



Elena Argunov <eargunov@gmail.com>

WA UTC Complaint CAS-39919-Q0C6N7 for Elena Argunov CRM:0132123

25 messages

Cook, Corey (UTC) <corey.cook@utc.wa.gov>
To: Elena Argunov <eargunov@gmail.com>

Fri, Jun 17, 2022 at 11:25 AM

Elena Argunov,

I am writing to you regarding your June 14, 2022, complaint against Puget Sound Energy (PSE). I have completed my investigation of your complaint. Today, I called you at the telephone number you provided, (425) 306-2305; however, I was not able to reach you. I am following up to provide you the results of my investigation.

In your complaint, you said your bills have been estimated at unreasonably high amounts since PSE installed its AMI meter at your residence and you did not understand how PSE determined the estimated amounts.

My investigation confirms on March 3, 2022, when you spoke with PSE's representative, they incorrectly advised you of estimated bills. Please understand, you have not been billed an estimated amount since Aug. 4, 2022, the date PSE's AMI meter was installed at your home. My review of your account reflects PSE has only billed you for actual usage which has passed through PSE's meter to your home. I have attached to this email a copy of PSE's records reflecting good daily meter reads from its meter from its installation date through June 14, 2022.

On May 4, 2022, PSE tested its meter at your home, and found a full load reading of 100.14 percent, a light load reading of 100.13 percent, and an average load of 100.135 percent. PSE's meter test reflects the usage it billed to you is accurate. Because of the length of time PSE took to complete the meter test, I have recorded one violation against the company.

Regarding your billing, my investigation does not find PSE in violation of any law, rule, tariff, or commission order. At this time, I have closed your complaint.

If you have additional questions or concerns, please feel free to contact me at your convenience. I can be reached by telephone at 1-888-333-9882. I am available Monday through Friday, from 8:30 a.m. to 4:30 p.m. I can also be reached via email at corey.cook@utc.wa.gov.

Regards,
Corey Cook
Complaint Investigator

**Meter_X155953447_Daily Reads.xlsx**

24K

Elena Argunov <eargunov@gmail.com>
To: "Cook, Corey (UTC)" <corey.cook@utc.wa.gov>

Fri, Jun 17, 2022 at 12:28 PM

Hello Corey,
The PSE representative provided incorrect information. As I stated via the phone their estimates are based on the invalid data. therefore, all their estimates are compromised. I have "raw" data of these readings, PSE does not apply the formula that is supposed to be embedded into their billing process. Please provide UTC contact (preferably supervisor), someone who understands the data flow. so I can present the information I gathered.
Thank you,

Elena Argunov
[Quoted text hidden]

Elena Argunov <eargunov@gmail.com>
To: "Cook, Corey (UTC)" <corey.cook@utc.wa.gov>

