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-4C

Puget Sound Energy's Confidential Response to Public Counsel Data Request No. 10 with Attachments B-1, B-2, C, G, and H

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. 010:

Please provide all correspondence and documents regarding complaints between PSE and Chad and Victoria Groesbeck 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:

- I. Included below is the correspondence and documents provided for Informal UTC complaint # CAS-33073-L9B0M8. The attachments to each corresponding email are identified below.
 - a. Opened: 2/22/2022 (Attachment A to PSE's Response to Public Counsel Data Request No.010)
 - b. 2/24/2022 PSE Initial response email (Attachment B to PSE's Response to Public Counsel Data Request No.010), with embedded documents that are provided below:
 - i. Attachment B-1 to PSE's Response to Public Counsel Data Request No.010
 - ii. Attachment B-2 to PSE's Response to Public Counsel Data Request No.010
 - iii. Attachment B-3 to PSE's Response to Public Counsel Data Request No.010
 - iv. Attachment B-4 to PSE's Response to Public Counsel Data Request No.010
 - v. Attachment B-5 to PSE's Response to Public Counsel Data Request No.010
 - vi. Attachment B-6 to PSE's Response to Public Counsel Data Request No.010
 - vii. Attachment B-7 to PSE's Response to Public Counsel Data Request No.010
 - viii. Attachment B-8 to PSE's Response to Public Counsel Data Request No.010
 - ix. Attachment B-9 to PSE's Response to Public Counsel Data Request No.010
 - x. Attachment B-10 to PSE's Response to Public Counsel Data Request No.010
 - xi. Attachment B-11 to PSE's Response to Public Counsel Data Request No.010

- xii. Attachment B-12 to PSE's Response to Public Counsel Data Request No.010
- xiii. Attachment B-13 to PSE's Response to Public Counsel Data Request No.010
- xiv. Attachment B-14 to PSE's Response to Public Counsel Data Request No.010
- xv. Attachment B-15 to PSE's Response to Public Counsel Data Request No.010
- c. 3/11/2022 UTC Follow up request #1 email (Attachment C to PSE's Response to Public Counsel Data Request No.010)
- d. 3/16/2022 PSE response to UTC follow up request #1 email (Attachment D to PSE's Response to Public Counsel Data Request No.010), with embedded documents that are provided below:
 - i. Attachment D-1 to PSE's Response to Public Counsel Data Request No.010
- e. 4/15/2022 UTC Follow up request #2 email (Attachment E to PSE's Response to Public Counsel Data Request No.010)
- f. 4/20/2022 PSE Response to UTC follow up request #2 email (Attachment F to PSE's Response to Public Counsel Data Request No.010) with embedded documents that are provided below:
 - i. Attachment F-1 to PSE's Response to Public Counsel Data Request No.010
 - ii. Attachment F-2 to PSE's Response to Public Counsel Data Request No.010
- g. Closed: 5/25/2022 (Attachment G to PSE's Response to Public Counsel Data Request No.010)
- h. Complaint resolved when UTC re-closed the informal complaint on 5/25/2022
- II. Included below is the correspondence and documents provided for Informal UTC complaint # CAS-40541-C8L4N0. The attachments to each corresponding email are identified below.
 - a. Opened: 7/12/2022 (Attachment H to PSE's Response to Public Counsel Data Request No.010)
 - b. 7/13/2022 PSE initial response to UTC (Attachment I to PSE's Response to Public Counsel Data Request No.010) with embedded documents that are provided below:
 - i. Attachment I-1 to PSE's Response to Public Counsel Data Request No.010
 - ii. Attachment I-2 to PSE's Response to Public Counsel Data Request No.010
 - iii. Attachment I-3 to PSE's Response to Public Counsel Data Request No.010
 - c. 7/15/2022 UTC Follow up Request #1 email (Attachment J to PSE's Response to Public Counsel Data Request No.010)

- d. 7/20/2022 PSE Response to UTC follow up request #1 email (Attachment K to PSE's Response to Public Counsel Data Request No.010), with embedded documents that are provided below:
 - i. Attachment K-1 to PSE's Response to Public Counsel Data Request No.010
 - ii. Attachment K-2 to PSE's Response to Public Counsel Data Request No.010
- e. Closed: 7/25/2022 (Attachment L to PSE's Response to Public Counsel Data Request No.010)
- f. Complaint resolved when UTC re-closed the informal complaint on 7/25/2022

Shaded information is designated as CONFIDENTIAL per WAC 480-07-160 as marked in Puget Sound Energy's Response to Public Counsel Request No. 010, Attachments A-K.

ATTACHMENTS A-L to PSE's Response to Public Counsel Request No. 010



WA UTC Complaint CAS-33073-L9B0M8 for Opened: 2/22/2022 Grouped By: Disputed Bill

Customer A	ccount Name:	
Account#:		
Service Add	ress:	

2/22/2022 WA-UTC INITIAL REQUEST:

On 10/2/20 the customer moved into a newly constructed home and started service with PSE. Since this date the customer has had consistent problems with PSE estimating bills and sending out notices of corrected charges. The customer is unable to trust the amount billed by PSE as it is consistently being changed and corrected.

