**BEFORE THE WASHINGTON**

**UTILITIES AND TRANSPORTATION COMMISSION**

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|---|---|
| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION<br>Elena and Alexander Argunov, Victoria and Chad Groesbeck, Heidi and Thomas Johnson<br>Complainants,<br>vs.<br>PUGET SOUND ENERGY,<br>Respondent. | **DOCKET UE-220701** |

# PETITION FOR RECONSIDERATION, REQUEST FOR ORAL ARGUMENT, AND MOTION TO REOPEN RECORD

**June 19, 2023**

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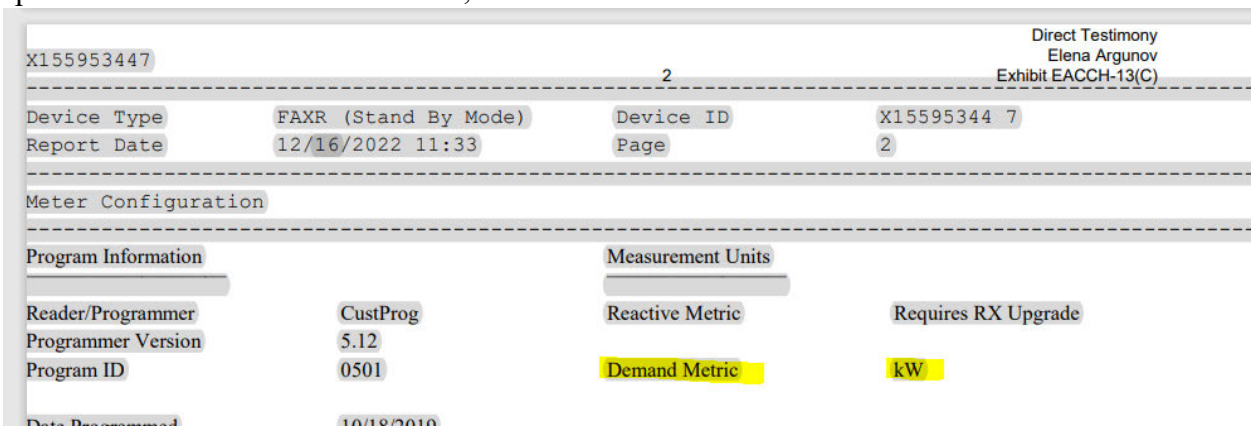
**Response to paragraph #19 of Initial Order #4**

In paragraph 19 of Initial Order #4; it stated the following:

1. "*The Company has established that it bills residential customers, such as the Complainants, based on kWh usage, not kW demand.*
2. *McClenahan and other PSE witnesses credibly testify that the Company does not use interval data readings for its monthly reads for residential billing purposes. PSE instead bills based on the starting and ending reads for each month, consistent with SAP's Standard Periodic Meter Reading Process*".

There are several issues with the statement above.

1. KWH vs KW.
   Looking at technical specifications of AMI Meters on all four accounts, they indicated a specific measurement unit as "KW",



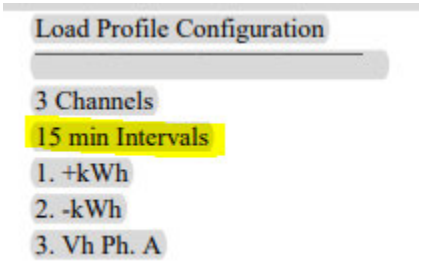
X155953447 2 Direct Testimony Elena Argunov Exhibit EACCH-13(C)

| | | | |
|---|---|---|---|
| Device Type | FAXR (Stand By Mode) | Device ID | X15595344 7 |
| Report Date | 12/16/2022 11:33 | Page | 2 |

Meter Configuration

| Program Information | | Measurement Units | |
|---|---|---|---|
| Reader/Programmer | CustProg | Reactive Metric | Requires RX Upgrade |
| Programmer Version | 5.12 | | |
| Program ID | 0501 | Demand Metric | kW |
| Date Programmed | 10/18/2019 | | |

   The technical specifications also clearly indicated the interval length or load profile configuration:

