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August 7, 2024

Public Utilities Commission 21 South Fruit Street,
Suite 10 Concord, NH 03301

Re: Order No. 27,031

To the PUC:

New Hampshire Hunger Solutions is writing to express its concerns about the Commission's recent decision in Order No. 27,031 that was issued on July 9, 2024. The Order would reduce the income eligibility threshold of the Electric Assistance Program and result in thousands of low-income households losing their current EAP discount.

In the last year, a growing number of households in New Hampshire (NH) have reported they are having difficulty paying for their usual household expenses and that they have not had sufficient food. We know that many of these households have incomes at or above 200% of the Federal Poverty Level (which, for a family of 3 would be \$51,640, a figure less than 60% of the median household income, which would be \$54,507). In fact, as recently as June of this year, over 16,000 households with incomes over \$100,000 reported sometimes not having enough to eat. Among adults 65 or older in NH, 1,688 said it was somewhat or very difficult to pay for usual household expenses and 11,096 lived in households that reported having insufficient food.¹

When the federal pandemic waivers that allowed all children to eat free meals in public schools ended last year, New Hampshire Hunger Solutions heard from many working parents and from schools that the additional expense of meals for their children, coupled with rising housing, utility and food costs was making it difficult to make ends meet (Reduced price meal income limit is 185% of the Federal Poverty Level). These data make clear that this is not the time to further burden working families.

Electric assistance is critical for low-income working poor families and households with fixed incomes who are increasingly facing economic burdens. Doing anything to restrict eligibility for

¹ Census Household Pulse Survey - May 28 - June 24, 2024

this critical program will put even further stress on New Hampshire households, with negative effects on the health and safety of our residents.

With Eversource bills recently increasing by 5% and Eversource seeking a total increase of 16-17% for the average customer in the pending rate case, the Public Utilities Commission should be doing everything in its power to connect more households to the Electrical Assistance Program. Changing the eligibility formula would effectively add another rate increase to many households, disconnecting them from needed assistance and likely increasing food insecurity for working families who will struggle to keep on heat and lights.

We know many working families face “benefit cliffs” across public programs - this is when a small increase in income renders them ineligible for benefits they have been receiving. The PUC’s eligibility change would not promote financial security of low-income working families, but would punish work. New Hampshire Hunger Solutions encourages the PUC to reconsider changing the eligibility requirements in any way that would result in a restriction of assistance.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Laura Milliken". The signature is fluid and cursive, with a long horizontal stroke at the end.

Laura Milliken
Executive Director

"It's in reference to Docket
No. DE 22-043"