

**BEFORE THE WASHINGTON UTILITIES & TRANSPORTATION COMMISSION**

**Complainants Alexander and Elena Argunov, Thomas and Heidi Johnson, Chad and  
Victoria Groesbeck**

**Vs**

**PUGET SOUND ENERGY**

**Respondent**

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**Docket UE-220701**

**REBUTTAL TESTIMONY OF ELENA ARGUNOV ON BEHALF OF THE COYOTE  
CREEK HOEOWNERS (PSE CUSTOMERS)**

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**EXHIBIT EACCH-27**

**02/24/2023**

**REBUTTAL TESTIMONY OF ELENA ARGUNOV (COMPLAINANT)**

**DOCKET UE-220701**

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**REBUTTAL TESTIMONY OF ELENA ARGUNOV (COMPLAINANT)**

**DOCKET UE-220701**

**WITNESS'S EXHIBITS LIST**

Exh. EACCH-27	Rebuttal Testimony
Exh. EACCH-28C	Johnson account # 220024547758, billing dated 03.24.2022 - 2382 KWH
Exh. EACCH-29C	Billing Summary - all four accounts (incl billing totals, monthly and projected costs)
Exh. EACCH-30	FOCUSAX - Product Specification and Schedule Sheet
Exh. EACCH - 31	SAP RTP billing
Exh. EACCH - 32C	acct. 220023882420 - MDMS vs Interval data
Exh. EACCH - 33C	Demand Billing
Exh. EACCH - 34C	Account #220024547758, statement dated 03/04/2022 - KWH hours billed - 2,382 (\$274.67) vs meter reads
Exh. EACCH - 35C	Meter Reads - AMR and NCR
Exh. EACCH - 36C	Account # 220024363511 statements dated 08.04.2021, 08.16.2021, and 08.18.2021
Exh. EACCH - 37	MDUS brochure
Exh. EACCH - 38	LandisGyr-AIM_Product-Description
Exh. EACCH - 39	Investigation and Service Notifications
Exh. EACCH - 40	Net Income PSE and PS (parent company)
Exh. EACCH - 41	Updated data - All accounts

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**I. INRODUCTION**

**Q. PLEASE STATE YOUR NAME.**

A. Elena Argunov (Complainant)

**Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

A. I am testifying on behalf of the Coyote Creek Homeowners - Thomas and Heidi Johnson, and Chad and Victoria Groesbeck (Complainants).

**II. REBUTTAL TESTIMONY**

**Q. WHAT’S YOUR RESPONSE TO A. IN EXH. IH-1T, PAGE 2 ROWS 13-20.**

A. Mr. Ian Hagan’s understanding of my claim regarding unit of measure is incorrect. As I stated in direct testimony, smart meter reads KW every 15 minutes. When I download the usage from PSE online account, it shows KWH as a usage value. The meter PSE installed to their customers is an Active “KWH-KW” (see Exh. Exh. EACCH-30). In normal circumstances, when VEE check goes through Meter and Interval Load for data integrity, usage values must have the same format, therefore, show same unit of measure. That’s why interval load shows KWH as a usage value. But this is just a “raw/uncalculated” data, and PSE must calculate this non-discrete data to obtain “Service Quantity”, the actual consumption. However, due to the lack of system settings, this step is completely ignored by PSE causing extremely high overcharges (four times greater than it should be).

1 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. IH-1T, PAGE 4 ROWS 20- 21, AND PAGE**  
2 **5 ROWS 1-11**

3 A. In our direct testimony, I have not stated that PSE needed to convert one value to another. What  
4 we were pointing out to is that PSE's AMI system had not been set up correctly, preventing SAP  
5 to calculate "Service Quantity" (also known as actual consumption), instead PSE was billing their  
6 customers for cumulative usage.

7 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. IH-1T, PAGEs 6-7, PAGE 8 ROWS 1-3.**

8 A. Per SAP technical specs provided in Exh. EACCH-2.4 (see more details in Exh. EACCH-31),  
9 describing purpose of billing for interval data, clearly shows that the reading is in KW. I understand  
10 that PSE is trying to narrow it down and prove their point. It's important to understand that the  
11 interval data can have either KW or KWH as a unit of measure, the usage value would not be any  
12 different. What makes KW to become a KWH is a time during which it was measured. Setting  
13 interval data to be loaded with KWH doesn't make it an actual consumption value. For example,  
14 if I turn on a small 1.5 KW heater for 15 min and then PSE interval data shows 1.5KWH, that  
15 doesn't mean that my heater consumed 1.5 KWH in 15 minutes. For the billing purposes, to  
16 calculate the actual consumption, 1.5 value must be calculated to bill for the KWH I used;  $KWH =$   
17  $KW * 0.25$  (Time - 15 minutes). In normal circumstances, when correct SAP module used; these  
18 calculations happen automatically. However, as I stated and PSE confirmed multiple times, they  
19 are not using a proper module to calculate the consumption.