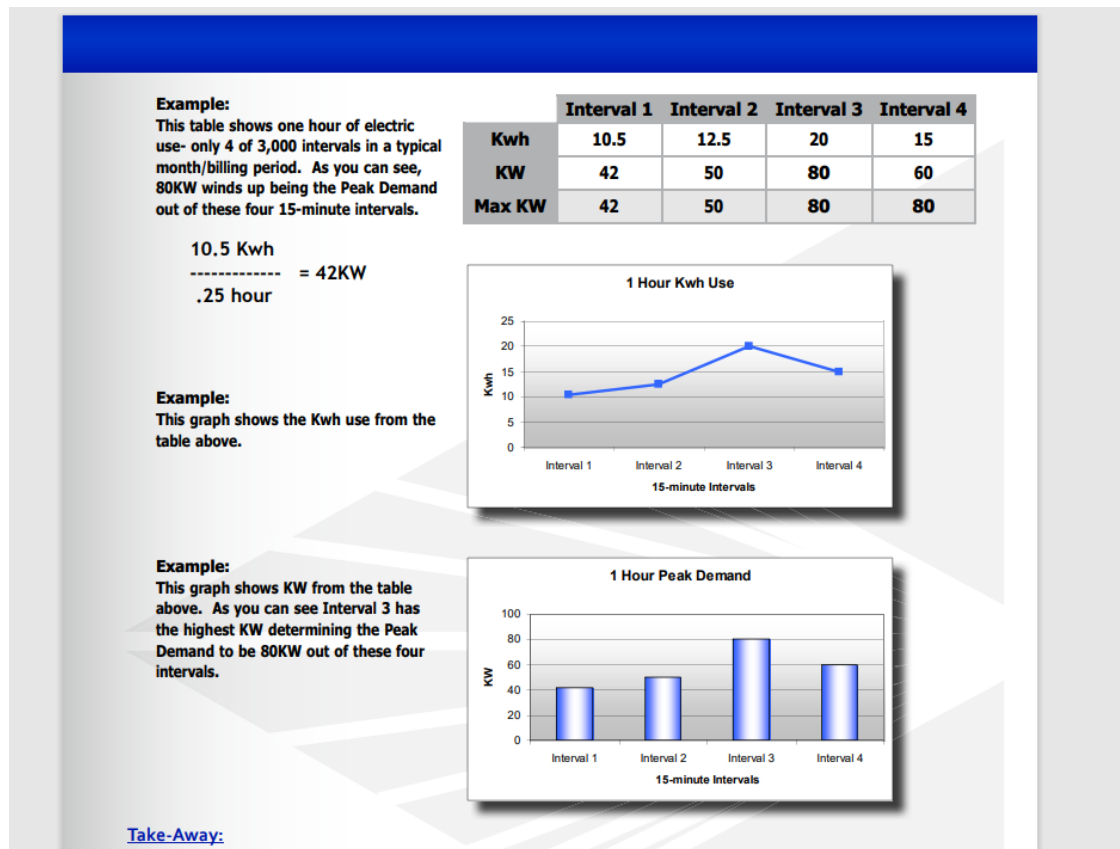
Fri, Jun 17, 2022 at 12:58 PM

[An Assessment of Interval Data and Their Potential Application to Residential Electricity End-Use Modeling \(eia.gov\)](#)

[Quoted text hidden]

Elena Argunov <eargunov@gmail.com>
To: "Cook, Corey (UTC)" <corey.cook@utc.wa.gov>

Fri, Jun 17, 2022 at 1:17 PM



[Quoted text hidden]

Elena Argunov <eargunov@gmail.com>
To: "Cook, Corey (UTC)" <corey.cook@utc.wa.gov>

Fri, Jun 17, 2022 at 1:26 PM

Peak Demand:

Most utilities divide your electric use into 15-minute intervals. The meter records your Kwh use for each of those 15-minute intervals. The interval with the highest 15-minute usage (in that billing period) sets your peak demand for that month. In an average 1-month billing period, you have about 3,000 opportunities to set the peak demand.

Hi Corey,
Here's the formula for billing calculations

Assuming the power is constant for every 15 minute interval. You get

$$E[n] = P[n] * 0.25 \text{ h}$$

[Quoted text hidden]

Cook, Corey (UTC) <corey.cook@utc.wa.gov>
To: Elena Argunov <eargunov@gmail.com>

Fri, Jun 17, 2022 at 1:45 PM

Elena,

Thank you for the additional details. I appreciate the opportunity to respond.

Please understand, in the screenshot you provided, the second sentence reads: "The meter records your kWh use for each of those 15-minute intervals." During our telephone conversation today, you were insistent PSE should be billing in KW and not kWh; however, the document you provided shows it is a mathematical conversion between the two. Regardless of how the data is represented, in KW or kWh, PSE still has only issued bills to you for electricity which passed through your meter since Aug. 4, 2021, when it installed your AMI meter. Again, I encourage you to review your bills for the last six months and confirm each bill reads "Actual Usage".

Additionally, the formula you provided is prefaced with: "Assuming the power is constant for every 15 minute interval". Electric usage very rarely, if ever, remains at a constant draw for this formula to be applicable. Again, I fail to understand why you believe PSE needs to implement this formula.

I hope this helps clear up any confusion. At this time, your complaint remains closed.

[Quoted text hidden]

Elena Argunov <eargunov@gmail.com>
To: "Cook, Corey (UTC)" <corey.cook@utc.wa.gov>, sheri.hoyt@utc.wa.gov
Bcc: victoriamicfarland24@hotmail.com

Tue, Jun 21, 2022 at 10:53 AM

Hello Corey and Sheri,

Thank you for your speaking with me last week!

As discussed, I am moving forward with a formal complaint, and I want to make sure I capture all the details we discussed over the phone and via email.

Corey,

1. During our initial call, you refused to discuss any data issues based on my file because this is out of your area of knowledge.
2. The conversation with PSE rep was strictly about Meter readings and you have not reviewed the "raw" data included into my excel file.

