STATE OF NEW HAMPSHIRE before the PUBLIC UTILITIES COMMISSION

Unitil Energy Systems, Inc. Request for Change in Rates Docket No. DE 21-030

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 Chief Executive Officer of The Way Home is Bianka Beaudoin. The Chief Operating Officer of The Way Home 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. 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, including education, housing and budget counseling, security deposit guarantees, special grants to prevent homelessness, community advocacy, mediation services, and lead paint hazard reduction.
- 4. 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 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 2018, The Way Home managed 51 units of supportive housing. The Way Home also owns and provides transitional housing units for low income families.

- 5. The Way Home participates in the Statewide Continuum of Care on Homelessness, which addresses issues related to accessing affordable housing throughout the state.
- 6. The Way Home is a member of the Electric Assistance Program Advisory Board and has participated in dockets to review and approve the Home Energy Assistance Program. Many clients of The Way Home are eligible for and/or are enrolled in the Electric Assistance Program and the Home Energy Assistance Program, which is funded through the System Benefits Charge collected by Unitil Energy Systems, Inc. ("the Company").

- 7. Many clients of The Way Home are eligible for and/or are enrolled in other low income utility assistance programs such as the Fuel Assistance Program, the Residential Low Income Assistance Program for Natural Gas Customers, Neighbor Helping Neighbor, and other programs administered by the state or other social services agencies.
 - 8. The Way Home seeks the status of full party intervenor in this proceeding to address the Company's Arrearage Management Proposal.
- 9. The Way Home and clients of The Way Home have a substantial interest in this proceeding.
 - 10. The interests of justice will be promoted by allowing the intervention of The Way Home in this proceeding.
 - 11. 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.
 - 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. Recently, The Way Home was a party in Docket No. DE 19-057 where the Commission approved a similar Arrearage Management Program for the customers of Public Service Company of New Hampshire d/b/a Eversource Energy via Order No. 26,433. The Way Home continues to participate in the development of Eversource's Arrearage Management Program through the New Start Stakeholder Group that recently filed a report on April 15, 2021 in Docket No. DE 19-057.
 - 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, gas, and telecommunication proceedings.

- 14. The rights, duties, privileges, and other substantial interests of The Way Home and its clients will be affected by this proceeding. The Way Home serves clients who move into Unitil's service territory. The creation of an Arrearage Management Program will not only impact low income customers in Unitil's service territory but will also impact ratepayers throughout the state who access low income utility assistance programs to help pay utility arrears.
 - 15. The interests of justice will be promoted by allowing the intervention of The Way Home in this proceeding because The Way Home's decades of experience serving low income ratepayers can inform the creation of Unitil's Arrearage Management Program to help ensure the program will achieve its goals. The Way Home can provide valuable insight about the impact the program will have on low income ratepayers and how the Arrearage Management Program will interact with other utility assistance programs.
 - 16. The Way Home's participation also promotes the interests of justice in order to ensure that different Arrearage Management Programs in New Hampshire are somewhat consistent across service territories so that similarly situated low income customers are treated fairly and equitably regardless of their geographical location.
 - 17. The Way Home has been authorized to state that the Office of the Consumer Advocate supports the granting of this petition.

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 4/19/21 Date By Its Attorneys New Hampshire Legal Assistance

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Certification of Service

I certify that on this date copies of this petition were filed electronically with the Commission, and copies were sent electronically to the Commission Staff, the Office of the Consumer Advocate, and parties on the service list in this docket pursuant to Puc 203.17.

New Hampshire Legal Assistance

Stephen Tower

Attorney for The Way Home