20 As for exhibit EACCH-3.2, I provided an example where I stated that PSE bills its customers based  
21 on raw/uncalculated data which is the same as billing for the cumulative speed (mph) rather than

1 actual distance (miles). This could have been avoided if PSE used appropriate calculations  
2 embedded into Landis+Gyr MDUS platform.

3 Demand billing as well as Time-of-Use are both just an additional feature driven by customer  
4 contract default settings and billing schedule. For some unknown reason, PSE convinced  
5 themselves that interval profiles can only be used for those two billing purposes. However, based  
6 on documentation provided on SAP, Oracle, and the US department of Energy, interval data is  
7 used for much wider spectrum, AND MUST be used to calculate the actual consumption.

8 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. IH-1T, PAGE 8 ROWS 6-14.**

9 A. This is not a true statement, neither Argunov nor Groesbeck were provided with load profile  
10 data from their AMR and NCM meters.

11 Also, when I asked the PSE tech who came to my property to take a meter read, he stated that “all  
12 he cares about is the meter read value, and he is not going to load anything from my NCM meter”.  
13 I tried to request profile data, but PSE stated they don't have any profile data from my non-  
14 communicating meter.

15 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. IH-1T PAGE 9 ROWS 3-4.**

16 A. We completely disagree, the “old school” analog meter is different, and robust smart meters  
17 integrated into AMI system cannot and should not be treated as meters from previous generation.  
18 The software allows users to modify and adjust both meter reads and interval data, as well as  
19 embedded scripts and algorithms. Claiming that a brand-new system working the same way, is like  
20 building an electric vehicle with a gasoline engine in it, and then saying this will work.

1 There is a huge difference in calculations for billing KWH quantities (discrete vs interval), which  
2 is why SAP and Oracle systems have separate modules for interval-related data.

3 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. IH-1T PAGE 9 ROWS 13-21.**

4 A. This is not a true statement. Please review Exh. EACCH-32 and EACCH-32.1. MDMS and  
5 Meter reads during the following period - from 12/6/2021 to 1/24/2022 do not show any daily  
6 usage, but Argunovs account was billed additional 6,963 KWH hours in bills dated 12/15/2021,  
7 01/13/2022, and 02/11/2022. However, based on interval data during the same period, the daily  
8 usage shows the total of 1,033.1 KWH, and none of those values show as estimated. It's unclear  
9 what was captured by MDMs during those days causing discrepancy of 5,930 KWH. Also, looking  
10 at the meter log, during same period there were multiple issues with meter such as Power down/up,  
11 sagging, as well as meter insertion. Therefore, I cannot agree with the statement provide by Mr.  
12 Hagan.

13 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. IH-1T PAGE 10 ROWS 2-8.**

14 A. I was present during the test conducted by a technician. He used Watthour Standard, and after  
15 15-20 minutes, I asked him if he saw any inconsistencies. He responded that values showing on  
16 meter do not match up. He asked me to turn on and off power in the trailer, but he said it still  
17 showed usage, even though everything was turned off. No further investigation was conducted by  
18 PSE.

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1 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. ARS-1T PAGE 6 ROWS 7-8.**

2 A. In my direct testimony, I provide three different sources of information showing that billing  
3 process is different for interval – related data. It's unclear why PSE staff has the opposite point of  
4 view to the system requirements.

5 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. ARS-1T PAGE 6 ROWS 10-14.**

6 A. It's unclear, how customers can understand and reconcile vs billing their daily usage when the  
7 KWH billed never matches the interval data. That would be another reason to have processes  
8 supporting data integrity through VEE check, and make sure that Billing quantities match  
9 Intervals.

10 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. ARS-1T PAGE 6 ROWS 17-20.**

11 A. Again. PSE does not follow the main requirements for processing and calculating interval-  
12 related data for billing purposes.

13 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. ARS-1T PAGE 7 ROWS 4-7.**

14 A. This is not a true statement. According to MDMS reads provided in exhibit EACCH-33, at least  
15 two accounts had similar charges. The billed flag in column AD, clearly shows that both accounts  
16 were billed for the demand.

