



24 Peabody Place • Franklin, NH 03235 • www.peabodyhome.org • P: 603.934.3718 • F: 603.934.3668

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

Re: Request for Waiver of Puc 303.02 – Master Metering
Peabody Home – New Construction Assisted Living and Independent Living

Dear Ms. Howland,

Peabody Home is constructing a new Assisted Living and Independent Living building in Franklin, NH. It will be an I-2 use group as defined by the NH Building Code (2015 IBC w/ NH Amendments). There are 58 Memory Care and Assisted Living units planned. The 13 Memory Care units will have no kitchenettes; the 45 Assisted Living units will have small kitchenettes with no cooking appliances. The 16 Independent Living Apartments will each have a full kitchen. There will be a main commercial kitchen and main dining room where residents will dine.

The building will fall under the Commercial chapter of IECC that is referenced in Puc 303.02 (b). Per 2015 IECC 405.6, "Each dwelling unit located in a Group R-2 building shall have a separate electrical meter." We are interpreting this to mean that I-2 would not need have an individual meter for each unit.

Services for residents will be all-inclusive, including activities, meals, and utilities. Utility usage will be included in the monthly rental fee. It would pose a hardship for the Peabody Home staff to separately track and administer individual utility bills for each resident, ensure each bill is paid on time, and to transfer accounts each time a resident moves.

Therefore, we would like to request a waiver to the individual metering requirement in Puc 303.02, and to have one master meter for the building.

Sincerely,


Meg Miller
Executive Director