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July 11, 2023

VIA ELECTRONIC FILING

Ms. A. Shonta Dunston, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-1394

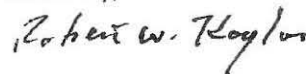
RE: APPLICATION FOR WAIVER, DOCKET NO. ER-144, SUB 0

Dear Ms. Dunston:

Enclosed for filing in the above-referenced docket, please find Charlotte Leased Housing Associates II, LLLP's Petition for a Waiver of Prohibition of Compliance with Master Metering Requirements Pursuant to N. C. Gen. Stat. § 143-151.42(b)(1),

Please do not hesitate to contact me if you have any questions.

Sincerely,



Robert W. Kaylor, P.A.

Enclosures

cc: Public Staff Legal, William E. H. Creech

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. ER-144, SUB 0

In the Matter of:)
 Application of Charlotte Leased Housing)
 Associates II, LLLP ("Charlotte Leased) APPLICATION FOR WAIVER
 Housing") Petition for a Waiver of)
 Prohibition of Compliance with Master)
 Metering Requirements Pursuant to N.C.)
 Gen. Stat. § 143-151.42(b)(1)

Charlotte Leased Housing II, LLLP ("Charlotte Leased Housing") ("Applicant") respectfully requests that the North Carolina Utilities Commission ("Commission") grant it approval to use master metering for a planned affordable housing multifamily residential property consisting of 150 residential apartments units ("the Apartments") located at CreekrIDGE on the Park, 7800 CreekrIDGE Road, Charlotte, North Carolina. In support of this request, Applicant shows the following:

1. The Apartments are located at 7800 CreekrIDGE Road in Charlotte, North Carolina.
2. Duke Energy Carolinas, LLC ("DEC") will install a master electric meter to serve the Apartment complex and Applicant will install property-owned submeters for each apartment and pass through electric rates and fees to the low-income tenant of each apartment.
3. Fixed fees from DEC for the master metering utility bill will be allocated by the number of apartments. The total master meter bill from DEC less fixed fees on the utility bill will be divided by the total kilowatt hours ("kWh") to arrive at the kWh per apartment cost. The kWh per apartment cost of electricity will then be multiplied by the

individual apartment submeter based on the actual amount of electricity usage for each apartment. Each apartment will only be invoiced/billed for the actual kWh recorded by the property-owned submeters during tenant occupancy.

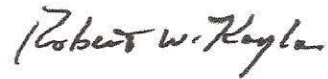
4. All North Carolina Utilities Commission (“NCUC”) rules and regulations regarding late fees, administrative charges, required minimum remittance due dates, and return check charges will be in accordance with NCUC Rule R-22. Individual apartment tenants will not be charged the cost of electricity from any other apartment or any common areas of the Apartment complex. There will be no “reselling” of electricity provided by DEC, only submetering of electricity via the DEC master meter to the individual apartments in the Apartment complex.

5. The Applicant will pay for all electricity provided by DEC through the master meter. Applicant is seeking authority from the Commission to bill the individual apartments via their submeters in accordance with N.C. Gen. Stat. § 62-110(h), and for an exemption from the master metering prohibition of N.C.G.S. § 143-151.42(a). Applicant will take the total bill each month for the master meter recording electricity used by the Apartment complex and bill each apartment as set forth in paragraph 3 above plus an administrative fee not to exceed \$3.75 per month.

WHEREFORE, for the reasons set forth above, Applicant submits that its master metering plan for the Apartment complex is in full accord with the spirit and letter of N.C. Gen. Stat. § 143-151.42 and respectfully requests that the Commission grant its request for approval of the master metering of the Apartment complex to be developed by Applicant at 7800 Creekridge Road, Charlotte, North Carolina and to authorize

Applicant to bill each Apartment its share of the cost of electricity that has been sub-metered by Applicant as set forth above and any further relief as the Commission deems just and proper.

Respectfully submitted this 11th day of July 2023.



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