

STEVEN W. KROHNE  
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DATE RECEIVED: APRIL 8, 2011  
IURC 30-DAY FILING NO: 2848  
Indiana Utility Regulatory Commission

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HACKMAN  
HULETT &  
CRACRAFT LLP

April 8, 2011

**VIA HAND DELIVERY**

Secretary of the Commission  
Indiana Utility Regulatory Commission  
National City Center  
101 West Washington Street, Suite 1500 E  
Indianapolis, Indiana 46204

Dear Secretary:

On behalf of Richmond Light & Power ("RP&L") and pursuant to 170 IAC 1-6-1 *et seq.*, we are submitting for Commission approval under the 30-day filing procedure: (1) a new street lighting rate to be added to RP&L's Rate Schedule N, Street Lighting Service, as well as two new municipal street lighting rates to be added to Rate Schedule M, Municipal Street Lighting Service; and (2) an amendment to RP&L's Rate Schedule R governing residential electric service (the "Residential Tariff"). Additional information regarding the proposed amendments to RP&L's tariffs is set forth below:

**Street Lighting Service**

RP&L proposes to add to its Street Lighting Service tariff (*i.e.*, Rate Schedule N) a new rate for "Twin 70 Watt Sodium Vapor" street lights. RP&L also proposes to add to its Municipal Street Lighting Service tariff (*i.e.*, Rate Schedule M) new rates for "400 Watt Sodium Vapor" and "1000 Metal Halide" street lights. The proposed modifications are necessary because RP&L has purchased the foregoing new types of street lights and has placed them into service. Rate Schedules M and N do not contain rates that appropriately reflect the cost of providing electric service through use of these new types of street lights. The proposed street lighting rates are "[n]ew rates" as defined in 170 IAC 1-6-2(6) and, therefore, may be submitted as a 30-day filing pursuant to 170 IAC 1-6-3(1).

The following attachments support RP&L's proposed additions to its Street Lighting Service and Municipal Street Lighting Service tariffs:

- Exhibit 1: amended redline versions of RP&L's Rate Schedule M and Rate Schedule N;
- Exhibit 2: amended clean versions of RP&L's Rate Schedule M and Rate Schedule N; and

- Exhibit 3: a spreadsheet setting forth the methodology and detailed pricing elements used to develop the proposed three new street lighting rates.

### **Residential Tariff**

The proposed amendment to RP&L's Residential Tariff incorporates language intended to clarify the manner in which RP&L will determine whether a customer will be provided service under residential or commercial electric rates. The proposed clarifying language is "revenue neutral within a specific rate schedule" and, accordingly, may be submitted as a 30-day filing pursuant to 170 IAC 1-6-3(5)(A).

The proposed clarifying language is designed to avoid future issues like those addressed by the Commission's Consumer Affairs Division in Case 88661, which involved a dispute as to whether RP&L's commercial or residential rates should apply to a property occupied by a tenant where service was being provided in the landlord's name. The Consumer Affairs Division found there was insufficient information in RP&L's tariffs to clearly indicate whether the commercial or residential rate applies to rental property under such circumstances. The Consumer Affairs Division concluded "[n]ot enough information is listed on the tariff or the rules of prediction to properly determine that this customer should be charged the commercial rate." (See, Exhibit 6.) The proposed changes to RP&L's Residential Tariff are intended to provide sufficient clarification to allow customers living in rental properties and landlords to easily determine which rates apply to the premises.

The following attachments support RP&L's proposed amendment to its Residential Tariff:

- Exhibit 4: an amended redline version of RP&L's Rate Schedule R;
- Exhibit 5: an amended clean version of RP&L's Rate Schedule R; and
- Exhibit 6: correspondence between the Commission and RP&L in Case 88661.

### **Information Relevant to the Modifications to Rate Schedules M, N and R**

In addition to the supporting documents listed above, this filing also contains a Verified Statement by RP&L concerning notification of customers regarding the proposed changes, a copy of said notification, and a copy of the publisher's affidavit. Proposed Utility Article minutes are enclosed in hard copy, and we are contemporaneously sending a copy of the proposed Utility Article minutes by electronic mail.

RP&L's contact person to whom technical questions relating to this filing may be addressed is:

Secretary of the Commission  
Indiana Utility Regulatory Commission  
April 8, 2011  
Page 3 of 3

DATE RECEIVED: APRIL 8, 2011  
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Indiana Utility Regulatory Commission

Steve Saum  
General Manager  
Richmond Power & Light  
2000 U.S. Hwy 27 South  
Richmond, IN 47374  
Telephone: 765-973-7200  
E-mail: [steves@rp-l.com](mailto:steves@rp-l.com)

We appreciate your assistance in processing this request through the Commission's 30-day filing procedure. Once the Commission has approved the proposed revised Rate Schedules N, M and R please return one set of the file-stamped and approved tariff sheets to me in the enclosed self-addressed, stamped envelope. If you have any questions regarding this request or need anything else, please do not hesitate to call.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven W. Krohne", with the letters "MON" written in the upper right corner of the signature.

