

# LEBANON HOUSING AUTHORITY

DITHA ALONSO  
Executive Director

April 6, 2021

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

## Re: Waiver Request for Lebanon Housing Authority for Master Meter at 258 Heater Rd., Lebanon, NH

Dear Ms. Howland:

Lebanon Housing Authority (LHA), a nonprofit is a public housing agency servicing the City of Lebanon, New Hampshire pursuant to State and Federal laws. LHA's goal is to provide affordable, decent, safe, and sanitary housing to income eligible residents in the community. LHA is currently undertaking the construction of a 44-unit, 3 story development for income eligible applicants. The project is utilizing financing from New Hampshire Housing Finance Authority, Mascoma Bank, and the Byrne Foundation.

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:

1. A waiver serves the public interest: This project will supply affordable housing for low-income residents. This project was put together by LHA, and in collaboration with the New Hampshire Housing Finance Authority (NHHFA). Low income residents will benefit from the project. All their utilities will be included in their rent, including heat, hot water and electricity. There is no need for individual meters.
2. A waiver serves the public interest: Electric usage will be spread across the units equally and not based on actual usage. There will be no resale of electricity. LHA 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, LHA seeks this Waiver. Liberty Utilities has been approached and has approved the use of a master meter system.
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 affordable housing project. Shifting funds to pay for individual meters would likely result in some other critical component of the renovation being sacrificed.
4. Our proposed alternative is to have only one master meter for the building.

The purpose of Puc 303.02 is to promote energy-efficient building design and the installation of energy- efficient mechanical, lighting, and power systems in new construction. Waiving Puc 303.02 for LHA serves the public interest as compliance would be burdensome and the rule's purpose is already satisfied.

Compliance would be onerous because it would merely increase costs with no added benefit. The wiring to create separate meters for each of the apartments would impose significant upfront costs and impose costly individual meter charges each year. These costs would burden LHA's construction and operations budget with no benefit to the non-profit or its low-income residents.

LHA has already satisfied the rule's purpose of promoting energy efficient design by developing a building that goes above and beyond the 2015 Energy Code. The sophistication of architectural design, the quantity of insulation, the selection of high R-value windows, the design of a state-of the art heating system, LED lighting, and Energy Star appliances represent significant investment in resource and reflect LHA's and NHHFA's commitment to improving energy efficiency.

We have listed below a few of the items showing the upgrade over current code.



31 ROMANO CIRCLE • P.O. BOX 5475 • WEST LEBANON, NEW HAMPSHIRE 03784  
www.lebanonhousing.org • 1-603-298-5753 • TDD 1-800-735-2964



	Per IECC 2015 Climate Zone 6	Final Design
Wall Construction	2x6 wood-framed with 5.5" high-density fiberglass in cavity R eff = 18.6	2x6 wood-framed (Advanced Framing Technique) with 5.5" fiberglass in cavity and 1.5" Zip R9 continuous R eff = 26.5
Roof Construction	Flat roof with 6" polyiso on roof R eff = 40.3	Flat roof with 6" polyiso on roof and 2" SPF above drywall ceiling R eff = 54
Glazing (U / SHGC)	Double Low-e U= 0.32 / SGHC= 0.30	Double Low-e U= 0.26 / SGHC= 0.30
Infiltration	7.0 ACH50 / 0.46 ACH nat (per NH amendment)	3.0 ACH50 / 0.21 ACH nat.
HVAC System	ASHP	Daikin VRF
Total Energy (KBTU)	1,580,555	840,760
Site EUI (KBTU/SF/YR)	35.2	18.7
Total Electric (KWH/YR)	463,194	246,391
Emissions (LBS CO2 / year)	622,532	331,150

Please accept this request to waive Puc 303.02 for 258 Heater Rd., Lebanon, in order to support affordable housing and promote energy efficient design within the affordable housing community. We accept that the waiver is effective for as long as the facility is operated as multi-family housing for low-income residents and that if it is no longer operated in this manner at some future time, then the waiver will no longer be effective, and the building owner will be required to install individual electric meters for each separate dwelling unit in the building. We would appreciate a decision as soon as possible, as we are slated to begin construction in June of 2021.

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 at 603-298-5753 or [ditha@lebanonhousing.org](mailto:ditha@lebanonhousing.org)

Sincerely,

Ditha Alonso



Executive Director, Lebanon Housing Authority, PO Box 5475, W. Lebanon, NH 03784