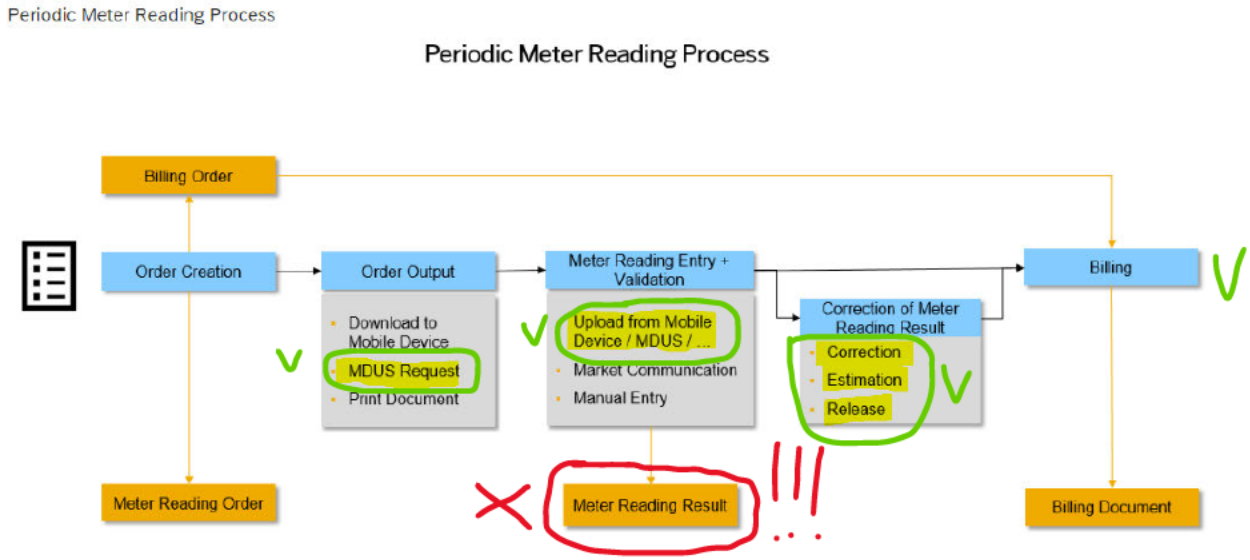


Load Profile Configuration

3 Channels
15 min Intervals
1. +kWh
2. -kWh
3. Vh Ph. A

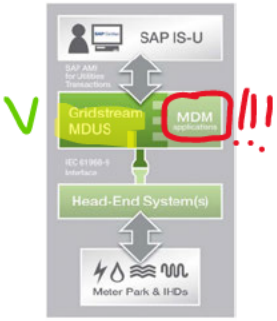
2. Billing according to "*SAP's Standard Periodic Meter Reading Process*". McCanahan provided the following link : https://help.sap.com/docs/SAP_S4HANA_ON-PREMISE/2ac7fe29a0c94cdd88fb80c2cb9f7758/bc90d0533f8e4308e10000000a174cb4.html in her testimony.

On the very first page, it clearly shows that PSE DOES NOT follow the standard. See below:




Periodic billing requires the MDUS billing module (also known as SAP plug in – see Ladys+Gyr specs). I would like to emphasize a very important fact that I asked McClenahan during the hearing, "Why does PSE not use MDUS?" She stated that it was not available at the time. This contradicts the information provided in the Landys+Gyr brochure (see exhibit EACCH-37) where it clearly shows the date stamp of 3.30.2017 on the bottom of page #4. PSE started implementation of their AMI meters in 2018.

As you can see on the diagram above, the calculations are supposed to be happening using "MDUS", instead PSE is using the "Meter Reading Result" which is <u>not</u> designed for billing purposes. This process is also described in the technical specifications provided in exhibit EACCH-37.



Furthermore, the "Focus AX Product Specification and Schedule Sheet" (Exhibit EACCH 30 – page 2), clearly points out there are only TWO(!) available billing options, see below:


1. Time of Use (which is to be implemented by PSE)
2. Demand Billing also known as Real-Time-pricing or interval billing – this type of billing can be used for residential and industrial customers. Where consumption billed based on calculated values.

Considering the facts provided above, I strongly disagree with the following statement in Initial order #04 that the testimony of McCanahan "*was never effectively impeached by the Complainants",* as the same facts and exhibits were mentioned both in the Direct and Rebuttal testimonies.

**Response to paragraph #20 of Initial Order #4**

I find it very disturbing that each fact presented in my direct/rebuttal testimonies that were supported by documents with very detailed information were absolutely dismissed and called "theory" and "misinterpretation". However, Hagan's testimony referencing the American National Standards Institute (ANSI) is considered credible and supported by evidence. So, let's review this witness' testimony:

"*The AMI meters follow American National Standards Institute (ANSI) industry standards. Specifically, they adhere to ANSI C12.1 for electric meters, ANSI C12.10 for physical aspects of watt hour meters, ANSI C12.18 Protocol specifications for ANSI Type 2 Optical Port, ANSI C12.19 Utility Industry end device data tables, ANSI 12.20 for electricity meters 0.2 and 0.5 accuracy classes."*

A. There was no documentation submitted showing detailed information, and it's unclear why witness mentioned industry standards, because we are discussing a completely different issue which is the standard module PSE failed to use – MDUS.

B. The copies of the codes are not available for download (subscription cost per code priced from $90 to $500)

C. Industry Standards and specification codes listed below are not related in any way to an ERP/accounting system (SAP) just because there are no regulations preventing a private utility company from working with the accounting system of their choice. However, each ERP software has their own set of standards described in Oracle and SAP technical specs, but PSE fails to follow the standard.

