

STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION

ELECTRIC AND GAS UTILITIES

2021-2023 Triennial Energy Efficiency Plan

Docket No. DE 20-092

**PETITION FOR INTERVENTION OF  
LISTEN COMMUNITY SERVICES**

Petitioner, LISTEN Community Services, moves for leave to intervene in this proceeding pursuant to Puc 203.17 and RSA 541-A:32, and states as follows:

1. LISTEN Community Services is located at 60 Hanover Street, Lebanon, NH 03766. The Executive Director of LISTEN is Kyle Fisher, and the Programs Services Director is Angela Zhang. LISTEN is a non-profit 501(c)(3) organization that was incorporated in New Hampshire in 1972. It is currently registered with and in good standing with the Office of the Secretary of State.
2. LISTEN is a commercial electric customer of Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty. LISTEN's original purpose was to "involve the low-income citizens of Lebanon and surrounding areas in programs which will improve their ability to meet the economic, cultural, social and environmental needs of their families." LISTEN currently envisions an Upper Valley community generously supporting individuals and families in their efforts to achieve and maintain successful independence. LISTEN's Housing Helpers and Heating Helpers programs are a critical part of the Upper Valley's safety net by providing assistance to individuals and families, especially the elderly and those with young children, who are struggling to cover their housing and utility costs.

3. LISTEN has participated in the statewide energy efficiency program that is the subject of this docket. LISTEN greatly benefited from its participation in the program and hopes to take advantage of the program again in the future.

4. Many of LISTEN's clients are eligible for the Home Energy Assistance (HEA) Program, the Weatherization Assistance Program (WAP), and the Fuel Assistance Program (FAP). LISTEN regularly helps its clients apply for HEA, WAP, and FAP through their local Community Action Agency. At least one of LISTEN's clients was scheduled to receive energy efficiency measures through the HEA Program in early 2022, but her project has been suspended indefinitely. She contacted LISTEN because she is concerned that she will not be able to afford her heating costs this winter as a result.

5. Therefore, LISTEN and its clients have an interest in this proceeding and will be directly affected by the joint utilities' proposed energy efficiency plan to be filed on March 31, 2022.

6. LISTEN intends to provide input to the utilities about the proposed plan and seeks the status of full party intervenor in this proceeding on behalf of its clients to participate in the proposed hearings to review the new plan.

7. LISTEN 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.

8. The rights, duties, privileges, and other substantial interests of LISTEN and its clients will be affected by this proceeding.

9. 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.

10. In addition, the interests of justice will be promoted by allowing the intervention of LISTEN in this proceeding.

11. LISTEN can provide a unique perspective that is not currently represented by any party in the proceeding as The Way Home no longer exists. LISTEN agrees to adopt the prior positions of The Way Home to the extent that is necessary for the orderly and prompt resolution of this proceeding. However, LISTEN is seeking intervention to review the new plan, which will require additional discovery, testimony and hearings to approve the plan.

12. On January 21, 2022, the joint utilities filed a proposed procedural schedule that contemplates hearing dates on April 25, 2022 and April 26, 2022. Since LISTEN is filing this petition at least three days prior to the proposed hearing dates to review the new plan, LISTEN respectfully requests that the Commission grant its petition pursuant to RSA 541-A:32, I.

13. Alternatively, the Commission has authority to grant LISTEN's petition pursuant to RSA 541-A:32, II should the Commission somehow determine that RSA 541-A:32, I does not apply at this point in the docket.

14. LISTEN respectfully requests that the Commission issue an order granting this petition by March 31, 2022 so that LISTEN can participate fully in the technical session and discovery planned for April 2022.

Wherefore, LISTEN respectfully requests that the Commission:

- A. Grant its request for leave to intervene as a full party intervenor in this proceeding; and
- B. Grant such other relief as may be just and appropriate.

Respectfully submitted,  
LISTEN

By Its Attorney  
New Hampshire Legal Assistance

1/21/2022  
Date

/s/ Raymond Burke  
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Certification of Service

I hereby certify that on this date a copy of this petition was filed electronically with the Commission, and a copy was sent electronically to the service list in Docket No. DE 20-092 consistent with the secretarial letter of March 17, 2020.

New Hampshire Legal Assistance

1/21/2022  
Date

/s/ Raymond Burke  
Raymond Burke, Esq.  
Attorney for LISTEN