When he has called PSE to try to get assistance with understanding the bills and why they continue to be estimates he is told he needs to speak with billing specialists, but that department doesn't want to work with him or answer their phones.

2/22/22 10:24 a.m. Passed complaint to PSE via email. PSE's response is due by 5 p.m. on 2/24/22.

2/24/2022 PSE INITIAL RESPONSE:

Included with our response is the account history, all Notices of Corrected Charges sent, all Installment Confirmation Letters sent and the daily read history for the new AMI meter set on 1/18/2021.

Mr. Account was started on 10/2/2020 with a start date of 9/10/2020 which is when the temporary meter was set. The meter that was set was an AMR meter. The meter was initially set up as a Commercial Meter and was converted to a Residential service on 11/12/2020. The rate was not changed in our billing system until 12/16/2020 and a billing correction was processed on 12/16/2020 to correct the rate schedule effective 11/12/2020 to rebil the account with Residential Schedule 7 rates.

Unfortunately, we did not ever hear from the AMR meter due to bad signal which resulted in estimated reads on the following dates: 10/13/2020, 11/11/2020, 12/14/2020, 1/13/2021, 2/11/2021, 3/15/2021, 4/13/2021 and 8/12/2021. A new meter (AMI) was set on 2/18/2021 and an actual read was obtained from the AMR meter at this time which was used to process a billing correction on 8/18/2021. You will see in the Daily Read history included with our response the AMI meter that was set on 8/18/2021 transmitted good reads from 8/18/2021 through 12/5/2021. The meter did not transmit reads from 12/6/2021 through 1/15/2022. It transmitted a good read on 1/16/2022 which was used to process a billing correction on 1/20/2022. The meter then did not transmit reads from 1/17/2022 - 1/24/2022 and then started transmitting good reads again on 1/25/2022. We apologize for all the billing corrections that have occurred and are hoping we will continue to consistently hear from the AMI meter to avoid future estimated billing reads.

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



Following are the details for each of the billing correction processed from 12/16/2020 through 1/20/2022. The installment arrangements are shown in the account history and copies of the Installment confirmation letters are included with our response.

12/16/2020

Notice of Charges for Corrected Rate Schedule

We found that your account previously was set up on the wrong rate schedule. We have corrected your schedule, and adjusted the charges 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.

- 1. What was the reason for the back-bill? To change rate schedule from Commercial 24 to Residential 7 effective 11/12/2020.
- 2. Dates for the back-bill? 11/12/2020-12/14/2020
- 3. Was this actual or estimated usage? Actual
- 4. Were any adjustments provided? No.
 - 5. Was an installment plan provided? One was offered on the Notice of Corrected Charges displayed above

4/21/2021

Notice of Corrected Error that Delayed Delivery of Bill

Due to a technical error that caused 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.



04/21/2021	reated service notification #511199631. Released delayed billing from 2/12/2021 - 4/13/2021 resulted in a debit of Estimated meter reads. The customer is eligible for a two month interest free installment plan. Resolved with EMMA Case #: 2496435.
	interest free installment plan. Resolved with EMMA Case #: 2496435.
	lthomas 88-4652

- 1. What was the reason for the back-bill? Delayed billing
- 2. Dates for the back-bill? **2/12/2021 4/13/2021**
- 3. Was this actual or estimated usage? Estimated
- 4. Were any adjustments provided? No
- 5. Was an installment plan provided? One was offered on the Notice of Corrected Charges displayed above

8/4/2021

Notice of Corrected Charges Based on Actual Meter Read

This bill is based on an actual meter read and includes corrected charges for your energy usage. Your previously billed charges were based on estimated meter reads. We have adjusted the billing amount as shown in the Detail Information section. If a charge is due, we set up your account on an interest-free installment payment plan, which will appear on your next bill. Questions? Call us at **1-866-767-5853**, Monday-Friday, 8 a.m. - 5 p.m.



- 1. What was the reason for the back-bill? To correct estimated reads with better estimated reads based on the actual read obtained on 5/28/2021.
- Dates for the back-bill? 12/15/2020 4/13/2021 and delayed charges from 4/14/2021 7/14/2021
- 3. Was this actual or estimated usage? Actual based on manual read obtained from meter on 5/28/2021.

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



- 4. Were any adjustments provided? No.
- 5. Was an installment plan provided? Yes, an arrangement was created on the total account balance of

8/12/2021

- What was the reason for the back-bill? This correction was not a back-bill it was to re-process the 8/4/2021 correction to remove the 7th month of charges billed from 6/15/2021 – 7/14/2021 due to 6 month rule.
- 2. Dates for the back-bill? N/A
- 3. Was an installment plan provided? The installment plan that was created on 8/4/2021 in the amount of was deactivated and a new installment plan was created on the new balance of

8/18/2021

Notice of Corrected Charges Based on Actual Meter Read

This bill is based on an actual meter read and includes corrected charges for your energy usage. Your previously billed charges were based on estimated meter reads. We have adjusted the billing amount as shown in the Detail Information section. If a charge is due, we set up your account on an interest-free installment payment plan, which will appear on your next bill. Questions? Call us at 1-866-767-5853, Monday-Friday, 8 a.m. - 5 p.m.



