



# VISIONS

FOR CREATIVE HOUSING SOLUTIONS, INC.

8 Sunrise Farm Lane, Enfield, NH 03748

*Date April 29, 2020*

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

Re: Waiver Request for Visions for Creative Housing Solutions, Inc. for Master Meter at 12 Green St., Lebanon, NH

Dear Ms. Howland:

Visions for Creative Housing Solutions, Inc., a nonprofit housing organization that provides residential options, services, and supports designed to meet the needs of adults with special needs, is currently undertaking the renovation of two multifamily housing units at 12 Green Street in Lebanon to create 10 units of housing. The project is utilizing financing from New Hampshire Housing Finance Authority and the Federal Home Loan Bank of Boston and Mascoma Bank and will serve households with incomes below 50% of the area median.

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:

1. A waiver serves the public interest: This is special needs housing for special needs tenants. This project was put together by Visions for Creative Housing Solutions, Inc., and the New Hampshire Housing Finance Authority (NHHFA) through the use of National Housing Trust Fund monies. Residents, who are extremely low income, will benefit from the project. All their utilities will be included in their rent, including heat, hot water and electricity. There is no need for individual meters.
2. A waiver serves the public interest: Electric usage will be spread across the units equally and not based on actual usage. There will be no resale of electricity. Visions for Creative Housing Solutions, Inc. believes that under Liberty Utilities' Tariff and PUC regulations, individual metering is not required in this building. Nevertheless, in the interest of an expeditious resolution of this issue, Visions for Creative Housing Solutions, Inc. seeks this Waiver, while not conceding that Liberty is correct in its position that separate metering is required, and reserving its right to contest that position if necessary.
3. A waiver serves the public interest: The project is on very tight budget, with limited funding, and cannot afford the cost of adding individual meters, especially since it would not provide any additional benefit to the project. We believe requiring individual meters is onerous and should be waived for the unique nature of this project. Shifting funds to pay for meters would likely result in some other critical component of the renovation being sacrificed.
4. Our proposed alternative is to have only a master meter per building.

The purpose of Puc 303.02 is to promote energy-efficient building design and the installation of energy-efficient mechanical, lighting, and power systems in new construction. DE 18-061 p.2. Waiving Puc 303.02 for Visions for Creative Housing Solutions, Inc. serves the public interest as compliance would be onerous and the rule's purpose is already satisfied.

Compliance would be onerous because it would merely increase costs with no added benefit. The wiring to create separate meters for each of the apartments would impose significant upfront costs and impose costly individual meter charges each year. These costs would burden Visions for Creative Housing Solutions, Inc.'s construction and operations budget with no benefit to the non-profit or its low income residents.

Visions for Creative Housing Solutions, Inc has already satisfied the rule's purpose of promoting energy efficient design by developing buildings that go above and beyond the 2015 Energy Code. The sophistication of architectural design, the quantity of insulation, the selection of high R-value windows, the design of a state-of the art heating system, LED lighting, and Energy Star appliances represent significant investment in resource and reflect Visions for Creative Housing Solutions, Inc. and NHHFA's commitment to improving energy efficiency.

Please accept this request to waive Puc 303.02 for 12 Green Street, Lebanon, in order to support affordable housing and promote energy efficient design within the affordable housing community. We accept that the waiver is effective for as long as the facility is operated as multi-family housing for low-income residents and that if it is no longer operated in this manner at some future time, then the waiver will no longer be effective and the building owner will be required to install individual electric meters for each separate dwelling unit in the building. We would appreciate a decision as soon as possible, as we are slated to begin construction in July of 2020.

Thank you for your consideration and I look forward to hearing from you. Please feel free to contact me directly if you have questions or require additional information about this project or this request at 603-632-7707 or [yfchsorg@gmail.com](mailto:yfchsorg@gmail.com)

Sincerely,

A handwritten signature in blue ink, appearing to read "Sylvia Dow". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Sylvia Dow  
Visions for Creative Housing Solutions, Inc.  
8 Sunrise Farm Ln, Enfield, NH 03748