

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

ALEXANDER AND ELENA ARGUNOV,  
THOMAS AND HEIDI JOHNSON,  
CHAD AND VICTORIA GROESBECK

Complainants,

v.

PUGET SOUND ENERGY

Respondent.

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DOCKET UE-220701

**RESPONSE TESTIMONY OF AARON TAM  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT AT-2C**

Puget Sound Energy's Confidential Response to Public Counsel Data Request No. 8 with  
Attachments B-1, B-2, and C

**February 9, 2023**

**Shaded Information is Designated Confidential per Protective Order in Docket UE-220701**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UE-220701  
Puget Sound Energy  
Coyote Creek Homeowners v. Puget Sound Energy**

**Public Counsel Request No. 008:**

Please provide all correspondence and documents regarding complaints between PSE and Alexander and Elena Argunov from January 1, 2018.

- a. Identify whether the complaints were resolved. If not, state why not. If so, state the resolution of the complaint.

**Response:**

- a. The following is the correspondence and documents provided for Informal UTC complaint #CAS-39919-Q0C6N7. The attachments to each email are identified below.
  - a. Opened: 6/14/2022 (Attachment A to PSE's Response to Public Counsel Data Request No. 008)
  - b. 6/15/2022 PSE Initial Response email (Attachment B to PSE's Response to Public Counsel Data Request No. 008), with embedded documents that are provided below:
    - i. Attachment B-1 to PSE's Response to Public Counsel Data Request No. 008
    - ii. Attachment B-2 to PSE's Response to Public Counsel Data Request No. 008
    - iii. Attachment B-3 to PSE's Response to Public Counsel Data Request No. 008
  - c. Closed: 6/17/2022 (Attachment C to PSE's Response to Public Counsel Data Request No. 008)
  - d. Re-opened: 6/21/2022 (Attachment D to PSE's Response to Public Counsel Data Request No. 008)
  - e. 6/24/2022 PSE response to re-opened UTC complaint (Attachment E to PSE's Response to Public Counsel Data Request No. 008), with embedded document that is provided below:
    - i. Attachment E-1 to PSE's Response to Public Counsel Data Request No. 008
  - f. Re-closed: 6/28/2022 (Attachment F to PSE's Response to Public Counsel Data Request No. 008)
    - i. Follow up email, Complaint resolved when UTC re-closed the informal complaint on 6/28/22

Shaded information is designated as CONFIDENTIAL per WAC 480-07-160 as marked in Puget Sound Energy's Response to Public Counsel Request No. 008 Attachments A, B and E.

**ATTACHMENTS A-E to PSE's Response  
to  
Public Counsel Request No. 008**

**ATTACHMENT B-1 TO PUGET SOUND ENERGY'S CONFIDENTIAL  
RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. 8**

**WA UTC Complaint CAS-39919-Q0C6N7** [REDACTED]  
**Opened: 6/14/22**  
**Grouped By: Disputed Bill**

Customer Account Name: [REDACTED]  
Account#: [REDACTED]  
Service Address: [REDACTED]

**6/14/22 WA-UTC INITIAL REQUEST:**

Since PSE installed the customer's AMI meter, they have received estimated bills of unrealistically high amounts.

In three months, the customer was billed [REDACTED] for a single-family home. The customer does not understand how PSE came to these estimates.

6/14/2022, 1:35 p.m. passed to PSE via email. Response due 6/16/2022, by 5 p.m.

**6/15/22 PSE INITIAL RESPONSE:**

Included in our response is an account history along with a copy of the daily meter reads since the AMI meter installation.

PSE replaced the AMR meter with an AMI meter on 8/4/21 because we were having trouble hearing from the AMR meter. Since the AMI meter installation, we've received good reads every day which you'll see in the included daily read report. On 3/3/22, [REDACTED] was misinformed by an Energy Advisor that we had been estimating the bill. Unfortunately, this call is more than 60 days old therefore I can no longer see the recorded video to determine what he was looking at. On 5/4/22, PSE tested Ms. [REDACTED] meter and the results are as follows:

**Full Load:** 100.14%  
**Light Load:** 100.13%  
**Average:** 100.135%

The Meter Journeyman noted in his completion notes that he found the meter operating with 3.3kW load, the voltage was good testing at 120/240V, and that he discussed billing and loads with customer. The customer has since requested that we remove the AMI meter and have an NCM meter installed. On 5/12/22, the customer's NCM enrollment form was received and accepted. There is an active service notification for the AMI removal/NCM installation.

