incentives during the current reporting period. I&M will continue to accept applications that have been approved by EGLE until funding for the *Charge Up Michigan Program* runs out.

5. Electric Vehicle Customer Outreach & Education

Between April 1, 2024, and September 30, 2024, I&M utilized digital advertisements, social media platforms, and targeted email messaging to educate, engage, and reach out to customers. Our digital campaigns included streaming audio, digital display ads, and social media (Facebook, Instagram, etc.), leveraging both paid and organic media to highlight EV awareness and promote our rebates and incentives.

Streaming audio allowed us to specifically target customers interested in electric vehicles, often while they were driving. Our digital display ads reached customers as they engaged with other digital media, such as reading online articles. Paid and organic social media messages were shared on Facebook, Instagram, X, and LinkedIn. During the reporting period, I&M undertook the following activities:

- In April and September 2024, I&M sent over 4,000 emails each time to residential customers who met specific criteria. These emails provided information on saving money by charging electric vehicles at night and included details on how to enroll and receive a \$500 rebate.
- In May and September, I&M featured the EV program on the homepage at [IndianaMichiganPower.com](https://www.IndianaMichiganPower.com) and listed it as a program highlight.
- In June and September, the program was included in monthly bill inserts.
- In July 2024, I&M's residential Energy Smart e-newsletter featured an article titled "Electric Vehicle Myths: Get The Facts," and our Commercial and Industrial Energy Efficiency e-newsletter, Energy Solutions, included an article on "How Do They Do That? Electric Vehicles." Both articles contained links to I&M's EV resources and rebates.

- In August, I&M's Energy Smart e-newsletter and in September, the Powering Up e-newsletter featured cross-sell advertisements for the EV program.
- In September, I&M included program highlights in our Weekly AMI report and High Bill Alert program.

Additionally, I&M's website includes the following PEV educational topics:

- Electric Vehicle Basics
- Dealership Information
- Fuel Cost Calculator
- Community Awareness and Participation
- Fleet and Workplace Charging