



Environmental Law ▪ *Utility Law*

Marcia A. Brown
Attorney at Law

October 18, 2023

VIA ELECTRONIC DELIVERY

Matthew Young, Esq.
Regulatory Division
Department of Energy
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: DW 22-058 Bedford Waste Services Corporation
Permanent Rate Proceeding
Responses to Department of Energy Set 3 Data Requests

Dear Attorney Young:

Enclosed please find Bedford Waste Services Corporation's responses to the Department of Energy's third set of data requests. Please do not hesitate to contact me if the Department has any questions about the attached.

Thank you.

Very Truly Yours,

A handwritten signature in cursive script that reads "Marcia A. Brown".

Marcia A. Brown

cc: Discovery Related Service List for DW 22-058

Bedford Waste Service Corporation
DW 22-058

Permanent Rate Proceeding
Responses to DOE Data Requests – Set 3

Date Request Received: 10/6/2023:
Request No. DOE 3-1

Date of Response: 10/18/23
Witness: Stephen P. St. Cyr:

REQUEST:

Re: Attachment A, pages 14, 16, 18

Please explain why costs to draft an engagement letter should be borne by Bedford customers and not borne by Stephen P. St. Cyr & Associates as a cost of gaining business.

RESPONSE:

As the DOE and PUC know, Stephen P. St. Cyr & Associates (“SPS&A”) provides management and other services to Bedford. The management agreement specifically does not provide for rate case services. As such, both parties thought that it would be good business practice to document the rate case services, both for itself, the PUC, the DOE, and other potential parties to the proceeding and Bedford customers. The engagement letter identifies the services to be provided and the related costs. In that regard, it was the formalization of the contract between the parties. The engagement letter was not a “cost of gaining business” because that RFP step was not required under the rules.

**Bedford Waste Service Corporation
DW 22-058**

Permanent Rate Proceeding
Responses to DOE Data Requests – Set 3

Date Request Received: 10/6/23:
Request No. DOE 3-2

Date of Response: 10/18/23
Witness: Stephen P. St. Cyr:

REQUEST:

Re: Attachment A, page 30, March 16

Please explain why costs related to the 2021 PUC Annual Report are included as rate case expenses and rather than being included as part of the Management Agreement matrix.

RESPONSE: The costs related to the 2021 PUC Annual Report were incurred in response to Atty. Brown's request for a copy of the 2021 PUC Annual Report to be included as an exhibit (See Exh. 2 of exhibits list) during the temporary rate hearing. SPS&A provide the 2021 PUC Annual Report to her for inclusion as an exhibit in the rate case. The costs were not incurred as part of the management agreement or any DOE audit.

Bedford Waste Service Corporation
DW 22-058

Permanent Rate Proceeding
Responses to DOE Data Requests – Set 3

Date Request Received: 10/6/23:
Request No. DOE 3-3

Date of Response: 10/18/23
Witness: Stephen P. St. Cyr:

REQUEST:

Re: Attachment A, page 38

Please explain why costs related to the Company's Affiliate Agreement are included as rate case expenses rather than being included as part of the Management Agreement matrix.

RESPONSE: The costs related to the Company's Affiliate Agreement were incurred in response to Atty. Brown's request to file the Affiliate Agreement in accordance to the Settlement Agreement on Permanent Rates (See 4.6 of the Terms of Agreement). For these reasons, these costs were related to the prosecution of the rate case.

**Bedford Waste Service Corporation
DW 22-058**

Permanent Rate Proceeding
Responses to DOE Data Requests – Set 3

Date Request Received: 10/6/23:
Request No. DOE 3-4

Date of Response: 10/18/23
Witness: Stephen P. St. Cyr:

REQUEST:

Re: Attachment A, pages 68 – 74

Please provide the hour and rate information to support each of the amounts charged to the rate case.

RESPONSE: See attached (as Attachment DOE 3-4) revised April – August 2023 LMC billings with hours and hourly rate reflected.

Also, attached is the actual (instead of the actual up to Sept. 15, 2023) Sept. 2023 and October 2023 and 4th Quarter estimate LMC billing, which includes the hours and hourly rate; as well as updated actual and estimated invoices from NH Brown Law for September 2023 and October 2023; and SPS&A for September 2023 and October 2023. The summary of rate case expenses has been updated to include these costs.

Bedford Waste Service Corporation
DW 22-058

Permanent Rate Proceeding
Responses to DOE Data Requests – Set 3

Date Request Received: 10/6/23:
Request No. DOE 3-5

Date of Response: 10/18/23
Witness: Stephen P. St. Cyr:

REQUEST:

Re: Attachment B

Please provide a copy of the EXCEL spreadsheet for Attachment B.