1. What was the reason for the back-bill? To correct estimated reads with better estimated reads based on the actual read obtained on 8/18/2021 when the meter was changed from an AMR meter to an AMI meter.



- Note: On 2/1/2022 the two active installment plans were deactivated and a single installment plan was created on the total account balance of \$
- Additionally, the AutoPay was not removed resulting in the full \$ being paid automatically on 2/9/2022. That payment was cancelled on 2/10/2022 and a new installment plan was created on 2/11/2022 for the amount of \$ being paid.
- 2. Dates for the back-bill? 12/15/2020 8/12/2021
- 3. Was this actual or estimated usage? Actual based on manual read obtained from meter on 8/18/2021.
- 4. Were any adjustments provided? No.
- 5. Was an installment plan provided? Yes, an arrangement was created on the total amount due of \$.

1/20/2022

Notice of Corrected Charges Based on Actual Meter Read

This bill is based on an actual meter read and includes corrected charges for your energy usage. Your previously billed charges were based on estimated meter reads. We have adjusted the billing amount as shown in the Detail Information section. If a charge is due, we set up your account on an interest-free installment payment plan, which will appear on your next bill. Questions? Call us at **1-866-767-5853**, Monday-Friday, 8 a.m. - 5 p.m.



- 1. What was the reason for the back-bill? To correct estimated reads with better estimated reads based on the read transmitted from the module on 1/16/2022.
- 2. Dates for the back-bill? 11/12/2021 1/13/2022
- 3. Was this actual or estimated usage? Actual
- 4. Were any adjustments provided? No.
- 5. Was an installment plan provided? Yes, an installment plan was created on such which was in addition to the installment plan created on 8/18/2021.

ATTACHMENT B-2 TO PUGET SOUND ENERGY'S CONFIDENTIAL RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. 10

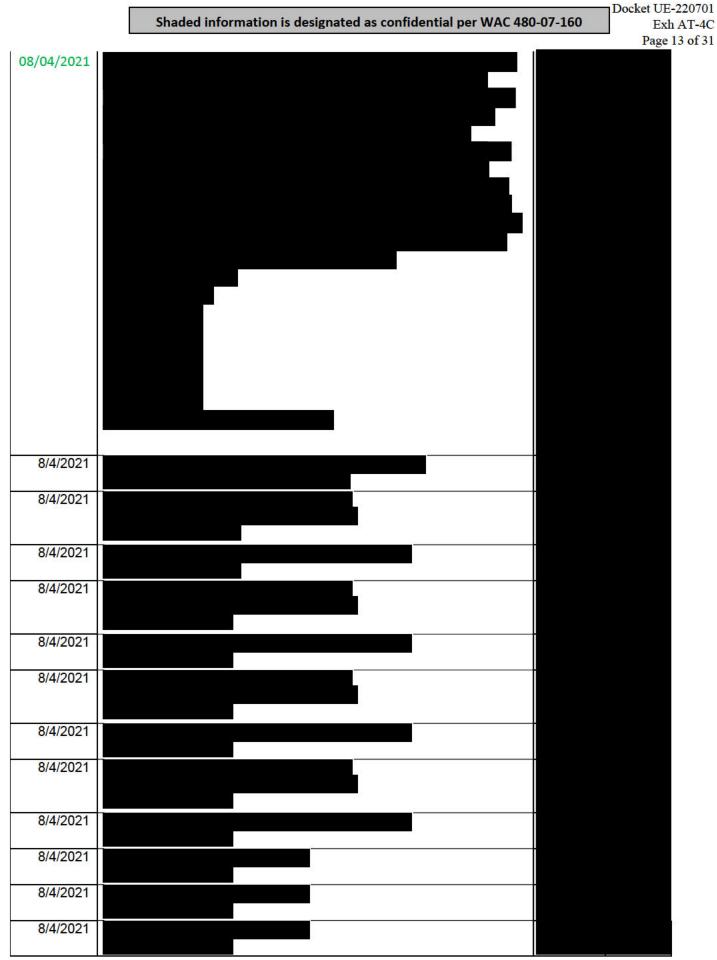
Docket UE-220701 Exh AT-4C Page 10 of 31

