

STATE OF NEW HAMPSHIRE

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March 26, 2021

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

Re: DE 20-065, Visions for Creative Housing Solutions, Inc.
Request for Waiver of Puc 303.02

Dear Ms. Dow:

On May 5, 2020, Visions for Creative Housing Solutions, Inc. (Visions) 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 two multi-family housing units located at 12 Green Street in Lebanon, New Hampshire. Commission Staff (Staff) conducted additional discovery and filed a memorandum on February 8, 2021, in which Staff recommended that the Commission grant a waiver as to the first building, but stated that a waiver was not necessary for the second building to be master metered.

Visions' website states that it is a 501(c)(3) non-profit organization, which provides housing for adults with special needs. In its request, Visions stated that the project would renovate the buildings to create 10 housing units (5 two-bedroom units) for low-income residents. It explained that the project is being financed by the New Hampshire Housing Financing Authority, the Federal Home Loan Bank of Boston, and Mascoma Bank, and will benefit households with income below 50 percent of the area median. Visions is seeking a waiver of Puc 303.02, because the cost of installing individual meters is prohibitive, given the project's limited budget, and would likely require the elimination of a critical component of the renovation. Visions maintained that the project would satisfy the intent of Puc 303.02, because it will promote energy efficient design.

Staff noted in its memorandum that the project would create 4 two-bedroom apartments in the first building (Building #1) and an additional two-bedroom living unit in the second building, along with administrative offices, accommodations for overnight staff, a common area and a large shared kitchen/dining room (Building #2). Staff stated that Visions' electric service provider, Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities (Liberty), informed Staff that it supports Visions' request for a waiver as to Building #1. Liberty informed Staff that Building #2 could be master metered without a waiver of Puc 303.02. Accordingly, Staff did not address Visions' waiver request for Building #2.

With regard to Building #1, Staff identified the following energy efficiency improvements Visions will make, in the estimated amount of \$47,620: new replacement windows and doors with a U value of less than 0.25 (compared to the code requirement of less than 0.32); attic and wall insulation which exceeds the 2015 Energy Code requirements; high efficiency Mitsubishi Air Source Heat Pumps to allow off-site monitoring, control, and adjustment of system set points; interior and exterior LED lighting fixtures with controls to dim lighting when a space is unoccupied; all EnergyStar appliances; and Energy Recovery Ventilation units.

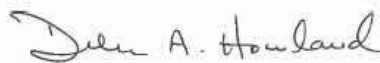
Staff stated that the purpose of the master metering rule, Puc 303.02, is to promote energy conservation and efficiency. Staff concluded that in this instance the rule's purpose would be met by making the building more energy efficient through enhancements to insulation, mechanical, lighting, and heating systems, which exceed code requirements. In addition, Visions stated that avoiding the costs associated with wiring and installing separate meters would support the overall project, including the identified energy efficiencies.

According to Staff, permitting Visions 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 Visions a waiver of the master metering rule as to Building #1.

The Commission has reviewed Visions' 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 Visions' request to waive the requirements of Puc 303.02 to permit the use of a master meter configuration for Building #1, as proposed by Visions. If, at some future time, Visions no longer operates Building #1 as multi-family housing for low-income residents, or does not make the energy efficiency updates it identified for Staff in discovery, then the waiver will no longer be effective. In that instance, Visions will be required to install individual electric meters in Building #1 and shall promptly notify the Commission and Liberty 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#: 20-065

Printed: 3/26/2021

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