

**EXH. SBH-1CT
DOCKET UE-220701
WITNESS: STACEY B. HALSEN**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

Complainants,

v.

PUGET SOUND ENERGY,

Respondent.

Docket UE-220701

PREFILED RESPONSE TESTIMONY (CONFIDENTIAL) OF

STACEY B. HALSEN

ON BEHALF OF PUGET SOUND ENERGY

REDACTED VERSION

FEBRUARY 9, 2023

PUGET SOUND ENERGY
PREFILED RESPONSE TESTIMONY (CONFIDENTIAL) OF
STACEY HALSEN

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PUGET SOUND ENERGY

**PREFILED RESPONSE TESTIMONY (CONFIDENTIAL) OF
STACEY B. HALSEN**

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1 **PUGET SOUND ENERGY**

2 **PREFILED RESPONSE TESTIMONY (CONFIDENTIAL) OF**
3 **STACEY B. HALSEN**

4 **I. INTRODUCTION**

5 **Q. Please state your name, business address, and position with Puget Sound**
6 **Energy.**

7 A. My name is Stacey B. Halsen and my business address is Puget Sound Energy,
8 P.O. Box 97034, Bellevue, Washington 98009-9734. I am employed by Puget
9 Sound Energy (“PSE”) as Senior Escalated Complaints Examiner.

10 **Q. Have you prepared an exhibit describing your education, relevant**
11 **employment experience, and other professional qualifications?**

12 A. Yes, I have. It is Exhibit SBH-2.

13 **Q. What are your duties as Senior Escalated Complaints Examiner for PSE?**

14 A. I manage customer complaints escalated through the Washington Utilities and
15 Transportation Commission (“Commission”) Consumer Protection Division, and
16 other high-level organizations and agencies. I also work on various projects
17 aimed at addressing the causes of escalated complaints and improving overall
18 customer experience and organization performance.

1 **Q. What topics are you covering in your testimony?**

2 A. My testimony addresses the information provided for the informal complaints
3 received from the Commission’s Consumer Protection Division for Elena
4 Argunov, Thomas Johnson, and Chad Groesbeck (collectively the
5 “Complainants”). I also respond at a high level to the customers’ formal
6 complaints and allegations.

7 **Q. Please generally explain PSE’s response to the complaints.**

8 A. PSE meters measure energy usage based on industry standard best practices, and
9 PSE endeavors to accurately and clearly communicate billing processes with
10 customers. The complaints in the proceeding all stem from three customers who
11 believe their individual energy bills were too high and now include an allegation
12 that PSE meters and billing system are quadruple charging customers for energy.
13 The premise of the allegation is that PSE is improperly calculating kilowatt hours
14 (“kWh”). This is incorrect and there is no evidence supporting Complainants’
15 theory that they are being quadruple-billed. The Complainants’ energy usage is
16 generally in line with the usage of PSE customers in unincorporated Kittitas
17 County.¹ Furthermore, the allegation that PSE’s AMI meters are quadrupling the
18 kWh measurement would mean that the average kWh per customer would be
19 approximately 200-250 kWh per month, which would be impractically below the

¹ Ms. Argunov argues the Complainants’ energy usage average is high, but her figures are distorted by three to four months of high usage by the Johnsons during winter construction, which is explained later in my testimony.

1 average for all utilities in the state. Additionally, if Complainants' allegations
2 were correct and PSE was billing customers at quadruple the authorized rate,
3 PSE's actual revenues would have been four times higher than the Commission-
4 allowed revenues, which is not the case.

5 The Prefiled Response Testimony of Ian Hagan, a PSE engineer, discusses how
6 PSE's meters are measured for accuracy, and how they automatically record and
7 transmit energy usage data in kWh. This is foundational as all of Ms. Argunov's
8 data calculations used in her exhibits incorrectly presume PSE is recording energy
9 usage based on kilowatts ("kW"), making her calculations irrelevant. The Prefiled
10 Response Testimony of Allison Sains discusses how PSE's meter data
11 management system ("MDMS") receives the energy usage data and has various
12 checks in place for accuracy. The Prefiled Response Testimony of Kristina
13 McClenahan discusses how PSE's SAP billing system retrieves energy usage
14 from the MDMS system, checks for accuracy, creates bills, and how the SAP
15 system manages estimated bills where actual energy usage is not available for a
16 particular billing cycle. My testimony addresses how PSE handles customer
17 complaints and covers some of the individual complexities within each complaint.

