

NEW HAMPSHIRE LEGAL ASSISTANCE

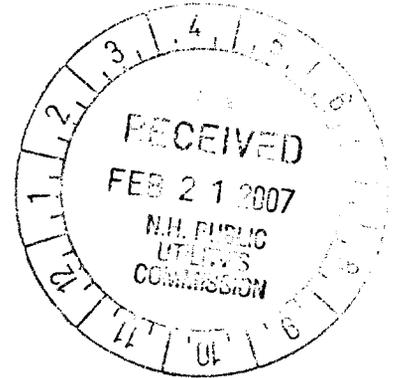
48 South Main Street, 2nd Floor  
Concord, NH 03301

Tel: (603) 223-9750 • Fax (603) 223-9794  
TTY: (800) 634-8989

February 21, 2007

Debra Howland  
Executive Director and Secretary  
NH Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301

Re: DG 06-107  
National Grid USA and KeySpan Corporation  
Petition For Approval of Merger Transaction



**Consumer Comment of The Way Home**

Dear Ms. Howland:

The Way Home submits the following comments with respect to the proposed merger of National Grid USA and KeySpan Corporation (KeySpan).

The Way Home and many of its clients are customers of KeySpan. The mission of The Way Home is to assist low income families obtain and retain affordable shelter and avoid homelessness. The attached brochure describes some of the activities and services provided by The Way Home.

The Way Home has had the opportunity to work with both National Grid and KeySpan for several years in other proceedings before this Commission. The Way Home and National Grid are each members of the Electric Assistance Program Advisory Board, which originated in 1997 as part of the Electric Restructuring docket in DR 96-150. Both The Way Home and National Grid are parties to the current Electric Assistance Program (EAP) docket, DE 07-009. In addition, The Way Home and National Grid have worked collaboratively as parties to the statewide Core Electric Energy Efficiency dockets. As a result of working with National Grid, The Way Home is aware of National Grid's firm support for the EAP, as well as National Grid's support for the low income Energy Efficiency program in DE 06-135, the current Core Electric Energy Efficiency Program docket.

Similarly, The Way Home has worked collaboratively with KeySpan in the Gas Energy Efficiency docket, DG 06-032, and is aware of KeySpan's firm support for the low income Gas Energy Efficiency program. Indeed, KeySpan has worked closely with the

Community Action Agencies to assure that quality energy efficiency measures and services are delivered expeditiously to as many low income households as possible within the limits of the low income energy efficiency budget.

It is The Way Home's positive working relationship with KeySpan that is the basis for The Way Home's comments with respect to the current merger proposal by the Companies in this docket.

Although not a party to this proceeding, it is the understanding of The Way Home, through its undersigned counsel, that in order for the Commission to approve this transaction, the transaction must meet certain statutory criteria, including the requirements that the transaction "will not have an adverse effect on rates, terms, service, or operation of the public utility within the state" (RSA 369:8, II(b)(1)), and that it be "lawful, proper and in the public interest" (RSA 374:33).

The Way Home, through its undersigned counsel, has reviewed the Companies' Joint Petition, the Pre-filed testimony and related attachments. The Companies agree in their Joint Petition that the legal tests to be applied by the Commission in determining whether to approve the proposed transaction are both the "no net harm" test as well as the "no adverse effect" on ratepayers test. Joint Petition, paragraphs 8 – 10. The Companies further assert in their Joint Petition that the public interest is served not only because "no net harm" results from the proposed transaction but also because "a positive benefit" to ratepayers will result. Joint Petition, paragraph 36. Indeed, the Companies state: "We are not seeking to maintain the status quo; we are aiming to provide affirmative benefits." Id.

As noted earlier, The Way Home has a substantial interest in the low income gas energy efficiency program. KeySpan has been successfully operating this program since 2002. As a result, many low income households, including clients of The Way Home, have significantly benefited from this program. At the same time, in meeting with KeySpan and other parties on a quarterly basis for several years to review the progress of the program, it is apparent that there is a high customer demand for the low income energy efficiency program. It has also become apparent that additional resources and increased funding is needed to meet this growing customer demand. The Way Home would like to see this valuable low income program not only continue, but also be expanded in order to meet the needs of the low income community.

The only mention of energy efficiency programs in the Joint Petition appears at the end of paragraph 17, and states only: "By working closely together, Energy North and Granite State Electric will be able to increase the impact of their efforts to publicize energy efficiency programs, implement low income programs, and coordinate community activities." Joint Petition, pages 15, 16. See also Direct Testimony of William Sherry, page 7 of 9, lines 13 – 16 (similar quote as above).

The Way Home respectfully suggests that in order to meet the public interest test and to fulfill the Companies' commitment to provide "a positive benefit" to ratepayers, approval of the proposed merger should be conditioned on the Companies' agreement to both continue

KeySpan's low income gas energy efficiency program, as well as to expand the program with an increased budget consistent with the capacity of the Community Action Agencies to serve additional low income households in KeySpan's service territory. The Way Home believes that this needed investment will provide "a positive benefit" for ratepayers and will be in the "public interest".

The Way Home appreciates the opportunity to submit these comments.

Sincerely,

A handwritten signature in cursive script that reads "Alan Linder".

