BEFORE THE WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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

Leave of the Commission and Proposed Reply

July 7, 2023

Proposed Reply

Dear Staff of the Utility and Transportation Commission,

I would like to point out several accusations made in PSE response to my petition.

In paragraph #15 (page 7), PSE stated the following: "*Complainants point to Exhibit EACCH-30 ("Focus AX Product Specification and Schedule Sheet) to support its claim that PSE uses interval reads by contending that PSE's meters currently offer "Time of Use and Demand Billing" billing options, which require interval billing. This is simply incorrect*".

Response: I provided a screenshot from exhibit EACCH-30 which clearly states the two available billing options

1. Time of Use
2. Demand Billing.

Display Options	Energy Metrics: +kWh, -kWh, Net kWh, and added kWh (Security)
	Metric Energy Display Format – 4x1, 4x10, 5x1, 5x10, 6x1 or 6x10
	Time of Use and Demand Billing

I insist that the product sheets are the source of truth and provide accurate and most current information. Demand billing is not only about "demand" charges, but there are two main components:

A. Service Quantity Calculation based on interval data (15, 30, or 60-minutes). The data used by PSE for billing is just an initial load. Service Quantity must be calculated based on load profile(s). That's where MDUS module comes in play. As I stated in our petition all PSE meters have the same load profile

Load Profile Configuration

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

B. Demand Charges - value calculated during billing process.

Even though both billing methods are different, they have one thing in common - calculations that are based on interval data.

Furthermore, in paragraph #17 PSE stated that *"Ms. Sains testified that MDUS is not required of exchanging data between an MDMS system and SAP. It is just an application you can purchase so you don't have to build in in-house."*

During the hearing witness (McClenahan) stated that MDUS was not available at a 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.

In same paragraph PSE stated "*In other words, MDUS is unnecessary if there is an alternative application available. Ms. Sains noted PSE built the MDUS equivalent application in-house and it provide the necessary functionality*".

There are several issues with this statement:

A. In my petition where I provided a link to the "*SAP's Standard Periodic Meter Reading Process*" (from McClenahan testimony), I presented proof that PSE does not follow the standard procedure. And **suddenly** in response to our petition**,** PSE change their story and comes up with some type of "*equivalent application*" that replaces MDUS.
In Exhibit KM-1CT (page #3), McClenahan provided step by step process of the SAP billing process, see below:
*"First, the SAP system creates the meter read order for billing three days prior to the date for billing, which enables MDMS lead time to get a meter read.*
Second, once the meter read is captured in MDMS the raw data is validated within MDMS for billing and is then uploaded into SAP."
It clearly shows that PSE does not have any "in-house" application and use MDMS raw data for the billing purposes which contradicts to the "SAP's Standard Periodic Meter Reading Process" below, disregarding the crucial part of the process which is uploading the data into MDUS module.

Periodic Meter Reading Process
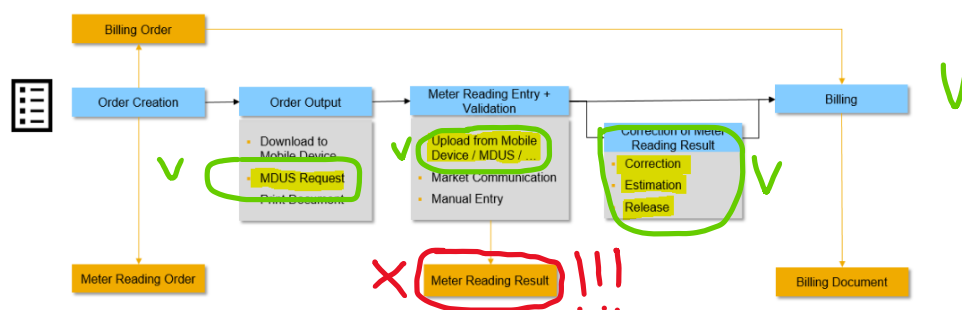
B. The MDUS is not just an application. As mentioned in Landys+Gyr brochure "*Gridstream MDUS provides a platform for smart metering functionality in the SAP system,*" and "*Gridstream MDUS is integrated with SAP for Utilities,*" and "*Landis+Gyr implemented Gridstream MDUS software.*"

Application is a smaller software explicitly created for a particular purpose, where software or platform is a collection of codes, programs, instructions etc. to perform multiple tasks.

In the response to my petition, PSE mentioned exhibit SBH-1T, where Halsen testified the following *"explaining if Complainants' allegations about AMI meters and PSE's billing system were correct, the system wide average usage would be approximately 200-250 KWH per month per each customer"*.

I am not sure what data source PSE used for the calculations above. But currently our average usage based on previous bills from PSE (for all accounts) are between 2500 KWH and 3700 KWH. And if the PSE would do their job, the monthly average usage would be between 625 KWH (2500/4) and 925 KWH (3700/4) per month.

I know that my petition is not perfect in terms of formatting, but I did my best to present the facts and show inconsistencies in PSE processes and procedures. I do not have an "army of lawyers" behind my back, but I have very particular skills that allowed me to investigate and determine the absolute chaos in PSE's billing process.

Therefore, I am asking the Commission to bring this case back and allow me to conduct an oral argument and proceed with further review.

Three families (and who knows how many more) have been struggling with PSE bills for over two years now, and the pain PSE is causing is unbearable.