**Shaded information is designated as confidential per WAC 480-07-160**

**ATTACHMENT B-2 TO PUGET SOUND ENERGY'S CONFIDENTIAL  
RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. 8**

	Customer Name: [REDACTED] Est. Account Date: 7/23/20 Credit History: [REDACTED] Security Deposit: 0 Late Notices: 2 Disconnects: 0 Returned Payments: 0		
Activity Date	Account History for Account: [REDACTED]	Amount	Balance
	Starting Balance = [REDACTED]		
8/11/2021	Electric Consumption Bill [REDACTED]		
8/12/2021	bill \$ [REDACTED] due 9/1/21		
8/26/2021	Incoming Payment [REDACTED]		
9/13/2021	Electric Consumption Bill [REDACTED]		
9/14/2021	bill \$ [REDACTED] due 10/4/21		
10/13/2021	Electric Consumption Bill [REDACTED]		
10/14/2021	bill [REDACTED] due 11/3/21		
11/5/2021	Incoming Payment [REDACTED]		
11/11/2021	Electric Consumption Bill [REDACTED]		
11/12/2021	bill \$ [REDACTED] due 12/6/21		
12/15/2021	Electric Consumption Bill [REDACTED]		
12/15/2021	bill [REDACTED] due 1/6/22		
01/11/2022	[REDACTED] UNAUTHORIZED: BALANCE INQUIRY: [REDACTED] requesting their balance at this time. I advised the customer they are not authorized on the account, and directed to the primary for authorization. Account not verified. CMontes 88-4039		
1/13/2022	Electric Consumption Bill [REDACTED]		
1/13/2022	bill [REDACTED] due 2/3/22		
01/28/2022	[REDACTED] UPDATED: CONTACT ADDED: Alexander Argunov requesting to add [REDACTED] as a contact. Transaction completed. Promoted myPSE Account. Account verified. rclema		
2/2/2022	Incoming Payment [REDACTED]		
02/02/2022	[REDACTED] PAYMENT: [REDACTED] wants to make a payment. Took payment via Paymentus, confirmation: [REDACTED]. replicated standard address. [REDACTED] checking acct. Promoted myPSE Account. Account verified. ddinndorf 88-4075		



2/10/2022	Electric Consumption Bill [REDACTED]	[REDACTED]	[REDACTED]
2/11/2022	bill [REDACTED] due 3/4/22	[REDACTED]	[REDACTED]
03/03/2022	[REDACTED] HIGH BILL INQUIRY: / [REDACTED] is concerned about a high bill. I advised the customer that the bill seems to be an accurate reflection of their usage. Account verified. adalas884002		
03/03/2022	[REDACTED] Customer called about a recent high bill, meters appear to good. The previous 2 bill were "estimated" bills so this maybe a catch up bill for them. Customer mentioned the location is doing construction to build a home and has been for 1.5 years now and still isn t done. They live in a trailer on the premise. Advised to make sure nothing else is connected to the powerlines they have and the usage would really becoming from their trailer. Customer requested meter test, transferred to CCC. Ttscott 88-4828		
03/03/2022	[REDACTED] HIGH BILL INQUIRY: [REDACTED] is concerned about a high bill. I advised the customer that the bill seems to be an accurate reflection of their usage. I created meter test per customer request. Account verified. KPhothivongsa 88-4418 Lock of type Dunning reason Bill Investigation valid 03/03/2022 - 04/02/2022 for business agreement 220023882420 created Lock of type Calculate Interest reason Bill Investigation valid 03/03/2022 - 04/03/2022 for business agreement 220023882420 created		
3/14/2022	Electric Consumption Bill [REDACTED]	[REDACTED]	[REDACTED]
3/16/2022	bill [REDACTED] due 4/5/22	[REDACTED]	[REDACTED]
4/13/2022	Electric Consumption Bill [REDACTED]	[REDACTED]	[REDACTED]
4/14/2022	bill [REDACTED] due 5/4/22	[REDACTED]	[REDACTED]
4/13/2022	URGENT NOTICE SENT FOR [REDACTED] Due 5/2/22	[REDACTED]	[REDACTED]
4/22/2022	FINAL NOTICE SENT FOR [REDACTED] Due 5/2/22	[REDACTED]	[REDACTED]