Steven W. Krohne

Enclosures

cc: Office of the Utility Consumer Counselor

Richmond Power and Light

Rate Schedule M  
(Municipal Street Lighting Service)  
 Phase II - Effective January 2006

AVAILABILITY

Available to the City of Richmond for the lighting of any City street, alley, or park, within the corporate limits. This rate schedule is applicable for service when it is supplied through existing, new, or rebuilt street lighting systems, including extensions of such street lighting system to additional locations where service is requested by the City, provided that the equipment to be installed at such new location is comparable to the equipment utilized on the existing system.

RATE\*

<u>Type of Lamp</u>	<u>Rate per Installation per Month</u>
<u>Post Type Fixtures</u>	
<u>Underground Service – Metal Pole</u>	
175 Watt Mercury Vapor	\$ 7.55
100 Watt Sodium Vapor	\$ 6.68
<u>Underground Service – Fiber Pole</u>	
100 Watt Sodium Vapor	\$ 6.68
<u>Single Pendant Type Fixtures</u>	
<u>Overhead Service – Wood Pole</u>	
250 Watt Mercury Vapor	\$ 8.06
150 Watt Sodium Vapor	\$ 7.02
250 Watt Sodium Vapor	\$ 8.06
400 Watt Sodium Vapor	\$26.48
<u>Overhead Service – Metal Pole</u>	
250 Watt Mercury Vapor	\$11.57
150 Watt Sodium Vapor	\$10.77
250 Watt Sodium Vapor	\$11.61
<u>Underground Service – Wood Pole</u>	
175 Watt Mercury Vapor	\$11.22
<u>Underground Service – Metal Pole</u>	
175 Watt Mercury Vapor	\$15.61
250 Watt Mercury Vapor	\$16.12
150 Watt Sodium Vapor	\$14.36
250 Watt Sodium Vapor	\$16.12
400 Watt Sodium Vapor	\$28.07
175 Watt Metal Halide	\$14.31

\* Subject to the provisions of Appendices A and B.

Richmond Power and Light

Rate Schedule M  
 (Municipal Street Lighting Service)  
 Phase II - Effective January 2006  
 (Continued)

RATE\*

<u>Type of Lamp</u>	<u>Rate per Installation per Month</u>
<u>Twin Pendant Type Fixtures</u>	
<u>Overhead Service – Metal Pole</u>	
150 Watt Sodium Vapor	\$14.34
250 Watt Sodium Vapor	\$16.64
<u>Underground Service – Metal Pole</u>	
150 Watt Sodium Vapor	\$18.02
250 Watt Sodium Vapor	\$19.14
<u>Customer Furnished Pole and Luminaire Package</u>	
<u>Single Pendant Fixture – Underground Service – Metal Pole</u>	
175 Watt Metal Halide	\$ 7.73
400 Watt Metal Halide	\$ 9.11
1000 Metal Halide	\$33.80
<u>Twin Pendant Fixture – Underground Service – Metal Pole</u>	
175 Watt Metal Halide	\$10.62

STREET LIGHTING FACILITIES

All facilities necessary for service hereunder, including all poles, fixtures, street lighting circuits, transformers, lamps, and other necessary facilities will be furnished and maintained by the utility.

HOURS OF LIGHTING

All lamps shall burn from approximately one-half hour after sunset until approximately one-half hour before sunrise each day in the year, approximately 4,000 hours per annum.

OTHER TYPES OF LIGHTING

When the City authorizes the installation of street lighting of a type and kind other than that set forth in this rate schedule, the monthly rate per installation shall be computed by the same formula and in the like manner as the rates so designated.

\* Subject to the provisions of Appendices A and B.

Richmond Power and Light

Rate Schedule N  
(Street Lighting Service)  
Phase II - Effective January 2006

AVAILABILITY

Available to any customer requesting the Utility to furnish pendant type fixtures for the lighting of railroad crossings or streets and alleys.

RATE\*

	Type of Lamp	Rate per Installation per Month
<u>Overhead Service – Wood Pole</u>	Any Type of Lamp Not in Excess of 400 Watts	\$10.07
<u>Underground Service – Metal Pole</u>	4-400 Watt Mercury Vapor	\$43.70
	70 Watt Sodium Vapor	\$18.65
	Twin 70 Watt Sodium Vapor	\$21.65
	150 Watt Sodium Vapor	\$21.38
	400 Watt Sodium Vapor	\$26.54
	2-400 Watt Sodium Vapor	\$36.54

HOURS OF LIGHTING

All lamps shall burn from approximately one-half hour after sunset until approximately one-half hour before sunrise each day in the year, approximately 4,000 hours per annum.

LATE PAYMENT CHARGE

A late payment charge of three percent (3%) of all bills will be charged if the bill is not paid by the due date printed on the bill.

SPECIAL TERMS AND CONDITIONS

The rates included herein are available only when the intersection to be lighted is located adjacent to existing Utility facilities. In the event the installation requires extensions, which in the opinion of the Utility are excessive, such extensions will be provided under separate contract.

\* Subject to the provisions of Appendices A and B.