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II. THE COMPLAINTS

A. The Customers' Informal and Formal Complaints

Q. Please provide a brief overview of the customers' complaints in this action.

A. The complaints in this proceeding are from three customers who all live within a subdivision in Cle Elem, Washington, known as the Coyote Creek subdivision. This is an area with particularly cold winters, where customer usage tends to be significantly higher in the winter than more temperate areas in the Puget Sound region. All three customers were constructing large new homes sometime between 2021 and 2022. The square footage on the three homes are approximately 2,232 square feet, 3,553 square feet, and 4,860 square feet. Each customer filed an informal complaint with the Commission contending their electricity bills were higher than expected. PSE investigated the complaints and sent out technicians to test the meters when requested, and each meter tested within the accuracy requirements of WAC 480-100-338. As discussed in the testimony of Ian Hagan, PSE also has routine procedures in place to make sure meters are accurately measuring energy usage.

Each customer had a separate reason or concern with their bill, which I address later in my testimony. Primarily, the Groesbecks had a set of estimated bills due to the AMR meter not transmitting billing reads. The AMR meter was removed

1 and replaced with an AMI meter² on August 18, 2021, at which time a manual
2 read was taken from the AMR meter's register. This read was used to process a
3 corrected bill in August 2021, which billed the actual usage that was not billed
4 when the billing reads were estimated.

5 The Johnsons contended the actual usage billed was too high. The Johnsons had a
6 few months of particularly high bills while construction was ongoing on the
7 property. Although the Johnsons deny that the high energy use resulted from
8 construction, there is evidence that they were using electricity to heat their
9 partially constructed house. Upon further review of correspondence between the
10 contractors and the Johnsons provided through discovery, it appears the house
11 was not fully buttoned up during the winter, while the electric heat system was
12 running, which likely resulted in the high energy usage.

13 Finally, the Argunovs contend their bills are high and allege PSE is charging them
14 quadruple their actual usage. The complaints all combined their informal
15 complaints into one formal complaint, based on the Argunovs' incorrect theory
16 that PSE was quadruple charging them rather than properly converting to kWh.

17 As discussed in the Prefiled Response Testimony of Ian Hagan, PSE's meters
18 measure residential usage in kWh, and there is no conversion required. Also,

² PSE has been in the process of switching its Automated Meter Reading ("AMR") equipment to newer technology Advanced Metering Infrastructure ("AMI") equipment. Please see Ms. Sains testimony for the difference between AMR and AMI meters.

1 PSE's meters are tested for accuracy and there is no evidence that the meters were
2 not operating properly.

3 **B. PSE's Process for Handling Customer Complaints**

4 **Q. Provide an overview of how PSE handles a complaint from a customer for a**
5 **high bill.**

6 A. When a customer contacts PSE's Customer Service Department with a billing
7 inquiry such as a high bill, the agent will review the customer's account to look
8 for many things such as estimated reads, rate changes, billing corrections, etc. If
9 the agent finds any billing concerns such as estimated reads, they will investigate
10 to see if the reason for the estimates can be determined during the initial contact
11 from the customer. If the agent finds no issues with the account or the meter, they
12 will offer to transfer the customer to an Energy Advisor who can do a deeper
13 review into the customer's usage. The Energy Advisor will assist the customer in
14 determining why their usage is higher than expected and offer tips to help them
15 lower their usage. If, after these steps are followed, the customer is still not
16 satisfied and wants their meter tested, the customer will be transferred to an agent
17 that can schedule a meter test appointment for them.

18 If there is any action needed such as service orders to investigate equipment the
19 agent will create an Enhanced Message Management Analysis ("EMMA") case
20 that will go in to queue to be worked by PSE's Billing Performance Team. If there
21 are any problems found after the case is worked by the Billing Performance

1 Team, the customer will either receive a corrected bill or they will be contacted
2 and advised if the findings are that the billing and equipment are correct.

