

Goddard Block Limited Partnership
P.O. Box 823, New Hampton, NH 03256

NH-PUC 17JUL19am11:49

July 3, 2019

Ms. Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 Fruit Street, Suite 10
Concord, NH 03301-2429

Re: Request for Waiver of PUC 303.02
To Master Meter Goddard Block Limited Partnership

Dear Commissioner Howland:

Goddard Block, LP is an affordable Housing Project located at 54-64 Pleasant St., Claremont, NH. The completed project will consist of 36 affordable residential housing units and some commercial space at the ground level facing Pleasant St. The Goddard Block was formerly a mixed use building in the heart of Claremont's downtown. Over the years, the building was neglected and fell into severe disrepair. In the Spring of 2017, after several attempts by the City to get the former owner to perform necessary life safety improvement to no avail, the City was forced to condemn the building which displaced 20 families on short notice.

Shortly thereafter, New England Family Housing, a developer of affordable housing, purchased the property with the intention of re-developing the abandoned property into affordable housing. This plan was strongly supported by the City of Claremont as well as Sullivan County, New Hampshire Housing Finance Authority and the New Hampshire Division of Historical Resources. As with other affordable housing projects, in order to maintain affordability, the funding sources include the Federal Low Income Housing Tax Credit (LIHTC) program, Historic Tax Credit Program, Community Development Block Grant (CDBG) Program, and HOME funds in order to provide and maintain below market rents. This project will serve residents in Claremont and the greater Sullivan County area, which is in desperate need of affordable housing. To Note: Sullivan County has the lowest vacancy rate in NH at only 0.9% Vacancy (according to the NHHFA Rental Survey 2018). This project is designed to serve a

mixed income population, including the work force population with 6 units targeted to residents earning at or below 20% of AMI, 2 units at 50% AMI, 16 units at 60% AMI, 3 units at 80% AMI and 9 units of Market Rate incomes.

Under Section PUC 201.05 Waiver of Rules, we respectfully request a waiver of the requirement that we install a meter for each unit based on the following information:

1. **A Waiver serves the public interest in this case**, since the residents who will be living at the Goddard Block project are low income workforce occupants who have limited financial ability to pay for additional energy costs. With that in mind, this building was designed to have all utility costs including heat, electricity, hot water, domestic water and sewer included in the below market rents, therefore, there is no need for individual meters.
2. **A Waiver serves the public interest in this case**, since the electric usage will be spread evenly across all of the units and included in their rent. Residents will not be charged separately for their individual usage. As this project is still in its early phase of construction, a Solar Array is also in the planning phase. Its feasibility (given the tight overall construction budget) is still being worked out, however, the prep work has been done which includes conduit runs from the rooftop to the electric room.
3. **A Waiver serves the public interest in this case**, since as with other affordable housing projects, our budget is extremely tight and all efforts are being taken in order to keep this project affordable. However, the cost of adding and maintaining an additional 35 individual meters creates an unnecessary burden on a low income project especially where there is additional savings that would be incurred by master metering.
4. **A Waiver serves the public interest in this case**, by allowing us to keep the long term operating costs as low as possible in an effort to maintain affordability for the residents. In order to maintain affordable rents, the building was designed with several “green” features which will keep the overall expenditures of utility costs to a minimum. To start, our development team included an Architect with a deep knowledge of energy efficiencies as well as a certified Energy Consultant. With these 2 individuals leading the design concepts, we have committed to achieve a minimum of **NGBS Gold Standard** as well as **Energy Star**. We have consulted with Eversource (our electric provider) throughout this process and have their support in this waiver request. **See attachment from Frank J. Barrett, Architect**, as well as an **attachment from Bob Tortorice, Energy Consultant** regarding the Energy Savings technologies incorporated into this project. To guarantee affordability over a long term period, we have been required by New

Hampshire Housing Finance Authority as well as the Community Development Finance Authority to record a Land Use Restriction which requires the building to maintain affordable rents for a period of 99 years, which is recorded in the Sullivan Country Registry of Deeds.

5. **Our proposed alternative is to have 1 Master Meter for ALL residential units, however the commercial spaces will be individually metered.**

We look forward to working with the Public Utilities Commission to achieve this very important project for low income working class residents of Claremont and the surrounding area. Please feel free to contact me directly with any questions, concerns or need for further information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'KL' followed by a flourish, positioned above a horizontal line.

Kevin Lacasse, Manager

Goddard Block Limited Partnership

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