



2012 FEB 27 AM 9:16

Omya Inc.

The Landings II, Suite 300
9987 Carver Road

Cincinnati, Ohio 45242
USA

Phone +1 513-387-4600
Fax +1 513-387-4693

www.omya.com

Ms. Susan M. Hudson, Clerk
Public Service Board
112 State Street, Drawer 20
Montpelier, VT 05620-2701

Cincinnati, February 16, 2012

Subject: Omya Inc. Customer Credit Program Participation Notice

Dear Ms. Hudson:

Following the sale of its Vermont Marble Power Division (approved in PSB Docket 7660), Omya Inc.'s Verpol Facility in Florence, Vermont ("Omya") became a retail customer of Central Vermont Public Service Corporation. As part of that retail service, Omya is now paying the Energy Efficiency Charge as required.

This letter is to provide the Board notice that Omya has notified the Energy Efficiency Utility ("EEU") that it intends to participate in the Customer Credit Program for calendar year 2012. A copy of that notice is attached. Included with the notification is a program description developed by Omya and the Department of Public Service. As the Board is aware, the requirements to gain entry into the Customer Credit Program are: 1) Certification under ISO standard 14001 and 2) becoming a partner in the Climate Wise program sponsored by the U.S. Department of Energy and the U.S. Environmental Protection Agency. However, as the Board also is aware, the Climate Wise program no longer exists; therefore, in accordance with the Customer Credit Program, revised eligibility standards were negotiated with the Department of Public Service. Those revised standards are based on the ISO 14001 program and portions of the Energy Star Program and are incorporated in the program description attached.

While the original Customer Credit Program does not appear to require Board approval, sections of the Board's Order in Docket 7660 seem to indicate that the Board may expect Omya to request and gain approval from the Board for participation as opposed, or in addition, to approval from the EEU. Specifically, the Order in Docket 7660 states:



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Although suitable alternatives to participation in the Climate Wise program could be developed for Omya and there are no other obstacles to Omya's participation in the C&I Customer Credit Program apparent in the record in this docket, a Board order on this matter seems premature.¹

Given the continuing discussions between Omya and Efficiency Vermont, it appears appropriate to delay any Board decision on whether to authorize Omya's participation in the C&I Customer Credit Program until such time as Omya decides how it wishes to proceed.²

Secondly, the Board confirms the Department's understanding that if Omya becomes a CVPS retail customer prior to making a decision about its participation in the C&I Customer Credit Program, Omya will be subject to the EEU charge until such time as it seeks and obtains approval to enter into the C&I Customer Credit Program.³

Omya requests that the Board approve Omya's participation in the Customer Credit Program (if necessary under the Order in Docket 7660 or otherwise) or clarify that Board approval is not necessary for Omya's participation.

Should you or the Board have any questions or require anything further in connection with this matter, please contact me.

Sincerely,

Omya Inc.

A handwritten signature in black ink, appearing to read "Todd A. Allard", is written over a horizontal line.

Todd A. Allard
Strategic Sourcing Manager – Energy and Engineering
Region Americas

Enclosure

CC: Department of Public Service
Energy Efficiency Utility

¹ PBS Docket 7660 Final Order at 67

² PBS Docket 7660 Final Order at 67

³ PSB Docket 7660 Final Order at 70

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Mr. Michael Wickenden
Efficiency Vermont
128 Lakeside Avenue, Suite 401
Burlington, VT 05401

Cincinnati, February 16, 2012

Subject: Omya Inc. Customer Credit Program Participation Notice

Dear Mr. Wickenden:

Following the sale of its Vermont Marble Power Division (approved in PSB Docket 7660), Omya Inc.'s Verpol Facility in Florence, Vermont ("Omya") became a retail customer of Central Vermont Public Service Corporation. As part of that retail service, Omya is now paying the Energy Efficiency Charge as required.

This letter is to provide Efficiency Vermont ("EVT") notice that Omya intends to participate in the Customer Credit Program for calendar year 2012. Included with this notification is a program description developed by Omya and the Department of Public Service. As EVT is aware, the requirements to gain entry into the Customer Credit Program are: 1) Certification under ISO standard 14001 and 2) becoming a partner in the Climate Wise program sponsored by the U.S. Department of Energy and the U.S. Environmental Protection Agency. However, as EVT also is aware, the Climate Wise program no longer exists; therefore, in accordance with the Customer Credit Program, revised eligibility standards were negotiated with the Department of Public Service. Those revised standards are based on the ISO 14001 program and portions of the Energy Star Program and are incorporated in the program description attached.