3 **Q. At what point in the process will PSE send out a technician to check the**
4 **accuracy of the meter?**

5 A. When a customer has concern about a bill and requests PSE check the accuracy of
6 the meter, PSE will schedule a technician to perform a meter test. During this
7 process the agent will explain the meter test process to the customer and ask
8 whether they want to be present to witness the meter test. If the customer does
9 wish to be present, an appointment is scheduled with them. Electric meter tests
10 can be performed in the field at the customer's property.

11 **Q. Did PSE send a technician to test the accuracy of the meter for any of the**
12 **Complainants?**

13 A. Yes, two of the Complainants requested meter tests: the Argonovs and the
14 Johnsons. The Argonovs' meter was tested on May 4, 2022, and it tested
15 accurate. There were no concerns raised by the meter technician who performed
16 the test. The Johnsons' meter was tested on May 6, 2022. The meter also tested
17 accurate and no concerns were raised regarding meter's accuracy by the meter
18 technician who performed the test. For further discussion regarding how PSE
19 tests meters to ensure they are accurately measuring kWh, please see the Prefiled
20 Response Testimony of Ian Hagan, Exh. IH-1T.

1 **Q. Did any of the Complainants request a new meter?**

2 A. Yes. The Argunovs requested a non-communicating meter, which was installed
3 on June 22, 2022. The Johnsons also requested a non-communicating meter but
4 never completed the paperwork required to change out the meter, as discussed in
5 more detail later in my testimony.

6 **Q. Ms. Argunov's Exhibit EACCH-22 claims most of PSE's complaints are**
7 **about high bills showing there is something wrong with PSE's meters and**
8 **billing system. Do you agree?**

9 A. No. PSE has more than a million electric customers and while there will
10 occasionally be some complaints about higher-than-expected bills, in my
11 experience I have not noticed a systemic issue. PSE strives to address each
12 complaint and work with the customer to address their individual concern.
13 Notably, most of the informal complaints filed with the Commission identified in
14 Exhibit EACCH-22 were closed with a "company upheld" disposition. For the
15 few that were closed with a "consumer upheld" disposition, there were no issues
16 found with the accuracy of PSE's meters or billing process.

1 **C. The Groesbeck's Complaint**

2 **Q. Could you please provide a brief overview of the Groesbeck's informal**
3 **complaint?**

4 A. The informal complaint, opened on February 22, 2022, stated that the customer
5 had moved into a newly constructed home and since the start of their PSE billing
6 they have been sent consistent estimated bills and notices of corrected charges.
7 They stated they were unable to trust the amount billed as it was constantly being
8 changed and corrected.

9 **Q. What steps did PSE take to respond to the informal complaint and address**
10 **the Groesbecks' concern?**

11 A. In the initial response, PSE provided an account history, all notices of corrected
12 charges, all installment confirmation letters, and the daily read history for the new
13 AMI meter installed on January 18, 2021. PSE also provided a written
14 explanation of the account history from the start date when the temporary meter
15 was set, through the most recent billing activity. A follow-up request was sent by
16 the Consumer Protection Division investigator on March 11, 2022. This request
17 included questions after the investigator's review of PSE's initial response. PSE
18 responded to the investigator's follow-up request on March 16, 2022. A second
19 follow-up request was sent by the investigator on April 15, 2022, after the
20 customer had received another estimated billing. PSE responded to this follow-up
21 request on April 20, 2022.

1 **Q. Why were there multiple estimated bills?**

2 A. There were communication issues due to a bad AMR signal from the AMR meter
3 to the MDMS system, resulting in estimated billing reads from October 2020
4 through April 2021 and in August 2021.

5 **Q. Were the Groesbecks eventually billed based off their actual energy usage?**

6 A. Yes. PSE was able to determine the actual usage on multiple occasions based on
7 manual meter reads. Each time when PSE received an actual read from the meter,
8 this was incorporated into the corrected charges. PSE received a manual read of
9 the meter May 28, 2021. PSE's Notice of Corrected Charges sent on August 4,
10 2021, corrected estimated reads based on the actual read from May.

11 After not receiving usage communications from the old AMR meter, PSE sent out
12 a technician to install a new AMI meter on August 18, 2021. The technician was
13 able to get a physical read from the AMR meter of [REDACTED] on August 18, 2021.
14 Previously, PSE had an actual read from May 28, 2021 of [REDACTED] which allowed
15 PSE to determine the actual energy usage during that time period. On the same
16 day, PSE sent a notice of corrected charges based on the actual read obtained that
17 day for the billing periods of December 15, 2020 to August 12, 2021.