Deleted: ¶

Richmond Power and Light

Rate Schedule M  
(Municipal Street Lighting Service)  
 Phase II - Effective January 2006

AVAILABILITY

Available to the City of Richmond for the lighting of any City street, alley, or park, within the corporate limits. This rate schedule is applicable for service when it is supplied through existing, new, or rebuilt street lighting systems, including extensions of such street lighting system to additional locations where service is requested by the City, provided that the equipment to be installed at such new location is comparable to the equipment utilized on the existing system.

RATE\*

	<u>Type of Lamp</u>	<u>Rate per Installation per Month</u>
<u>Post Type Fixtures</u>		
<u>Underground Service – Metal Pole</u>		
	175 Watt Mercury Vapor	\$ 7.55
	100 Watt Sodium Vapor	\$ 6.68
<u>Underground Service – Fiber Pole</u>		
	100 Watt Sodium Vapor	\$ 6.68
<u>Single Pendant Type Fixtures</u>		
<u>Overhead Service – Wood Pole</u>		
	250 Watt Mercury Vapor	\$ 8.06
	150 Watt Sodium Vapor	\$ 7.02
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	250 Watt Mercury Vapor	\$11.57
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	175 Watt Mercury Vapor	\$15.61
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	150 Watt Sodium Vapor	\$14.36
	250 Watt Sodium Vapor	\$16.12
	400 Watt Sodium Vapor	\$28.07
	175 Watt Metal Halide	\$14.31

\* Subject to the provisions of Appendices A and B.

Richmond Power and Light

Rate Schedule M  
 (Municipal Street Lighting Service)  
 Phase II - Effective January 2006  
 (Continued)

RATE\*

<u>Type of Lamp</u>	<u>Rate per Installation per Month</u>
<u>Twin Pendant Type Fixtures</u>	
<u>Overhead Service – Metal Pole</u>	
150 Watt Sodium Vapor	\$14.34
250 Watt Sodium Vapor	\$16.64
<u>Underground Service – Metal Pole</u>	
150 Watt Sodium Vapor	\$18.02
250 Watt Sodium Vapor	\$19.14
<u>Customer Furnished Pole and Luminaire Package</u>	
<u>Single Pendant Fixture – Underground Service – Metal Pole</u>	
175 Watt Metal Halide	\$ 7.73
400 Watt Metal Halide	\$ 9.11
1000 Metal Halide	\$33.80
<u>Twin Pendant Fixture – Underground Service – Metal Pole</u>	
175 Watt Metal Halide	\$10.62

STREET LIGHTING FACILITIES

All facilities necessary for service hereunder, including all poles, fixtures, street lighting circuits, transformers, lamps, and other necessary facilities will be furnished and maintained by the utility.

HOURS OF LIGHTING

All lamps shall burn from approximately one-half hour after sunset until approximately one-half hour before sunrise each day in the year, approximately 4,000 hours per annum.

OTHER TYPES OF LIGHTING

When the City authorizes the installation of street lighting of a type and kind other than that set forth in this rate schedule, the monthly rate per installation shall be computed by the same formula and in the like manner as the rates so designated.

\* Subject to the provisions of Appendices A and B.



Richmond Power and Light

Rate Schedule N  
(Street Lighting Service)  
Phase II - Effective January 2006

AVAILABILITY

Available to any customer requesting the Utility to furnish pendant type fixtures for the lighting of railroad crossings or streets and alleys.

RATE\*

	<u>Type of Lamp</u>	<u>Rate per Installation per Month</u>
<u>Overhead Service – Wood Pole</u>	Any Type of Lamp Not in Excess of 400 Watts	\$10.07
<u>Underground Service – Metal Pole</u>	4-400 Watt Mercury Vapor	\$43.70
	70 Watt Sodium Vapor	\$18.65
	Twin 70 Watt Sodium Vapor	\$21.65
	150 Watt Sodium Vapor	\$21.38
	400 Watt Sodium Vapor	\$26.54
	2-400 Watt Sodium Vapor	\$36.54

HOURS OF LIGHTING

All lamps shall burn from approximately one-half hour after sunset until approximately one-half hour before sunrise each day in the year, approximately 4,000 hours per annum.

LATE PAYMENT CHARGE

A late payment charge of three percent (3%) of all bills will be charged if the bill is not paid by the due date printed on the bill.

SPECIAL TERMS AND CONDITIONS

The rates included herein are available only when the intersection to be lighted is located adjacent to existing Utility facilities. In the event the installation requires extensions, which in the opinion of the Utility are excessive, such extensions will be provided under separate contract.

\* Subject to the provisions of Appendices A and B.

