



October 13, 2025

Chroma Technology Inc.  
10 Intec Lane  
Bellows Falls, VT 05101

Public Utility Commission  
112 State Street  
Montpelier, Vermont 05620

**Subject: Request for Waiver Regarding Chroma Technology and the Customer Credit Program**

**References: Case No. 25-1362-PET; Case No. 24-2317-INV**

Dear Commissioners,

On behalf of Chroma Technology, I am writing to respectfully request a one-time waiver of the Customer Credit Program (CCP) guidelines to allow our organization to accept an Incentive Agreement (IA) from Efficiency Vermont. While we understand and respect the current rules of the CCP, we believe our situation warrants special consideration due to the unique and unavoidable timing of events beyond our control.

Our company was enrolled in the Customer Credit Program almost concurrently with the issuance of the IA from Efficiency Vermont. Prior to CCP enrollment, we had been actively collaborating with Green Mountain Power (GMP) and other technical vendors on a Flexible Load Management (FLM) project since November 2024—shortly after the conclusion of the Energy Savings Account (ESA) Pilot Program.

Unfortunately, the development and coordination of the FLM project and associated IA took longer than anticipated, due in part to the availability and scheduling constraints of multiple external vendors. Had it been solely within our control, this project would have been finalized and the IA executed as early as Spring 2025.

We are proposing two options for a waiver.

The first option would be to have the start date of the participation in the CCP program begin on January 1, 2026 versus the date of September 23, 2025. That would not only allow Chroma to complete its work with the EEU, but also allow the EEU to complete their work on the CCP project forms and processes for accrual of funds to be completed.

The second option would be to exclude this project from the following CCP provision: are therefore requesting a waiver from the following CCP provision:

“Participants are restricted from engaging with any custom projects and incentive offers while they are enrolled in the CCP. If a participant has an existing executed Incentive Agreement prior to enrolling in the CCP, the measures indicated on that agreement will not be eligible as CCP projects. Participants cannot receive both an EEU custom incentive and reimbursement with CCP funds for the same project or energy saving measure.”

*ESA and CCP Guidelines – Last Edited June 18, 2025*

While we acknowledge this policy is intended to prevent duplicate funding, our request is limited to a single project and is based on the efforts and funds already expended toward energy savings during the transition period between the ESA and CCP programs. We believe it is equitable to recognize our longstanding commitment to this initiative and the delays we encountered that were beyond our control.

We respectfully request that the Commission grant this one-time waiver using either of the options to allow us to accept the IA and proceed with the project under the previously established terms. We are confident that this project will yield significant energy savings and align with the shared goals of the CCP and Efficiency Vermont.

Thank you for your consideration. Please let us know if any additional documentation or clarification is needed to support this request.

Sincerely,

*Janette Bombardier, P.E.*

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