[REDACTED VERSION]

1 **Q. Were there any additional estimated billings for the Groesbecks after the**
2 **AMI meter was installed?**

3 A. Yes. There were three additional estimated billing reads after the AMI meter was
4 installed on August 18, 2021, which were for the dates of December 15, 2021,
5 January, 13 2022, and April 14, 2022. These were due to the AMI meter not
6 transmitting reads for those three dates. On January 20, 2022, a corrected bill was
7 issued to rebill the previously estimated December 15, 2021 and January 13, 2021
8 reads with better estimated reads based on the good read transmitted from the
9 meter on January 16, 2022. The AMI meter began transmitting consistent daily
10 reads on January 25, 2022. Since that time there has been only one estimated
11 billing read, on April 14, 2022. All other billing reads have been actual reads up
12 to the most current billing read on January 12, 2023. There was not a corrected
13 bill issued for the April 14, 2022 read as the next billing read on May 12, 2022
14 was greater than then the April 14, 2022 estimated billing read and therefore no
15 correction was necessary.

16 **Q. Did PSE test the Groesbecks' AMI meter when it failed to transmit reads?**

17 A. Yes. On January 20, 2022, an agent in PSE's Billing Performance Department
18 created a Service Notification to obtain a read from the meter and check the meter
19 because it stopped sending automated reads on December 5, 2021. This order
20 was completed on April 13, 2022. The technician found no problem with the
21 meter and also verified it had started transmitting consistent daily reads again on

1 January 25, 2022. A manual read was taken from the meter's register and the
2 read was [REDACTED]

3 **Q. Can you elaborate on the corrected bills that were issued to the Groesbecks?**

4 A. Yes. PSE's corrected bills were all based on the total amount of electricity usage
5 that would have been billed if PSE was receiving a meter read on the billing day,
6 subtracted by the amount charged in the estimated bill. The Groesbecks had
7 multiple estimated bills that, once re-billed based on actual usage, resulted in a
8 debit because the initial estimated reads were estimated too low. This was due to
9 the lack of historical usage in PSE's billing system on which to base the
10 estimates. PSE offered a payment plan to allows the Groesbecks to pay the
11 amount owed over 18 months.

12 While the Groesbecks were concerned their billed energy usage was high, their
13 energy usage is generally in line with the average usage of PSE customers in
14 unincorporated Kittitas County. The average PSE customer in unincorporated
15 Kittitas County used about 1,574 kWh per month in 2022. Similarly, the
16 Groesbecks used on average [REDACTED] per month in 2022. Attached as the
17 Second Exhibit to the Prefiled Testimony of Stacey B. Halsen, Exh. SBH-3C is a
18 breakdown of the actual reads and estimated reads for this customer.

19 **Q. Do you have an understanding of why PSE's estimated bills were inaccurate?**

20 A. Yes, the initial estimated reads were inaccurate because the meter was a new
21 installation and SAP did not have any historical usage from which to base the

1 estimates. Please see the Prefiled Response Testimony of Kristina McClenahan
2 for further discussion regarding the SAP estimation process.

3 **Q. How did PSE communicate to the Groesbecks that the bills were estimated**
4 **and they were receiving a catch-up bill?**

5 A. PSE clearly marks all estimated bills and catch-up bills when it sends them to
6 customers. This was done with the Groesbecks as well. This process is further
7 discussed in the Prefiled Direct Testimony of Kristina McClenahan.

8 The Groesbecks received four corrected bills because of the ongoing meter
9 communication issues that resulted in estimated billing reads.

10 **Q. What was the final determination for the Groesbeck's informal complaint?**

11 A. The informal complaint was closed on May 25, 2022, with a consumer upheld
12 disposition and nine violations cited. The violations were for: billing the wrong
13 rate schedule for the period of November 12, 2020 to December 14, 2020; billing
14 three billing periods between April 21, 2021 and August 4, 2021, when the rules
15 require bills to be issued in intervals not to exceed two one-month billing cycles;
16 billing estimated reads more than four consecutive months; and sending a notice
17 of corrected charges 68 days after performing a check read on May 28, 2022,
18 when the rule requires the corrected bill be sent with-in 60 days.