Sheri,

1. During our phone conversation you mentioned that you disagree with my calculations and you also stated " it doesn't matter' what units of measure are used during the 15 minutes interval, because PSE billing is looking at ending and beginning balance regardless of what type of reading is happening in the background.
2. You haven't reviewed my file with PSE rep

Please confirm that the statements above are correct, and feel free to add details if I missed something.

Corey, thank you so much for providing the PSE file, which I didn't have access to. I reviewed the file and it also confirms that PSE data integrity was compromised a long time ago. The file you provided and 'raw' data collected from PSE website will be an excellent prove.

It's a shame that neither of you took time to dive more into this issue causing hundreds of their customers to suffer from PSE irresponsible behavior and lack of professionalism.

Below, I am providing a couple links, so you can learn more about AIM data and interval measurements. In general, 15,30, or 60 minutes intervals were implemented to simplify data collection and billing. Officially it's called " Peak Demand", where software determines the highest point of peak demand (KW) during billing cycle. In order to calculate the actual Energy consumption (KWH) the following formula is used by all energy companies across the board (except PSE , apparently)

KWH = KW/4.

For residential customers billing the calculation for monthly consumption would be $(\text{KWH} \times 24) \times \text{days/billing cycle}$. For example, the highest demand for the billing cycle ending 01/13/2022 PSE file show Daily KW demand of 8.743(KW). Therefore, $8.743/4 = 2.19$ KWH. the number of days in that billing cycle is 29. So the billable usage calculation is $(2.19\text{KWH} \times 24) \times 29 = 1,524.24$ KWH. I was billed for 2548.90 (estimated bill)!!!

So, billing is not supposed to look at the start/ending readings at all. The whole point of AIM data collecting and 15 minutes interval is to be able to calculate monthly charges voiding dependencies on service interruptions and other issues which PSE had a lot.

[power - Convert 15 minute kW readings to a monthly kWh total - Electrical Engineering Stack Exchange](#) - this is an official site where engineers share their computations.

[New Metering Pulse Totalizers | SSI News \(solidstateinstruments.com\)](#) - pay attention to two last paragraphs.

Sorry for taking time from you busy schedule, but I am a full-time working mom with three kids and I can't tolerate any longer the fact that one of the largest energy companies of WA state is trying to rip off my family and hundreds other families. They didn't forget to increase the energy charge rates, but they forgot how to do their job!!!

Have a great day,
Elena Argunov

On Fri, Jun 17, 2022 at 11:25 AM Cook, Corey (UTC) <corey.cook@utc.wa.gov> wrote:

[Quoted text hidden]

Mail Delivery Subsystem <mailer-daemon@googlemail.com>

Tue, Jun 21, 2022 at 10:53 AM

To: eargunov@gmail.com



Address not found

Your message wasn't delivered to **sheri.hoyt@utc.wa.go** because the domain **utc.wa.go** couldn't be found. Check for typos or unnecessary spaces and try again.

[LEARN MORE](#)

The response was:

DNS Error: DNS type 'mx' lookup of utc.wa.go responded with code NXDOMAIN Domain name not found: utc.wa.go Learn more at <https://support.google.com/mail/?p=BadRcptDomain>

Final-Recipient: rfc822; sheri.hoyt@utc.wa.go

Action: failed

Status: 5.1.2

Diagnostic-Code: smtp; DNS Error: DNS type 'mx' lookup of utc.wa.go responded with code NXDOMAIN Domain name not found: utc.wa.go Learn more at <https://support.google.com/mail/?p=BadRcptDomain>

Last-Attempt-Date: Tue, 21 Jun 2022 10:53:30 -0700 (PDT)

----- Forwarded message -----

From: Elena Argunov <eargunov@gmail.com>
To: "Cook, Corey (UTC)" <corey.cook@utc.wa.gov>, sheri.hoyt@utc.wa.gov
Cc:
Bcc:
Date: Tue, 21 Jun 2022 10:53:20 -0700
Subject: Re: WA UTC Complaint CAS-39919-Q0C6N7 for Elena Argunov CRM:0132123
----- Message truncated -----

Elena Argunov <eargunov@gmail.com>
To: sheri.hoyt@utc.wa.gov

Tue, Jun 21, 2022 at 10:58 AM

Sorry Sheri, I sent it to the invalid email address
[Quoted text hidden]

Hoyt, Sheri (UTC) <sheri.hoyt@utc.wa.gov>
To: Elena Argunov <eargunov@gmail.com>

Tue, Jun 21, 2022 at 11:38 AM

Good morning Elena Argunov.

