

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

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

Complainants,

v.

PUGET SOUND ENERGY

Respondent.

DOCKET UE-220701

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

EXHIBIT AT-3C

Puget Sound Energy's Confidential Response to Public Counsel Data Request No. 9 with
Attachments B-1, B-2, and B-3, 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. 009:

Please provide all correspondence and documents regarding complaints between PSE and Thomas and Heidi Johnson 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. Following is the correspondence and documents provided for Informal UTC complaint # CAS-39911-X0W9W9. The attachments to each email are identified below.
 - a. Opened: 6/15/2022 (Attachment A to PSE's Response to Public Counsel Data Request No.009)
 - b. 6/16/2022 PSE initial response (Attachment B to PSE's Response to Public Counsel Data Request No.009) with embedded documents that are provided below:
 - i. Attachment B-1 to PSE's Response to Public Counsel Data Request No.009.
 - ii. Attachment B-2 to PSE's Response to Public Counsel Data Request No.009
 - iii. Attachment B-3 to PSE's Response to Public Counsel Data Request No.009
 - iv. Attachment B-4 to PSE's Response to Public Counsel Data Request No.009
 - v. Attachment B-5 to PSE's Response to Public Counsel Data Request No.009
 - vi. Attachment B-6 to PSE's Response to Public Counsel Data Request No.009
 - vii. Attachment B-7 to PSE's Response to Public Counsel Data Request No.009
 - viii. Attachment B-8 to PSE's Response to Public Counsel Data Request No.009
 - c. Closed: 7/29/2022 (Attachment C to PSE's Response to Public Counsel Data Request No.009)
 - d. Complaint resolved when UTC re-closed the informal complaint on 7/29/2022

Shaded information is designated as CONFIDENTIAL per WAC 480-07-160 as marked in Puget Sound Energy's Response to Public Counsel Request No. 009 Attachments A and B.

ATTACHMENTS A-C to PSE's Response to Public Counsel Request No. 009

**ATTACHMENT B-1 TO PUGET SOUND ENERGY'S CONFIDENTIAL
RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. 9**

WA UTC Complaint CAS-39911-X0W9W9 for [REDACTED]
Opened: 6/15/22
Grouped By: High Bill

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

6/15/22 WA-UTC INITIAL REQUEST:

Since 2021, the customer is building a home at the service address and has temporary service connected to a trailer on the property. In December 2021 permanent service was connected to the home, but the temporary power was kept run to the trailer until the house was finished and ready to move into. The customer maintains two accounts for the two meters.

Contractors have continued to use cords connected to the temp pole as the electricians had not installed outlets in the home yet, and the customer is not aware of any power consumption on the permanent service until lights were installed in May.

The customer hadn't had any issues, and was being billed for the temp pole and set up for autopay. Last week, the customer had a [REDACTED] debit taken from the account by PSE. The customer received a notice of corrected charges, dated 5/19/22, providing a "delayed bill" for the following billing periods:

- 2/10/22 - 3/14/22 [REDACTED] kWh
- 3/14/22 - 4/13/22 [REDACTED] kWh
- 4/13/22 - 5/12/22 [REDACTED] kWh

The customer does not believe the readings from that meter are even in the realm of possibility and seem to have been fabricated out of the ether. The customer has spoken with several supervisors that have all told him there is nothing wrong with the smart meter and it is correctly reading the customer's consumption. The customers have been told they were consistently using over [REDACTED] kWh per day, despite several of those billing periods having zero activity as there was too much snow to have any of the contractors come out.

The customer asserts that all construction consumption during the period covered by this bill has gone through the temporary power pole, and that the meter put on for permanent service went crazy since it was installed. The customer demands that PSE return the charges paid on that meter. The customer also wants the smart meter removed and a manual read meter installed.

6/15/22 2:25 p.m. Passed Complaint to PSE via email. PSE's response is due by 5 p.m. on 6/17/22.

6/16/22 PSE INITIAL RESPONSE:

Included with our response is the usage histories for the Temp Service account and the Permanent Service Account, account history for the permanent service account, copy of the 5/19/22 Notice of

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

In the account history you will see on 6/10/22 [REDACTED] was offered to be transferred to an Energy Advisor to discuss ways to reduce their usage and she declined this option and requested the meter be tested a 2nd time for her to witness the test. The agent scheduled an appointment with her for Monday, 6/13 and when she was contacted on 6/13/22 to re-schedule that appointment due to our meter testers only being in Kittitas County on Wednesdays she declined after she was advised she would be charged for the 2nd test. This is due to it being less than a year since the meter was tested per her request on 5/6/22.

Additionally, you will see that the customer has cancelled their auto pay for account [REDACTED] and the current bill sent 6/14/22 due 7/6/22 will not be automatically withdrawn.

