

THE STATE OF NEW HAMPSHIRE
BEFORE THE PUBLIC UTILITIES COMMISSION

Docket No. DE 19-057

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY
Petition for Permanent Increase to Distribution Rates

AARP NEW HAMPSHIRE PETITION FOR LEAVE TO INTERVENE

Pursuant to the New Hampshire Public Utilities Commission's (Commission's) Order No. 26,256 dated June 7, 2019 in this proceeding, New Hampshire Code Administrative Rules Puc 203.17 and Puc 203.02, and in accordance with the standards of RSA 541-A:32, AARP New Hampshire¹ hereby respectfully requests an order from the Commission granting it leave to intervene as a party in the above-captioned proceeding.

In support of this petition, AARP New Hampshire states as follows:

1. AARP, with its nearly 38 million members in all 50 States and the District of Columbia, Puerto Rico, and U.S. Virgin Islands, is a nonpartisan, nonprofit, nationwide organization that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection from financial abuse. Many of our members are on low or fixed incomes. They struggle to make ends meet. AARP has over 225,000 members in New Hampshire, many

¹ In 1999, the "American Association of Retired Persons" changed its name to simply "AARP," in recognition of the fact that people do not have to be retired to become members. In this proceeding AARP will identify itself as AARP New Hampshire, to reflect its focus on the issues and interests of concern to New Hampshire members of AARP.

of whom are residential electric customers of Eversource Energy (“Eversource” or “Company”).

2. AARP New Hampshire’s interest in this matter and its grounds for intervention relate to the substantial (and above system average) electric rate increases proposed by Company for the residential customer class, along with proposed customer charge hikes, and a new proposed surcharges, including a Distribution Rate Adjustment Mechanism (DRAM), as well as decoupling mechanism. AARP has weighed in on similar issues in utility rate case filings across the country. AARP also has concerns related to these and other rate design changes that may yet be proposed in this proceeding by other parties. AARP New Hampshire desires to advocate on behalf of those residential electric customers to help ensure that their rates are no higher than a just and reasonable level.

3. AARP New Hampshire has retained utility rate expert Scott J. Rubin, and plans to offer his testimony with regard to the proposed decoupling charges, and the expansive DRAM proposal, as well as provide critical analysis on residential customer charges. AARP New Hampshire will provide a unique perspective on these issues and on how such rate proposals can adversely impact older energy consumers. Intervention will allow AARP New Hampshire to share its expert testimony in the record of this matter and will assist the Commission by offering a broader array of perspectives on these important issues.

4. More specifically, AARP New Hampshire’s interest relates to how Company’s rate increase proposal may directly and adversely impact those customers who are aged 50 and over. People aged 50 and over are generally more vulnerable to increases in energy prices. These consumers also tend to devote a higher percentage

of their total spending towards residential energy costs than do other age groups. Many older consumers also have special needs and safety concerns regarding their access to electric service. Accordingly, the New Hampshire members of AARP and AARP have substantial interests that may be affected by this proceeding.

5. AARP New Hampshire's specific interests in this proceeding are not exclusively nor adequately represented by other parties, given the unique understanding and perspective of AARP New Hampshire with respect to the interests of older Americans. AARP New Hampshire submits that its intervention and participation in this proceeding would serve the public interest. Accordingly, AARP New Hampshire seeks to become a party to this case in order to participate as a full party in all respects. Moreover, AARP New Hampshire will assure that its intervention will not unduly delay the proceedings nor prejudice the rights of any other party. AARP New Hampshire accepts the procedural schedule as it is currently established. Further, AARP New Hampshire expects no party other than AARP New Hampshire may oppose the automatic rate increase mechanism known as decoupling. Therefore, without AARP New Hampshire's intervention, the record may lack important information and argument regarding the negative impact of such proposal on consumers, which is necessary for a fair consideration of the issue.

6. AARP New Hampshire is aware that this petition to intervene is not filed within the deadline for intervention requests set in Order No. 26,256. AARP New Hampshire has only recently been able to complete the administrative process to secure legal representation for formal participation in this case. AARP New Hampshire will accept the current procedural posture of this proceeding as it stands, and will present its

recommendations in this matter in the form of written testimony within the procedural dates established by the Commission. AARP New Hampshire intends to file its testimony by the currently scheduled deadline of December 20, 2019, as required by the procedural schedule.

7. AARP New Hampshire agrees to accept electronic service. Service of any document or orders in this matter should be addressed to:

John B. Coffman (MO Bar #36591)
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Phone: 573-424-6779
Email: john@johncoffman.net

Joseph G. Donahue (ME Bar #1342)
Preti Flaherty Beliveau & Pachios, LLP
PO Box 1058
45 Memorial Circle
Augusta, ME 04333-1058
Phone: 207-623-5300
Email: jdonahue@preti.com

WHEREFORE, AARP New Hampshire respectfully requests that the Commission grant its Petition for Leave to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,



/s/ John B. Coffman

John B. Coffman (MO Bar #36591)
Attorney and Rate Consultant
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Phone: 573-424-6779
Email: john@johncoffman.net

Joseph G. Donahue (ME Bar #1342)
Preti Flaherty Beliveau & Pachios, LLP
PO Box 1058
45 Memorial Circle
Augusta, ME 04333-1058
Phone: 207-623-5300
Email: jdonahue@preti.com

Dated: December 6, 2019

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the original and six (6) copies of the foregoing were hand delivered to the New Hampshire Public Utilities Commission and that electronic copies of the foregoing have been served via electronic filing with the New Hampshire Public Utilities Commission and with the Office of the Consumer Advocate and to the official electronic service list in Docket No. DE 19-057, on this 6th day of December, 2019.



Joseph G. Donahue, Esq.
Preti Flaherty Beliveau & Pachios, LLP
PO Box 1058
45 Memorial Circle
Augusta, ME 04333-1058
Phone: 207-623-5300
Email: jdonahue@preti.com