D. These same codes were referenced in product specifications (exhibit EACCH-30), and they have nothing to do with billing.

| | |
|---|---|
| Applicable Standards | ANSI C12.1 for electric meters |
| | ANSI C12.10 for physical aspects of watt hour meters |
| | ANSI C12.18 Protocol specifications for ANSI Type 2 Optical Port |
| | ANSI C12.19 Utility Industry End Device Data Tables |
| | ANSI C12.20 for electricity meters, 0.2 and 0.5 accuracy classes |
| | CAN3-C17-M84 Canadian specifications for approval of type of electricity meters |

E. In our formal complaint we are not arguing about the standard of the equipment, the main and only argument is that PSE omits crucial standards AND required steps of their operational software causing unrealistically high charges for energy consumption.

In continuation to paragraph #20 where it states "*The fact that meters have the capability to be used in another manner does not establish that PSE is required to use them in that manner. There is no persuasive evidence that PSE is failing to follow guidance on the use of AMR or AMI meters*."

I think the fact that matters is PSE does not have the right to choose to avoid mandatory software system steps. PSE must use MDUS module for all calculations, and other processes that are happening once the interval data is loaded into this module.

Instead, PSE chooses to bill its customers for the "raw" data. As I previously mentioned, PSE meters have only two billing methods: TOU (time-of-use) or demand billing. The TOU was not implemented by PSE, and then they decided that they do not wish to use the only other available option, which is "demand billing" (also known as real-time pricing or interval billing). So, then my question to PSE, what exactly are they using for billing??? I think the answer is obvious, PSE decided that they are above the law, and they came up with some kind of "work around", disregarding mandatory steps and procedures, compromising data integrity, completely ignoring the UTC's WA codes, and failing their customers.

**Response to paragraph #21 of Initial Order #4**

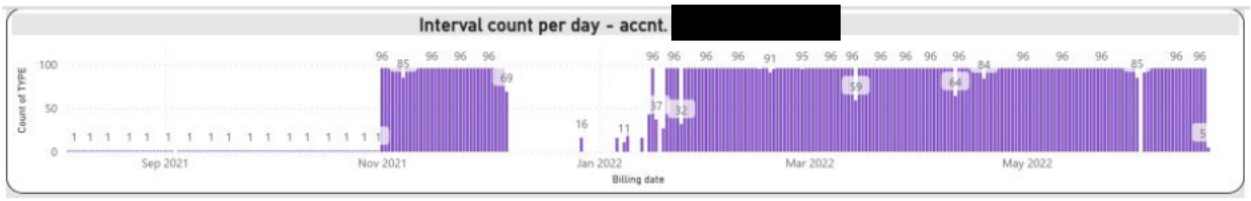
Exhibit EA CCH-6C was completely misinterpreted by Sains. Not once in any of my testimonies did, I state that PSE is multiplying values by four and billing its customers. What I was explaining is that PSE does not use a proper billing module for interval-related data and as a result, their customers are being billed for consumption that is four times greater than they used.

E=KW*hours where "E" is Energy (consumption), "KW" - demand, and "hours" - period of time during which energy was measured. It means that each interval value to be multiplied by 0.25 (15 min=0.25/hour), or there should be another formula calculating the average of every four intervals (15 min*4=1 hour). Both calculations will have same result. These calculations are happening in Landys+Gyr MDUS module (the one that PSE does NOT use). Therefore all PSE usage values are off by factor of 4.

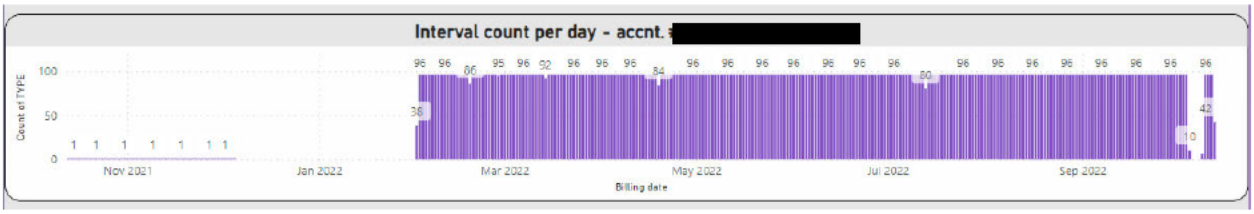
Also, in my rebuttal testimony I responded to Sains's claim that the cut-off dates were wrong in my calculations. In Exhibit 40 ("Interval Reads" tabs) I used a very simple formula adding one day to the original date to match it to the billing cut-off periods.

Furthermore, in paragraph #21 it was stated the that "*Sains also notes that interval load data may not match billing usage when the meter is not able to communicate with MDMS, which was true for the period from December 2021 to January 2022.*" It is still unclear to me why PSE did not address the issue right away. The Covid restrictions were lifted long before this issue had occurred. I am guessing it happened because even though PSE received daily reports, there is not staff responsible for its review and resolution. Below is a screenshot of Argunovs and Johnsons accounts showing a daily count of intervals. As you can see on the screenshots the issue with meters lasted way longer than from December 2021 to January 2022.

