

STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

Public Service Company of New Hampshire d/b/a Eversource Energy
Notice of Intent to File Rate Schedules
Docket No. DE 19-057

Petition for Intervention of
The Way Home

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

1. The Way Home is located at 241 Spruce Street, Manchester, New Hampshire 03103. 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 with 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. Petitioner is a commercial customer of Public Service Company of New Hampshire d/b/a Eversource Energy.

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 22,000 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 day-time 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 2018, 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.

7. Many clients of The Way Home receive service under the Company's residential rate R. Due to their low incomes, clients of the Way Home may be eligible for and/or participate in the low income electric energy efficiency program administered by Eversource and the New Hampshire Electric Assistance Program, which is funded through the System Benefits Charge collected by Eversource.

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.

9. The rights, duties, privileges, and other substantial interests of The Way Home and its clients will be affected by this proceeding. In particular, The Way Home is concerned about the bill impact on low income customers who tend to experience higher energy burdens compared to non-low income customers. While the Company proposes adjusting temporary rates for each rate class on a uniform percentage basis, the impact on a customer's bill will vary by rate class and within each rate class, as well as by level of consumption by residential customers.

10. Even though low income customers tend to use less energy and spend less on energy overall, they spend a larger proportion of their income on energy than non- low income customers. These high energy burdens can result in low income families having to choose between paying their utility bill and affording other basic necessities. As a result, The Way Home is concerned that lower use customers will experience a higher percentage increase in their bills based on the Company's proposal. For example, within the residential rate class, the attachments to the temporary rate testimony (EAD-5, pg. 1 of 23, Customer Bill Comparisons) show that lower use customers experience higher percentage rate increases than higher use customers. This significantly impacts low income, low use customers with respect to both temporary rates and permanent rates.

11. The Way Home is also interested in other issues in this docket that are not reflected in the Company's petition for temporary rate schedules but that could be present in the Company's petition for permanent rate schedules. These concerns include the fixed customer charge, proposals with respect to automatic rate adjustments and customer arrearages, and the impact on low income customers with disabilities whose medical conditions require more substantial usage

to meet their medical needs. In addition, The Way Home is concerned whether the Company's single block, flat residential rate design is fully consistent with the goals of conservation and energy efficiency.

12. 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.

13. 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. The Way Home also participates in the Electric Assistance Program Advisory Board.

14. 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, gas, and telecommunication proceedings.


15. 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.

16. 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


Raymond Burke
Stephen Tower

5/17/2019
Date


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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 Commission Staff, the Office of the Consumer Advocate, and parties on the email list in this docket pursuant to Puc 203.17.

5/17/2019
Date

New Hampshire Legal Assistance


Raymond Burke
Attorney for The Way Home