Corrected Charges, the 5/6/22 Meter Tested Accurate Letter and the daily usage histories for the meters serving the residential permanent service and the commercial temporary service. The billing has been reviewed and found to be accurate along with the meter being tested and testing accurate.

You will see in the account history that on 3/7/22 [REDACTED] requested that the meter be tested. The notes on the meter test order state she did not want to be present for the meter test. The meter was tested on 5/6/22 and tested accurate. I listened to the 3/7/22 call recording and both [REDACTED] and [REDACTED] were on this phone call. I verified our agent did ask if they wanted to be present for the meter test and they both said no. [REDACTED] exact response was "No, just come out whenever". The agent advised her that if the meter test passed compliance they would be mailed a letter advising that the meter tested accurate.

Following are the test results.

Full Load = 100.12%
Light Load = 100.12%
Average Test Load = 100.12%

Meter # [REDACTED] for the permanent service was installed on 12/9/21 and billed on account [REDACTED].

The meter for the Temporary Service (meter # [REDACTED] was installed on 10/1/2020 and was upgraded to an AMI meter on 9/2/21 with meter # [REDACTED]. The Temporary service account number [REDACTED] which we show is still active.

Regarding the customer's request to have the AMI (Smart Meter) removed and a manual read meter installed, I had our AMI team send the customer the NCM (Non-Communicating Meter) paperwork for them to complete and return to PSE. That information is being mailed today, 6/16/22.

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. 9**

Activity Date	Account history for account [REDACTED]	Amount	Balance
	Est. 12/9/21, Good, 0.00 dpst, 0 late notices, 0 disconnects, 0 returned payments		
	Starting Balance = [REDACTED]		
12/15/2021	Electric Consumption Bill [REDACTED] 12/9/2021 - 12/15/2021 Actual Read 0 Zero usage billed		
12/23/2021	Elec Billing Initiation Charge 6.10		
12/23/2021	bill [REDACTED] due 1/14/22		
1/13/2022	Electric Consumption Bill [REDACTED] 12/16/2021 - 1/13/2022 Estimated Read 572.055		
1/13/2022	bill [REDACTED] due 2/3/22 A bank withdrawal is scheduled for 2/3/2022 for charges due		
2/3/2022	Incoming Payment [REDACTED]		
2/10/2022	Electric Consumption Bill [REDACTED] 1/14/2022 - 2/10/2022 Actual Read [REDACTED]		
2/11/2022	bill [REDACTED] due 3/4/22 A bank withdrawal is scheduled for 3/4/2022 for charges due		
3/4/2022	Incoming Payment [REDACTED]		
03/07/2022	[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. She requests a meter test. Placed SN and dunning/calculate interest locks. Account verified. arose 88-4131 Authenticated with SSN Lock of type Dunning reason Bill Investigation valid 03/07/2022 - 04/06/2022 for business agreement [REDACTED] created Lock of type Calculate Interest reason Bill Investigation valid 03/07/2022 - 04/06/2022 for business agreement [REDACTED] created [REDACTED] AROSE UPDATED: Authorized customer billing inquiry. Account verified. Reviewed customer payment history. Reviewed customer usage history in MDL. I advised the customer that the bill seems to be an accurate reflection of their usage.		
05/19/2022	[REDACTED] Meter #: [REDACTED] Released delayed billing from 02/11/22 - 05/12/22 resulting in a debit of [REDACTED] kWh. The customer is eligible for a three month interest free installment plan. jmoses 88-4342		

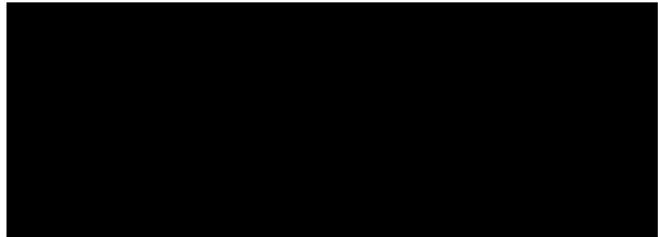
5/19/2022	Electric Consumption Bill [REDACTED] 2/11/2022 - 3/14/2022 Actual Read [REDACTED]
5/19/2022	Electric Consumption Bill [REDACTED] 3/15/2022 - 4/13/2022 Actual Read [REDACTED]
5/19/2022	Electric Consumption Bill [REDACTED] 4/14/2022 - 5/12/2022 Actual Read [REDACTED]
5/19/2022	bill [REDACTED] due 6/9/22 A bank withdrawal is scheduled for 6/9/2022 for charges due Notice of Delayed Delivery of Bill There was a delay in delivering your Puget Sound Energy bill, this month's bill includes charges for the unbilled period as shown in the Detail Information section. If you need to arrange an interest-free installment payment plan, please call us at 1-866-767-5853, Monday-Friday, 8 a.m. - 5 p.m.
06/07/2022	[REDACTED] EMMA CASE 2913568 : Meter Accuracy test performed 5/6/22 on meter [REDACTED] per s/n [REDACTED]. Meter tested accurate, billing is correct. Ktissell 884680
6/9/2022	Incoming Payment [REDACTED]
06/10/2022	[REDACTED] BALANCE INQUIRY: [REDACTED] requesting their balance at this time. I provided [REDACTED] with their current balance and notice of corrected charges. Xferred to back office team. Promoted myPSE Account. Account verified. P44166 4051 Authenticated with SSN
06/10/2022	[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. Offered energy advisor to discuss ways to reduce the usage and/or pin point where usage came from. Customer declined. Requested that the meter be tested. Scheduled SN Promoted myPSE Account. Account verified. CMontes 88-4039



