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. 209(d)(3)(C)	

Case No. 25-1362-PET

Application of Chroma Technology Corporation for participation in the Customer Credit Program	

Case No. 25-1363-PET

Application of Chroma Technology Corporation for participation in the Energy Savings Account	

Case No. 25-1398-PET

Application of Killington Pico Ski Resort Partners, LLC for participation in the Energy Savings Account	

Case No. 25-1419-PET

Application of Smurfit Westrock Missisquoi Mill, VT for participation in the Energy Savings Account program	

Case No. 25-1422-PET

Application of Mack Molding Company for participation in the Energy Savings Account program	

Case No. 25-1428-PET

Application of Ethan Allen Operations for participation in the Energy Savings Account program	

Case No. 25-1441-PET

Application of Weidmann Electrical Technology, Inc. for participation in the Energy Savings Account program	

Case No. 25-1446-PET

Application of Champlain Water District for participation in the Energy Savings Account program	

Order entered: 09/23/2025

ORDER ADDRESSING ENERGY SAVINGS ACCOUNT AND CUSTOMER CREDIT PROGRAM PARTICIPATION AND TRACKING OF FUNDS

I. INTRODUCTION

Case No. 24-2317-INV concerns the implementation of the Energy Savings Account ("ESA") program and Customer Credit Program ("CCP") pursuant to Public Act 142 of the 2024 Vermont legislative session.[1] Pursuant to 30 V.S.A. § 209(d)(3)(C), these programs allow customers who meet certain eligibility standards to use a percentage of their annual electric energy efficiency charge ("EEC") payments to self-administer energy efficiency as a substitute for participation in energy efficiency utility ("EEU") programs. The remaining above-captioned cases concern the applications filed for participation in the ESA and CCP programs.

In today's order, the Vermont Public Utility Commission ("Commission") concurs with the recommendations jointly filed by Efficiency Vermont and the Vermont Department of Public Service ("Department") that all applicants "should be accepted into their respective programs of choice"[2] and approves the applications. We also address the reporting mechanism for tracking EEC funds for the programs.

[1] Public Act No. 142, § 209 (2024 Vt., Adj. Sess.).
[2] Letter from Emily Roscoe, Project Manager, Efficiency Vermont, to Holly Anderson, Clerk of the Commission, dated August 7, 2025.

II. PROCEDURAL HISTORY

On June 5, 2025, the Commission issued an order in Case No. 24-2317-INV addressing the application process for the ESA and CCP programs. We approved the program design elements (the "Program Document") and application forms for the ESA and CCP programs with minor changes. We set the deadlines for existing ESA and ESA pilot participants to file applications as July 18, 2025, and for the EEUs and the Department to file recommendations on participation as August 7, 2025. We also set the deadlines for new ESA and CCP applicants to file applications as July 18, 2025, and for the EEUs and the Department to file their recommendations with respect to eligibility and acceptance as August 20, 2025. Finally, we also requested the Department and the EEUs to make a filing by July 3, 2025, regarding the appropriate reporting mechanism for tracking the total annual amount of EEC funds for the ESA and CCP programs.

On July 3, 2025, Efficiency Vermont filed comments on behalf of the EEUs and the Department addressing the tracking of and reporting on program caps for the ESA and CCP.

On August 7, 2025, Efficiency Vermont and the Department jointly filed a recommendation that existing and new ESA applicants and the one CCP applicant be accepted into their program of choice.[3]

III. DISCUSSION

Efficiency Vermont states that the reporting of EEC contributions could potentially include confidential participant information and that reporting could be done either in aggregate or via an attestation that confirms all contributions have been tracked and do not exceed the statutory caps, whichever method avoids disclosure of confidential information. Efficiency Vermont also proposes that the above information (in aggregate or via attestation) could be filed in each EEU's savings claims report, which is filed with the Commission annually in April. Efficiency Vermont recommends that if the EEC funds for the pool of applicants are projected to be at or close to the program caps, the EEUs could provide more frequent reports on the status of each program's cap.