Alan Linder  
Attorney for The Way Home

AL:blg

Enclosure

Cc:  
Service List DG 06-107  
Dianne Pitts, The Way Home

## The Way Home's mission is to

- help low income households obtain and keep safe, affordable housing with
- direct housing assistance services
- empowerment of low income tenants
- community advocacy for housing.

## The Community Benefits

- Homelessness is prevented.
- Tenants learn their responsibilities and rights.
- Families are helped with budgeting.
- Self-sufficiency is promoted.
- Medication detens evictions and vacancies.
- Long-term tenants improve neighborhoods.
- Children have stability in their homes.
- Landlords are guaranteed security deposits.
- Stable tenants pay rent and care for property.
- Apartment conditions are checked.
- Healthy living conditions are promoted.
- Children's health is protected.

## You Can Help

 **Contribute:** Send your tax-deductible donation to: The Way Home, 214 Spruce Street, Manchester, NH 03103.

 **Volunteer:** Call 603-627-3491 to learn how you can help The Way Home.

## Did you know?

In 1988, a United Way community network created Manchester's security deposit program.

In 1989, The Security Deposit Loan Fund of Gr Manch. was incorporated to continue this program.

In 1997, a new name, The Way Home, was selected to describe the full range of programs helping low income families and individuals become successful in safe, affordable housing.

In fifteen years of service, over 5,000 families and individuals have been housed with the help of the programs of The Way Home.

## They Tell Their Success Stories

 "When I applied for help, I was homeless and completely without resources. I want to thank you for being there for me."

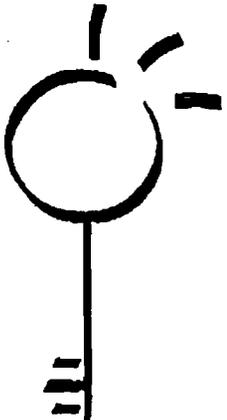
young mother with two children

 "We just want to let you know how grateful we really are, you have been very helpful, and also to let you know that I got the job and I love it."

family of four, homeless due to unemployment

 "I cannot thank you enough for all the help and support your office has given me. After all the running around to re-establish a place to call home for my girls and myself. After being rejected by so many places, I was giving up hope. Until I went to The Way Home ..."

mother homeless with her children to escape violence and abuse

  
**The Way Home**  
Providing keys to success in affordable housing

**Help prevent homelessness!**

**The Way Home**  
214 Spruce Street  
Manchester, NH 03103  
603-627-3491

The Way Home is funded by Heritage United Way.

## Use these Keys to Success

### Housing Services

- ▶ **Housing Counseling** includes
  - \* intervention to prevent loss of housing
  - \* assessment of needs
  - \* establishing housing-affordability plans
  - \* budget counseling
  - \* tenant education
  - \* apartment inspections
  - \* landlord negotiations.
- ▶ **Housing Assistance** includes
  - \* security deposit guarantees
  - \* special grants to prevent homelessness
  - \* mediation to prevent eviction.

**Security Deposit Guarantee:** In 1993 The Way Home's Security Deposit Guarantee became the model for the State of New Hampshire Housing Security Guarantee Program. While the landlord is guaranteed the security deposit, the tenant is helped to make budgeted monthly payments. By working with a housing counselor, the tenant is guided in solving problems that could result in homelessness.

**Rental Guarantee:** In 2000-02 a program to provide incentives to property owners to house homeless families with children was developed.

## in Affordable Housing

### Steps to Success

- ▶ **Finding The Winner Within ©**, gives participants empowerment tools designed to remove blocks to success, raise their self-esteem, and help them make decisions about what they allow to shape their lives.
- ▶ **Family Self-Sufficiency Coaching** teaches family goal-setting skills and coaches in steps to achieve goals.
- ▶ **Housing Advocacy** helps homeless and at-risk families to advocate on their own behalf with landlords and agencies to meet their safe, affordable housing needs.
- ▶ **Temporary Housing** helps families meet their immediate housing needs while assisting them to develop skills for success in safe, affordable housing. The facility combines six private apartments with common areas for family and community activities, tutoring, and comprehensive supportive services. **Eligibility:**
  - ◆ families with young children at risk of lead poisoning or other health problems due to hazards in the home
  - ◆ homeless families using our Steps to Success training with peer support.

The Way Home's 214 Spruce St. facility opened Spring 2002 as a Housing Resource Center with Temporary Housing for Families.

### Healthy Home Services

- ▶ **Housing Safety and Child Health** are linked in our unique services combine peer educators working with families in their homes with specialized cleaning and supportive services to reduce in-home environmental health hazards such as lead dust, asthma triggers, and head lice.
- ▶ **Lead Paint Hazard Reduction**, as a fee-for-service for property owners, includes consultation with our Licensed Lead Abatement Contractor on interior controls and lead-safe work practices. Healthy Home Services staff can assist with lead hazard reduction activities:
  - lead dust cleaning
  - paint stabilization
  - covering hazards, such as friction surfaces and chewable surfaces
  - replacement windows and clean-up.
- ▶ **Community Advocacy**
  - ◆ **Community Advocacy** works on low income housing issues with groups such as The NH Coalition to End Homelessness, the NH Housing Forum, and Manchester's Homeless Continuum of Care.