17 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. ARS-1T PAGE 7 ROWS 12-17.**

18 A. I am not disagreeing with Mrs. Allison R. Sains. However, the fundamental misunderstanding  
19 of AMI system, especially the billing part what is causing their customers to pay extremely high  
20 energy bills for KWH they have not used.



1 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. ARS-1T PAGE 8 ROWS 3.**

2 A. The fact that PSE is not aware of AMI major system requirement does not excuse their behavior.  
3 And they must be held accountable for their actions.

4 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. ARS-1T PAGE 9 ROWS 18-20.**

5 A. This is not a true statement. Account # 220024547758 was charged \$274.67 (2,382 KWH).  
6 However, According to Interval data the total usage was 331.76 KWH due to missing reads, and  
7 per Meter Read report - the total usage was 590.17 KWH. So, even though the ETO (Estimation  
8 Threshold Overflow) flag was showing even more than six consecutive days in the row, the  
9 account was charged the total usage of 2,382 KWH. Also, the figures showing on the statement do  
10 not match Meter Read values. The start read of 2,446 KWH doesn't exist and end date read of  
11 4,848 KWH appears on 02/11/2022.

12 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. ARS-1T PAGE 10 ROWS 13-19 AND**  
13 **PAGE 11 ROWS 7-13.**

14 A. Exhibit EACCH-6C, represents the data loaded from PSE website as well as Meter Reads  
15 provided by PSE. The reason I added maximum value from interval table is to show the calculation  
16 of daily demand from Meter Read. The purpose is to show that PSE demand calculated as follows  
17  $\text{Daily Demand} = \text{MaxUsage Value} * 4$ . In normal circumstances the demand charge calculated  
18 based on the highest daily usage value. So, it's still unclear why PSE uses different calculations.  
19 As of today, none of the calculations are working either consumption or demand. PSE does not  
20 use a proper SAP module (aka billing component) IS-U-EDM (see exhibit EACCH-31, chapter  
21 "Process Flow") or MSUD – "SAP for Utilities Adapter" platform to perform the following tasks:  
22 creating and configuring devices (meters), registers, and measurement, billing of meters etc. (see

1 <https://www.landisgyr.com/product/mdus-sap-for-utilities-adaptor/> Chapter “ Landis+Gyr SAP  
2 For Utilities Adapter (SUA)”. Both components could be used to prepare and calculate interval-  
3 related data to further processing in IS-U billing component, mentioned in exhibit KM-1CT on  
4 page 2 row 4.

5 At this point we want to concentrate on the consumption billing issue, because that is what impacts  
6 our accounts the most.

7 As for cutoff dates, the interval read date is a calculated column adding one day to the actual  
8 interval date. Therefore, the cutoff dates are correct, and match the beginning/end of each billing  
9 cycle.

10 As for the accuracy of the read information, PSE does not provide enough evidence of accuracy.  
11 Secondly, as I stated above, PSE does not have a proper system setup to confirm the unexplainable  
12 high consumption while interval data shows much smaller usage values.

13 **Q. WHAT’S YOUR RESPONSE TO A. IN EXH. ARS-1T PAGE 11 ROWS 15-19.**

14 A. We disagree. The data integrity described in all three sources, the US Department of Energy,  
15 SAP, and Oracle requires a 100% match in meter and interval reads, when both processed through  
16 VEE (validation, estimation, and editing) process. However, as I stated before, PSE did not set up  
17 their system correctly. Therefore, the accuracy of captured usage has been compromised since the  
18 beginning.

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1 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. ARS-1T PAGE 12 ROWS 5-7.**

2 A. The refusal to provide logic and formulas associated with billing quantities prevents all parties  
3 from looking into root causes, and we have no sight of how and when the data was edited or  
4 adjusted. A proper order has been issued and submitted by all parties to keep confidentiality of all  
5 documentation when applicable. So, it's unclear why PSE has not provided this information.

6 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. ARS-1T PAGE 12 ROWS 12-15.**

7 A. As I stated before, PSE system set up is incomplete. I provided official documentation  
8 supporting my statement. As of today, all their billing is compromised because PSE is not  
9 following fundamental AMI system requirements.

10 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. KM-1CT PAGE 12 ROWS 2-11.**

11 A. We disagree. According to information provided in exhibit EACCH-31, PSE was supposed to  
12 set up another billing component (IS-U-EDM) or Landis+Gyr MDUS – “SAP for Utilities  
13 Adaptor” to prepare Interval data for billing in IS-U (SAP). It appears PSE rushed into  
14 implementation phase without considering the consequences.