1 **Q. Do you have anything to add with respect to the violations cited?**

2 A. Yes. PSE strives to comply with the Commission rules and has taken steps to
3 avoid similar violations in the future. PSE's business practices are designed to
4 comply with all rules required by regulation. When issues arise that put PSE out
5 of compliance, PSE works to resolve those issues by taking the necessary steps to
6 avoid violations going forward. But with respect to the formal complaint at issue
7 here, ultimately, the amounts that the Groesbecks were billed for energy usage,
8 with corrections, was determined to be accurate.

9 **D. The Johnsons' Complaint**

10 **Q. Please provide a brief overview of the Johnsons' informal complaint.**

11 A. The informal complaint, opened on June 15, 2022, stated that the Johnsons were
12 disputing the usage billed on their permanent meter as they were not aware of any
13 power consumption on the permanent service until lights were installed in May,
14 and that all construction consumption has gone through their temporary power
15 pole meter. They stated that they do not believe the reads from the meter and that
16 they seem to have been fabricated. They also stated they had requested to have
17 the smart meter removed and a manually read meter installed.

1 **Q. Did PSE follow-up on the Johnson's request to have the smart meter**
2 **removed?**

3 A. Yes. The Non-Communicating Meter Service Agreement was mailed to the
4 Johnsons on June 16, 2022, and as of February 3, 2023, the Johnsons have not
5 returned the completed service agreement. They were also sent follow-up letters
6 on August 1, 2022 and August 26, 2022.

7 **Q. What other steps did PSE take to address the Johnsons' concerns?**

8 A. The first contact from the Johnsons regarding their usage was on March 7, 2022.
9 On this date, Heidi Johnson called into PSE's Customer Care Center concerned
10 about a high bill they received. The call center agent reviewed the customer's
11 account and reads in PSE's meter reading system and advised that there does not
12 appear to be any billing or meter read issues. Ms. Johnson requested a meter test.
13 The agent created a meter test service order, which was completed on May 6,
14 2022. Ms. Johnson was asked if she wanted to be present for the testing of the
15 meter and she declined. The meter was found to be registering accurately, and
16 the customer was mailed a letter with this information.

17 Ms. Johnson called into PSE's Customer Care Center again on June 10, 2022, still
18 concerned with their high bills, and at this time the agent reviewed the customer's
19 account and meter readings and advised that the bill appeared to be an accurate
20 reflection of their usage. Ms. Johnson was given the option to be transferred to an

1 Energy Advisor to discuss ways to reduce their usage and/or pin point where the
2 usage came from; however, she declined that offer.

3 On June 13, 2022, Ms. Johnson called again regarding their usage and the
4 previous meter test and asked to have the meter tested again. Ms. Johnson
5 declined a second meter test after being told there would be a charge to test the
6 meter again since it has been less than 12 months since their previous meter test
7 request.

8 Two days later, on June 15, 2022, PSE received an informal complaint filed by
9 the Johnsons with the Commission. On July 29, 2022, the informal complaint was
10 closed with a “Company Upheld” disposition and no violations.

11 **Q. Were the Johnsons billed based on actual energy usage?**

12 A. Yes. On March 7, 2022, Heidi Johnson requested a meter test. PSE sent a
13 technician to the property on May 6, 2022 to confirm the meter was recording
14 accurately. No issues were found with the meter and the meter tested accurate.

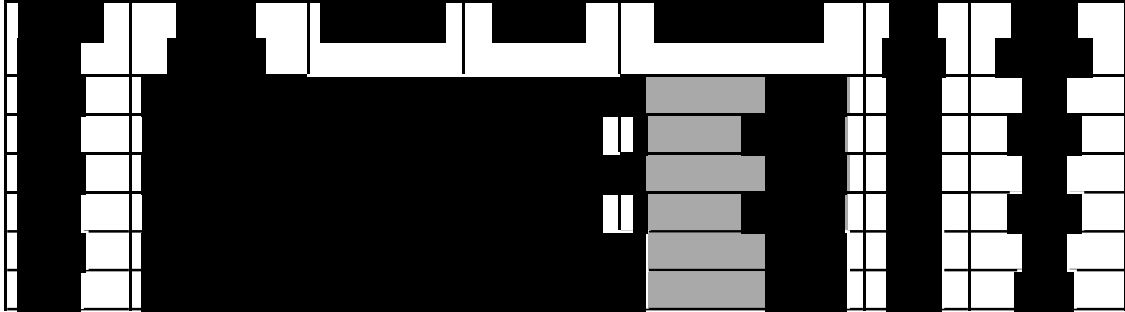
15 **Q. What additional information do you have regarding the Johnsons’ high**
16 **energy usage?**

