

Service Date: September 22,2023

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

<p>ALEXANDER AND ELENA ARGUNOV, THOMAS AND HEIDI JOHNSON, CHAD AND VICTORIA GROESBECK,</p> <p>Complainants,</p> <p>v.</p> <p>PUGET SOUND ENERGY,</p> <p>Respondent.</p>	<p>DOCKET UE-220701</p> <p>Petition #2</p> <p>PETITION FOR RECONSIDERATION OF DENIAL IN ORDER #5</p>
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BACKGROUND (Response to Discussion in Order #5)

1. In paragraph 16 of Order #5, the Commission stated the following,

“Complainants have still not established that PSE is using automated meter reading (AMR) or AMI meters incorrectly or contrary to any published guidance.”

In our multiple exhibits, and in previous petition, we were able to show the inconsistencies between software requirements and PSE workflow. Both Landys+GYR and SAP have separate billing modules that must be used for **all interval-related data**. Landys+Gyr offers MDUS, SAP - IS-U-EDM.

On the second page of our previous petition we provided a screenshot of the “Periodic Meter Reading Process”, link was provided by McClenahan in exhibit KM-CT (page #3). Where the standard requires to load meter data into MDUS module. As I stated before, PSE does not follow the standard procedure. Furthermore, one of the PSE witnesses provided a false statement when asked about the module, stating that MDUS was not available at that time. This is not a true statement, because according to the Landys+Gyr documentation (see exhibit EACCH-37), MDUS module existed since 3.30.2017, and PSE started the implementation back in 2018.

I also wanted to point out that in the PSE response to our previous petition, PSE provided false information again, when they stated that PSE developed their “in-house” application. According to the statements by the PSE witness, they did not have or use any application for billing purposes. According to their “Step by Step” explanation on page #19 in exhibit KM-1CT “*once the meter read is captured by MDMS the raw data is validated within MDMS for billing*”. As you can see the witness has not mentioned any “in-house” application. I think it’s clear PSE omits the standard published guidance, described in detail on the official SAP website referenced in exhibit KM-1CT. In the standard process shown below, references from MDUS mode which are used specifically for the interval data according to Landys+Gyr brochure (exh. EACCH-37).

If PSE chooses not to use Landis+Gyr product, then SAP offers their “in-house” billing module required for interval-related data (profiles) called “IS-U-EDM”. Per SAP documentation (page #3 of exh. EACCH-2.1 – Process Flow section):” *IS-U-EDM allows you to prepare for RTP billing. An internal interface transfers prepared RTP data to the IS-U billing component.*

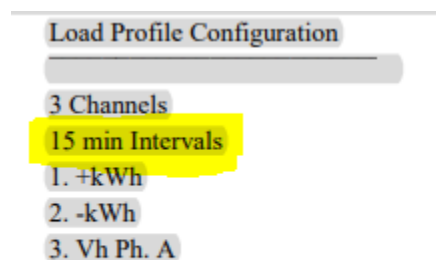
Unlike conventional IS-U billing, RTP billing allows you to bill very small units of time (such as data from 15-minute intervals).

These units of time correspond to the time units of the interval data measured.”

However, PSE does not utilize either Landy’s or SAP solutions. By not utilizing either of those modules, PSE compromised their billing, and have been invoicing wrong consumption quantities for quite some time now.

PSE stated there are no requirements, however, per Landys-Gyr and SAP documentation both have requirements when it comes to interval-related data, described above.

All PSE AMI meters have the same Profile Load shown in meter specifications, provided in exhibits EACCH-13C-17C. See screenshot below:



Therefore, PSE must use appropriate billing modules to prepare and calculate the “raw” data accordig to profile configuration, which is “15-minute intervals”.

2. In paragraph 13 of Order #5, the Commission stated the following:
“We agree with PSE that the only issue addressed by the Petition, and thus subject to review, is that of the Complainants’ overarching claim of inappropriate billing practices related to the use of AMI meters. The penalties assessed in Order 04 for specific violations of RCW 80.28.080 and WAC 480-100 related to billing, meter reading, and meter testing are unchallenged by either party and remain unaltered.”

Unfortunately, the assessed penalties are not forcing PSE to change their practices and procedures. So far, PSE have not posted credits to any of our accounts. Eventhough, we presented enough information showing major inconsistencies such as variaces of 180%-784%(!!!), showing unrealistic daily usage of 500 KWH per day that was coming from Johnson’s AMI meter, when their house had only one single outlet!!!!

PSE must be held accountable for their actions, forced to reload the “raw” data using appropriate software, and credit our accounts accordingly.

SUMMARY

PSE failed to follow standards and requirements, its witnesses gave false statements on the stand!

We provided all facts supported by the official documentation, where their testimonies were based only on their opinions and endless denials.

The ask from the Commission is not to give preference to either parties, but look at the facts and not opinions.

REQUEST

For the reasons discussed above, we are asking the Commission to reconsider their denial.