Per your request, I am responding to the statements you have, as I understand it, directed to me and asked for my confirmation on. My responses are in-line, in green.

1. During our phone conversation you mentioned that you disagree with my calculations and you also stated " it doesn't matter' what units of measure are used during the 15 minutes interval, because PSE billing is looking at ending and beginning balance regardless of what type of reading is happening in the background.

I stated I disagree with you that PSE is charging all of its customers four times their actual consumption and I also stated daily readings are not used for billing purposes. Only beginning and ending reads in a bill cycle are used for billing purposes.

2. You haven't reviewed my file with PSE rep

I reviewed the informal complaint record in its entirety; however, it's unclear to me what you mean by your "file with PSE rep."

Regards,
Sheri

Sheri Hoyt

Consumer Protection Manager

Phone: (360) 664-1102

Email: sheri.hoyt@utc.wa.gov

Utilities and Transportation Commission

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pronouns: she/her



This email/letter states the informal opinions of commission staff, offered as technical assistance, and are not intended

as legal advice. We reserve the right to amend these opinions should circumstances change or additional information be brought to our attention. Staff's opinions are not binding on the commission.

Elena Argunov <eargunov@gmail.com>
To: "Hoyt, Sheri (UTC)" <sheri.hoyt@utc.wa.gov>

Tue, Jun 21, 2022 at 1:53 PM

Hi Sheri,

Thank you so much for the quick response!

I was talking about a file that I sent to Corey to review during a conversation with PSE, and you also reviewed this with me when we were over the phone.

As I stated in the email, sent this morning, the beginning and end reads are not allowed to be used if Smart Meters are set to 15 minutes interval mode. This method is for detecting the highest peak demand and/calculating hourly consumption based on average. Instead, PSE is billing us for the readings that have nothing to do with actual KWH used during the month. Again, according to PSE billing, I use about 4 KWH (4,000W) PER hour, 96000W!!! per day. I am not running a welding factory here. We live in a new trailer, our house is still under construction, and whatever we have there is highly efficient equipment, so is it not that obvious that there is an error on the PSE side?

I am attaching a "raw" data file loaded from the PSE website, as a proof that this is how it is set up since 2021.

[Quoted text hidden]

 **PSE data - copy.xlsx**
818K

Hoyt, Sheri (UTC) <sheri.hoyt@utc.wa.gov>
To: Elena Argunov <eargunov@gmail.com>

Tue, Jun 21, 2022 at 2:09 PM

Elena Argunov,

Corey has reopened your informal complaint and will provide all of the information you've provided to commission staff to PSE for a response. The rules require regulated utility companies to provide a response within three business days; however, due to the volume of information you've provided, I anticipate PSE will request an extension for its response. We want PSE to thoroughly investigate your assertions that you are being billed incorrectly for the usage flowing through your meter and provide a comprehensive response so Corey will grant that extension request. Corey will respond to you as soon as he has information to provide to you.

Regards,
Sheri

Elena Argunov <eargunov@gmail.com>
To: "Hoyt, Sheri (UTC)" <sheri.hoyt@utc.wa.gov>

Tue, Jun 21, 2022 at 3:13 PM

Hello Sheri,

There are no words to describe how I appreciate what you've done for me and my family.

Really and truly, I don't want to get anyone in trouble, but it became unbearable to keep paying for their errors. During 22 months my account was charged almost \$6,300. I never paid that much for my energy bills. We moved from Bonney Lake a couple years ago, where during summer time our air-conditioners were working 24/7 and I paid around \$230. For the bill with the ending period 02/10/2022 I was charged \$669.68 dollars for almost 6,000 KWH. There is nothing in our trailer that could possibly consume that much energy.

Again, I really appreciate your help and assistance and I hope we can resolve this once and for all.

Best Regards,
Elena Argunov

[Quoted text hidden]

Elena Argunov <eargunov@gmail.com>
To: "Cook, Corey (UTC)" <corey.cook@utc.wa.gov>

Wed, Jun 22, 2022 at 10:28 AM

Hi Corey,

I wanted to thank you for reopening the complaint. Please let PSE know that I am not letting it go, and if they don't proceed with a full investigation and keep coming back with vague explanations, I will proceed with a formal complaint, and there will be much more severe consequences. The informal complaint is my last attempt to have PSE look at their billing issues and fix them ASAP. I am trying to be patient and give them time to research, but if my kindness will be taken as weakness, I want them to know that I will proceed to the next steps. I have enough people to file a class A lawsuit. I know that this is the last thing that any of the parties involved want, but I am not giving up. Feel free to reach out to me if you have any questions.

