

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Complainants

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PSE Account # 220023882420 (meter # X155953447)

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PSE Account # 220024363511 (meter #163339099)

Complaint against "Puget Sound Energy" company (PSE)

Address: P.O. Box 91269, Bellevue WA 98009-9269

Formal Complaint (Summary)

Commision Rules violated by PSE

WAC 480-100-103 - billing accuracy and reporting, information to customers

WAC 480-100-001 – consumer protection, financial records, and reporting, electric metering

WAC 480-100-013 – the Utility district is not enforcing rules and regulations, and PSE is not communicating the system changes impacting meter reading, billing, reporting and their customers

WAC 480-100-108 – no communications on PSE side about service and meter type

WAC 480-100-148 – Service responsibility (we were neve notified in service and meter type change)

WAC 480-100-173 – PSE failed to fulfill their “Electric utility responsibilities for complaints and disputes”

WAC 480-100-338 – Demand-Meter Accuracy

Facts:

1. Puget Sound Energy failed to communicate with their customers as well as Utilities and Transportation Commission on system changes and method of data readings obtained from their new equipment. For example, at one point the readings were being measured as total “daily” consumption. And then they switch to 15 minutes interval (aka Demand interval), without adjusting their billing calculations accordingly. This caused miscalculation in monthly billing; as a result, their customers were drastically overcharged (three times higher than it was supposed to be. The 15 minutes interval method is different, and it changes the multiplier from “1” to “0.25” (15 minutes = quarter of an hour). See section “B” for more details.
The units of measure used by PSE in those readings is KWH hours every 15 minutes the meter reads approximate average of energy consumption and not an actual usage. There are multiple ways to calculate actual monthly consumption, in this case, the PSE failed to adjust their system accordingly. They kept using multiplier “1” instead of “0.25”. The 15 minutes interval method is different, and it changes the multiplier from “1” to “0.25” (15 minutes = quarter of an hour). See sections “A” and “B” for more details.

Reference links below:

- a. Specs from the largest international data base management company well known and implemented by many companies across the US
https://docs.oracle.com/en/industries/utilities/opower-platform/data-transfer/interval_AMI_spec/DataDefinitions_AMI_.htm

docs.oracle.com/en/industries/utilities/opower-platform/data-transfer/interval_AML_spec/DataDefinitions_AML.htm

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Usage Value

A usage value is the amount of energy consumed at a specific service point over a given period of time. The term "usage value" refers to the amount of energy delivered to or generated at a service point during the time interval that is specified. Usage values do not represent the cumulative value displayed on the meter at the end of the interval.

Interval Usage Values

The aggregation of the interval usage values for a service point should illustrate a linear progression of the energy usage for that service point over a period of time.

- Any gaps in usage values should indicate an actual gap in service and should be a rare occurrence.
- There should be no overlaps in usage periods for a service point.
- All reads in a given file should be equivalent in interval size. For example, all reads within a file should be 15 minute intervals, and not a mix between 15/30/60 minute intervals.
- Data should be provided in fixed intervals (for example, always ending at fixed 15 minute increments of the hour.) Valid time values are 0015, 0030... 2345, 0000.
- Data should be grouped by `service_point_id` and `date`, and ordered by `time`.

Important: If a service point has net-metering, only one usage value for each interval is supported. If you have values for gross consumption and gross generation, and they are both associated with the same service point ID, you must combine them into net consumption before transferring that data to Oracle Utilities.

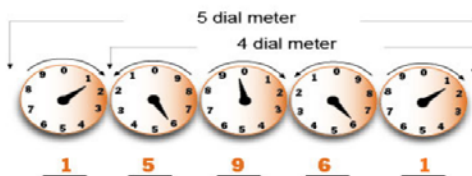
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b. Third Party energy data and billing process

<https://www.nbpower.com/en/products-services/business/demand-and-energy/calculating-your-energy-consumption/>

Read the meter by noting the position of the pointer on each dial, from right to left across the dials, and record the numbers in the same order. This is the proper way to read a meter Right to Left. If the pointer is between two numbers, record the smaller number except if it is between 9 and 0, in this case the reading is 9. Note the direction of rotation of the pointer clockwise or counterclockwise to ensure you record the smaller number. On electronic meters with digital display, the reading is shown directly on the display.