Shaded information is designated as confidential per Protective Order in Docket UE-220701.

04/29/2022	<p>[REDACTED]</p> <p>[REDACTED] called to follow up again on an emma case regarding an estimated bill and a meter test. Meter test emma was still outstanding. I created an Escalated Complaint EMMA case. Account verified. SLeoso 81-4144 Lock of type Dunning reason Bill Investigation valid 04/29/2022 - 05/29/2022 for business agreement 220023882420 created</p>		
05/02/2022	<p>[REDACTED]</p> <p>emailed leads to escalate WO - 3001840463 and SN - 512653750. twright 884345</p>		
05/02/2022	<p>[REDACTED]</p> <p>THREE MIN EMMA : [REDACTED] called to request a report of meter reads and billed amt 4/1/21-4/1/22. Emma case created - 0002993964 Promoted myPSE Account. Account verified. P43053 884010 20220502143532P43053 UPDATED: Authorized customer billing inquiry. Reviewed customer usage history in MDL. Account verified. Sent account history to the customer. Reviewed Emma Cases. Reviewed customer payment history. TRANSFERRED CALL: Transferred the call to the Energy Advisors. I advised the customer that the bill seems to be an accurate reflection of their usage.</p>		
05/02/2022	<p>[REDACTED]</p> <p>customer has more issues with the upgrade of the meter and complaints on smart meters. customer declined to be transferred to AMI Back Office, advised of usage being consistently high 24/7 - around a base average of 4 to 5 kwh per hour from the usage graphs, advised on 4/23 10am thru 4/24 7am, there was a decrease in the usage, advised customer to reflect on what might have been different on that day to determine what is causing the high usage, advised of online tools and to keep track of what is being used per day to help with determining what is using more energy. account verified by previous agent. rstump884825</p>		

05/03/2022	<p>[REDACTED]</p> <p>METER UPGRADE REFUSAL2996190: [REDACTED] is refusing the new AMI Meter Upgrade due to cost . After discussing the benefits of the new AMI meter, customer requesting a Non-Communicating Meter. Checked eligibility. Customer is eligible for NCM meter. Discussed the program details and received verbal agreement from customer regarding the NCM requirements and restrictions. Sent NCM Enrollment form and customer is aware the form is required within 60 days.. hpoole 88-4288</p>		
05/12/2022	<p>[REDACTED]</p> <p>NCM ENROLLMENT FORM 2996190: Alexander Argunov sent in an NCM form. NCM Enrollment form received and has been accepted. Sent Acceptance letter, attached form to WebIC and created Service Notification 512909623 to PSE for NCM Meter Upgrade. KFINGE 88-4124</p>		
5/12/2022	Electric Consumption Bill [REDACTED]		
5/13/2022	bill [REDACTED] due 6/3/22		
06/07/2022	<p>[REDACTED]</p> <p>UPDATED: SEEKING ENERGY ASSISTANCE: [REDACTED] is seeking energy assistance. Advised customer that a hold will be placed on account until 6/14/2022. I provided Elena with energy assistance information. Advised customer to call back with appointment information, once it is obtained, and it may be possible for an additional hold to be placed on the account. Promoted myPSE Account. Account verified. P24361 88-4062 Lock of type Dunning reason Seeking Energy Assistance valid 06/07/2022 - 06/14/2022 for business agreement 220023882420 created</p>		