Just to summarize what we discussed, I am attaching a file including calculations, notes, links etc.

Best Regards,
Elena Argunov

[Quoted text hidden]

 **PSE Billing summary.xlsx**
607K

Elena Argunov <eargunov@gmail.com>

Tue, Jun 28, 2022 at 8:11 AM

To: "Cook, Corey (UTC)" <corey.cook@utc.wa.gov>, sheri.hoyt@utc.wa.go

Hello Corey,

Have you hear anything back from PSE?

Thank you,

Elena Argunov

[Quoted text hidden]

Mail Delivery Subsystem <mailer-daemon@googlemail.com>

Tue, Jun 28, 2022 at 8:11 AM

To: eargunov@gmail.com

[Quoted text hidden]

Final-Recipient: rfc822; sheri.hoyt@utc.wa.go

Action: failed

Status: 5.1.2

Diagnostic-Code: smtp; DNS Error: DNS type 'mx' lookup of utc.wa.go responded with code NXDOMAIN

Domain name not found: utc.wa.go Learn more at <https://support.google.com/mail/?p=BadRcptDomain>

Last-Attempt-Date: Tue, 28 Jun 2022 08:11:54 -0700 (PDT)

----- Forwarded message -----

From: Elena Argunov <eargunov@gmail.com>

To: "Cook, Corey (UTC)" <corey.cook@utc.wa.gov>, sheri.hoyt@utc.wa.go

Cc:

Bcc:

Date: Tue, 28 Jun 2022 08:11:43 -0700

Subject: Re: WA UTC Complaint CAS-39919-Q0C6N7 for Elena Argunov CRM:0132123

----- Message truncated -----

Cook, Corey (UTC) <corey.cook@utc.wa.gov>

Tue, Jun 28, 2022 at 8:33 AM

To: Elena Argunov <eargunov@gmail.com>

Elena,

Thank you for your response. I appreciate the opportunity to verify the accuracy of my investigation.

Puget Sound Energy (PSE) has confirmed the understanding you are providing regarding 15-minute interval data is inaccurate. According to PSE's commission-approved Tariff, Schedule 7, PSE only charges for energy used in kWh. PSE produces a bill based on the actual amount of kWh used during the billing period unless there is a situation which would require an estimated bill.

PSE advised its AMI meters receive 15-minute interval data in a secure packet. This means every 15 minutes, the meter records actual kWh usage, and is not measuring a peak demand as described in the document you supplied. PSE explicitly states in its response: "The 15 minute interval data is not used in the way the customer alleges in their complaint."

I sincerely understand this information is not what you expected to receive; however, I wanted to ensure you had an accurate understanding of PSE's methods of measuring, and billing, electrical usage.

If you have additional questions or concerns, please don't hesitate to contact me. I can be reached by telephone at 1-888-333-9882. I am available Monday through Friday, from 8:30 a.m. to 4:30 p.m. I can also be reached via email at corey.cook@utc.wa.gov.

I understand my supervisor, Sheri Hoyt, sent you the commission's formal complaint packet. If you still disagree with the results of my investigation, you have the right to submit a formal complaint upon the commission. I recommend reviewing the email, and corresponding attachments, Sheri Hoyt sent you with this information.

Regards,
Corey Cook
Complaint Investigator

[Quoted text hidden]

Elena Argunov <eargunov@gmail.com>
To: "Cook, Corey (UTC)" <corey.cook@utc.wa.gov>

Tue, Jun 28, 2022 at 8:47 AM

Thank you so much for the quick response!

And yes, I disagree with their decision because they are wrong, and don't want to admit it. I will be moving forward with a formal complaint.

I will follow up with Sheri as I have couple of questions.

Just FYI 15 minutes intervals are measuring in KWH. KWH is the amount consumed in one hour, this measure is absolute no matter how PSE wants to interpret it.

15 min consumption = KW*0.25 (15 minutes or quarter of hour)

Have a great day,
Elena Argunov

[Quoted text hidden]

Elena Argunov <eargunov@gmail.com>
To: "Hoyt, Sheri (UTC)" <sheri.hoyt@utc.wa.gov>

Tue, Jun 28, 2022 at 10:32 AM

Good morning Sheri,

I have a quick question. Can I file a joint formal complaint with another customer of PSE?