**Richmond Power and Light**  
Summary of Calculated Rates

<b>Type of Light</b>	<b>Monthly Rate</b>	
Twin 70 Watt Sodium Vapor	\$	21.65
400 Watt Sodium Vapor	\$	26.48
1000 Metal Halide	\$	33.80

Supporting Calculations on Pages 2 through 8

**Richmond Power and Light**  
 Determination of Lighting Rates

**Determination of Monthly Rate**

	<b>Twin 70 Watt Sodium Vapor Double Fixture 25' Steel Pole w/double Banner (2 Arms)</b>	<b>400 Watt Sodium Vapor Single Fixture 39' Al Pole w/single Mongoose</b>	<b>1000 Metal Halide Twin Fixture 35' Al Pole w/single Sports Lighter</b>
Street Lighting Expenses from Cost of Service, Page 3 of 6	\$ 4.18	\$ 4.18	\$ 4.18
Production Cost, Page 4 of 6	\$ 1.86	\$ 4.55	\$ 11.06
Customer Expenses from Cost of Service, Page 5 of 6	\$ 0.68	\$ 0.68	\$ 0.68
Distribution Costs from Cost of Service, Page 6 of 6	\$ 0.62	\$ 0.62	\$ 0.62
Depreciation Expense @ 5.00%	\$ 6.22	\$ 7.15	\$ 7.51
Debt Coverage and Margin @ 6.5% ROR	\$ 8.09	\$ 9.30	\$ 9.76
<b>Monthly Rate</b>	<b>\$ 21.65</b>	<b>\$ 26.48</b>	<b>\$ 33.80</b>

**Richmond Power and Light**  
Determination of Lighting Maintenance Expenses  
From Cost of Service Study

**Lighting Maintenance Expenses**

Distribution Lighting O&M	\$295,245
Payroll and Other Taxes	\$11,608
Payment in Lieu of Taxes	\$19,889
	<hr/>
	\$326,742
Number of Lights from Cost of Service	6,513
Rate Per Month Per Light	<u>\$ 4.18</u>

**Richmond Power and Light**  
 Determination of Purchase Power Cost

	<b>Twin 70 Watt Sodium Vapor Double Fixture</b>	<b>400 Watt Sodium Vapor Single Fixture</b>	<b>1000 Metal Halide Twin Fixture</b>
Estimated Annual Kwh	797	1,945	4,730
Production Cost Per kWh From Cost of Service Study	\$ 0.028048	\$ 0.028048	\$ 0.028048
Annual Production Cost	\$ 22.35	\$ 54.55	\$ 132.67
Average Monthly Purchase Power Cost	\$ 1.86	\$ 4.55	\$ 11.06

**Richmond Power and Light**  
 Determination of Customer Related Expenses  
 Allocated to Lighting in Cost of Service

**Operation & Maintenance Expenses**

Distribution Customer	\$	-
Customer Accounts	\$	38,789.00
Customer Service	\$	11,425.00
	\$	<u>50,214.00</u>

**Payroll and Other Taxes**

Distribution Customer	\$	290.00
Customer Accounts	\$	1,902.00
Customer Service	\$	582.00
	\$	<u>2,774.00</u>

**Payment in Lieu of Taxes**

Distribution Customer	\$	-
Customer Accounts	\$	-
Customer Service	\$	-
	\$	<u>-</u>

Grand Total \$ 52,988.00

Number of lights 6,513  
 Rate per Month per Light \$ 0.68

0.073

**Richmond Power and Light**  
Determination of Distribution Related Cost

<b>Operation &amp; Maintenance Expenses</b>	
Distribution Substation	\$ 10,420.00
Primary and Secondary Lines	\$ 27,035.00
Line Transformers	\$ 5,099.00
	<u>\$ 42,554.00</u>
<b>Payroll and Other Taxes</b>	
Distribution Substation	\$ 481.00
Primary and Secondary Lines	\$ 1,056.00
Line Transformers	\$ 206.00
	<u>\$ 1,743.00</u>
<b>Payment in Lieu of Taxes</b>	
Distribution Substation	\$ 563.00
Primary and Secondary Lines	\$ 2,804.00
Line Transformers	\$ 788.00
	<u>\$ 4,155.00</u>
Grand Total	\$ 48,452.00
Number of lights	<u>6,513</u>
Rate per Month per Light	<u>\$ 0.62</u>

**Richmond Power and Light**

Cost of Installed Light

	Twin 70 Watt Sodium Vapor Double Fixture 25' Steel Pole w/double Banner (2 Arms)	400 Watt Sodium Vapor Single Fixture 39' Al Pole w/single Mongoose	1000 Metal Halide Twin Fixture 35' Al Pole w/single Sports Lighter
Fixture and Pole Cost	\$ 747.80	\$ 1,456.42	\$ 1,056.24
Banner Arms	incl	incl	incl
Receptacle	incl	incl	incl
Installation Cost	\$ 745.12	\$ 259.90	\$ 745.12
Total Installed Cost	<b>\$ 1,492.92</b>	<b>\$ 1,716.32</b>	<b>\$ 1,801.36</b>
Estimated annual kWh	797	1945	4730