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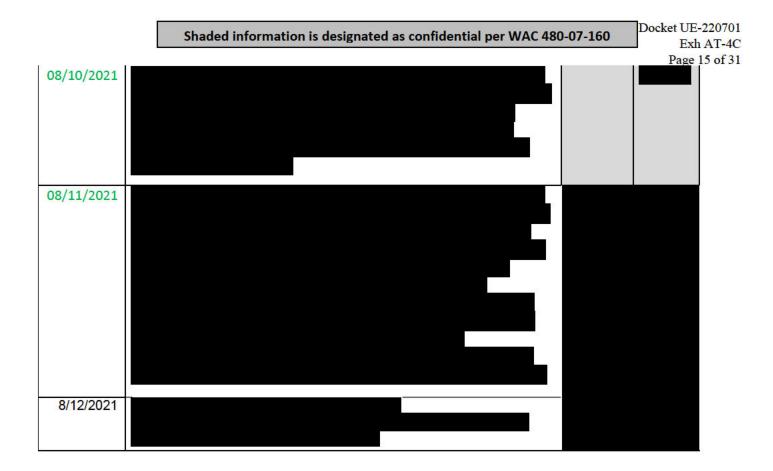
Docket UE-220701 Exh AT-4C Page 11 of 31

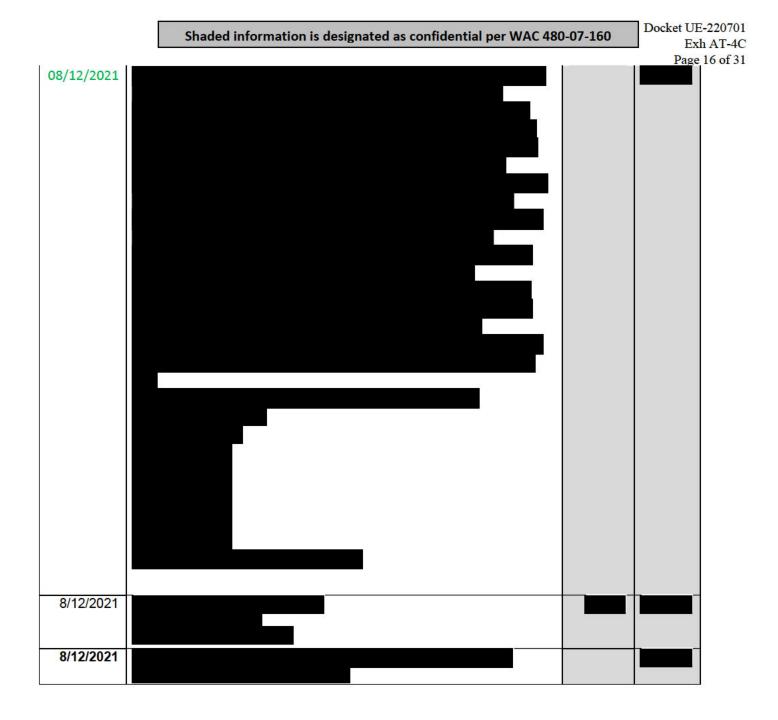
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12/16/2020	
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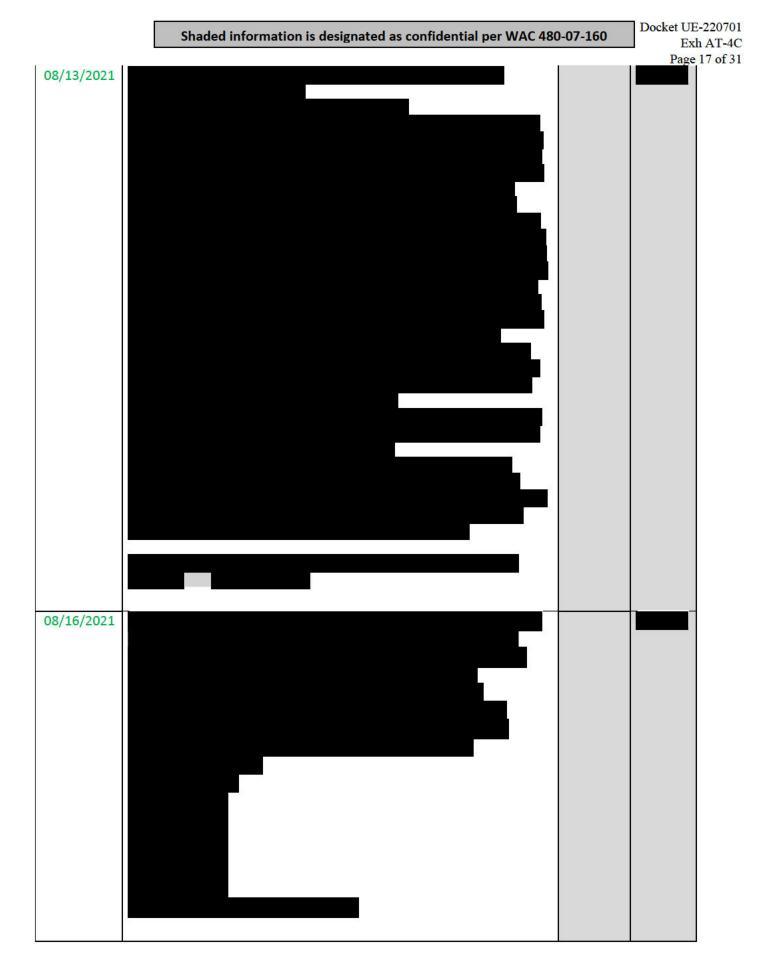


