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4 BEFORE THE
5 WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
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10 ALEXANDER AND ELENA ARGUNOV,
11 THOMAS AND HEIDI JOHNSON, CHAD
12 AND VICTORIA GROESBECK,
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14 Complainants,

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16 v.
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18 PUGET SOUND ENERGY
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20 Respondent
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DOCKET U-220701

PUGET SOUND ENERGY'S
ANSWER TO FORMAL COMPLAINT

26 **I. ANSWER TO FORMAL COMPLAINT**
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28 Puget Sound Energy ("PSE") herein answers the Formal Complaint ("Complaint") of
29 Alexander and Elena Argunov (complainant "Argunov"), Thomas and Heidi Johnson
30 (complainant "Johnson"), and Chad and Victoria Groesbeck (complainant "Groesbeck")
31 (hereinafter referred to collectively as "Customers") dated September 15, 2022. The
32 Customers are residential customers who recently switched to or began using PSE's AMI
33 metering system. As set forth in PSE's detailed answer below, the Customers are on a
34 monthly billing schedule, and PSE bills residential customers for electricity consumption
35 based on approved calculation methods, as provided for in PSE's electric tariff schedules.
36 PSE charges customers for energy used in kWh based on actual monthly usage. PSE may on
37 occasion issue customers a bill based on estimated usage, which is corrected if the customer
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1 was underbilled or overbilled compared to the customer’s actual energy consumption.
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3 PSE’s AMI meters record the kWh register read but do not send demand data to PSE for
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5 billing purposes to use a “multiplier” to determine the kWh energy usage from AMI meters
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7 when billing customers. PSE denies that it violated the Commission Rules as alleged by
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9 Customers.
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11 II. FACTS

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13 1. Answering paragraph 1 of the Complaint, PSE denies the allegations in
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15 paragraph 1 of the Complaint. PSE provided information to the Commission and its
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17 customers about the switch to AMI meters consistent with the purpose and usage of AMI
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19 meters. While AMI meters have the capability to transmit readings in 15-minute intervals,
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21 this functionality is not used for the calculation of total monthly usage when billing
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23 customers. To determine the usage of a particular customer, a meter read is obtained at the
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25 end of each monthly billing period by subtracting the beginning read at the beginning of the
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27 month from the end read at the end of the month. The customer is then billed based on the
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29 total kWh and charged the kWh rate.
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31 2. Answering paragraph 2 of the Complaint, PSE denies the allegations in
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33 paragraph 2 of the Complaint. AMI interval data readings are not incorporated into billing
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35 readings. The Customers each had independent causes for either delayed bills, corrected
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37 bills, or otherwise estimated bills. PSE billings for complainant Groesbeck involved five
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39 billing corrections and one delayed billing between December 16, 2020 and January 20,
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41 2022. The billing corrections updated the billing amount to reflect actual usage.
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43 Complainant Groesbeck was initially provided bills based off estimates because the installed
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45 meter was for a new construction. Complainant Argunov received estimated bills for
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47 December 2021 and January 2022, because meter readings were not transmitting reads for

1 billing purposes. But, starting in January 2022, the bills for complainant Argunov have been
2 based on actual usage. Complainant Johnson requested a meter test due to concerns with the
3 bill, which was completed, and the meter tested as accurate. The Johnsons then received a
4 delayed bill encompassing three months of usage.
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10 3. Answering paragraph 3 of the Complaint, PSE has insufficient information
11 and therefore denies.
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14 4. Answering paragraph 4 of the Complaint, PSE denies the allegations in
15 paragraph 4. PSE contends the meters were working and receiving actual reads. The alleged
16 issues with the Customers meters were tied to the transmission of the reads to PSE for
17 purposes of billing.
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22 23 **III. STATISTICS**

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25 1. Answering “Statistics” paragraph 1 of the Complaint, PSE has insufficient
26 information and therefore denies the allegations in Statistics paragraph 1. Complainant
27 Johnson was billed for usage over 15,000 kWh during one billing cycle and the amount was
28 based on actual usage. The meter was tested and found to be accurately registering energy
29 usage.
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35 2. Answering “Statistics” paragraph 2 of the Complaint, PSE has insufficient
36 information and therefore denies the allegations in Statistics paragraph 2.
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41 42 **IV. RESOLUTION**

43 An answer to Resolution paragraphs 1-6 is not required, but to the extent an answer
44 is required, PSE denies.
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DATED this 21st day of October, 2022.

PERKINS COIE LLP



By: _____

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Attorneys for Puget Sound Energy