06/10/2022	<p>[REDACTED] EMMA CASE 3055791: BILLING CORRECTION: OUTBOUND CALL: CALLED [REDACTED] and spoke with [REDACTED] - went over charges - states the home under construction and is vacant - I did mention sometimes due to work the usage and billing could be high. Was at the vet and needed to go - was upset. Before I could offer installment, even though paid in full. Verified. E/McCaughey 884654</p>	[REDACTED]
06/10/2022	<p>[REDACTED] Emma case created - 0003055941 [REDACTED] is calling in regarding his bill. It is showing a balance of [REDACTED] he is disputing the usage should be this high at the location. Claiming it is mostly vacant but some construction was done. He is disputing the meters accuracy please double check the accuracy of the meter for the location. He would like to be contacted once the meter is checked. Please verify the meter is not slow/stopped and the usage is valid.</p>	[REDACTED]
06/13/2022	<p>[REDACTED] HIGH BILL INQUIRY: [REDACTED] is concerned about a high bill. I advised the customer that this bill is high due to a billing adjustment. Advised the bill was so high due to the fact that its mult months combined. Customer wanted details as to why/what caused it. Transferred customer to 18667675853 per leadership I promoted myPSE. Account verified. KG 88-4138 Authenticated with SSN</p>	[REDACTED]
6/13/2022	<p>[REDACTED] INQUIRY: OUTBOUND CALL: Called [REDACTED] to reschedule meter test as we are only in Kittitas County on Wednesdays. Customer declined as she would be charged for the second meter test. I created a Supervisor Callback EMMA case. Account verified. CMontes 88-4039</p>	[REDACTED]
6/14/2022	<p>Electric Consumption Bill [REDACTED] 5/13/2022 - 6/13/2022 Actual Read [REDACTED]</p>	[REDACTED]
6/14/2022	<p>[REDACTED] due 7/6/22</p>	[REDACTED]
6/15/2022	<p>Queue Name: Escalated Complaints Case Source: WUTC Case Type: High Bill/Usage Dispute Case ID: 10001250 External Complaint Number: CAS-39911-X0W9W9 Person Responsible: SHAMMO Description: Disputing usage and wants Smart Meter removed Actual Open Date: 06/15/2022</p>	[REDACTED]

6/16/2022	Account Balance =	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
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**ATTACHMENT B-3 TO PUGET SOUND ENERGY'S CONFIDENTIAL
RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. 9**



We have tested your meter

Dear 

In response to your request, the electric meter at the service address above has been tested.

The meter was found to register accurately. We also checked your billing schedule and computation to further verify the accuracy of your billing.

If you have questions, please contact us. We appreciate the opportunity to serve you.

Sincerely,

Customer Care
Puget Sound Energy



**ATTACHMENT C TO PUGET SOUND ENERGY'S CONFIDENTIAL
RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. 9**

Complaint # CAS-39911-X0W9W9

7/29/2022 UTC Closing email

From: Trier, John (UTC) <john.trier@utc.wa.gov>
Sent: Friday, July 29, 2022 11:14 AM
To: WUTC Complaints - mail -
Subject: RE: 6-16-22 Response for WA UTC Complaint CAS-39911-X0W9W9 for [REDACTED] CRM:0133995

CAUTION - EXTERNAL EMAIL
Phishing? Click the PhishAlarm "Report Phish" button.

Good morning Stacey,

Thank you for your patience as I reviewed this complaint. I think the only possible violation I could go with here might have been for the three month delayed bill when WAC 480-100-178(1) would require bills every two one-month billing cycles, but there may have been good cause for the delay due to the billing and meter investigation requested on 3/7/22. I'm not able to sustain the customer's claims that the work crews that were out there had not hooked anything up to the permanent service connection, and would have expected a more significant increase in the temporary connection if they had routed everything through it.

This complaint is now closed. The disposition is Company Upheld. Please note that the Consumer Protection division has an internal quality review program and all closed complaints are subject to review and / or reopening.

Have a great day, it's been great working with you and Melissa both!

-John

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