Argunov's Account




Groesbeck's Account



As for the interval data not matching billing usage, looking at the Argunov account [redacted]0 the difference between billing quantities billed for the period from 12/16/2021 to 02/10/2022 is **326%** higher than daily meter reads and **180%** higher than cumulative interval values for the same billing period. According to the interval data there was no issue with data collection, and the total cumulative usage value for the same billing period is 2,921.27. See screenshot of Argunov account below.

**METER READS vs MDMD vs INTERVALS**

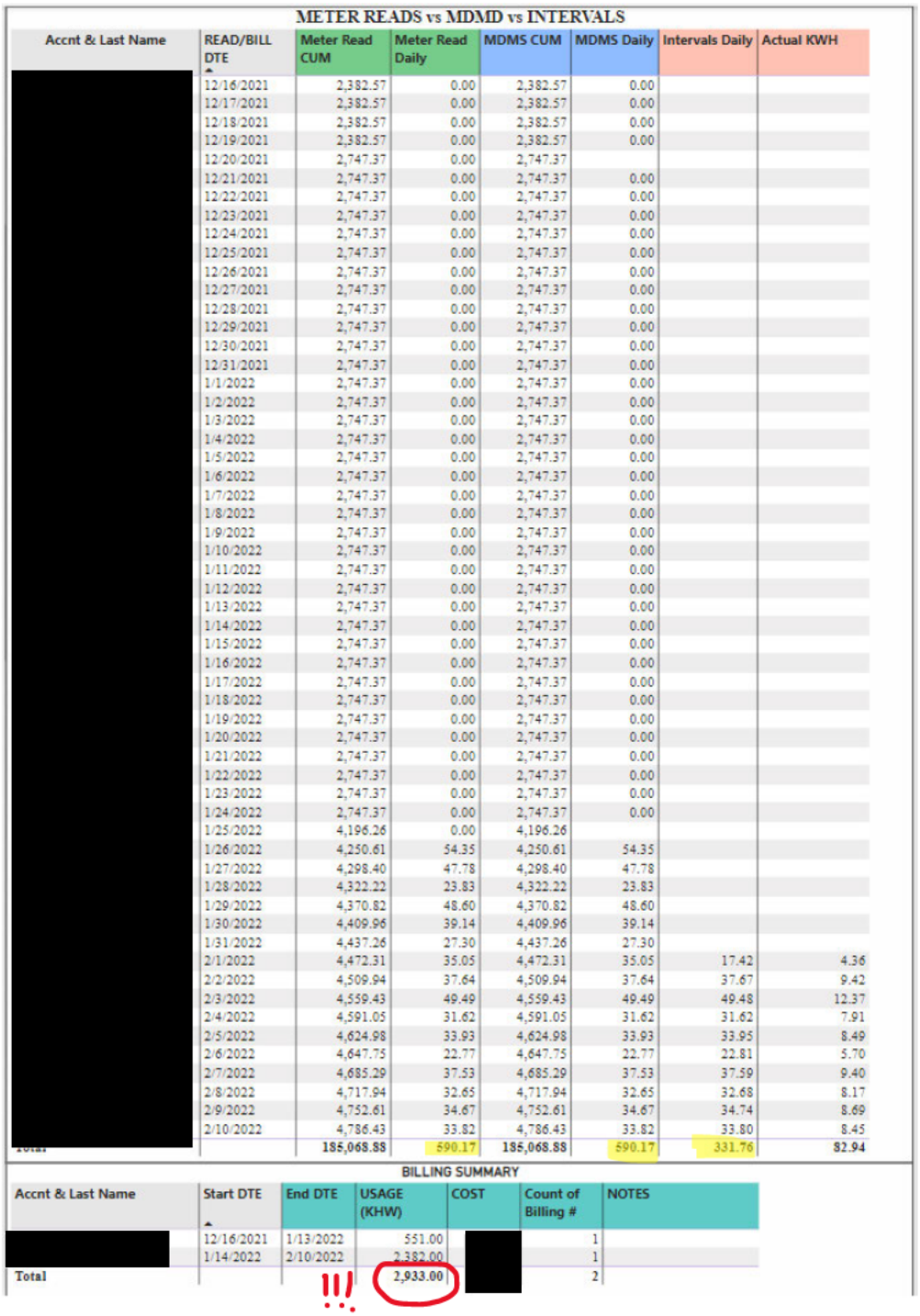
| Accnt & Last Name | READ/BILL DTE | Meter Read CUM | Meter Read Daily | MDMS CUM | MDMS Daily | Intervals Daily | Actual KWH |
|---|---|---|---|---|---|---|---|
| [redacted] | 12/6/2021 | | | | | 81.77 | 20.44 |
| | 12/27/2021 | | | | | 30.80 | 7.70 |
| | 1/6/2022 | | | | | 15.68 | 3.92 |
| | 1/8/2022 | 13,338.48 | 0.00 | 13,338.48 | | 18.30 | 4.58 |
| | 1/9/2022 | | | | | 41.64 | 10.41 |
| | 1/13/2022 | | | | | 21.86 | 5.47 |
| | 1/15/2022 | | | | | 57.34 | 14.34 |
| | 1/16/2022 | 14,499.46 | 0.00 | 14,499.46 | | 135.16 | 33.79 |
| | 1/17/2022 | | | | | 48.33 | 12.08 |
| | 1/19/2022 | | | | | 40.52 | 10.13 |
| | 1/20/2022 | | | | | 112.62 | 28.16 |
| | 1/21/2022 | | | | | 123.92 | 30.98 |
| | 1/22/2022 | | | | | 137.97 | 34.49 |
| | 1/23/2022 | | | | | 125.46 | 31.36 |