While the original Customer Credit Program does not appear to require Board approval, sections of the Board's Order in Docket 7660 seem to indicate that the Board may expect Omya to request and gain approval from the Board for participation as opposed, or in addition, to approval from the EEU. Specifically, the Order in Docket 7660 states:



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Although suitable alternatives to participation in the Climate Wise program could be developed for Omya and there are no other obstacles to Omya's participation in the C&I Customer Credit Program apparent in the record in this docket, a Board order on this matter seems premature.¹

Given the continuing discussions between Omya and Efficiency Vermont, it appears appropriate to delay any Board decision on whether to authorize Omya's participation in the C&I Customer Credit Program until such time as Omya decides how it wishes to proceed.²

Secondly, the Board confirms the Department's understanding that if Omya becomes a CVPS retail customer prior to making a decision about its participation in the C&I Customer Credit Program, Omya will be subject to the EEU charge until such time as it seeks and obtains approval to enter into the C&I Customer Credit Program.³

Omya separately will request that the Board approve Omya's participation in the Customer Credit Program (if necessary under the Order in Docket 7660 or otherwise) or clarify that Board approval is not necessary for Omya's participation.

Should you have any questions or require anything further in connection with this matter, please contact me.

Sincerely,

Omya Inc.

A handwritten signature in black ink, appearing to read "Todd A. Allard". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Todd A. Allard
Strategic Sourcing Manager – Energy and Engineering
Region Americas

Enclosure

CC: Department of Public Service

¹ PBS Docket 7660 Final Order at 67

² PBS Docket 7660 Final Order at 67

³ PSB Docket 7660 Final Order at 70

January 27, 2012

The original Customer Credit Program (CCP) design calls for a customer wishing to participate to meet a number of requirements. First, the customer must not ever have received incentives from Efficiency Vermont. Second, the customer must have ISO 14001 certification. Finally, the customer must agree to participate in the EPA Climate Wise program.

The EPA Climate Wise program no longer exists. The EPA merged the Climate Wise program with ENERGY STAR. The CCP design anticipates such an occurrence, and provides that alternative criteria may be developed by the customer in collaboration with the Department of Public Service and submitted to the Public Service Board for approval. The Verpol Facility of Omya Inc. (Verpol) has collaborated with the Department of Public Service, and commits to take the following Energy Management steps to ensure that the principles behind the Climate Wise program (and the successor ENERGY STAR program) are met. These steps are based upon the ENERGY STAR program criteria and modified slightly to apply more directly to Verpol's unique situation.

- 1) **Commitment to Continuous Improvement**
 - a. Verpol's Energy Philosophy is incorporated in its QSHE (Quality, Safety, Health and Environment) policy and its commitment to "be environmentally responsible", to "[w]isely use resources" and to "find ways to reduce emissions". The Energy Philosophy's goals are clear short term (annual) goals set through Verpol's ISO 14001 program. The energy goals are measured through key performance indicators that are reviewed monthly and include specific electric and fuel reduction targets.
 - b. The QSHE policy ensures continuous improvement by including provisions for evaluating and updating the policy to reflect changing needs and priorities. These include the "pledge to provide, through targets and objectives, the necessary means to implement this Quality, Safety, Health and Environment Policy and to regularly assess its effectiveness" as well as its strategic goal to "maintain and enhance our integrated QSHE Management Systems."
 - c. Verpol has an Energy Manager who manages and coordinates implementation of the Energy Philosophy.
- 2) **Commitment to Assess Performance**
 - a. Verpol has in place processes to gather and track data, establish benchmarks, and analyze energy use patterns and trends. Verpol commits to utilizing and take steps to improve these processes in the future.
- 3) **Commitment to Create and Implement Action Plans**
 - a. Verpol currently uses and will continue to use the data gathered in step 2 to develop and implement action plans to meet the goals in step 1.
- 4) **Commitment to Evaluate Progress to Goals on a Regular Basis**
 - a. Verpol personnel meet regularly to review results and progress toward goals as part of its ISO 14001 program.
 - b. Verpol reviews and revises action plans to identify and implement best practices.
- 5) **Commitment to Recognize Achievements**
 - a. Verpol is committed to provide recognition to individuals, teams, and processes within the organization.
 - b. Verpol will collaborate with the Department and others to highlight achievement where appropriate.

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Most, if not all, of these aspects of Energy Management are in place currently at Verpol. The commitment made in this proposal is more appropriate for Verpol than joining the Energy Star program because this proposal is specific to Omya's operations in Vermont. In contrast, the Energy Star program is based on a corporate headquarters commitment, applicable to varied and diverse operations, while the commitments proposed in this program are based on the local operations and their recognition of the local commitments, efficiency ethic, and governing bodies.