RESPONSE: Please see Attachment DOE 3-5.

Bedford Waste Service Corporation
DW 22-058

Permanent Rate Proceeding
Responses to DOE Data Requests – Set 3

Date Request Received: 10/6/23:
Request No. DOE 3-6

Date of Response: 10/18/23
Witness: Stephen P. St. Cyr:

REQUEST:

Re: Puc 1905.03(e) – (h)

Regarding the rate case expenses submitted for recovery, please provide the following:

- a) A statement that the expenses are consistent with the Company's written procurement policy. (If available.) (Puc 1905.03(e)).
- b) A copy of the Company's procurement policy in place at the time the expenses were incurred. (If available.) (Puc 1905.03(f)).
- c) A copy of the contract (where applicable) entered into that generated the expense. (Puc 1905.03(g)).
- d) A statement of whether the contract (where applicable) was obtained after negotiations or competitive bid. (Puc 1905.03(h)).

RESPONSE:

- a) The expenses incurred as part of the Bedford rate case filing are consistent with the Company's procurement policies.
- b) The Company does not have a written procurement policy. The Company's practice is to consult with the owner's representative with regards to the available options and to review and consider the best option for the best price for the best service.
- c) See attached Attachment DOE 3-6(c)i, Attachment DOE 3-6(c)ii, and Attachment DOE 3-6(c)iii (confidential and redacted)

Pursuant to Puc 203.08, Bedford Waste Service Corporation has a good faith basis for seeking confidential treatment of the attachments. Bedford Waste Service Corporation has submitted a motion for confidential treatment regarding said documents to the Commission.

- d) Puc 1905.04 requires regulated public utilities serving 600 customers or more to acquire service providers through a competitive bidding process. Bedford does not have 600 customers; it has 78 customers. Therefore the competitive bidding provision does not apply to it. Nonetheless, Bedford entered into contracts with Stephen P. St. Cyr and Associates, LaMontagne Management Corp, and NH Brown Law, PLLC to provide services for Bedford's rate case filing because Bedford is aware that these providers have fees that are competitively lower than others in their respective specialty. Please note that services provided by Steven E. Patnaude and Doug Brogan were retained by the Commission.

Bedford Waste Service Corporation
DW 22-058

Permanent Rate Proceeding
Responses to DOE Data Requests – Set 3

Date Request Received: 10/6/23:
Request No. DOE 3-7

Date of Response: 10/16/23
Witness: Stephen P. St. Cyr:

REQUEST:

Re: Puc 1905.04

Please provide a narrative with supporting documentation regarding the competitive bid process undertaken by the Company relative to its procurement of the legal and consultant services utilized during the rate proceeding.

RESPONSE: Please see response to DOE 3-6(d).

Bedford Waste Service Corporation
DW 22-058

Permanent Rate Proceeding
Responses to DOE Data Requests – Set 3

Date Request Received: 10/6/23:
Request No. DOE 3-8

Date of Response: 10/18/23
Witness: Stephen P. St. Cyr:

REQUEST:

Please provide a copy of the Affiliate Agreement between Bedford Waste Service Corporation and LaMontagne Management Corporation in effect PRIOR to June 13, 2023.

RESPONSE:

Please see Attachment DOE 3-8, which documents the monthly hourly matrix and hourly rates used to develop the monthly charge from LMC to Bedford for services provided. The monthly charge was used both prior to and after June 13, 2023.

Bedford Waste Service Corporation
DW 22-032

Permanent Rate Proceeding
Responses to DOE Data Requests – Set 6

Date Request Received: 10/6/23:
Request No. DOE 3-9

Date of Response: 10/18/23
Witness: Stephen P. St. Cyr:

REQUEST:

Please provide a copy of the Rate Case Engagement letters between Bedford Waste Service Corporation and each of the following:

- a) Stephen P. St. Cyr & Associates
- b) NH Brown Law

RESPONSE: Please see Attachment DOE 3-6(c)i (SPS&A), Attachment DOE 3-6(c)ii (LMC), and Attachment DOE 3-6(c)iii (NHBL).

Pursuant to Puc 203.08, Bedford Waste Service Corporation has a good faith basis for seeking confidential treatment of the attachments. Bedford Waste Service Corporation has submitted a motion for confidential treatment regarding said documents to the Commission.