| | 1/24/2022 | 15,539.44 | 0.00 | 15,539.44 | | 41.73 | 10.43 |
| | 1/25/2022 | 15,655.93 | 116.49 | 15,655.93 | 116.49 | 116.51 | 29.13 |
| | 1/26/2022 | 15,767.51 | 111.58 | 15,767.51 | 111.58 | 111.57 | 27.89 |
| | 1/27/2022 | 15,904.12 | 136.61 | 15,904.12 | 136.61 | 136.62 | 34.16 |
| | 1/28/2022 | 16,061.20 | 157.08 | 16,061.20 | 157.08 | 157.05 | 39.26 |
| | 1/29/2022 | 16,237.73 | 176.52 | 16,237.73 | 176.52 | 176.54 | 44.14 |
| | 1/30/2022 | 16,377.51 | 139.78 | 16,377.51 | 139.78 | 139.77 | 34.94 |
| | 1/31/2022 | 16,524.12 | 146.61 | 16,524.12 | 146.61 | 146.58 | 36.65 |
| | 2/1/2022 | 16,664.27 | 140.15 | 16,664.27 | 140.15 | 140.12 | 35.03 |
| | 2/2/2022 | 16,766.38 | 102.12 | 16,766.38 | 102.12 | 102.12 | 25.53 |
| | 2/3/2022 | 16,883.06 | 116.68 | 16,883.06 | 116.68 | 116.72 | 29.18 |
| | 2/4/2022 | 16,964.81 | 81.76 | 16,964.81 | 81.76 | 81.79 | 20.45 |
| | 2/5/2022 | 17,057.59 | 92.78 | 17,057.59 | 92.78 | 92.77 | 23.19 |
| | 2/6/2022 | 17,146.07 | 88.48 | 17,146.07 | 88.48 | 88.46 | 22.12 |
| | 2/7/2022 | 17,238.54 | 92.48 | 17,238.54 | 92.48 | 92.56 | 23.14 |
| | 2/8/2022 | 17,339.66 | 101.11 | 17,339.66 | 101.11 | 101.09 | 25.27 |
| | 2/9/2022 | 17,424.94 | 85.29 | 17,424.94 | 85.29 | 85.30 | 21.33 |
| | 2/10/2022 | 17,509.28 | 84.33 | 17,509.28 | 84.33 | 84.37 | 21.09 |
| | | 326,900.11 | 1,969.83 | 326,900.11 | 1,969.83 | 3,003.04 | 750.76 |

