



Your Affordable Housing Partner

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February 12, 2018

NHPUC 16FEB'18AM10:54

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

Re: Waiver Request for Twin Pines Housing Trust for a Master Meter at 10 Parkhurst St., Lebanon, NH

Dear NH PUC:

Twin Pines Housing, a nonprofit housing organization, is currently undertaking the renovation of 10 Parkhurst Street in Lebanon to create 18 units of housing for the chronically homeless. The project is utilizing financing from New Hampshire Housing Finance Authority and will serve households with incomes below 30% of the area median, or \$15,500 for a single individual. We are in discussion with our electric provider, Liberty Utilities, regarding metering of the property. Since we are replacing and upgrading the electrical service, Liberty Utilities has informed us, that per NH PUC Codes, we are required to provide individual meters for each unit. The building has had a master meter until now, and it is our hope to continue with that system. A single master meter has been permitted by the City of Lebanon.

Under Section PUC 201.05 Waiver of Rules, we respectfully request a waiver<sup>1</sup> 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 the chronically homeless. This project was put together by the City of Lebanon, Twin Pines Housing, The Upper Valley Haven, and the New Hampshire Housing Finance Agency through the use of National Housing Trust Fund monies. Residents, who are extremely low income, will benefit from project-based Section 8 Vouchers while at Parkhurst and pay 30% of their income for rent. They will receive enhanced case management services from the Upper Valley Haven. All their utilities will be included in their rent, including heat, hot water and electricity. There is no need for individual meters. The building previously was master metered and we are currently permitted by the City of Lebanon to continue that system.
2. A waiver serves the public interest: Electric usage will be spread across the 18 units equally and not based on actual usage. Rents will all be the same for all units. There will be no resale of electricity. The owner of the property, Parkhurst Community Housing, Inc. (an affiliate of Twin

<sup>1</sup> Twin Pines 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, Twin Pines 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.

Pines Housing), will only assign to the rents that portion of the operating project costs associated with the electricity.

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.

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.

Sincerely,



Andrew Winter, Executive Director

802-291-7000

cc: liberty Utilities