Please advise.
Thank you,
Elena Argunov

[Quoted text hidden]

Hoyt, Sheri (UTC) <sheri.hoyt@utc.wa.gov>
To: Elena Argunov <eargunov@gmail.com>

Tue, Jun 28, 2022 at 11:27 AM

Hello Elena Argunov.

You can review a formal complaint, Docket UG-190857, filed by multiple customers here: | [UTC \(wa.gov\)](#).

Regards,
Sheri

Sheri Hoyt

Consumer Protection Manager

Phone: (360) 664-1102

Email: sheri.hoyt@utc.wa.gov

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pronouns: she/her



[Quoted text hidden]

Elena Argunov <eargunov@gmail.com>
To: "Hoyt, Sheri (UTC)" <sheri.hoyt@utc.wa.gov>

Tue, Jun 28, 2022 at 11:27 AM

Thank you!

[Quoted text hidden]

Elena Argunov <eargunov@gmail.com>
To: "Cook, Corey (UTC)" <corey.cook@utc.wa.gov>
Bcc: victoriamcfarland24@hotmail.com

Tue, Jun 28, 2022 at 12:54 PM

Hi Corey,

Have PSE provided any documentation proving their point or it's just another "she said he said" situation?
Please advise.

Thanks,
Elena

[Quoted text hidden]

Cook, Corey (UTC) <corey.cook@utc.wa.gov>
To: Elena Argunov <eargunov@gmail.com>

Tue, Jun 28, 2022 at 1:44 PM

Elena,

Thank you for your response. I appreciate the opportunity to address your questions.

First, I must clearly state this is not a "he said, she said" situation, as that would imply a situation where commission staff cannot make a determination based on differing versions of opinions. However, this complaint does not involve PSE's opinions of what happened, it involves the facts of how it bills residential customers and its approved tariff on file with the commission.

You have presented your documentation to Sheri and myself, I provided to PSE your interpretations and beliefs regarding PSE's practices, to which PSE responded. Commission staff disagrees with your understanding. PSE has confirmed your understanding of its residential billing to be incorrect.

Please understand, PSE does not use demand metering (the type of meter reading you are referencing) for residential consumers. This type of meter reading is typical of a large, commercial facility. PSE provided good, actual meter reads to commission staff. These actual meter reads are what PSE billed you for; that is to say, your actual usage. This is consistent with PSE's commission-approved tariff.

To bluntly answer your question, there is no additional documentation which commission staff believes PSE needs to provide, as commission staff disagrees with your interpretation of PSE's residential billing practices.

Regards,
Corey Cook
Complaint Investigator

[Quoted text hidden]

Elena Argunov <eargunov@gmail.com>

Thu, Jun 30, 2022 at 5:01 PM

To: "Cook, Corey (UTC)" <corey.cook@utc.wa.gov>, "Hoyt, Sheri (UTC)" <sheri.hoyt@utc.wa.gov>

Bcc: victoriamcfarland24@hotmail.com

Hello Corey,

There is an obvious disconnect in what type of information they needed to provide. This is not about tariffs or how UTC approved their billing. There is an existing governance process described here see below

<https://www.eia.gov/consumption/residential/reports/smartmetering/pdf/assessment.pdf>

So neither UTC nor PSE have absolutely no right to approve something like this.

Therefore, I am requesting from PSE and UTC to provide an official documentation showing how PSE is handling their billing. Reconciliations, analysis, actual usage in watts because their meters to don't show anything.

The responses from UTC or PSE without providing an actual paperwork is not relevant.

I am a PSE customer and I have a right to know why my bills are skyrocketing. So far, PSE and UTC admitted that they have no knowledge of how the interval data works. As a customer and as a data analyst professional who is dealing with a large datasets used in financial reporting on daily basis, I have a right to receive this documentation.

Thanks,
Elena

[Quoted text hidden]

Cook, Corey (UTC) <corey.cook@utc.wa.gov>

Fri, Jul 1, 2022 at 8:24 AM

To: Elena Argunov <eargunov@gmail.com>

Elena,

Thank you for your response. I appreciate the opportunity to address your concerns.

I regret to have to inform you, the information you are seeking regarding PSE's billing is, contrary to your statement, not something you have a right to access.

I encourage you to file your formal complaint upon the commission and, if accepted, PSE would have an opportunity to present additional data in response to your allegation.

Regards,
Corey