**BILLING SUMMARY**

| Accnt & Last Name | Start DTE | End DTE | USAGE (KHW) | COST | Count of Billing # | NOTES |
|---|---|---|---|---|---|---|
| [redacted] | 12/16/2021 | 1/13/2022 | 2,548.89 | [redacted] | 1 | * This data was estimated |
| | 1/14/2022 | 2/10/2022 | 5,843.75 | | 1 | |
| Total | | | 8,392.64 | | 2 | |

!!!

There were similar issues with Johnson's account, where billed usage value is **396%** higher than PSE meter/MDMS reads and **784%** higher than interval reads for the same billing period.



METER READS vs MDMD vs INTERVALS

| Accnt & Last Name | READ/BILL DTE | Meter Read CUM | Meter Read Daily | MDMS CUM | MDMS Daily | Intervals Daily | Actual KWH |
|---|---|---|---|---|---|---|---|
| [redacted] | 12/16/2021 | 2,382.57 | 0.00 | 2,382.57 | 0.00 | | |
| | 12/17/2021 | 2,382.57 | 0.00 | 2,382.57 | 0.00 | | |
| | 12/18/2021 | 2,382.57 | 0.00 | 2,382.57 | 0.00 | | |
| | 12/19/2021 | 2,382.57 | 0.00 | 2,382.57 | 0.00 | | |
| | 12/20/2021 | 2,747.37 | 0.00 | 2,747.37 | | | |
| | 12/21/2021 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 12/22/2021 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 12/23/2021 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 12/24/2021 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 12/25/2021 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 12/26/2021 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 12/27/2021 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 12/28/2021 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 12/29/2021 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 12/30/2021 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 12/31/2021 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/1/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/2/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/3/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/4/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/5/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/6/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/7/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/8/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/9/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/10/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/11/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/12/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/13/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/14/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/15/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/16/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/17/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/18/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/19/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/20/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/21/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/22/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/23/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/24/2022 | 2,747.37 | 0.00 | 2,747.37 | 0.00 | | |
| | 1/25/2022 | 4,196.26 | 0.00 | 4,196.26 | | | |
| | 1/26/2022 | 4,250.61 | 54.35 | 4,250.61 | 54.35 | | |
| | 1/27/2022 | 4,298.40 | 47.78 | 4,298.40 | 47.78 | | |
| | 1/28/2022 | 4,322.22 | 23.83 | 4,322.22 | 23.83 | | |
| | 1/29/2022 | 4,370.82 | 48.60 | 4,370.82 | 48.60 | | |
| | 1/30/2022 | 4,409.96 | 39.14 | 4,409.96 | 39.14 | | |
| | 1/31/2022 | 4,437.26 | 27.30 | 4,437.26 | 27.30 | | |
| | 2/1/2022 | 4,472.31 | 35.05 | 4,472.31 | 35.05 | 17.42 | 4.36 |
| | 2/2/2022 | 4,509.94 | 37.64 | 4,509.94 | 37.64 | 37.67 | 9.42 |
| | 2/3/2022 | 4,559.43 | 49.49 | 4,559.43 | 49.49 | 49.48 | 12.37 |
| | 2/4/2022 | 4,591.05 | 31.62 | 4,591.05 | 31.62 | 31.62 | 7.91 |
| | 2/5/2022 | 4,624.98 | 33.93 | 4,624.98 | 33.93 | 33.95 | 8.49 |
| | 2/6/2022 | 4,647.75 | 22.77 | 4,647.75 | 22.77 | 22.81 | 5.70 |
| | 2/7/2022 | 4,685.29 | 37.53 | 4,685.29 | 37.53 | 37.59 | 9.40 |
| | 2/8/2022 | 4,717.94 | 32.65 | 4,717.94 | 32.65 | 32.68 | 8.17 |
| | 2/9/2022 | 4,752.61 | 34.67 | 4,752.61 | 34.67 | 34.74 | 8.69 |
| | 2/10/2022 | 4,786.43 | 33.82 | 4,786.43 | 33.82 | 33.80 | 8.45 |
| Total | | 185,068.88 | 590.17 | 185,068.88 | 590.17 | 331.76 | 82.94 |

BILLING SUMMARY

| Accnt & Last Name | Start DTE | End DTE | USAGE (KHW) | COST | Count of Billing # | NOTES |
|---|---|---|---|---|---|---|
| [redacted] | 12/16/2021 | 1/13/2022 | 551.00 | [redacted] | 1 | |
| | 1/14/2022 | 2/10/2022 | 2,382.00 | | 1 | |
| Total | | | 2,933.00 | | 2 | |

There were similar issues with Groesbeck's account, where billed usage value is **84%** higher than PSE meter/MDMS reads and **76%** higher than interval reads for the same billing period.

