

July 27, 2017

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D. Matthew Moscon
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201 South Main Street, Suite 1100
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Re: Docket No. 14-035-114: Auric Solar, LLC's Response to Rocky Mountain Power's First Set of Discovery Requests

Please find enclosed Auric Solar, LLC's Response to Rocky Mountain Power's First Set of Discovery Requests.

Thank you.

Sincerely,

/s/ Elias Bishop

Elias Bishop
Director of Government Affairs & Public Policy
Auric Solar, LLC
2310 South 1300 West
Salt Lake City, UT 84119
(801) 878-3363
elias.bishop@auricsolar.com

14-035-114

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Auric Solar, LLC Response to Rocky Mountain Power First Set of Data Requests

RMP Data Request 1

Do you claim that Rocky Mountain Power's proposal in this proceeding would eliminate net metering as a customer choice? If your answer to this question is in the affirmative, please provide the documents or other information on which you rely to support this claim and explain the factual basis for your claim.

Response to RMP Data Request 1

Auric Solar, LLC (Auric) objects to this question on the grounds that it is vague and ambiguous. Without waiving that objection, Auric responds as follows:

No. Rocky Mountain Power's proposal in this proceeding would not technically eliminate net metering as a customer choice. However, if Rocky Mountain Power's proposal in this proceeding is adopted it would severely damage and hinder net metering as a customer choice.

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RMP Data Request 2

Do you claim that competing fairly in the free market means that net metered customers should be subsidized by other customers? If so, please explain the basis for this claim and provide any related documentation or other information you contend supports this claim.

Response to RMP Data Request 2

No, Auric does not necessarily claim this.

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RMP Data Request 3

Please provide all documentation or other information reflecting the types of jobs that Auric claims will be lost if Rocky Mountain Power's proposal is adopted. In responding to this request, please identify the extent to which (i.e. the percentage that) those expected job losses would impact full-time vs. part-time positions or independent contractors, and provide any documents or other information showing Auric's estimates of the impact of the proposal on jobs, including the impact on specific positions or types of positions (i.e. managerial, sales, administrative, etc.) for the solar industry, if such information exists.

Response to RMP Data Request 3

Auric has not calculated exactly how many jobs it would lose if Rocky Mountain Power's proposed changes to net metering are implemented. However, Auric estimates full-time employee job losses would be +80%. Full-time positions that will be lost are sales reps, installers, project managers, electricians, designers, drafters, customer service reps, marketing associates, human resource associates, lead generation reps, training specialists, analysts, it administrators, purchasing/warehouse reps, safety personnel, and others.

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RMP Data Request 4

Please provide all documentation or other information showing how and what Auric advises their customers or potential customers regarding the price of Rocky Mountain Power (or utility-provided) electricity versus the price of installing and using residential solar technology.

Response to RMP Data Request 4

Auric informs and advises customers on RMP's current tiered rate structure, the designed system size and offset percentage of a customer's electric usage based on the customer's RMP bill, and the historical rate increases for the past 20 years to show there may be rate increases in the future. Auric also provides the customers with the cash price for the solar energy system and, if elected by the customer, the monthly loan payment.

RMP Data Request 5

Please provide the documentation or other information necessary to show employment data reflecting the number of Auric employees who were full-time, part-time, or who were employed as independent contractors from January 1, 2012 to the present.

Response to RMP Date Request 5

Auric objects to this question on the grounds that it is overly broad, unduly burdensome, irrelevant, and competitively sensitive. Without waiving that objection, Auric responds as follows:

Utah Full-Time Employees by Year			
	Total	W-2	1099
January 1, 2013	3	3	0
January 1, 2014	3	3	0
January 1, 2015	40	20	20
January 1, 2016	108	108	0
January 1, 2017	209	209	0
Current	134	134	0

As a note, Rocky Mountain Power's net metering proposal in November of 2016 destabilized the solar industry in Utah. This is a significant contributor to the job loss that is shown from *January 1, 2017* to *Current*.

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RMP Data Request 6

Please provide the documentation or other information necessary to show the amount of compensation paid to Auric sales force employees, including the hourly rates, monthly and yearly salaries, and any commissions paid from January 1, 2012 to the present.

Response to RMP Data Request 6

Auric objects to this data request on grounds that it is overly broad, unduly burdensome, irrelevant, and competitively sensitive.

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RMP Data Request 7

Please provide the documentation or other information necessary to show the commission structure Auric employs and the commission amounts Auric pays or has paid to compensate its sales force for solar installations from January 1, 2012 to the present.

