

STATE OF NEW HAMPSHIRE

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**PUBLIC UTILITIES COMMISSION**

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April 6, 2021

Joshua Meehan,  
Executive Director, Keene Housing and  
President, Monadnock Affordable Housing Corporation  
831 Court Street  
Keene, NH 03431

Re: DE 20-188, Keene Housing  
Request for Waiver of Puc 303.02

Dear Mr. Meehan:

On December 2, 2020, Keene Housing (KH) filed a request for a waiver of New Hampshire Administrative Rule Puc 303.02, the master metering rule, in connection with its plans to renovate the Bennett Block building located at 32-34 Washington Street in Keene, New Hampshire (Bennett Block). Keene Housing and Monadnock Affordable Housing Corporation (MAHC) also filed a supplemental request for waiver on March 30, 2021. Commission Staff (Staff) conducted additional discovery and filed a memorandum on March 30, 2021, in which Staff recommended that the Commission grant the waiver request.

KH is a non-profit public housing agency. In 1993, it bought Bennett Block, a 3-story building, which currently contains 14 residential units on the top 2 floors, and a retail space and multi-purpose space on the first floor. The U.S. Department of Housing and Urban Development's Project Based Voucher program subsidizes each of Bennett Block's residential units, which ensures that they are reserved for low-income Keene residents, who are not billed for their electrical usage.

In 2009, KH transferred ownership of Bennett Block to its affiliate, MAHC, an affordable housing provider. KH, however, continues to act as the property manager of Bennett Block on behalf of MAHC. MAHC, by a vote of its board of directors on March 1, 2021, authorized KH to seek a waiver of Puc 303.02 on its behalf. *See* KH and MAHC Supplemental Filing (March 30, 2021).

KH (and MAHC) stated that they plan to renovate the Bennett Block to, among other things, reduce overall energy consumption by improving the building's exterior thermal envelope. KH (and MAHC) requested a waiver of the master metering rule so that they can consolidate the individual electric meters, which have reached the end of their useful lives, in each of the 14 residential units. Consolidation of the electric meters would reduce renovation costs by approximately \$20,000 to \$30,000, in that it would eliminate the need to relocate the meters and build out an electrical room in the basement.

In its memorandum, Staff stated that the cost of the energy efficiency improvements to Bennett Block's residential and common areas, including the elevator and the basement, is estimated at \$134,000. Staff identified the following energy efficiency improvements planned by KH and MAHC: replacement of all windows in the residential units with new low-e, double insulated windows (upper two floors); replacement of all refrigerators in the residential units with new EnergyStar refrigerators; replacement of all exterior doors with

thermally insulated doors; reconstruction of the elevator shaft penthouse at the roof to reduce air loss and increase insulation value; and the addition of insulation at the rooftop in combination with structural reinforcement of the existing roof construction, which would allow for the potential future addition of high efficiency heat pumps. Staff noted that KH and MAHC also plan to replace and upgrade the electric distribution panels and feeders, as some of the electric equipment dates back to the original building construction in 1910 and is currently housed in the electrical service room of an adjacent property, which is owned by an unrelated party.

Staff explained that KH, on behalf of itself and MAHC, provided additional information clarifying that it is requesting a waiver of Puc 303.02 in order to consolidate the electric meters for the 14 residential units and common areas on the top 2 floors, the elevator providing service to the residential units, and the basement, with the non-residential spaces (retail and community/multi-purpose spaces) on the first floor of the building to remain separately metered. Staff noted that the master meter can be housed in an existing storage room on the first floor. Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource), the electric provider for Bennett Block, informed Staff that it did not oppose the proposed configuration or KH's waiver request.

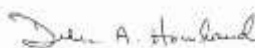
Staff stated that the purpose of the master metering rule, Puc 303.02, is to promote energy conservation and efficiency. Staff concluded that in this instance the rule's purpose would be satisfied using an alternative method by making Bennett Block more energy efficient through installation of a number of building envelope, insulation, and appliance improvements.

According to Staff, permitting KH to use this alternative method of satisfying the purpose of Puc 303.02 would serve the public interest and would not disrupt the orderly and efficient resolution of matters before the Commission. Based on its analysis, Staff recommended that, pursuant to Puc 201.05, the Commission grant KH a waiver of the master metering rule.

The Commission has reviewed KH's request for a waiver of Puc 303.02 and Staff's memorandum. Based on Staff's recommendation, the Commission has determined that the standards for waiver contained in Puc 201.05 have been satisfied. Accordingly, the Commission has granted KH's request to waive the requirements of Puc 303.02 to permit the use of a master meter configuration for Bennett Block, as proposed by KH on behalf of itself and on behalf of MAHC. If, at some future time, Bennett Block is no longer operated as subsidized public housing for low-income households or does not implement the proposed energy efficiency measures (other than the prospective high efficiency heat pumps) as identified for Staff in discovery, then the waiver will no longer be in effect. In that case, KH and MAHC will be required to install individual electric meters in Bennett Block and shall promptly notify the Commission and Eversource of the changes

Please be advised that this rule waiver extends only to the Commission rule and not to any independent requirements of the New Hampshire building code, or to any other federal, state, or local requirement.

Sincerely,



Debra A. Howland  
Executive Director

cc: Service List (Electronically)  
Docket File

## Service List - Docket Related

Docket#: 20-188

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