## The State of New Hampshire Public Utilities Commission

#### DE 17-136

#### Electric and Gas Utilities

2018-2020 New Hampshire Statewide Energy Efficiency Plan

# Petition for Intervention of The Way Home

Petitioner, The Way Home, petitions for leave to intervene in this proceeding pursuant to PUC 203.17 and RSA 541-A:32, and states as follows:

- The Way Home is located at 241 Spruce Street, Manchester, New Hampshire 03103
   (ph.) 603-627-3491. The Executive Director of The Way Home is Mary Sliney. The Housing Services Advocate of The Way Home is Dianne Pitts.
- 2. The Way Home is a non-profit 501(c)(3) organization that was incorporated in New Hampshire in 1989. It is currently registered and in good standing with the Office of the Secretary of State. The Way Home is funded by housing and homeless services program grants and charitable donations.
- 3. The Way Home is a commercial customer of Public Service Company of New Hampshire d/b/a Eversource Energy and of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities.
- 4. The mission of The Way Home is to help low income households obtain and retain safe, affordable housing and prevent homelessness in New Hampshire. The Way Home provides housing services to low income individuals and families in the Manchester area, including education, housing and budget counseling, security deposit guarantees, special grants to prevent homelessness, community advocacy, mediation services, and lead paint hazard reduction.

- 5. The Way Home has assisted over 21,000 families and individuals since opening in 1988. Its first program, a security deposit loan fund, was combined with rental housing counseling to teach tenants self-help skills, provide housing advocacy, and assist with landlord negotiations. In 1993 State Legislation used The Way Home's Security Deposit Program as its model in creating the New Hampshire Housing Security Guarantee Program, resulting in The Way Home securing housing for more than 6,000 families and individuals with over \$3.4 million in guarantees. As a HUD certified comprehensive housing counseling agency, The Way Home provides financial management education for homeless persons, renters, and homeowners at risk of foreclosure. In 1995 and 1997, these programs were expanded to include Healthy Home Services, which focuses on making housing conditions safe for children, and Steps to Success coaching, which helps homeless and at-risk households set and meet housing goals. In 2002, The Way Home renovated its first property as a Housing Resource Center, which now serves as a daytime facility for homeless and at-risk individuals, program offices, and seven transitional housing/shelter apartments for homeless children and their families. The Way Home has developed and/or taken over the management of supportive housing for several special needs populations, including chronically homeless individuals and homeless veterans, and has redeveloped several deteriorating and foreclosed multi-family properties to prevent family homelessness. In 2017, The Way Home managed 51 units of supportive housing.
- 6. The Way Home also owns and provides transitional housing units for low income families. These units use electricity provided by Eversource and natural gas provided by Liberty Utilities.
- 7. Due to their low incomes, clients of the Way Home may be eligible for and/or participate in the low income electric and natural gas energy efficiency programs.

- 8. The Way Home, clients of The Way Home, and families who reside in the transitional housing units of The Way Home have an interest in this proceeding and in how the Energy Efficiency Resource Standard (EERS) will be implemented through the 2018-2020 Statewide Energy Efficiency Plan. In particular, The Way Home is also interested in the budget, design, and implementation of the low income electric and natural gas energy efficiency programs.
- 9. The rights, duties, privileges, and other substantial interests of The Way Home and its clients may be affected by this proceeding.
- 10. The Way Home seeks the status of full party intervenor in this proceeding on behalf of its clients and the families who reside in its transitional housing units.
- 11. The Way Home was a party to the Settlement Agreement that the New Hampshire Public Utilities Commission approved on August 2, 2016, in Order No. 25,932 in Docket No. DE 15-137. That Settlement provided for the implementation of an EERS in New Hampshire beginning in 2018 through the draft plan that is the subject of this proceeding. *See Electric and Gas Utilities*, Order No. 25,932 (August 2, 2016) at 41. The Way Home would like to continue working with other stakeholders to achieve the energy efficiency goals that were adopted by the Commission in Order No. 25,932 and to enable the low income energy efficiency programs to serve as many low income families as possible.
- 12. The Way Home has been an intervenor in and party to other electric and natural gas dockets since 2006 pertaining to issues affecting low income electric and natural gas customers.
- 13. The Way Home is represented by New Hampshire Legal Assistance in this proceeding. New Hampshire Legal Assistance has represented low income individuals and organizations before this Commission in numerous electric and gas proceedings.

- 14. The granting of this petition will not impair the prompt and orderly conduct of this proceeding, will not result in delay, and will not prejudice the interest of any party.
- 15. The interests of justice will be promoted by allowing the intervention of The Way Home in this proceeding.

Wherefore, The Way Home requests that the Commission grant its request for leave to intervene as a full party intervenor in this proceeding and for such other relief as may be just.

Respectfully submitted, The Way Home

By Its Attorney

New Hampshire Legal Assistance

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### Certification of Service

I certify that on this date copies of this petition were hand delivered to the Commission and filed electronically, and copies were sent electronically to the Office of the Consumer Advocate and parties on the email list in this docket.

New Hampshire Legal Assistance

Raymond A. Burke

Attorney for The Way Home