**Richmond Power and Light**

Calculation of NNUAL kWh Consumption

			Watt	kWh	kwh per 12 hours
Twin 70 W	Sodium Vapor		182	0.182	2.184000
400 W	Sodium Vapor		444	0.444	5.328000
1000 W	Metal Halide		1080	1.08	12.960000
				4.368	5.328
	Burn Factor	# Days	Twin 70	400 W	1000 W
January	1.208194	31	81.79956658	199.5549866	485.4040214
February	1.1540358	28	70.57159724	172.1636768	418.7765111
March	1.0442357	31	70.69893383	172.4743221	419.5321348
April	0.9457827	30	61.9676825	151.1739068	367.7203138
May	0.8581529	31	58.10038394	141.7393982	344.7715091
June	0.7679822	30	50.31819374	122.7542748	298.5914794
July	0.7784118	31	52.70159251	128.5687202	312.7347248
August	0.8614968	31	58.32677935	142.2917035	346.1149544
September	0.9553295	30	62.59318884	152.6998673	371.4321096
October	1.0668377	31	72.22917964	176.2074492	428.6127144
November	1.1599772	30	76.00170614	185.4107556	450.9991354
December	1.2089565	31	81.85119088	199.6809272	485.7103634
Total Usage			797.1599952	1944.719988	4730.399971

Richmond Power and Light

Rate Schedule R  
(Residential Electric Service)  
Phase II - Effective January 2006

AVAILABILITY

To residential customers including rural customers for all domestic uses in individual private customer-occupied residences or dwellings and their appurtenances, when all service is taken through one meter. When service is supplied to a residential dwelling unit where the use is primarily for the accommodations of roomers or boarders, the service will be provided under Rate Schedule CL, the commercial lighting rate schedule, unless separate circuits are furnished by customer to permit the Utility to separately meter and bill the residential and commercial uses.

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CHARACTER OF SERVICE

Alternating current, sixty Hertz, single phase, at a voltage of approximately 120 volts two-wire, 120/240 volts three-wire, or 120/208 volts three-wire as designated by the Utility.

RATE\*

Facilities Charge ----- \$10.00 per meter per month  
Energy Charge:  
For the first 350 KWH ----- \$0.06492 per KWH  
For the next 1150 KWH ----- \$0.04909 per KWH  
For all KWH above 1500 KWH ----- \$0.04563 per KWH

MINIMUM CHARGE

The minimum monthly charge shall be the facilities charge.

LATE PAYMENT CHARGE

A late payment charge of three percent (3%) of all bills will be charged if the bill is not paid by the due date printed on the bill.

SPECIAL TERMS AND CONDITIONS

This rate schedule is available for single phase service only, except as required by the Utility. Where three-phase service will be used for commercial or industrial purposes, the applicable rate schedules will apply to such service.

\* Subject to the provisions of Appendices A and B.

Richmond Power and Light

Rate Schedule R  
(Residential Electric Service)  
Phase II - Effective January 2006

AVAILABILITY

To residential customers including rural customers for all domestic uses in individual private customer-occupied residences or dwellings and their appurtenances, when all service is taken through one meter. When service is supplied to a residential dwelling unit where the use is primarily for the accommodations of roomers or boarders, the service will be provided under Rate Schedule CL, the commercial lighting rate schedule, unless separate circuits are furnished by customer to permit the Utility to separately meter and bill the residential and commercial uses.

CHARACTER OF SERVICE

Alternating current, sixty Hertz, single phase, at a voltage of approximately 120 volts two-wire, 120/240 volts three-wire, or 120/208 volts three-wire as designated by the Utility.

RATE\*

Facilities Charge ----- \$10.00 per meter per month  
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MINIMUM CHARGE

The minimum monthly charge shall be the facilities charge.

LATE PAYMENT CHARGE

A late payment charge of three percent (3%) of all bills will be charged if the bill is not paid by the due date printed on the bill.

SPECIAL TERMS AND CONDITIONS

This rate schedule is available for single phase service only, except as required by the Utility. Where three-phase service will be used for commercial or industrial purposes, the applicable rate schedules will apply to such service.

\* Subject to the provisions of Appendices A and B.

**From:** Burris, Amy  
**To:** Unruh, Darian  
**Subject:** RE: Case --- 88661  
**Date:** Friday, January 29, 2010 3:26:49 PM

---

Under General Terms and Conditions on our website you can go to Predication of Rates and the residential and commercial terms are there.

Copies of our rates are available at customer request in our business office. This is also stated on the website under Rate Schedules.

Please let me now if this is what you needed. If you have further questions feel free to contact me.

-----Original Message-----

**From:** Unruh, Darian [mailto:DUnruh@urc.IN.gov]  
**Sent:** Friday, January 29, 2010 2:03 PM  
**To:** Burris, Amy  
**Subject:** RE: Case --- 88661

Amy,

I had a few additional questions.

Do you have any specific location in your tariff that would explain the difference between a residential customer and a commercial customer. Also, do you have any reference in your tariff that would direct someone back to your Terms and Conditions.

Darian Unruh  
Complaint Analyst  
800-851-4268 ext 295

Indiana Utility Regulatory Commission  
101 W Washington St.  
Suite 1500 E  
Indianapolis IN 46204

**From:** Burris, Amy [mailto:AmyB@RP-L.com]  
**Sent:** Tuesday, January 19, 2010 9:13 AM  
**To:** Unruh, Darian  
**Subject:** RE: Case --- 88661

Thank you Darian.

-----Original Message-----

**From:** Unruh, Darian [mailto:DUnruh@urc.IN.gov]  
**Sent:** Tuesday, January 19, 2010 9:02 AM

**To:** Burris, Amy  
**Subject:** RE: Case --- 88661

Amy,

I called Mr. Chapman and let him know that if he wants the residence to be charged for a residential rate he can have his daughter put the bill in her name.