06/13/2022	<p>[REDACTED]</p> <p>INQUIRY: [REDACTED] called to aug 4 2021 - june 8 2022 she reviewed the usage data online. Starting 10/31/2022 switched smart meter from every day to every 15 min send data to PSE. she feels the data is being read wrong. thinks we are taking readings every 15 mins. on her PSE acct - My usage, bottom corner, green button, download data, exported usage. From date Aug 4 2021 - Oct 30 2021, this was correct. Starting Oct 31 2021 start meter started taking measurements every 15 min. 1.09 x hours data this # needs to be X by 025. July 23 2020 - May 12 2022, 658 days, 21 months, calculated the hourly rate based on when switched to 15 min intervals = [REDACTED] Monthly usage average from data is [REDACTED]. calculated correct rate 15 min average divide is [REDACTED], in 15 min using [REDACTED] watts.Emma case created - 0003058543 4253062305 call back number. Account verified. ddinndorf 88-4075 Lock of type Dunning reason Bill Investigation valid 06/13/2022 - 06/20/2022 for business agreement 220023882420 created</p>		
6/13/2022	Electric Consumption Bill [REDACTED]		
6/14/2022	bill [REDACTED] due 7/6/22		
6/14/2022	<p>[REDACTED]</p> <p>INQUIRY: [REDACTED] called to advised no one call her back yesterday, told her she would receive a call back today Promoted myPSE Account. Account verified. p17587 88-4032</p>		
6/14/2022	<p>9051662693 Case Management - 10001243        Queue Name: Escalated Complaints        Case Source: WUTC        Case Type: Disputed Bill/Estimated Meter Reads        Case ID: 10001243        External Complaint Number: CAS-39919-Q0C6N7        Person Responsible: MSOUTH        Description: Unrealistically high estimated bills since AMI installation        Actual Open Date: 06/14/2022</p>		

6/14/2022	<p>[REDACTED]</p> <p>INQUIRY: [REDACTED] called to asked in chat if a supervisor was available, no response but let her know I will follow up if there is a response, [REDACTED] best # to call back wanted to report she filed a UTC complaint. Promoted myPSE Account. Account verified. ddinndorf 88-4075</p>		
6/14/2022	<p>[REDACTED]</p> <p>Spoke to [REDACTED] and explained that I am not able to diiscuss the details at this point since a case has been opened with WUTC. Advised once it is closed we would be happy to discuss. Supervisor/thacke</p>		
6/15/2022	Account Balance = [REDACTED]		[REDACTED]

**ATTACHMENT C TO PUGET SOUND ENERGY'S CONFIDENTIAL  
RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. 8**

**Complaint #CAS-39919-Q0C6N7**

6/17/2022 Closing email from UTC

**From:** Cook, Corey (UTC) <corey.cook@utc.wa.gov>  
**Sent:** Friday, June 17, 2022 11:28 AM  
**To:** WUTC Complaints - mail -  
**Subject:** WA UTC Complaint CAS-39919-Q0C6N7 for [REDACTED]  
CRM:0132117

**Categories:** Melissa

**CAUTION - EXTERNAL EMAIL**

Phishing? Click the PhishAlarm "Report Phish" button.

Melissa,

Thank you for your response.

Please note, I have recorded one violation of WAC 480-100-183(3) because on 3/3/2022, the customer requested PSE complete a meter test; however, PSE failed to complete the test within 20 business days and on 5/4/2022, it completed the test.

The complaint is now closed. The disposition is company upheld with violations. Please note that the Consumer Protection section has an internal quality review program and all closed complaints are subject to review and/or re-opening.

The explanation of the violations recorded constitutes technical assistance. Please make all corrections necessary to ensure future compliance. Repeat violations may result in enforcement action, including monetary penalties. Staff considers a number of factors when recommending penalties, including whether past technical assistance was provided and subsequently followed.

The company may request a review of this investigation by Sheri Hoyt, Consumer Protection Manager. Please clearly note why the company requests a review and I will forward the request. To contact Sheri directly, email [sheri.hoyt@utc.wa.gov](mailto:sheri.hoyt@utc.wa.gov) or call 360-664-1102.

Thanks,  
Corey