

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

ELECTRIC AND GAS UTILITIES

2024-2026 Triennial Energy Efficiency Plan

Docket No. DE 23-068

**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 Rob McGregor, 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 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), the Fuel Assistance Program (FAP) and the Electric Assistance Program (EAP). LISTEN regularly helps its clients apply for HEA, WAP, FAP, and EAP through their local Community Action Agency.

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 filed on June 30, 2023

6. LISTEN 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, especially with respect to the HEA Program.

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 because it is uniquely positioned to speak to the impact this plan will have on low-income households in New Hampshire.

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

7/21/2023
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 23-068 consistent with the Commencement of Adjudicative Proceeding and Notice of a Prehearing Conference and the secretarial letter of March 17, 2020.

New Hampshire Legal Assistance

7/21/2023
Date

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