Case closed, unjustified.

Thanks,

Darian Unruh  
Complaint Analyst

**From:** Burris, Amy [mailto:AmyB@RP-L.com]  
**Sent:** Tuesday, January 05, 2010 3:29 PM  
**To:** Unruh, Darian  
**Subject:** RE: Case --- 88661

As no policy covers every potential use, neither do our electric policies. When a question arises concerning our rate selection, we must rely on the intent of the language applicable. In the instance of an out of town property owner allowing someone use of the property, the documentation most applicable is found in General Terms and Conditions for Electric Service on sheet 1-A and 1-B under Predication of Rates. Subsection 2 states "When service is supplied to a residential dwelling unit where the use is primarily for the accommodations of roomers or boarders, the service will be provided under the commercial rate schedule, unless separate circuits are furnished by customer to permit the Utility to separately meter and bill the residential and commercial uses." Most of the Predication of Rates section explains further how to determine the difference between commercial and residential. It then seems prudent that an owner not living at the property in question would suggest a commercial use even if owner receives payment untraceable to the utility (bartering, intellectual exchange, etc.).

Our entire Terms and Conditions are listed on our website at rp-l.com under the Company tab.

Please let me know if I can be of further assistance.

-----Original Message-----

**From:** Unruh, Darian [mailto:DUnruh@urc.IN.gov]  
**Sent:** Tuesday, January 05, 2010 1:19 PM  
**To:** Burris, Amy  
**Subject:** RE: Case --- 88661

Amy,

Can I get a copy of that document.

Darian

**From:** Burris, Amy [mailto:AmyB@RP-L.com]

**Sent:** Tuesday, January 05, 2010 10:45 AM  
**To:** Unruh, Darian  
**Subject:** RE: Case --- 88661

Darian,

If the owner or person who has the utility in their name is not the resident of that property then they would not be issued the residential rate. This is stated in our general terms and conditions.

If his daughter will put this service in her own name then she would be able to have service under the residential rate. The landlord/owner (Mr. Chapman) is choosing to keep the services in his name so he then is issued the commercial rate.

Please let me know if you have any further questions or if I can be of further assistance in this matter.

-----Original Message-----

**From:** Unruh, Darian [mailto:DUnruh@urc.IN.gov]  
**Sent:** Tuesday, January 05, 2010 9:45 AM  
**To:** Burris, Amy  
**Subject:** Case --- 88661

Please review the attached case.

Thanks,

Darian Unruh  
Complaint Analyst  
800-851-4268 ext 295

Indiana Utility Regulatory Commission  
101 W Washington St.  
Suite 1500 E  
Indianapolis IN 46204

**From:** Burris, Amy  
**Sent:** Monday, January 17, 2011 10:30 AM  
**To:** Duke, Gus  
**Subject:** FW: Case - 88661 Randy Chapman

-----Original Message-----

**From:** Duke, Gus  
**Sent:** Wednesday, June 09, 2010 1:56 PM  
**To:** 'Unruh, Darian'  
**Cc:** Saum, Steve; Burris, Amy; Sharp, Scott  
**Subject:** RE: Case - 88661 Randy Chapman

Darian

Mr. Chapman's bill now reflects a \$380.38 credit from the adjustment listed below, and his rate has been switched from rate CL to rate R. Let me know if I can be of further assistance.

Gregg Duke  
 Richmond Power and Light

Bill Adjustment > 1 month

Randy C. Chapman 9284674795

735 Northwood Dr

Incorrect	KWH	EL	ECA	FC	Tax	TOTAL
May-10	802	88.39	<--included		17.507.41	113.30
April-10	887	97.76	<--included		17.508.07	123.33
March-10	694		74.06<--included		17.50 6.41	97.97
February-10	902		96.25<--included		17.50 7.96	121.71
January-10	583		72.20<--included		17.50 6.28	95.98
December-09	678		83.96<--included		17.50 7.10	108.56
November-09	608		75.29<--included		17.50 6.50	99.29
October-09	831		97.44<--included		17.50 8.05	122.99
September-09	1198		140.48<--included		17.50 11.06	169.04
August-09	931		109.17<--included		17.50 8.87	135.54
July-09	841		104.55<--included		17.50 8.54	130.59
June-09	637		79.19<--included		17.50 6.77	103.46
<b>Total</b>	<b>9592</b>	<b>\$1,118.74</b>	<b>\$0.00</b>	<b>\$210.00</b>	<b>\$93.02</b>	<b>\$1,421.76</b>
Correct	KWH	EL	ECA	FC	Tax	Total
May-10	802		44.92	25.58	10.00	86.13
April-10	887		49.09	28.29	10.00	93.50
March-10	694		39.62	20.62	10.00	75.16
February-10	902		49.83	26.80	10.00	92.69
January-10	583		34.17	17.32	10.00	65.80
December-09	678		38.83	27.00	10.00	81.14
November-09	608		35.40	23.94	10.00	74.20
October-09	831		46.34	32.73	10.00	95.30
September-09	1198		64.36	36.30	10.00	118.41
August-09	931		51.25	28.21	10.00	95.72
July-09	841		46.83	25.48	10.00	88.08
June-09	637		36.82	23.52	10.00	75.26
<b>Total</b>	<b>9592</b>	<b>\$537.46</b>	<b>\$315.79</b>	<b>\$120.00</b>	<b>\$68.13</b>	<b>\$1,041.38</b>