17 A. While the Johnsons contend the construction workers were not able to access
18 electricity and it was not possible for them to use the permanent meter during the
19 time periods at issue in the complaint, this does not appear to be the case. Based
20 on email conversations between the Johnsons and their contractor, the home had

1 permanent power and electric heating installed by December 11, 2021. On
2 February 4, 2022, the Johnsons confirmed that the power was on and the heater
3 was installed. On February 7, 2022, the correspondence confirmed heat had been
4 running consistently to maintain a temperature of 65 degrees in the partially-
5 constructed house. These communications between the Johnsons and their
6 contractor were provided through discovery and are attached as the Third Exhibit
7 to the Prefiled Response Testimony of Stacey B. Halsen, Exh. SBH-4. Further
8 communication with the contractor also reveals the house did not have garage
9 doors nor did the house have the interior door connecting the garage to the house
10 installed, forcing the contractor to cover some of the exposed areas with either
11 plywood or plastic. Cle Elum is particularly cold in the winter, so these measures
12 would not be helpful. The communications between the contractor and the
13 Johnsons further reveal there was some construction activity on the property for
14 the months in question. The high energy usage reflects attempts to heat an
15 approximately 4,860 square foot home that is not properly insulated and without
16 necessary doors, and fighting a losing battle with the elements during some of the
17 coldest months of the year.

18 **Q. What was the usage on the Johnsons' temporary and permanent meters**
19 **during this time frame?**

20 A. Below is a table showing the temporary and permanent meters on the Johnsons'
21 property during this critical time when weather was cold, heat was running, and
22 the home was under construction and not properly buttoned up:



1 While there was some usage on the temporary meter, probably attributed to the
 2 construction work, the largest usage is from the permanent meter, which would
 3 have been connected to the home's heating system.

4 **Q. On Pages 7:13-8:2, of the Prefiled Direct Testimony of Elena Argunov, Exh.**
 5 **EACCH-1, Ms. Argunov contends the Johnsons' account was charged a**
 6 **delayed bill of \$4,500 for three months. Please explain that bill.**

7 A. The statement sent to the Johnsons on May 19, 2022 included charges for three
 8 separate billing periods totaling [REDACTED] Those billing periods were [REDACTED]
 9 [REDACTED]
 10 [REDACTED]; and [REDACTED]
 11 [REDACTED]. The usage billed in all three billing periods were billed based
 12 on actual usage, no billing reads were estimated. PSE records show the only
 13 estimated read for the meter on the Johnsons' residential permanent service meter
 14 was on January 13, 2022, all other reads were actual reads. If the January 13,
 15 2022 read was estimated too low the unbilled usage would have been billed when
 16 the February bill generated with an actual, not estimated, read.

[REDACTED VERSION]

1 **Q. Why was the billing delayed?**

2 A. The reason for the delayed billing was due to the outsourcing of the March, April
3 and May statements for manual review by PSE's Billing Performance team to
4 review the reads before releasing the bills to the customer. The reads were
5 reviewed on May 19, 2022, and the billing was released to the customer. The
6 May 19, 2022 billing statement included the following bill print message.

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.

7
8 **Q. Please provide the actual and estimated billing for the Johnsons' account.**

9 A. Attached as the Fourth Exhibit to the Prefiled Testimony of Stacey B. Halsen,
10 Exh. SBH-5C, is a breakdown of the actual reads and estimated reads for this
11 customer.

12 **Q. What was the final determination for the Johnsons' informal complaint?**

13 A. Commission staff closed the complaint on July 29, 2022 with a "Company
14 Upheld" disposition. No violations were cited.

15 **E. The Argunovs' Complaint**

16 **Q. Please provide a brief overview of the Argunovs' complaint.**

17 A. The informal complaint stated that since the installation of the AMI meter, the
18 estimated bills were unrealistically high. This complaint was closed by the

1 Commission's Consumer Protection Division but later re-opened due to new
2 allegations from the customer, specifically, the re-opened complaint claimed that
3 PSE was billing customers four times the amount of actual energy used based on
4 how AMI meters collect data.