Response to RMP Data Request 7

Auric objects to this data request on grounds that it is overly broad, unduly burdensome, irrelevant, competitively sensitive, and unlikely to lead to any useful information in this proceeding.

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RMP Data Request 8

Please provide the documentation or other information necessary to show what Auric has told or shown to its customers about the period of time in which they will be able to recoup their costs for purchasing solar power equipment and installation costs in the state of Utah. In responding to this Data Request, please provide all brochures, handouts, flyers, or other documents reflecting any such information ever used by Auric or its contractors in this state.

Response to RMP Data Request 8

Auric objects to this data request on grounds that it is overly broad, unduly burdensome, irrelevant, and competitively sensitive.

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RMP Data Request 9

Please provide the documentation or other information showing the cost to install solar panels and the associated system supplied by Auric to residential customers and showing the payment options Auric's customers are given to either pay for the system or pay to have the system in this state.

Response to RMP Data Request 9

Auric objects to this data request on grounds that it is overly broad, unduly burdensome, irrelevant, and competitively sensitive.

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RMP Data Request 10

Does Auric provide or has it ever provided its sales force with suggested topic lines or scripts to utilize when making sales pitches to potential customers regarding the purchase of solar power? If so, please provide all documentation relating to any suggested topic lines or scripts.

Response to RMP Data Request 10

Auric objects to this data request on grounds that it is overly broad, irrelevant, and competitively sensitive. Notwithstanding this objection, Auric responds with the following:

Auric does not provide scripts to the sales reps.

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RMP Data Request 11

Please provide the documentation or other information necessary to show the profit margins Auric earns or has earned on solar installations before owner or management compensation from January 1, 2012 to the present. Your response to this information should provide sufficient data to determine Auric's actual costs to purchase or manufacture materials for a residential solar system and Auric's sale or use price for that system. Recognizing that different systems will be priced differently based on size and configuration please provide sufficient information to determine profit margins per panel or per system, including but not limited to any work-ups Auric has or has done of "typical" systems.

Response to RMP Data Request 11

Auric objects to this data request on grounds that it is overly broad, unduly burdensome, irrelevant, and competitively sensitive.

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Auric Solar, LLC Response to Rocky Mountain Power First Set of Data Requests

RMP Data Request 12

Please provide copies of all discovery responses Auric has served in this proceeding as well as copies of all responses it later serves in response to data requests in this proceeding.

Response to RMP Date Request 12

To date, Auric has not served discovery responses in this proceeding. We will comply with this request going forward.

From: [Moscon, Matthew](#)
To: [Tolbert, Rachel](#)
Subject: Fwd: Meet and Confer -- In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program
Date: Thursday, August 03, 2017 1:14:54 PM

Begin forwarded message:

From: "Moscon, Matthew" <matt.moscon@stoel.com>
Date: August 3, 2017 at 11:55:06 AM MDT
To: Elias Bishop <elias.bishop@auricsolar.com>
Cc: "Sabin, Cameron" <cameron.sabin@stoel.com>
Subject: **Re: Meet and Confer -- In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program**

Thanks for your response Mr Bishop. Please be aware that time is of the essence as the purpose of the data would be to utilize in surrebuttal testimony which is due in 5 days. Can we anticipate a response later today do you think?

On Aug 3, 2017, at 11:34 AM, Elias Bishop <elias.bishop@auricsolar.com> wrote:

Hello Mr. Sabin,

I will need to discuss this with Auric Solar's executives first -- after which I'll call you to try to resolve this.

Thank you,

Elias Bishop
Director of Government Affairs & Public Policy
(801) 878-3363
auricsolar.com

<[image001.png](#)>

From: Sabin, Cameron [<mailto:cameron.sabin@stoel.com>]
Sent: Wednesday, August 2, 2017 4:52 PM
To: Elias Bishop <elias.bishop@auricsolar.com>
Cc: Moscon, Matthew <matt.moscon@stoel.com>
Subject: Meet and Confer -- In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program

Mr. Bishop:

We are in receipt of Auric Solar's Responses to Rocky Mountain Power's First Set of Data Requests. In those responses, Auric has in some cases refused to provide requested information or documents. Pursuant to the Commission's rules and Utah law, we would like to meet and confer with you regarding those responses to determine whether we can reach an agreement regarding the production of necessary information. Rocky Mountain Power is willing to agree that confidential information should be subject to a protective order, but we are uncertain whether that will resolve Auric's objections.

Please let us know when you are available by phone to meet and confer on this issue.

Cameron L. Sabin | Partner

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