



An Employee Owned Company

September 12, 2024

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 24-2317-INV
Investigation of the Energy Savings Account
and Customer Credit programs pursuant to
30 V.S.A. Section 209(d)(3)(C)

**CHROMA TECHNOLOGY CORP COMMENTS ON THE DEPARTMENT OF PUBLIC
SERVICE'S PROPOSAL FOR PROGRAM DESIGN CHANGES FOR ENERGY SAVINGS
ACCOUNT AND CUSTOMER CREDIT PROGRAMS**

Please accept these comments in response to the Department of Public Services' ("DPS")
proposed program design changes, filed on August 22, 2024.

As background, Chroma Technology Corp. has been an active participant in the Energy Savings Account ("ESA") Pilot program as well as the Energy Savings Account Partnership Pilot Program Working Group. In addition, Chroma Technology was active in the development of recently enacted Act 142 of 2024 that was the impetus to this investigation to update the ESA and Customer Credit Program ("CCP"). To that end, we appreciate the timely manner in which the PUC has started this investigation, especially since the Pilot Program ended in December of 2023 and Chroma Technology Corp. like other pilot Participants, is eager to have the PUC update the programs and allow enrollment into the revised and improved ESA and CCP as soon as practicable.

The ESA program as described no longer fits the needs of our business as compared to the original pilot program. The benefits of the pilot program have been eliminated and therefore not comments are being provided on the ESA program.

Customer Credit Program (pp.10-11)

Chroma Technology is considering making an application for the revised CCP when it becomes available. We support the DPS' description of the program contained on pp. 9-10 of their filing. In addition, and to make sure this point is made explicit, the DPS proposal (as well as the legislative report) allows for the CCP to have the most flexibility possible for CCP participants and to include all types of eligible measures and projects, which include thermal and process fuel efficiency, flexible load management, combined heat and power systems, demand



management, energy productivity, and energy storage. CCP participants may pursue any of these types of measures and projects provided they meet the cost-effectiveness screening process, and unlike the ESA program, are not required to seek prior PUC authorization to pursue non-electric measures or projects. We highlight this key difference because we are interested in the CCP not only for the higher reimbursement levels, but because of the flexibility provided in areas where Chroma Technology has substantial potential energy savings.

CCP Allowable Measures and Reimbursement (p.11) –

The DPS' proposal recommends that the cost of engineering, planning and study costs should be

reimbursed up to 25% of the total costs. The reason is to make sure that EEC funds are spent on projects that are implemented and not entirely on engineering and study costs. It has been Chroma Technology's experience that engineering costs can easily exceed 25% for complex projects. Therefore, Chroma Technology would like to propose for consideration a compromise whereby engineering and study costs in excess of 25% could be reimbursed after a project has been implemented. This would address the DPS' concern about funds being spent without project implementation and a participant's ability to recover legitimate project costs.

CCP Application and Enrollment Periods/Participation Requirements (pp.11-12)

The DPS proposal recommends the same application and enrollment period for the CCP as the ESA. Chroma Technology Corp. therefore seeks some further clarification and offers the following suggestions. We assume that the DPS is proposing enrollment in the CCP in January 2025 for the extended performance period similar to the ESA enrollment timeline. In other words, enrollment in 2025 for a five-year period with a full open enrollment opportunity in 2030. The clarification sought is whether ESA Pilot participants, such as Chroma Technology Corp. would be automatically allowed to enroll in the CCP, provided of course that they "demonstrate their commitment to pursuing cost effective energy efficiency (electric and thermal), demand management, combined heat and power, or energy storage on its own" (which prior ESA Pilot participation should satisfy) and meet the additional programmatic requirement that they have "a designated, dedicated contractor or staff within the corporation with responsibility to develop, analyze, implement, and verify projects. These personnel should be Certified Energy professionals or licensed engineers and/or have an applicable degree from an ABET-accredited institution or formal energy or environmental certification such as an ISO or EU standard. This should be certified/justified every three years."

In summary, Chroma Technology suggests that if an ESA Pilot participant can make the additional programmatic demonstration of in-house or contracted energy expertise,



it should be able to apply and be accepted into the revised CCP as soon as possible. As the PUC and DPS are well aware, the CCP has historically only had one participant, and has been perceived as being overly complicated to utilize. Revising and improving this program so that it can be utilized by new, qualified participants should be a priority and encouraged.

Chroma Technology Corp. looks forward to the revisions and updates to the existing ESA and CCP programs. These programs facilitate the design and implementation of larger scale energy efficiency projects by some of Vermont's largest energy users in rural areas of the state. The reimbursement process allows these companies to plan further into the future and leverage greater internal company resources to tackle meaningful projects that otherwise might not be pursued. In the grand scheme of the EEU budget, these programs are very small, but for the participating companies they are very important and will help Vermont and these key employers reach our greenhouse reduction goals.

Sincerely,

Janette K. Bombardier, P.E.

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COO/CTO

Chroma Technology Corp.