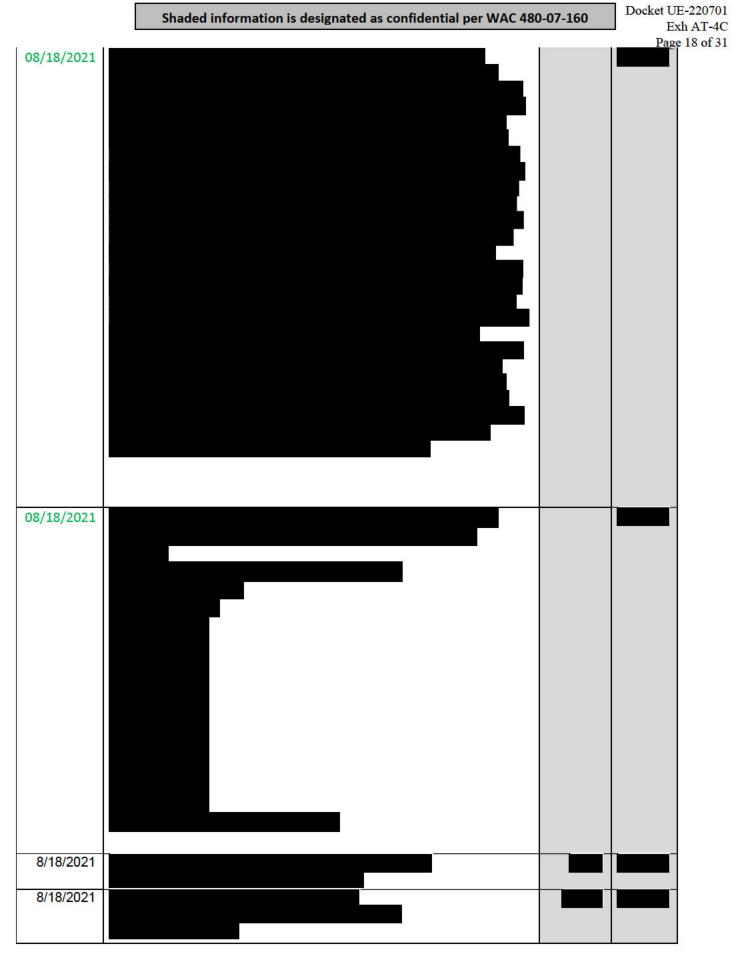






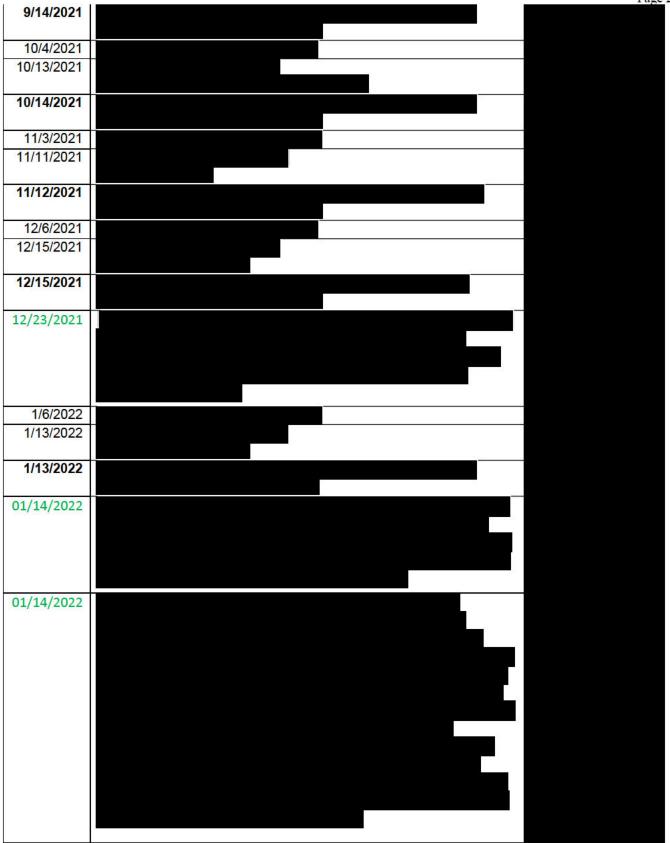


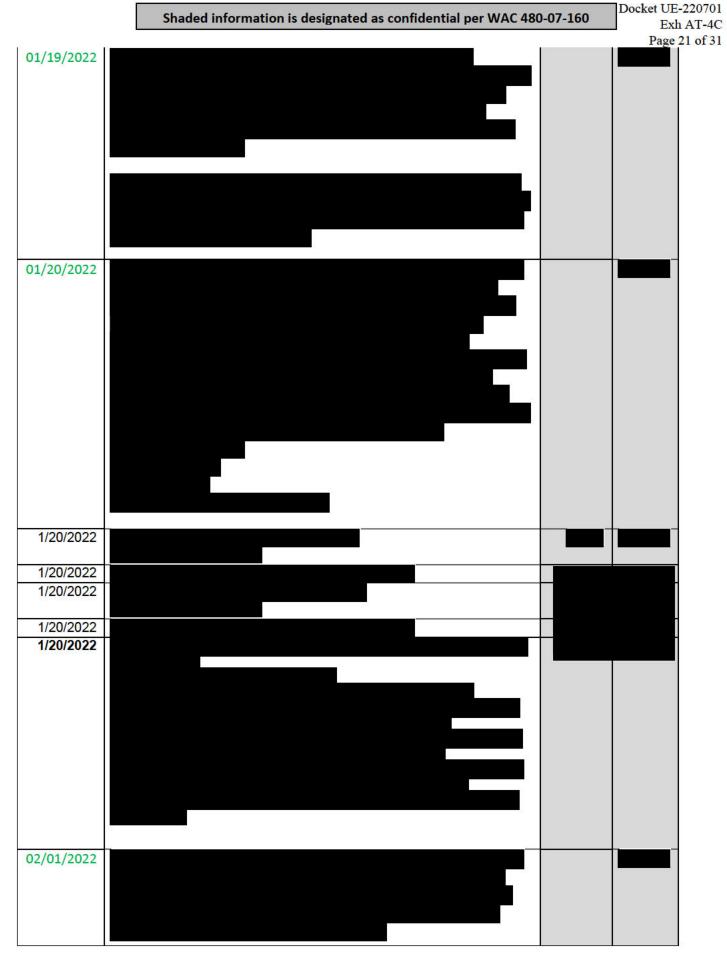


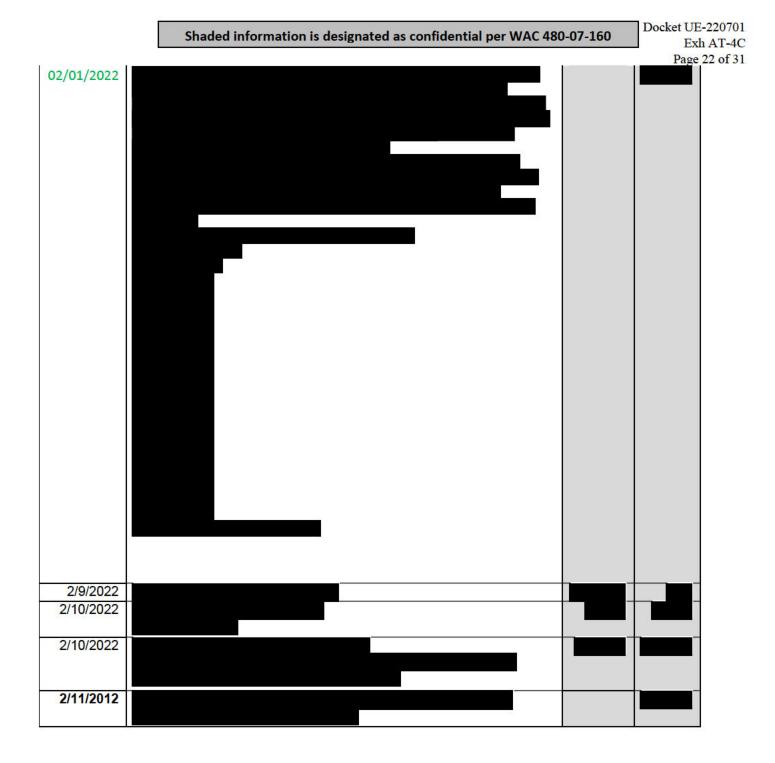


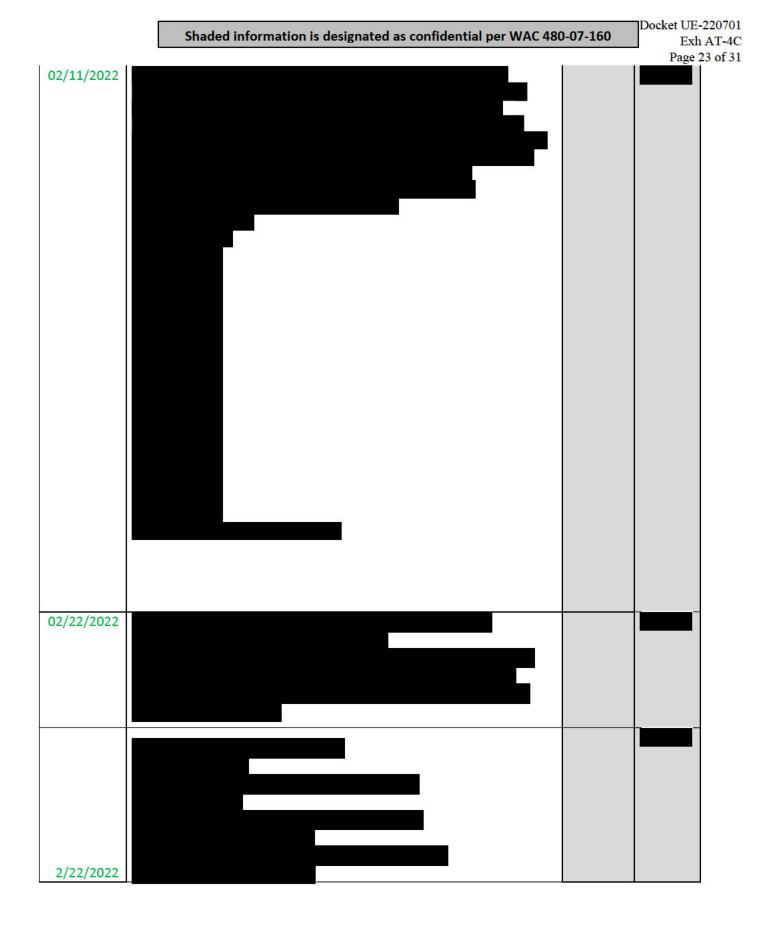
	Shaded information is designated as confidential per WAC 480-07-160	Docket UE-220701 Exh AT-4C
8/18/2021		Page 19 of 31
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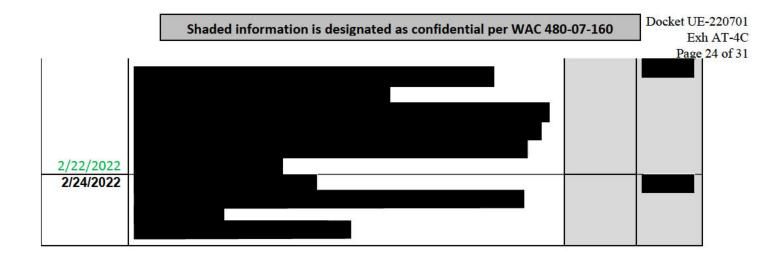
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ATTACHMENT C TO PUGET SOUND ENERGY'S CONFIDENTIAL RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. 10

I. Complaint # CAS-33073-L9B0M8

3/11/2022 UTC Follow up request #1 email

From: Trier, John (UTC) <<u>iohn.trier@utc.wa.gov</u>> Sent: Friday, March 11, 2022 10:57 AM To: WUTC Complaints - mail - <<u>WUTC Complaints@pse.com</u>> Subject: RE: 2-24-2022 Response for WA UTC Complaint CAS-33073-L9B0M8 for CRM:0133591

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

Good morning Stacey,

Thank you for the initial response. I have to admit this has been a very challenging account for me to unpack. I am reviewing the initial billing corrections in August 2021 and have a few questions / concerns about how these corrections were processed.

As far as I can tell from the response the initial meter was set on 9/10/20 and the customer was responsible for service at this location from that date. It also looks like there are no actual reads obtained from the meter until a visit on 5/28/21 and then when the AMR meter was switched out for the first AMI meter on 8/18/21.