1. Reading your mechanical meter



2. Electronic or Hybrid Meter

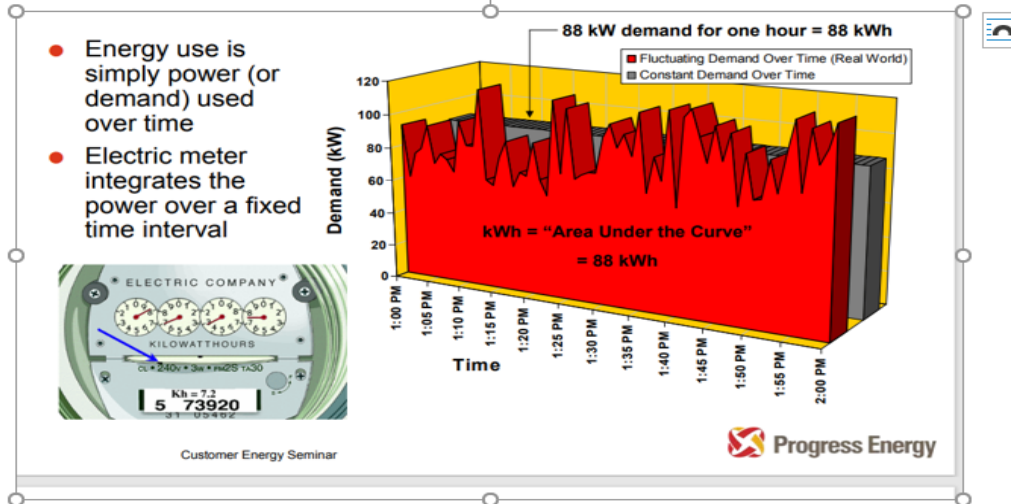
The reading is shown directly on the display: **15961**

Regardless of the type of meter, the kilowatt-hours (KWh) you consume are registered cumulatively. To calculate your consumption, you must take the reading obtained (15961) and subtract from it the previous reading (which can be found on your latest invoice) then multiply the difference by the billing multiplier (when applicable can be found on your bill).

The number by which a demand reading is multiplied, to obtain actual usage data.

- c. Below is an example of 5 minutes interval which is similar to 15 interval data reading. During 1 hour period, there are 12 intervals showing current demand in KW. The total consumption based on average rate rather than the cumulative meter value.

[understanding_kw_and_kwh.pdf\(progress-energy.com\)](http://understanding_kw_and_kwh.pdf(progress-energy.com))



- d. PSE uses KWH as a unit of measure assuming that this is an accurate value of actual usage per 15 minutes which, as it is stated in several sources above, is not true. The formula for usage consumption calculations is absolute, no matter how PSE is trying to interpret theirs. The KWH is defined as the energy consumed by power consumption of 1kW during 1 hour. To calculate the usage per 15 minutes, PSE was supposed to use the following formula $KW \times 0.25 = KWH$; instead they use a cumulative meter readings causing major overcharges. On top of all of those miscalculations, the PSE made system modifications by setting their meter readings to 14 minutes. Firstly, this is causing an additional 8% in overcharges, and secondly, the modifications are not allowed when it comes to AMI procedures and requirements described in AMI data documentation. The set intervals can be either 5, 15, 30, or 60 minutes.
2. The inconsistencies and discrepancies in data readings resulted in incorrect billing estimates, completely disregarded by PSE and UTC. Example, chaotic and incomprehensible estimated multiple bills within a single billing period. Acct # 2200224363511, billing total adds up to \$9,868.08 without prior communication or explanation of charges. When the owners of this account, Victoria and Chad Groesbeck reached out to PSE for explanation and justification of those charges, were told by PSE rep: "Well, someone has to pay for it!"

See Billing details below

| | | |
|-----------|-------------------------------|------------|
| 8/18/2021 | Bill due 09/08/21 | \$2,122.21 |
| 8/17/2021 | Bill due 09/03/21 | \$2,478.59 |
| 8/17/2021 | PaymentArrangement unenrolled | \$0.00 |
| 8/17/2021 | PaymentArrangement unenrolled | \$0.00 |
| 8/17/2021 | PaymentArrangement unenrolled | \$0.00 |
| 8/17/2021 | PaymentArrangement enrolled | \$0.00 |
| 8/15/2021 | PaymentArrangement unenrolled | \$0.00 |
| 8/15/2021 | PaymentArrangement unenrolled | \$0.00 |
| 8/15/2021 | PaymentArrangement enrolled | \$0.00 |
| 8/12/2021 | Bill due 09/01/21 | \$2,124.60 |
| 8/12/2021 | Bill due 09/01/21 | \$657.50 |
| 8/11/2021 | PaymentArrangement unenrolled | \$0.00 |
| 8/11/2021 | PaymentArrangement enrolled | \$0.00 |
| 8/4/2021 | Bill due 08/24/21 | \$2,485.18 |

