

STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

Residential Low Income Assistance Program for Natural Gas Customers
Consideration of Program Design Change
Docket No. DG 20-013

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 214 Spruce Street, Manchester, New Hampshire 03103. The Executive Director of The Way Home is Bianka Beaudoin, and the Chief Operating Officer is Mary Sliney.

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 gas customer of Liberty Utilities (Energy North 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 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 gas provided by Liberty Utilities.

7. Many clients of The Way Home receive service under the Liberty Utilities' residential rate. Due to their low incomes, clients of The Way Home may be eligible for and/or participate in the residential low income assistance program (RLIAP) for gas customers. The Way Home often

counsels low income individuals and families about their housing costs, which includes the cost of their utilities. It is not uncommon for The Way Home to help clients resolve issues with their utility company when a client is struggling to afford service.

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 that will result from any program changes since low income customers tend to experience higher energy burdens compared to non-low income customers. Changes to the design of the RLIAP will have a significant impact on The Way Home and its clients. The Way Home is also concerned about whether the program is sufficiently reaching eligible gas customers.

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 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.

12. 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.

13. 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.

14. 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

3/10/20
Date




Stephen Tower
Raymond Burke
117 North State Street
Concord, NH 03301
Phone No. (603) 223-9750
Email: rburke@nhla.org
Email: stower@nhla.org

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.

New Hampshire Legal Assistance

3/10/20
Date



Stephen Tower
Attorney for The Way Home