Stephen P. St. Cyr & Associates

17 Sky Oaks Drive
Biddeford, Me. 04005
207-423-0215
stephenpstcyr@yahoo.com

October 1, 2023

Robert S. LaMontagne
Bedford Waste Services Corp.
C/O St. Cyr & Associates
17 Sky Oaks Drive
Biddeford, Me. 04005

Re: Management

Fee for services rendered during September 2023 (see management agreement).

Monthly Management	\$ 512.75
Billing, Processing, etc.	315.13
Collection (0.625 x \$72.00 / hour)	45.00
Cash Flow analysis (0.00 x \$104.75 / hour)	0.00
2022 Refi (0.00 x \$135.00 / hour)	0.00
2022 Rate Case (10.8125 x \$135.00 / hour)	1,459.69
2022 PUC Investigation into Step Adj (0.00 x \$135.00)	0.00
2022 Website (0.00 x \$104.75)	0.00
2023 DOE Step 1 Audit (0.00 x \$104.75)	0.00
2023 Communication Plan (0.00 x \$104.75)	0.00
Reimbursable expenses:	
Postage	0.00
Copies: 9/25 RC invoices	26.38
Scan	0.00
P. O. Box rental	0.00
Mileage (... x 0.625)	0.00
Website Development	0.00
Current Month Billing	<u>\$2,358.95</u>

Payment due upon receipt.

If you have any questions or comments, please call me at 207-423-0215.

Sincerely,

Stephen P. St. Cyr

Stephen P. St. Cyr & Associates

17 Sky Oaks Drive
 Biddeford, Me. 04005
 207-423-0215
 stephenpstcyr@yahoo.com

Date	Description of Service	Hours
------	------------------------	-------

Collections

09/01	Review A/R Aging Sum	0.125
09/07	Review/Reply to Rick's email re: Sambrook payments; Review/Reply to email re: same; Review Rick's email re: inv; Review inv	0.25
09/19	Review A/R Aging Sum	0.125
09/27	Review A/R Aging Sum	0.125
Total		<u>0.625</u>

2022 Refinancing / Financing

Total		<u>0.00</u>
-------	--	-------------

2022 Rate Case

09/06	Review Patnuade's email re: inv; Review same; Reply to email; Review Patnuade's reply	0.1875
09/12	Review PUC email re: PUC Order; Review same; Forward same to Carleton & Marcia; Review/Reply to Marcia's email re: same	1.125
09/13	Review/Reply to Marcia's email re: PUC order; Review PUC order; Review temp to perm calc; Review RC Exp sum sch; Update same; Update sup docs; Prepare email re: final RC exp; Prepare 09/23 inv; Prepare 12/23 inv; Prepare prop sur; Prepare prop sur options	3.375
09/14	Review Marcia's email re: DOE concerns; Review DOE email re: same; Review PUC Order; Reply to same; Review Carleton's email re: PUC order; Review Carleton's email re: inv	0.625
09/15	Review LMC invs; Reply to email	0.25
09/18	Review Marcia's emails re: PUC order; Talk w/Marcia re: PUC order / DOE concerns; Review Marcia's email re: same; Reply to email; Review Marcia's email re: Aug. 2023; Review same; Update RC Exp sch	1.00
09/19	Review Marcia's email re: Comp tariff; Review cover ltr; Review track changes to pgs 6a & 7; Review clean version; Reply to email; Review Marcia's email re: draft cover ltr for Step 2 filing	0.625
09/20	Talk w/Marcia re: DOE concerns, tariff, etc.; Review Marcia's reply to DOE email re: concerns; Review Marcia's email re: comp tariff filing; Review cover ltr; Review filing	0.50
09/21	Update RC Sum sch; Review temp to perm rate calc; Review updated prop surcharge Options; Prepare email re: same	1.00
09/22	Review Carleton's reply re: prop surcharge; Review RC Exp; Prepare email re: same	0.375
09/25	F/U w/Marcia re: filing	0.125
09/26	Review Marcia's email re: RC Exp; Review Marcia's email re: tariff; Review cover ltr; Provide comments; Review NHBrownLaw Sept & Oct 2023 inv; Update RC Exp sum sch; Update prop sur; Review same; Email same; Review sup tar; Review Motion for Prot Order; Review RC sup docs	0.25
09/27	Review/Reply to Marcia's email re: filing; Review Marcia's email re: filing; Review cover ltr; Review Marcia's email re: conf version	0.375
09/28	Review DOE email re: comp tariff; Review Marcia's email re: same; Review DOE email prop footnote; Review Marcia's reply; Review DOE reply; Review DOE email re: prop proc sch; Review Marcia's email re: same; Review Carleton's reply; Review Marcia's email re: comp bid; Review Marcia's email re: revised comp tariff; Review DOE email re: same; Review DOE email re: Anal & Rec	0.875
09/29	Review Marcia's email re: comp bid	0.125
Total		<u>10.8125</u>