**METER READS vs MDMD vs INTERVALS**

| Accnt & Last Name | READ/BILL DTE | Meter Read CUM | Meter Read Daily | MDMS CUM | MDMS Daily | Intervals Daily | Actual KWH |
|---|---|---|---|---|---|---|---|
| [redacted] | 12/16/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/17/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/18/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/19/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/20/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/21/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/22/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/23/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/24/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/25/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/26/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/27/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 39.05 | 9.76 |
| | 12/28/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/29/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/30/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 12/31/2021 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 1/1/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 1/2/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 1/3/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 1/4/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 1/5/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 1/6/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 1/7/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 1/8/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 1/9/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 12.54 | 3.14 |
| | 1/10/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 1/11/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 21.46 | 5.37 |
| | 1/12/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 1/13/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 6.35 | 1.59 |
| | 1/14/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 1/15/2022 | 3,223.78 | 0.00 | 3,223.78 | 0.00 | 0.00 | 0.00 |
| | 1/16/2022 | 6,602.76 | 0.00 | 6,602.76 | | 6.40 | 1.60 |
| | 1/17/2022 | 6,698.92 | 96.16 | 6,698.92 | 96.16 | 96.18 | 24.05 |
| | 1/18/2022 | 6,776.77 | 77.85 | 6,776.77 | 77.85 | 77.90 | 19.48 |
| | 1/19/2022 | 6,865.05 | 88.28 | 6,865.05 | 88.28 | 88.28 | 22.07 |
| | 1/20/2022 | 6,977.14 | 112.09 | 6,977.14 | 112.09 | 112.08 | 28.02 |
| | 1/21/2022 | 7,062.46 | 85.32 | 7,062.46 | 85.32 | 113.38 | 28.34 |
| | 1/22/2022 | 7,143.03 | 80.57 | 7,143.03 | 80.57 | 80.55 | 20.14 |
| | 1/23/2022 | 7,266.38 | 123.35 | 7,266.38 | 123.35 | 123.33 | 30.83 |
| | 1/24/2022 | 7,399.98 | 133.60 | 7,399.98 | 133.60 | 133.60 | 33.40 |
| | 1/25/2022 | 7,525.08 | 125.10 | 7,525.08 | 125.10 | 125.11 | 31.28 |
| | 1/26/2022 | 7,693.76 | 168.68 | 7,693.76 | 168.68 | 168.73 | 42.18 |
| | 1/27/2022 | 7,866.06 | 172.30 | 7,866.06 | 172.30 | 172.27 | 43.07 |
| | 1/28/2022 | 8,035.25 | 169.19 | 8,035.25 | 169.19 | 169.22 | 42.31 |
| | 1/29/2022 | 8,164.14 | 128.90 | 8,164.14 | 128.90 | 128.90 | 32.23 |
| | 1/30/2022 | 8,291.12 | 126.98 | 8,291.12 | 126.98 | 126.99 | 31.75 |
| | 1/31/2022 | 8,400.01 | 108.89 | 8,400.01 | 108.89 | 108.88 | 27.22 |
| | 2/1/2022 | 8,532.75 | 132.74 | 8,532.75 | 132.74 | 132.75 | 33.19 |
| | 2/2/2022 | 8,675.31 | 142.57 | 8,675.31 | 142.57 | 142.64 | 35.66 |
| | 2/3/2022 | 8,823.76 | 148.45 | 8,823.76 | 148.45 | 148.40 | 37.10 |
| | 2/4/2022 | 8,892.26 | 68.50 | 8,892.26 | 68.50 | 68.44 | 17.11 |
| | 2/5/2022 | 8,953.02 | 60.77 | 8,953.02 | 60.77 | 60.79 | 15.20 |
| | 2/6/2022 | 9,012.36 | 59.34 | 9,012.36 | 59.34 | 59.32 | 14.83 |
| | 2/7/2022 | 9,082.64 | 70.27 | 9,082.64 | 70.27 | 70.28 | 17.57 |
| | 2/8/2022 | 9,170.99 | 88.36 | 9,170.99 | 88.36 | 88.40 | 22.10 |
| | 2/9/2022 | 9,256.62 | 85.63 | 9,256.62 | 85.63 | 85.62 | 21.41 |
| | 2/10/2022 | 9,289.85 | 33.23 | 9,289.85 | 33.23 | 33.26 | 8.32 |
| **Total** | | **308,394.55** | **2,687.09** | **308,394.55** | **2,687.09** | **2,801.10** | **700.28** |

**BILLING SUMMARY**

| Accnt & Last Name | Start DTE | End DTE | USAGE (KHW) | COST | Count of Billing # | NOTES |
|---|---|---|---|---|---|---|
| [redacted] | 12/16/2021 | 1/13/2022 | 2,025.00 | [redacted] | 1 | * This data was estimated |
| | 1/14/2022 | 2/10/2022 | [illegible] | | 1 | |
| **Total** | | | **4,942.00** | | 2 | |

According to WAC 480-100-338 the errors can be within plus/minus from 2 to 4%. The extremely large discrepancies in all three accounts vary from **76%** to **784% (!)** and the issues, lasted for over two months, were completely dismissed and have not been investigated by PSE staff at a time.

Total discrepancies for all billing cycles:

**Account [redacted] (Argunov)**

Interval data – 23,021.21 KWH (raw data)

Daily Meter/MDMS Reads – 55,154.21 KWH (raw data)

Billed – 76,023 KWH (raw data)

Total Variance Interval data vs Meter/MDMS Reads – 139%.

Total Variance Interval data vs Billing – 230%.

**Account [redacted] (Groesbeck)**

Interval data – 26,001.44 KWH (raw data)

Daily Meter/MDMS Reads – 46,075.44 KWH (raw data)

Billed – 55,511.68 KWH (raw data)

Total Variance Interval data vs Meter/MDMS Reads – 77%.

Total Variance Interval data vs Billing – 113%.

**Account [redacted] (Johnson)**

Interval data – 8,764.14 KWH (raw data)

Daily Meter/MDMS Reads – 8,764.14 KWH (raw data)

Billed – 15,113 KWH (raw data)

Total Variance Interval data vs Meter/MDMS Reads – 0%.

Total Variance Interval data vs Billing – 72%.

Johnson's account [redacted] looks even more terrifying when their meter was showing daily energy usage of 500 KWH, that is 500,000-watt hours in the house that was under construction and had only 1 outlet. As Johnsons testified, they have not used the central heater, instead they purchased small heaters which were connected to the temporary power. The meter with permanent power hasn't been used at all for any purposes up until summer of 2022. And yet their account was billed for 15,000 KWH for three consecutive months. Let's assume that Johnsons did use the heater, the regular central heater consumes anywhere from 55 to 70 KWH per day! Hence, according to the PSE meter, there were eight or nine(?) central heaters working

simultaneously. It is obvious that the meter showed faulty results due to tampering which could be potentially caused by the fact that two AMI meters were installed at the same address within less than 150 feet from each other. But we will never know because as always, the issue has not been reported, addressed, or investigated at that time. The test was conducted several months after the fact when Johnsons contacted PSE asking to explain the charge of [redacted]

The WAC 480-100-318 states *"Electric utilities that decide to either measure a customer's consumption with a device that employs a multiplier or calculate consumption from recording devices must provide customers, upon request, information sufficient to enable the customer to compute the quantity consumed."* As of today, PSE was unable to provide accurate and sufficient data, therefore, its customers cannot calculate or verify the consumption they were billed for.