5 **Q. What steps did PSE take to respond to the informal complaint and address**
6 **the Argunovs' concern?**

7 A. In the initial response, PSE provided an account history which showed the billing,
8 payment, and interaction record history; a copy of the customer's daily meter
9 readings showing the actual usage consumed in kWh; and the results of a recent
10 meter test showing that the meter is registering usage accurately. In the follow-up
11 response, PSE referenced Residential Schedule 7, which states PSE only charges
12 for energy used in kWh. Additionally, PSE explained how estimated bills are
13 calculated after a device modification and that it may be necessary to correct the
14 estimated reads once an actual meter reading is obtained. PSE also provided an
15 explanation of the AMI 15-minute interval data collection.

16 **Q. Did the Argunovs have any bills that were estimated?**

17 A. Yes. Before the customer received an AMI meter, the AMR meter experienced
18 some communication issues resulting in estimated bills and eventually resulted in
19 PSE switching out the old AMR meter with the new AMI meter. For the period in
20 question identified in Ms. Argunov's complaint, which was specific to the AMI
21 meters, PSE issued estimated bills between December 2021 through January 2022

1 when the Coyote Creek area experienced AMR and AMI meter communication
2 issues and PSE was not receiving daily reads from some of the meters in that area.
3 As discussed in the Prefiled Response Testimony of Allison R. Sains and Kristina
4 McClenahan, even though the reads were not being transmitted to PSE, the meters
5 were still recording usage.

6 Attached as the Fifth Exhibit to the Prefiled Testimony of Stacey B. Halsen, Exh.
7 SBH-6C, is a breakdown of the actual reads and estimated reads for this customer.

8 **Q. Were the Argunovs billed based on actual energy usage?**

9 A. Yes. When the Argunovs had an AMR meter, they received a corrected bill dated
10 July 29, 2021, which was based on an actual meter read obtained from the AMR
11 meter's register. Once the AMI meter was installed on August 4, 2021, all bills
12 were based on actual energy usage with the exception of the December 2021 and
13 January 2022 bills. When the February 2022 bill issued, PSE had obtained an
14 actual meter read for billing. Because the February 2022 actual meter read was
15 higher than the January 2022 estimated read, it was determined that a billing
16 correction was not necessary.

17 **Q. What was the final determination for the Argunovs' informal complaint?**

18 A. The Commission's Consumer Protection Division closed the complaint both times
19 with the disposition 'Company Upheld with Violations.' The violation cited was
20 due to the meter not being tested within 20 business days as the rule requires.

1 **Q. On Page 12 lines 3-8, of the Prefiled Direct Testimony of Elena Argunov,**
2 **Exh. EACCH-1, Ms. Argunov contends their account was charged from**
3 **07/22/2020 to 07/13/2021 and issued an “unexplained credit of \$1,650.23.”**
4 **Please explain what happened here.**

5 A. The first meter set at this residence was installed on July 23, 2020 and was an
6 AMR meter. PSE had consistent difficulty obtaining actual meter reads for billing
7 due to an AMR transmission issue. PSE sent a field technician out on July 13,
8 2021, who obtained an actual read from the meter’s register. On July 29, 2021,
9 PSE issued a corrected bill using the actual read obtained on the meter’s register
10 on July 13, 2021. The corrected bill also included amounts that had not previously
11 been billed from April 14, 2021 through July 13, 2021. Based on WAC 480-100-
12 178(5)(a), PSE cannot collect for underbilled amounts greater than six months
13 from the date the error occurred. Accordingly, PSE applied a credit to the account
14 in the amount of \$1,650.23 for charges underbilled in accordance with the WAC.

15 **Q. Do you have any additional comments on the Argunovs’ complaint?**

16 A. Yes. PSE strives to comply with the WAC regarding meter testing and estimation
17 of bills. PSE has taken steps to avoid similar delays in the future. However, the
18 crux of Ms. Argunov’s complaint is incorrect. PSE is not billing these customers
19 four times the amount of their energy usage.

1 **III. CONCLUSION**

2 **Q. Does that conclude your prefiled response testimony?**

3 A. Yes, it does.