E Comm Adj	-355.49
TAX ADJ	-24.89

-----Original Message-----

**From:** Unruh, Darian [mailto:DUnruh@urc.IN.gov]  
**Sent:** Wednesday, June 09, 2010 9:34 AM  
**To:** Duke, Gus  
**Subject:** Case - 88661 Randy Chapman

Gregg,

I need to have the amount of credit that you will be giving to the account of Randy Chapman. Case 88661. Please show how that credit was arrived.

The credit to the customer is one year of service for being charged a Commercial Lighting Rate instead of the Residential Rate. Not enough information is listed on the tariff or the rules of predication to properly determine that this customer should be charged the commercial rate.

I need this information by the end of the business day Thursday 10<sup>th</sup>.

Darian Unruh  
Complaint Analyst  
800-851-4268 ext 295

Indiana Utility Regulatory Commission  
101 W Washington St.  
Suite 1500 E  
Indianapolis IN 46204



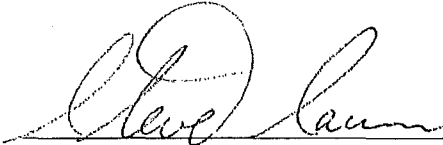
**Verified Statement of Richmond Power & Light**  
**Concerning Notification of Customers Affected by the Proposed Changes to**  
**RP&L's Rate Schedule M, N, & R**

Richmond Power & Light ("RP&L") complied with the Notice Requirements under I70 IAC 1-6-6 in the following manner:

- beginning on April 6, 2011 and continuing through the filing date, the attached notice was posted in RP&L's offices located at 44 South 8th Street and 2000 US Hwy 27 South, Richmond, Indiana;
- beginning on April 6, 2011 and continuing through the filing date, the same notice was posted on RP&L's website on the home page under the "Latest News" tab;
- a legal notice was published in the Palladium-Item newspaper on April 6, 2011, as evidenced by the attached Publishers Affidavit; and
- beginning on the filing date, a copy of the 30-day filing will be included on RP&L's website on the home page under the "Latest News" tab.

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

Dated this 5 day of APRIL, 2011.

  
Steve Saum  
General Manager  
Richmond Power & Light

## PUBLIC NOTICE

### Richmond Power & Light Company

PUBLIC NOTICE is hereby given, pursuant to 170 Ind. Admin. Code 1-6-6, that on or about April 8, 2011, the City of Richmond, by its municipal electric utility, Richmond Power & Light Company, expects to file with the Indiana Utility Regulatory Commission, under its 30-day filing procedure, a request seeking Commission approval of: (1) a new street lighting rate to be added to RP&L's Rate Schedule N, Street Lighting Service, as well as two new municipal street lighting rates to be added to Rate Schedule M, Municipal Street Lighting Service; and (2) an amendment to RP&L's Rate Schedule R governing residential electric service. RP&L proposes to add to Rate Schedule N a new rate for "Twin 70 Watt Sodium Vapor" street lights. RP&L also proposes to add to Rate Schedule M new rates for "400 Watt Sodium Vapor" and "1000 Metal Halide" street lights. The proposed amendment to Rate Schedule R incorporates language intended to clarify the manner in which RP&L will determine whether a customer will be provided service under residential or commercial electric rates. Specifically, clarifying language has been added to Rate Schedule R to indicate that residential rates apply to "residential customers including rural customers for all domestic uses in individual private customer-occupied residences or dwellings and their appurtenances, when all service is taken through one meter." Rate Schedule R provides that "[w]hen service is supplied to a residential dwelling unit where the use is primarily for the accommodations of roomers or boarders, the service will be provided under Rate Schedule CL, the commercial lighting rate schedule, unless separate circuits are furnished by customer to permit the Utility to separately meter and bill the residential and commercial uses." The date by which approval of the filing is expected is on or about May 9, 2011. The contact information for the persons to whom an objection should be made is below:

Secretary of the Commission  
Indiana Utility Regulatory Committee  
PNC Center  
101 West Washington Street, Suite 1500 E  
Indianapolis, Indiana 46204  
Telephone: (317) 232-2701

Indiana Office of Utility Consumer Counselor  
PNC Center  
115 W. Washington St., Suite 1500 South  
Indianapolis, Indiana 46204  
Telephone: 1-888-441-2494

**PALLADIUM-ITEM**  
 A Division of Federated Publications, Inc.  
 1175 North A Street  
 Richmond, Indiana 47374  
 Wayne County, Indiana

**HACKMAN, HULETT & CRACRAFT LLP (R P & L)**  
 Federal ID #16-0980985  
 Account number **663654-01**  
 Order/Invoice number **487523**  
 Total Amount of Claim **\$37.75**