8/18/21 acct note "We got a physical read of accession on 11/23/2020. I then informed that we did not hear from the meter for the next six months causing the estimate reads to happen. We then created a service order to exchange a part for the meter on 05/28/2021 and got a read of accession... that the next 2.5 months after 05/28/2021 were estimated reads again, so we created another service order to physically change out the meter. We were able to get a physical read of accession on August 18, 2021"

So looking at the previous billings it appears the meter was set at 0 starting 9/10/20 and never phoned home, so every single bill until August 2021 was estimated. However, when PSE went back and performed the billing correction it chose the period of 12/15/21 to 4/13/22 (I think) for rebilling and how that noted physical read of on 11/23/20 was used. I find it very interesting how consistently the overall consumption was distributed across each billing period when estimated by SAP on 8/4/21 with each period being about \$360 +/- \$15.

I think I can see where there may have been some bill periods with (for example looking at the good daily reads between 1/25/22 to 2/22/22 has a daily average of and total consumption of across 29 days). So I think it probably is reasonable looking back at last Winter to see a similar consumption, but for other periods it seems like there would be much lower consumption based on the daily reads from 8/19/21 to 12/5/21.

In addition, it appears that after the 2/11/21 bill cycle the system tried to catch the lack of reads from the meter for the past four months and delayed billing so an meter investigation could be done, but for some reason on 4/21/21 PSE released the two months of delayed bills with more estimated readings instead of investigating why it was not getting readings from the meter.

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

PSE's Response to Public Counsel Data Request No. 010 Attachment C

I think that's everything for my initial review. Can PSE explain the process it used to determine which period to perform the 8/4/21 billing correction and provide details of the calculations used to distribute the total consumption between actual readings used as the basis for that correction?

Please provide a response by 5 p.m. on 3/16/22.

Thank you, John

ATTACHMENT G TO PUGET SOUND ENERGY'S CONFIDENTIAL RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. 10

I. Complaint # CAS-33073-L9B0M8

5/25/2022 UTC closing email

From:	Trier, John (UTC) <john.trier@utc.wa.gov></john.trier@utc.wa.gov>
Sent:	Wednesday, May 25, 2022 2:43 PM
То:	WUTC Complaints - mail -
Subject:	RE: 4-20-22 Response for WA UTC Complaint CAS-33073- L9B0M8 for CRM:0133591

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

Good afternoon Stacey,

Thank you so much for you continued patience as I untangled this account and worked through it with the customer. This was by far the most challenging account review I've had to do due to the number of estimates and corrections performed. Hopefully with the meter properly transmitting daily reads back to PSE the customers should not experience this kind of unreliability in their bills moving forward.

