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NHPUC IR 20-089 Investigation into the effects of the COVID-19 Emergency on Utilities and Utility Customers

Good afternoon. My name is Stephen P. St. Cyr. I manage 3 small sewer companies regulated by the NHPUC. Bedford Waste Services in Bedford, NH has 78 customers. Bodwell Waste Services in Manchester & Londonderry, NH has 528 customers. Lorden Commons Sewer Co. in Londonderry, NH has 47 customers. I also work with a lot of water companies regulated by the NHPUC. Today, I'm representing the 3 small sewer companies.

I appreciate the opportunity to participate in the status conference, comment on customer and employee safeguards, etc. and provide feedback on the proposed reporting requirements.

As indicated in the NHPUC order of notice, Governor Sununu issued emergency order #3 dated March 17, 2020 which temporarily prohibited "all provider of electric, gas, water, telephone, cable, VOIP, internet, and deliverable fuels service in NH from disconnecting or discontinuing service for non-payment while the State of Emergency remains in effect."

Please note that the order does not, and I repeat does not, address providers of sewer service. I'm not sure why providers of sewer service were excluded. Perhaps, it was because the providers of sewer service do not have the ability to disconnect or discontinue service for non-payment. We simply cannot shut off the sewer service. Since the order does not address providers of sewer service, then the sewer companies do not need "assistance and guidance ... in implementing the provision of the order." As such, Bedford, Bodwell and Lorden respectfully request being excluded from the investigation and being exempt from the proposed monthly reporting requirement.

Having made that request, the 3 sewer companies have no employees. However, we do have two contractors that wear masks, practice social distance, wash their hands and clean equipment, etc. Our contractors have very little contact with customers. Since each of the 3 sewer companies have fixed, quarterly rates. There is no change to the sales forecast. The companies continue to bill on a quarterly basis. Its last bills were issued April 1, 2020 and its next bills will be issued July 1, 2020. At this point, the companies' cash flow and receivables seem to be holding steady.

With respect to the proposed monthly reporting requirements, to the extent that the sewer companies have to comply, Bedford, Bodwell and Lorden would prefer to report quarterly. It should be noted that the reporting requirements appear to be design for Eversource and the larger utilities. Perhaps, the small utilities should be asked to meet fewer requirements and/or report less frequently, i.e., quarterly? Reporting requirement #2 is particularly onerous. As I stated earlier, the 3 sewer companies have no employees, which would mean that they would have to contract out the additional reporting requirements. The last thing that the 3 sewer companies need is more reporting requirements and more costs.

Getting back to the request on behalf of the 3 sewer companies, we respectfully request that Bedford, Bodwell and Lorden be excluded from the investigation and be exempt from the proposed monthly reporting requirements.

I'm available for any questions or comments.

Thanks,
Steve
6/17/20