3. There is a fundamental disconnect and misunderstanding of general rules and requirements applicable to the AMI data collection , AMI meter readings, and billing process in general. Please refer to the Advanced Metering Infrastructure documentation from the US Department of Energy See link below

https://www.energy.gov/sites/prod/files/2016/12/f34/AMI%20Summary%20Report_09-26-16.pdf

Below are the main benefits of AMI implementation which does not apply in any way to what PSE is doing

Major Findings

SGIG projects demonstrated that AMI and customer systems can achieve substantial grid impacts and benefits for customers and utilities, including:

- **Reduced costs for metering and billing** from fewer truck rolls, labor savings, more accurate and timely billing, fewer customer disputes, and improvements in operational efficiencies.
- **More customer control over electricity consumption, costs, and bills** from greater use of new customer tools (e.g., web portals and smart thermostats) and techniques (e.g., shifting demand to off-peak periods).
- **Lower utility capital expenditures and customer bill savings** resulting from reduced peak demand and improvements in asset utilization and maintenance.
- **Lower outage costs and fewer inconveniences for customers from faster outage restoration** and more precise dispatching of repair crews to the locations where they are needed.

4. According to WAC 480-100-333, all meters must be in good order and adjusted to register as nearly correct as practicable prior to being put into service or returned to service following testing or other work. All meters in service must be sealed by the use of a sealing device acceptable to the commission.

However, per email from John Trier dated 5/25/2022 in regards to complaint # CAS-33073-L9B0M8, he stated that *“During my investigation I found on 10/2/20 you assumed responsibility for temporary commercial service during construction. Around 11/23/20 the service was converted to permanent residential service and an actual read of 89 was obtained from the meter. Between 11/23/20 and 5/28/21 PSE received no readings from the meter and billed completely from estimates. No further readings were obtained after 5/28/21 until 8/18/21 when PSE replaced the existing meter with an AMI meter. However, PSE processed this billing correction for a period of seven months, but by rule may only collect underbilled amounts for up to six months, and thus on 8/12/21 it reversed the charges for the seventh billing period from the account. On 8/18/21 PSE*

replaced the existing meter with a new AMI meter and obtained the final meter exchange reading of 20,074. PSE used the interval read between 5/28/21 and 8/18/21 to adjust down (-\$716.96) the 5/14/21 - 8/12/21 billing periods due to the lower current consumption compared to the amount used between 11/23/20 and 5/28/21. PSE can establish that between 11/23/20 and 8/18/21 the consumer used 19,985 kWh of energy and with the 8/18/21 billing correction actually have a true account balance at that time."

So, over the period of six months, PSE failed to act in accordance to WAC 480-100-333. They also violated the WAC 480-100-148, when two of us (Elena Argunov and Victoria Groesbeck) called PSE about their high bills, we were told that they switched our meters to a new meter because the old ones did not work properly, and they were reaching the end of their life span. They never informed us about brand new AMI smart meters and/or any other upgrades affecting their service general including billing.

Statistics

1. The average energy consumption for a single-home residence across the WA is around 1,030 KWH per month. The PSE average billing is approximately 3,200 KWH. Looking at the Johsons account, monthly charges went up to 15,000 KWH hours even though they did not move into their house and there is nothing connected to any of power sources.
2. We requested public records related to billing PSE complaints, the percentage of billing complaints is much higher than everything else, its 53% from 2019 to 2022. In 2022 only the percentage of "billing disputes" raised up to 70%. The customers keep complaining on skyrocketing bills, but nothing has been done to enforce a full scale investigation. Most of the complaints are being closed (same as ours) without reasonable explanations.

Resolution

We demand from "Puget Sound Energy" the following

1. Immediately recalculate and adjust all three accounts
2. Refund amounts owed via check
3. For PSE to conduct a full scale investigation, system adjustments, testing and further enhancements to fix all billing issues moving forward.
4. For PSE, to send out official letters to all customers impacted by their actions, and return money owed.
5. Reimburse to Elena Argunov a full time working mom for the time she spent on data analysis and research. The total "project" hours = 150 hours (from mid April to mid July 22'). Average hourly rate \$50 per hour. Total cost = \$7,500.
6. We hope that PSE will be held accountable for the actions and more regulation will be imposed by the Utilities and Transportation commission to build higher standards helping protect consumers rights, billing accuracy, and data integrity.