15 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. KM-1CT PAGE 3 ROWS 6-20.**

16 A. This is not a true statement. According to MDMS reads, AMR and/or NCR meters do not have  
17 daily data, which makes it an inadequate source of monthly billing. See exhibit EACCH-35. Based  
18 on “step-by-step” description provided by Mrs. McClenahan, it looks like PSE is missing the most  
19 important step when it comes to billing calculations which is using the proper software –  
20 Landis+Gyr MDUS – “SAP for Utilities Adaptor.

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**Q. WHAT’S YOUR RESPONSE TO A. IN EXH. KM-1CT PAGE 4 ROWS 8-20.**

A. We disagree. As I previously stated, the interval related data must be processed in specific SAP billing component - IS-U-EDM or Landis+Gyr MDUS – “SAP for Utilities Adaptor” (see exhibit EACCH-37). PSE has not set up their system accordingly causing incorrect billing quantities charged to its customers.

**Q. WHAT’S YOUR RESPONSE TO A. IN EXH. KM-1CT PAGE 6 ROWS 10-13.**

A. We disagree. A proper set up required for interval data processing. Looking at information on SAP website, provided by Mrs. McClenahan, there are some restrictions for Standard Periodic Meter Reding. Chapter “Quantity determination” clearly states the following, *“As a sub step of Process Measurement Data for Discrete Meter Readings, quantity determination belongs to Measurement Data Management. Measurement Data Management includes the determination and management of discrete measurement data as well as interval data. The data can originate from different types of meter.*

*Discrete data from a conventional meter or an advanced meter*

*Interval data from an advanced meter or another interval meter*

*Quantity determination is only relevant for discrete measurement data.”*

Which is why SAP requires additional billing component IS-U-EDM for interval-related data processing.

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**Q. WHAT’S YOUR RESPONSE TO A. IN EXH. KM-1CT PAGE 6 ROWS 16-18 AND PAGE 7 ROWS 1-2.**

A. The statement does not answer the following question “Does PSE’s SAP system use 15-minute residential customer interval usage”. Therefore, I would like to follow up on this matter during evidentiary hearing.

**Q. WHAT’S YOUR RESPONSE TO A. IN EXH. KM-1CT PAGE 6 ROWS 16-18 AND PAGE 7 ROWS 15-21.**

A. In my direct testimony I did not point this out to contradict the description of AMI meters. Instead, I presented an official document describing billing requirements for AMI meters and interval related data.

**Q. WHAT’S YOUR RESPONSE TO A. IN EXH. KM-1CT PAGE 6 ROWS 16-18 AND PAGE 8 ROWS 17-20.**

A. We are very concerned about PSE initiative to start implementing Time-of-Use (TOU) rate. Their system is not even near completed to perform regular billing. It seems like PSE is looking for other ways to increase our energy bills when it’s already unaffordable. The Utility and Transportation Commission approved the annual increase of 14%. TOU rate, that PSE is planning to implement, is where customer will pay more per KWH during peak hours. The Utility and Transportation Commission has already approved the annual increase of 14%.

**Q. WHAT’S YOUR RESPONSE TO A. IN EXH. KM-1CT PAGE 6 ROWS 16-18 AND PAGE 11 ROWS 16-19 AND PAGE 12 ROWS 1-3.**

1 A. This is not a true statement. As shown in exhibit EACCH-4C Groesbeck’s account was charged  
2 the estimate KWH quantity of 108.71 KWH per day. The history of their usage either previous or  
3 historical does not even come close to this estimate. There are multiple discrepancies and  
4 inconsistencies, which PSE never investigated or explained.

5 **Q. WHAT’S YOUR RESPONSE TO A. IN EXH. KM-1CT PAGE 13 ROWS 10-14.**

6 A. This is not a true statement. Both accounts Argunov’s (#220023882420) and Groesbeck’s  
7 (#220024363511) have up to 10 consecutive estimated bills, and we have not received any  
8 notifications from PSE that someone has come to investigate the issue.

9 **Q. WHAT’S YOUR RESPONSE TO A. IN EXH. KM-1CT PAGE 15 ROWS 12-21 AND**  
10 **PAGE 16 ROWS 1-5**

11 A. This is not a true statement. Johnson’s account was charged nearly 15,000 KWH per month for  
12 three consecutive months costing them almost \$5,000, even though they didn’t have any  
13 “electrical” done by their contractor. PSE assumed the meter test that lasted 3 minutes and 47  
14 seconds would justify these extremely high usage values. The estimations are not the only issue  
15 with our accounts, and it requires much more attention which we could not get from PSE no matter  
16 what. The PSE employee did not show up at any time between December 2021 and January 2022  
17 even though, this account showed multiple errors such as ETO (Estimation Threshold Overflow)  
18 - 19 consecutive times, USN (Usage Status No) – 11 consecutive times, and CGR (Current Good  
19 Read) – this error triggers algorithm which PSE refused to provide. As a result of all these errors,  
20 all the meter reads along with interval data have been compromised and tempered.

