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New Hampshire Public Utilities Commission
 21 South Fruit Street
 Suite 10
 Concord, NH 03301-2429

To Whom it May Concern:

We are writing to request a waiver to the International Energy Conservation Code 2009 under RSA 55-A:1, IV stating that "in buildings having individual dwelling units, provisions shall be made to determine the electrical energy consumed by each tenant by separately metering individual dwelling units."

Under PUC 201.05 Waiver Rules, the "commission shall waive the provisions of any of its rules.....upon request by an interested party...if the commission finds that; (1) The waiver serves the public interest; and (2) The waiver will not disrupt the orderly and efficient resolution of matters before the commission."

The following outlines the reasoning for this request, the benefits to be gained, and our argument that Keene Housing meets the spirit of the code requirements regardless of whether the individual dwelling units are individually metered or whether there is a master-meter on the buildings, and that the waiver will serve the public interest.

Keene Housing Overview and Commitment to Energy Conservation

Keene Housing provides and advocates for affordable housing and supportive services that strengthen and empower low and moderate-income households in the Monadnock region. We are committed to reducing our carbon footprint as well as our utility operating expenses. In addition to the environmental benefits, reducing our energy and water consumption will free up much needed funds for programming as well as developing new affordable housing units and maintaining our existing portfolio.

In 2014, we engaged an energy consulting firm to help us move forward with this goal. The first step was to benchmark our properties to identify priorities for energy conservation measures. Buildings were compared to a national data set of similar buildings in ENERGY STAR Portfolio Manager®, as well as to the rest of our portfolio. Not surprisingly, the properties that rely on electricity for heating were some of our least efficient and most expensive. Annually, Keene Housing spends over one million dollars on energy and water utility costs.

There is a direct relationship between our operating expenses and our ability to maintain and expand our stock of affordable housing in the Monadnock region. Quite simply, the less we spend on electric bills the more funding we have available to repair roofs, repave parking lots, and develop new desperately needed affordable housing.

Upon completion of our benchmarking process, Keene Housing and our energy consulting firm began looking at a variety of strategies, including energy efficiency, generation, and conservation (resident behavior). Keene Housing joined on as a Department of Energy Better Buildings Challenge (BBC) Partner in 2015 and committed



to a 20 percent reduction in energy and water use by 2025. Additionally, we made an internal commitment to meet all of our energy needs with renewables by 2035.

Over the past four years, our energy conservation measures have included the following:

1. Utility consumption for our properties is analyzed every six months so that high usage and/or leaks can be addressed.
2. Purchasing a blower door system and training our maintenance staff on conducting blower door tests. Today, blower door guided air sealing is done on every unit upon turnover. We believe we are the only public housing authority in New England addressing weatherization so aggressively.
3. Removal of older, inefficient heating systems at our West Street property and installation of heat pumps. Energy consumption at this five-unit property dropped by over 30 percent. We are currently seeking funding to implement the same improvement at one of our larger properties.
4. Solar capacity research and the first steps towards installing a 90 kW-AC solar array at our Harper Acres property.
5. Comprehensive LED lighting retrofits at four properties with assistance from Eversource commercial lighting incentives.
6. We have worked to reduce water consumption throughout our portfolio by locating and sealing leaks in our systems as well as replacing old water fixtures with low-flow versions. Due to our efforts in 2014 and 2015, our water conservation measures have resulted in an 8 percent reduction portfolio-wide.

Current Metering Arrangement and Benefits of Master-Metering:

Four properties managed by Keene Housing are currently sub-metered for electricity and we would like to install master-meters at the building level. There are individual meters on the units but Keene Housing pays the bill. The tenants never see the bill or their electricity consumption. However, Keene Housing closely monitors consumption at the building level.

These properties and their associated monthly service charges are represented in the table below.

Name of Property	Number of Buildings	Number of Apartments	Number of Electricity Accounts	Monthly Services Charge	Per Month	Per Year	If Metered by Building
Bennett Block	1	14	16	\$12.69	\$203	\$2436	\$152.28
Forest View	9	38	84	\$12.64	\$1,062	\$1,2741	\$2,730.24
North and Gilsum	6	29	58	\$12.64	\$733	\$8,797	\$1,820.16
Central Square Terrace	1	90	74	\$12.64	\$935	\$11,224	\$151.68
Totals	20	189	248			35199	4854.36

By consolidating the meters, Keene housing would see a potential annual savings of \$30,345.

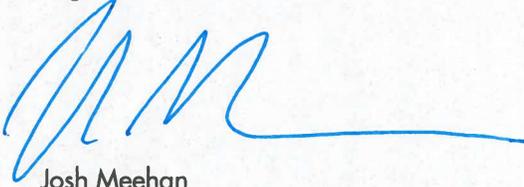
Two properties (Forest View and North and Gilsum) are on Eversource's Heat Smart program and have two meters per unit. We are working on financing the replacement of the older, inefficient thermal storage units at these properties with the more efficient heat pumps. Until that takes place, we are paying for two monthly service charges per unit.

In addition to the higher costs associated with individual service charges, sub-metering is impinging upon our energy conservation initiatives in two other ways:

1. Solar – We are researching the installation of a community-supported solar array at our Forest View property. To effectively install a solar array that serves the whole property, we would need a single commercial meter at the property.
2. Incentives - We are in the process of planning a major rehab of our Central Square Terrace property and a moderate rehab of our Bennett Block property. While common area lighting retrofits have been completed, we would like to install LED lighting throughout the residential units. We can access incentives that make this improvement cost effective through programs overseen by Eversource and NH Saves, but the units need to be on a commercial meter.
3. Bi-annually, our energy consultant pulls utility data and reports at the building level to both Keene Housing and to the Better Buildings Challenge. Currently this entails pulling close to 350 accounts at an hourly cost to Keene Housing. Regularly analyzing our utility consumption data would be facilitated by having fewer meters to monitor.

We appreciate your prompt attention to this waiver request. Upon receipt of the waiver, our intention is to work closely with Eversource and a local electrician to consolidate the meters. We are happy to discuss with the Commission as would be helpful.

Regards,



Josh Meehan
Executive Director
Keene Housing