[3] In its letter, Efficiency Vermont states that "[t]his filing provides Efficiency Vermont and the Department of Public Service's response of recommendations for both existing and new ESA & CCP applicants."

The Commission accepts the proposal that EEC funds be tracked and reported on an annual basis through the EEU savings claim report. As described below, total EEC funds for the total pool of current applicants for both programs are not projected to exceed the statutory program caps. Therefore, we conclude that annual reporting is sufficient at this time. For the ESA, the Commission directs that the funds be reported in aggregate. Because there will be only one participant in the CCP at this time, an attestation that the CCP program cap has not been exceeded is appropriate to ensure confidentiality for that participant.

Applications for the ESA were filed by: Chroma Technology Corporation; Killington/Pico Ski Resort Partners, LLC; Smurfit Westrock Missisquoi Mill, VT; Mack Molding Company; Ethan Allen Operations, Inc.; Weidmann Electrical Technology, Inc.; and Champlain Water District. Chroma Technology Corporation also filed an application for the CCP "with a stated preference for enrollment in the CCP."[4] All applications were timely filed and meet the requirements established in Case No. 24-2317-INV.

Efficiency Vermont and the Department recommend that all applicants be accepted into their program of choice. Efficiency Vermont states that it has confirmed utility account numbers with each applicant and that the total EEC funds for the total pool of applicants will not exceed the statutory program caps, which are \$1,000,000 annually for the CCP and \$2,000,000 annually for the ESA. Efficiency Vermont states that it does not anticipate that the program caps will be reached with the current pool of applicants.

The Commission concurs with the joint recommendation of Efficiency Vermont and the Department that all applicants be accepted into their program of choice. Accordingly, Killington/Pico Ski Resort Partners, LLC; Smurfit Westrock Missisquoi Mill, VT; Mack Molding Company; Ethan Allen Operations, Inc.; Weidmann Electrical Technology, Inc.; and Champlain Water District are accepted into the ESA. Participants are directed to file all future program-related filings in their respective petition cases captioned above. For example, the Program Document states that Energy Management Plans ("EMPs"), if applicable, must be filed with the Commission. Additionally, Chroma Technology Corporation is accepted to participate

[4] Letter from Rick Holloway, Facilities Manager, Chroma Technology Corp., dated June 24, 2025, in Case No. 25-1362-PET.

in the CCP. Therefore, Case No. 25-1363-PET, which concerns Chroma Technology Corporation's application for participation in the ESA, is closed.

As previously determined by the Commission, the program periods for participants and programs are as follows:

- Existing ESA and ESA pilot participants: From the date of this order authorizing participation through December 31, 2029.[5]
- New ESA participants: January 1, 2027, through December 31, 2029.
- CCP participants: From the date of this order authorizing participation through December 31, 2029.

The Commission distinguishes the revised ESA program details from those of the ESA pilot, which were established in Case No. 19-0302-INV. While the ESA pilot program initially ended on June 30, 2022, Vermont Public Act 164 ("Act 164") extended certain provisions of the ESA pilot program through December 31, 2023. Pursuant to Section (b)(5) of Act 164, pilot participants were able to request an additional extension through December 31, 2026. Pilot participants who were approved to extend participation through the end of 2026 were able to spend -- or contract to spend -- funds that were accrued *before* January 1, 2024. Participants were not allowed to accrue additional funds. The pilot participants that were approved for this extension were: Collins Aerospace; Ethan Allen Operations, Inc.; Mack Molding Company; Weidmann Electrical Technology, Inc.; WestRock Converting, LLC; and Vail Resorts. The specifications previously framed by the Commission regarding the ESA pilot are still in place.[6]

The entities approved to participate in this revised ESA program are bound by the parameters and specifications outlined in Case No. 24-2317-INV. However, Ethan Allen Operations, Inc., Mack Molding Company, and Weidmann Electrical Technology, Inc. are participants in both the ESA pilot and the revised ESA program.[7] We also note that WestRock Converting, LLC, did not apply for the revised ESA program; however, Smurfit Westrock

[5] This includes participants who participated in the ESA pilot that have reapplied and been approved to participate in this revised ESA program.