**Please mail payments to: PALLADIUM-ITEM ~ PO BOX 677562 ~ DALLAS TX 75267-7562**

**PUBLISHER'S CLAIM**

**LINE COUNT**

Display Master (Must not exceed two actual lines, neither of which shall total more than four solid lines of the type in which the body of the advertisement is set) —number of equivalent lines \_\_\_\_\_

Head - number of lines \_\_\_\_\_ 3

Body - number of lines \_\_\_\_\_ 101

Tail - number of lines \_\_\_\_\_ 1

Total number of lines in notice \_\_\_\_\_ 105

**COMPUTATION OF CHARGES**

105 lines, 1 columns wide equals 105 equivalent lines at 0.350 cents per line. \$ 36.75

Additional charge for notices containing rule or tabular work (50 percent of above amount) \_\_\_\_\_

Charge for extra proofs of publication (\$1.00 for each proof in excess of two) \_\_\_\_\_ 1.00

**TOTAL AMOUNT OF CLAIM \$ 37.75**

**DATA FOR COMPUTING COST**

Width of single column 8 ems. Size of type 6 point  
 Number of insertions 1

Pursuant to the provisions and penalties of IC 5-11-10-1, I hereby certify that the foregoing account claimed is just and correct, that the amount claimed is legally due, after allowing all just credits, and that no part of the same has been paid.

I also certify that the printed matter attached hereto is a true copy, of the same column width and type size, which was duly published in said paper 1 times. The dates of publication being as follows:

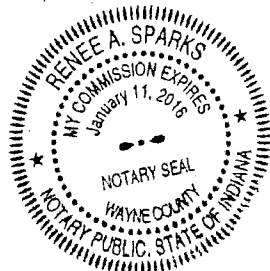
04/06/11

Additionally, the statement checked below is true and correct:

- Newspaper does not have a website.
- Newspaper has a website and this public notice was posted in the same day as it was published in the newspaper.
- Newspaper has a website, but due to technical problem or error, public notice was posted on \_\_\_\_\_.
- Newspaper has a website but refused to post the publish notice.

April 6, 2011

*Micie H. Chapman*  
 Title: Accounting Clerk  
*Renee A Sparks*  
 Notary Public residing in Wayne County, Indiana



Subscribed and sworn to before me this day Wednesday, April 06, 2011  
 My Commission expires January 11, 2016.

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 (1) a new street lighting rate to be added to RP&L's Rate Schedule N, Street Lighting Service, as well as two new municipal street lighting rates to be added to Rate Schedule M, Municipal Street Lighting Service; and  
 (2) an amendment to RP&L's Rate Schedule R governing residential electric service. RP&L proposes to add to Rate Schedule N a new rate for "Two 70 Watt Sodium Vapor" street lights. RP&L also proposes to add to Rate Schedule M new rates for "100 Watt Sodium Vapor" and "1000 Metal Halide" street lights. The proposed amendments to Rate Schedule R incorporate language intended to clarify the manner in which RP&L will determine whether a customer will be provided service under residential or commercial electric rates. Specifically, clarifying language has been added to Rate Schedule R to indicate that residential rates apply to "residential customers including rural customers for all domestic uses in individual private customer-occupied residences or dwellings and their appurtenances, when all service is taken through one meter." Rate Schedule R provides that "when service is supplied to a residential dwelling unit where the use is primarily for the accommodations of roomers or boarders, the service will be provided under Rate Schedule CL, the commercial lighting rate schedule, unless separate circuits are furnished by customer to permit the utility to separately meter and bill the residential and commercial uses." The date by which approval of the filing is expected is on or about May 9, 2011. The contact information for the persons to whom an objection should be made is below:  
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 Indianapolis, Indiana 46204  
 Telephone: 1-888-441-2494  
 #11487523 4/6/2011

**Richmond Power & Light Company**

Richmond Power & Light Company ("RP&L") seeks Commission approval of: (1) a new street lighting rate to be added to RP&L's Rate Schedule N, Street Lighting Service, as well as two new municipal street lighting rates to be added to Rate Schedule M, Municipal Street Lighting Service; and (2) an amendment to RP&L's Rate Schedule R governing residential electric service. RP&L proposes to add to Rate Schedule N a new rate for "Twin 70 Watt Sodium Vapor" street lights. RP&L also proposes to add to Rate Schedule M new rates for "400 Watt Sodium Vapor" and "1000 Metal Halide" street lights. The proposed amendment to Rate Schedule R incorporates language intended to clarify the manner in which RP&L will determine whether a customer will be provided service under residential or commercial electric rates. Specifically, clarifying language has been added to Rate Schedule R to indicate that residential rates apply to "residential customers including rural customers for all domestic uses in individual private customer-occupied residences or dwellings and their appurtenances, when all service is taken through one meter." Rate Schedule R provides that "[w]hen service is supplied to a residential dwelling unit where the use is primarily for the accommodations of roomers or boarders, the service will be provided under Rate Schedule CL, the commercial lighting rate schedule, unless separate circuits are furnished by customer to permit the Utility to separately meter and bill the residential and commercial uses."