

DE 19-063

**Sanborn Crossing Apartments Limited Partnership
P. O. Box 1358, Atkinson, NH 03811**

March 12, 2019

NHPUC 27MAR'19PM12:40

Ms. Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, suite 10
Concord, NH 03301-2429

Re: Request for Waiver of Puc 303.02
To Master Meter Sanborn Crossing Apartments, LP

Dear Commissioner Howland:

Sanborn Crossing Apartments is an affordable age restricted project which has come about through the efforts of the Town of Londonderry, who approached our company to create Londonderry's first affordable senior housing community. Sanborn Crossing will consist of 102 age restricted units located on donated Town land that was a cleaned up Brownfield site. The Town has worked with us over the past two years to create a venture that would provide truly affordable housing options to seniors in Londonderry.

By donating the land, the Town provided an incentive to help overcome the local high costs of land acquisition. This is a public/private partnership which, when construction is complete will provide below market rental housing for Londonderry's aging population. This undertaking is a group effort between the Town of Londonderry, New Hampshire Housing Finance Authority and Sanborn Crossing Apartments. We have utilized the Federal Low Income Housing Tax Credit (LIHTC) program, combined with New Hampshire HOME funds to provide substantially below market rent. This project will serve residents in the Londonderry area with 20% of the units dedicated to households that make 50% or less of median income, and the remaining units to serve households that make 60% or less of median income.

Under Section PUC 201.05 Waiver of Rules, we respectfully request a waiver of the requirement that we install a meter for each unit based on the following information:

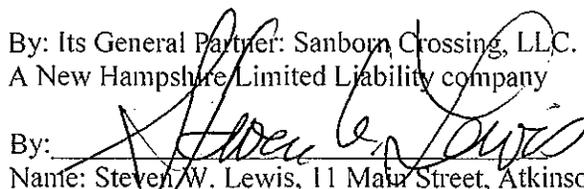
1. **A Waiver serves the public interest in this case**, since the residents who will be living at Sanborn Crossing are low income, elderly citizens, who have limited financial ability to pay for additional energy costs. Therefore we have designed these buildings to have all of the utility costs, including heat, hot water and electricity in the below market rent. So there is no need for individual meters.

2. **A Waiver serves the public interest in this case** since electrical usage will be spread across all of the units equally and not based on actual per unit usage. The cost for energy will be the same for all units. There is no resale of electricity. We have designed elements in the building systems to greatly reduce the energy consumption of the total building. **See Attachment #1 Architect's Letter**. This is being done to maintain below market rent. Solar panels are also being utilized in this project to further assist in lowering energy costs, so the cost of energy will be low enough to not adversely affect the fixed rent prices. We have worked closely with Eversource Energy strive to make Sanborn Crossing as affordable and energy efficient as possible. Eversource is aware of our designs for Solar Panels and is working with our Solar Panel Company, **Revision Energy** to put the needed agreements for solar energy in place. **See Attachment #2 Revision Energy's contract**. Eversource is also aware and supports this request for master metering of our two buildings.
3. **A Waiver serves the public interest in this case** since like all Low Income Tax Credit Projects our budget is very tight and has limited funds available to complete this complex and make it truly affordable. The additional costs of adding 100 individual meters in this commercial venture creates an unnecessary burden on a low income project especially where there is additional savings that would be incurred by master metering.
4. **A Waiver request serves the public interest in this case by** allowing us to keep the long term operating costs as low as possible to maintain affordability. We have employed many Green Technology elements to create energy conservation in the effort to keep costs low. These buildings will receive a **Gold Energy Standard** rating due to our multiple green building elements. We are master metering the water from Manchester Water Works as well as the natural gas that is being used to provide the heating for the building. We have worked closely with Liberty Utilities for the natural gas design and they are on board with our design. We have also worked with Eversource Energy to design a system that will keep costs as low as possible for the consumer. To guarantee affordability over a long term period, we have been required by New Hampshire Housing Finance Authority to record at the Rockingham County Registry of Deeds a "Land Use Restriction" requiring these units to remain affordable for a period of at least thirty years.
5. **Our proposed alternative is to have only a master meter.**

We look forward to working with the Public Utilities Commission to achieve our goal of creating Londonderry's first affordable senior housing project. Please feel free to contact me directly if you have questions or require additional information about this joint venture effort in Londonderry.

Sanborn Crossing Apartments Limited Partnership

By: Its General Partner: Sanborn Crossing, LLC.
A New Hampshire Limited Liability company

By: 
Name: Steven W. Lewis, 11 Main Street, Atkinson, NH 03811
Title: Manager/Member
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