21 The test was conducted after the fact on May 6, 2022, after Johnsons called PSE customer service  
22 raising their concerns over the charges on the account # 220028367005.

1 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. KM-1CT PAGE 16 ROWS 18-19, AND**  
2 **PAGE 17 ROWS 1-13.**

3 A. It seems like PSE continue coming up with different reasons to justify their wrongful behavior.  
4 At first, we were told that the meter was not working, then during pre-hearing sessions, the PSE  
5 staff stated that there was a problem with network connection, and now in addition to that it was a  
6 Covid protocol. We've tried to address billing multiple times, and each time our concerns were  
7 ignored by PSE. Our families were also impacted by Covid and being charged thousands of dollars  
8 and offered a "free interest" payments was not helpful at all. PSE have not tried to investigate  
9 and/or resolve anything but their own main concern – getting their revenue from us no matter what.  
10 The bottom line we just wanted to pay for what we actually used, not what PSE forced us to pay,  
11 constantly threatening to disconnect our services.

12 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. KM-1CT PAGE 19 ROWS 5-14.**

13 A. We disagree. As stated in SAP documentation, the "Real Time Pricing" process flow required  
14 for all interval-related data profiles. Unfortunately, PSE has not set up their system according to  
15 requirements listed in SAP, Oracle, and the US Department of energy documentation.

16 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. SBH-1CT PAGE 2 ROWS 10-19.**

17 This is not a true statement. PSE was provided with multiple supporting documentation and facts  
18 from three sources, where PSE did not provide any evidence on their end.

19 I am not sure what data was used to calculate 200-250 KWH per month, according to billing  
20 summary, if PSE would bill their customers accordingly, the average monthly usage comes up to  
21 560-600 KWH per month. Since during 2020 and 2021 Argunovs and Johnsons lived in trailers

1 using propane as a main source of heating, and Groesbecks moved in around April of 2021, the  
2 average usage seems more than reasonable.

3 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. SBH-1CT PAGE 3 ROWS 1-4**

4 This is not a true statement. According to the financial statements reported in 2020-2021 by Puget  
5 Sound energy and its parent company Puget Energy Inc., the Net Income has drastically increased  
6 from \$159M to \$351M (PSE) and from \$82M to \$294M (Puget Sound Inc.). See exhibit EACCH-  
7 40.

8 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. SBH-1CT PAGE 4 ROWS 4-16.**

9 Although cold weather, impacts the energy consumptions, PSE charges between 3,000 and 5,500  
10 KWH does not make any sense because propane was the main source of heating when we lived in  
11 trailers and then moved into our houses. In fact, Johnsons were being billed 15,000 KWH for three  
12 months even though their house had no "electrical" completed. Finished "electrical" was scheduled  
13 later. Therefore, the accuracy Mrs. Halsen is talking about is very questionable.

14 The quadrupled charges are a result of improper set up of the AMI system. PSE is completely  
15 dismissing the fact that their meters read every 15 minutes, and each value represents average of  
16 usage value measured every 5 minutes. PSE bills us for cumulative amount of KWH instead.  
17 Therefore, the quantity billed to the customer is four time more than it should be.

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1 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. SBH-1CT PAGE 5 ROWS 5-12.**

2 This is not a true statement. According to the contractor's schedule the electric phase did not start  
3 until June of 2022. I am looking forward to seeing examples from PSE explaining what kind of  
4 heaters can consume 500 KWH per day. Looking at MDMS errors and lack of investigation on  
5 PSE side, it's clear these charges were not legitimate.

6 **Q. WHAT'S YOUR RESPONSE TO A. IN EXH. SBH-1CT PAGE 8 ROWS 9-12.**

7 This is not a true statement. According to the public records 54% of all informal complaints were  
8 filed to dispute billing issues. As of June 2022, 70% of all informal complaints filed from January  
9 through June 2022 were filed disputing PSE billing, 50% of complaints were about billing  
10 discrepancies and high bills. The records clearly show that there is a systemic issue, and it has been  
11 ignored by the PSE for a very long time.

12 **Q. DOES THIS CONCLUDE YOUR PREFILED REBUTTAL TESTIMONY.**

13 A. Yes, it does.