[6] *See Investigation to establish an Energy Savings Account partnership pilot program, establish a methodology for evaluation, measurement, and verification of Self-Managed Energy Efficiency Program and Energy Savings Account projects, and review the Customer Credit Program*, Case No. 19-0302-INV.

[7] Collins Aerospace and Vail Resorts did not apply and are not enrolled in the revised ESA program.

Missisquoi Mill, VT did apply and is enrolled. The Commission requests that the EEUs and the Department identify any implementation issues related to simultaneous participation by these companies in both the ESA pilot and the revised ESA program. For example, should funds accrued through participation in the revised ESA program be allowed to be used for projects identified by the participant during the ESA pilot period? Additionally, the EEUs are requested to confirm that they will track the funds for the ESA pilot separately from the funds for the revised ESA program for simultaneous participants. Responses are requested to be filed by October 8, 2025. Any reply comments should be filed by October 22, 2025. Responses and reply comments should be filed in Case No. 24-2317-INV.

SO ORDERED.

Dated at Montpelier, Vermont, this 23rd day of September, 2025.

Edward McNamara	)	PUBLIC UTILITY
Margaret Cheney	)	COMMISSION
J. Riley Allen	)	OF VERMONT

OFFICE OF THE CLERK

Filed: September 23, 2025

Attest: ______________________________
Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

PUC Case No. 24-2317-INV - SERVICE LIST

John Abbott
Vermont Public Power Supply Authority
PO Box 126
5195 Waterbury-Stowe Road
Waterbury Center, VT 05677
jabbott@vppsa.com

(for Vermont Public Power Supply Authority)

Janette Bombardier
Chroma Technology Corporation
10 Imtec Lane
Bellows Falls, VT 05101
jbombardier@chroma.com

(for Chroma Technology Corporation)

Warren Coleman
MMR, LLC
45 Court St
Montpelier, VT 05602
warren@mmrvt.com

(for WESTROCK)

Tait Germon
Killington/Pico Ski Resort Partners, LLC
4763 Killington Rd
KILLINGTON, VT 05751
tgermon@killington.com

(for Killington Pico Ski Resort Partners, LLC)

Nathan Hill
Collins Aerospace
100 Panton Rd
Vergennes, VT 05491
nathan.hill@collins.com

(for Collins Aerospace)

John W Kessler
Agency of Commerce and Community Development
National Life Building, Drawer 20
Montpelier, VT 05620-0501
john.kessler@vermont.gov

(for Vermont Agency of Commerce and Community Development)

Megan Ludwig, Esq.
Vermont Department of Public Service
112 State Street
Montpelier, VT 05620-2601
megan.ludwig@vermont.gov

(for Vermont Department of Public Service)

Harland L Miller Collins Aerospace 100 Panton Road Vergennes, VT 05491 harland.miller@collins.com	(for Collins Aerospace)
Ken Nolan Vermont Public Power Supply Authority P.O. Box 126 Waterbury Center, VT 05677 knolan@vppsa.com	(for Vermont Public Power Supply Authority)
Matthew Poli Killington/Pico Ski Resort Partners LLC 4763 Killington Road Killington, VT 05751 mpoli@killington.com	(for Killington Pico Ski Resort Partners, LLC)
Matthew J. Walker Efficiency Vermont-Vermont Energy Investment Corporation 20 Winooski Falls Way 5th Floor Winooski, VT 05404 mjwalker@veic.org	(for Efficiency Vermont - Vermont Energy Investment Corporation)
David C. Westman Efficiency Vermont - Vermont Energy Investment Corporation 20 Winooski Falls Way 5th Floor Winooski, VT 05404 dwestman@veic.org	(for Efficiency Vermont - Vermont Energy Investment Corporation)