This complaint is now closed. The disposition is Consumer Upheld. 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.

Please note that I have recorded one violation of RCW 80.28.080(1) for the billing period 11/12/20 to 12/14/20 when the customer was converted to permanent residential service the customer was billed under Schedule 24. On 12/16/20 PSE issued a corrected bill to correct the previous estimated read, and switch the billing to Schedule 7 residential service. PSE must bill for the rates and charges applicable to such service as specified in its schedule filed and in effect at the time provided.

Please note that I have also recorded one violation of WAC 480-100-178(1)(a) for the three billing periods between 4/21/21 and 8/4/21 where PSE did not issue a bill. By rule PSE's bills must be issued at intervals not to exceed two one-month billing cycles.

Please note that I have also recorded five violations of WAC 480-100-178(1)(i)(ii) as between 12/15/20 and 8/12/21, PSE did not have a single billing period which was based on actual beginning and ending reads. By rule, PSE must not estimate for more than four consecutive months except under specific circumstances.

PSE's Response to Public Counsel Data Request No. 010 Attachment G

Page 1

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

Please note that I have also recorded two violations of WAC 480-100-178(5)(a) for errors made on its 8/4/21 notice of corrected charges. On 8/4/21 PSE issued a notice of corrected charges 68 days after performing a check read on 5/28/22 and confirming the suspected meter issue. In addition, the 8/4/21 notice of corrected charges attempted to collect for seven billing periods. By rule, PSE must must issue the corrected bill within sixty days from the date the utility discovered that an account had been underbilled or overbilled, and it may not collect underbilled amounts for any period greater than six months from the date the error occurred. On 8/12/21 PSE did reverse the charges for the seventh billing period.

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 <u>Sheri.Hoyt@utc.wa.gov</u> or call 360-664-1102.

Thank you again for your patience, have a great evening,

John

ATTACHMENT H TO PUGET SOUND ENERGY'S CONFIDENTIAL RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. 10

II. Complaint # CAS-40541-C8L4N0

7/12/2022 UTC Opening email

From:	Dijos, Liz (UTC) <liz.dijos@utc.wa.gov></liz.dijos@utc.wa.gov>
Sent:	Tuesday, July 12, 2022 11:20 AM
То:	WUTC Complaints - mail -
Subject:	WA UTC Complaint CAS-40541-C8L4N0 for
	CRM:0230221

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

New Complaint

Washington UTC Complaint CAS-40541-C8L4N0

Company: Puget Sound Energy

Customer:

Account #:

Contact:

Service Address:



Secondary Phone:

Email Address:

Complaint Information:

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

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

Complaint ID: CAS-40541-C8L4N0

Serviced By: Liz Dijos

Opened On: 7/11/2022 4:45 PM

Grouped By: Disconnect

Description:

The customer recently received a disconnect email from the UTC advising that PSE was about to disconnect service. The customer had a prior complaint about a billing disputed related to AMI readings and corrected billings investigated in CAS-33073-L9B0M8. The customer had set up payment arrangements with PSE but PSE has continued to cancel the payment arrangements and is now threatening to disconnect service for non-payment.

is the person who is filing the complaint. They are listed as an alternate contact for

7/12/2022, 11:19 a.m.-passed to PSE via email. Response due 7/14/2022 by 5 p.m.

7/12/2022 UTC updated opening email

From:	Dijos, Liz (UTC) <liz.dijos@utc.wa.gov></liz.dijos@utc.wa.gov>
Sent:	Tuesday, July 12, 2022 11:40 AM
To:	WUTC Complaints - mail -
Subject:	WA URGENT UTC Complaint CAS-40541-C8L4N0 for
	CRM:0230221

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

WA URGENT UTC Complaint CAS-40541-C8L4N0 for Chad Groesbeck CRM:0230221

New Complaint

Washington UTC Complaint CAS-40541-C8L4N0

Company: Puget Sound Energy

Customer:

Account #:

Contact:

Service Address:

Primary Phone:

Secondary Phone:

Email Address:

Complaint Information:

Complaint ID: CAS-40541-C8L4N0

Serviced By: Liz Dijos

Opened On: 7/11/2022 4:45 PM

Grouped By: Disconnect

Description:

The customer recently received a disconnect email from the UTC advising that PSE was about to disconnect service. The customer had a prior complaint about a billing disputed related to AMI readings and corrected billings investigated in CAS-33073-L9B0M8. The customer had set up payment arrangements with PSE but PSE has continued to cancel the payment arrangements and is now threatening to disconnect service for non-payment.

is the person who is filing the complaint. They are listed as an alternate

contact for

7/12/2022, 11:19 a.m.-passed to PSE via email. Response due 7/14/2022 by 5 p.m.

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