## MOTION TO REOPEN RECORD AND REQUEST FOR ORAL ARGUMENT

The Complainants Reserve the Right to Seek Future Reconsideration or Judicial Review. The Complainants reserves the right to seek additional review, whether by a petition for reconsideration or judicial review or both, of any future order arising in this proceeding related to the to docket UE-220701.

The Complainants also request Oral Argument due to complexity of the case, misinterpreted facts and false accusations on PSE side.

## CONCLUSION

The testimonies of all PSE witnesses were based on false premises.

**False Premise #1.** PSE stated that they bill for KWH wrongfully assuming that Focus AMI meters measure consumption (KWH) and not a demand (KW).

**Facts:**

According to meter specifications provided by PSE, and product/technical specs published by Ladys+Gyr the Focus meters measure demand data every 15 minutes and have only two available options TOU and demand billing (also known as "real-time" or "interval" billing). In

WAC 480-100-338 section "Demand meter accuracy" references ANSI codes (same codes that were referenced by Hanis).

NOTE: According to WAC 480-100-318 "*Measuring devices that have the capability to do so must measure all energy sold to customers at a minimum of **sixty-minute** intervals for **residential customers** and **fifteen-minute** intervals for **nonresidential customers**."* It is still unclear why PSE does not follow the code and set up 15-minutes intervals for residential customers like us.

**False Premise #2.** Installed AMI meters are no different from "old school" mechanical meters.
Facts: According to Landys+Gyr Product sheet (Exhibit EACCH 30 – page 2), Focus AX meters are "*Active Energy "KWH-KW" meters*", and have only two billing options TOU and demand billing (also known as "Interval billing), therefore, AMI meters installed by PSE are the demand meters. AMI meters function completely different from mechanical meters especially when it comes to billing calculations.

**False Premise #3.** PSE does not use interval data for billing purposes using instead MDMS cumulative values to bill for consumption.
**Fact:**
According to product specs published by Landys+Gyr and SAP software specs, MDMS is a repository system used for the data storage and VEE checks once interval data is loaded. Then adjusted interval data must be loaded to a specific "SAP adapter" called MDUS. The one that according to PSE witness McCanahan did not exist, contradicting the date stamp "03.30.2017" on the brochure.
McCanahan testified that PSE is following the "*SAP's Standard Periodic Meter Reading Process"*, providing the following link https://help.sap.com/docs/SAP_S4HANA_ON-PREMISE/2ac7fe29a0c94cdd88fb80c2cb9f7758/bc90d0533f8e4308e10000000a174cb4.html. Please see page #2 of this petition where it clearly shows the required steps that PSE refuses to follow. They are not utilizing required MDUS module (SAP adaptor) instead they are using Meter/MDMS reads, but according to the process flow described in the diagram, meter/MDMS reads should not be used for the billing purposes. MDUS calculates future billing quantities of KWH based on embedded group calculations, algorithms, etc.

**False Premise #4.** The facts provided by the main complainant are a product of her "theory" and "misinterpretation".

**Fact:**
I am a PSE customer, but I am also a professional specializing in data management, software implementation, business analytics, and internal controls. I have received multiple CFO awards, my reports ranked #1 among an existing 25,000 reports. I work for one of the largest healthcare organizations in the United States, and even though it was very challenging, I took my time to perform a case study of the PSE data, product sheets, brochures, as well as SAP and Oracle guides. For the past 12 months, I have thoroughly reviewed PSE data and its processes. I have provided facts supported by documentation from the original sources, showing all issues and flaws. Therefore, my testimonies are very credible, and they are not a product of my theory or misinterpretation.

## APPENDIX

I am not sure how can I be clearer about PSE's broken system; therefore, I am requesting an oral argument. Up util now, I was not given the opportunity to speak. I had 10 minutes for an opening statement and 15 minutes during closing arguments. Considering the complexity and the number of technical aspects of this case, I am asking the Commission to allow me to speak up and answer any questions from any parties involved. I also believe it would be a good idea to hear directly from members from the Landys+Gyr and/or SAP support team so we can resolve this issue and get it over with once and for all.

Also, I wanted to respond to the following in the order "*While Tam does not directly address the theory of quadruple billing, Tam's testimony that PSE is, in fact, billing the Complainants based on kWh undermines their theory*". The fact that the Public Counsel does not agree or disagree with me, doesn't make my complaint less credible. The Public Counsel staff concentrated their work on PSE's violations, I hope that this petition will change their point of view moving forward, and PSE will be fully held accountable for their actions.