

STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

Low Income Electric Assistance Program
2022-2023 Electric Assistance Program Budgets

Docket No. DE 22-043

**PETITION FOR INTERVENTION OF
LISTEN COMMUNITY SERVICES**

LISTEN Community Services (LISTEN) hereby petitions to intervene in the above captioned proceeding pursuant to Puc 203.17 and RSA 541-A:32 and states as follows:

1. LISTEN is located at 60 Hanover Street, Lebanon, NH 03766. The Executive Director 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 aiding individuals and families, especially the elderly and those with young children, who are struggling to cover their housing and utility costs.

3. Many of LISTEN's clients are eligible for the Electric Assistance Program (EAP) discount, and LISTEN regularly helps its clients apply for the EAP. LISTEN also helps clients

resolve issues with their utility company when a client is struggling to afford service and facing a potential disconnection.

4. LISTEN is a party in Docket No. DE 21-133. In Order No. 26,576, the Commission stated that Docket No. DE 21-133 would address whether the EAP meets certain statutory requirements, whether it is sufficiently targeted to serve lower income households, whether enrollment can be increased, and whether administrative costs can be reduced. Order No. 26,576 at 3.

5. On March 16, 2022, the Commission approved the parties' joint motion to hire a consultant to review and evaluate EAP and to suspend Docket No. DE 21-133 so that the EAP Advisory Board and the parties could review the consultant's report before addressing the issues in the docket.

6. However, on August 11, 2022, the Commission issued a Procedural Order directing the parties to file the consultant's report, written recommendations, and the EAP Advisory Board's recommendations in Docket No. DE 22-043, rather than in Docket No. DE 21-133, on or before October 3, 2022.

7. Therefore, the rights, duties, privileges, and other substantial interests of LISTEN and its clients will be affected by this proceeding.

8. While the Commission has not yet issued an Order of Notice in Docket No. DE 22-043, LISTEN submits this petition now to seek the status of full party intervenor in Docket No. DE 22-043 so that so that it can fully participate in the docket and any proceedings that will address the consultant's report and recommendations as well as the issues initially raised in Docket No. DE 21-133.

9. Since the parties are required to make certain filings by October 3, 2022, LISTEN respectfully requests that this petition be granted as soon as possible so that LISTEN can participate in any communications with the parties to Docket No. DE 22-043.

10. LISTEN also has a substantial interest in the review and approval of the 2022-2023 EAP budgets that are the subject of Docket No. DE 22-043.

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 Department of Energy, the Office of the Consumer Advocate, the EAP Administrator on behalf of the Community Action Agencies, Public Service Company of New Hampshire d/b/a Eversource Energy, Unitil Energy Systems, Inc., Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty, and the New Hampshire Electric Cooperative, Inc. assented to the relief requested in this petition.

13. LISTEN is represented by New Hampshire Legal Assistance in Docket No. DE 21-133 and 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 interests of justice will be promoted by allowing the intervention of LISTEN in this proceeding.

Wherefore, LISTEN respectfully requests that the Commission grant its petition for leave to intervene as a full party intervenor in this proceeding as soon as possible and for such other relief as may be just.

Respectfully submitted,
LISTEN

By Its Attorney
New Hampshire Legal Assistance

9/20/2022
Date

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

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 lists in Docket Nos. DE 22-043 and DE 21-133 consistent with the secretarial letter of March 17, 2020.

New Hampshire Legal Assistance

9/20/2022
Date

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