Attachment DOE 3-4

Bedford Website

Total

0.00

Bedford Step 1 Audit

Total

0.00

Bedford Communication Plan

Total

0.00

SPSt. Cyr
 10/01/23

Item	Amount
Bedford Website	0.00
Bedford Step 1 Audit	0.00
Bedford Communication Plan	0.00
Total	0.00

Attachment DOE 3-4

Stephen P. St. Cyr & Associates

17 Sky Oaks Drive
Biddeford, Me. 04005
207-423-0215
stephenpstcyr@yahoo.com

October 17, 2023

Robert S. LaMontagne
Bedford Waste Services Corp.
C/O St. Cyr & Associates
17 Sky Oaks Drive
Biddeford, Me. 04005

Re: Management

Fee for services rendered during Oct. – Dec. 2023 (see management agreement).

Monthly Management	\$ 512.75
Billing, Processing, etc.	315.13
Collection (0.00 x \$72.00 / hour)	0.00
Cash Flow analysis (0.00 x \$104.75 / hour)	0.00
2022 Refi (0.00 x \$135.00 / hour)	0.00
2022 Rate Case (9.125 x \$135.00 / hour)	1,231.88
2022 PUC Investigation into Step Adj (0.00 x \$135.00)	0.00
2022 Website (0.00 x \$104.75)	0.00
2023 DOE Step 1 Audit (0.00 x \$104.75)	0.00
2023 Communication Plan (0.00 x \$104.75)	0.00
Reimbursable expenses:	
Postage	0.00
Copies	0.00
Scan	0.00
P. O. Box rental	0.00
Mileage (... x 0.625)	0.00
Website Development	0.00
Current Month Billing	<u>\$2,358.95</u>

Payment due upon receipt.

If you have any questions or comments, please call me at 207-423-0215.

Sincerely,

Stephen P. St. Cyr

Stephen P. St. Cyr & Associates

17 Sky Oaks Drive
 Biddeford, Me. 04005
 207-423-0215
 stephenpstcyr@yahoo.com

Date	Description of Service	Hours
------	------------------------	-------

Collections

Total		0.00
-------	--	------

2022 Refinancing / Financing

Total		0.00
-------	--	------

2022 Rate Case

10/02	Review/Reply to Team mtg invite; Review prop proc sch; Prepare alt prop proc sch; Prep for & part in conf call	0.75
10/03	Review Marcia's email re: prop proc sch; Review same; Incorp same into calendar; Review Marcia's email re: team mtg invite	0.375
10/05	Review PUC email re: proc order; Review var emails re: same; Review Marcia's email re: revised prop proc sch	0.25
10/06	Review DOE email re: DRs – Set 3; Review same; Prepare email re: 3-4	0.25
10/08	Review Marcia's email re: DRs template; Review template; Review Marcia's email re: same	0.25
10/10	Review/Reply to Marcia's email re: Co resp	0.125
10/11	Review Carleton's reply; Review Marcia's reply	0.125
10/13	Review Carleton's email re: Co resp to 3-4; Draft resp to 3-1 – 3-3 & 3-5 – 3-9. Review same; Reply to Carleton's email; Prepare email re: Co resp	2.00
10/16	Gather/Review atts to 3-4, 3-5, 3-6 & 3-8; Prepare email re: same; Update Co resp; Prepare email re: same	2.00
10/17	Review Marcia's email re: 3-4; Review Carleton's reply; Review Marcia's email re: 3-6 & 3-8; Talk w/Marcia re: same; Review Marcia's email re: final Co resp & att; Review same; Reply to email	1.00
10/20	Prep for & part in team mtg w/DOE	1.00
11/17	Review DOE report	0.50
12/15	Review PUC order; Review Marcia's email re: draft sup tariff; Review same; Reply to email	0.50
Total		9.125

Bedford Website

Total		0.00
-------	--	------

Bedford Step 1 Audit

Total		0.00
-------	--	------

Bedford Communication Plan

Total		0.00
-------	--	------

SPSt. Cyr
 10/17/23

LaMontagne Management Corp

317 South River Road
 Bedford, NH 03110

Ph:(603) 668-7933 / Fax: (603) 626-0432

INVOICE	
BED2304	
Date	
April 28, 2023	

Customer:
Bedford Waste Services Corp.
 C/O Stephen P. St. Cyr & Associates
 17 Sky Oaks Dr.
 Biddeford, ME 04005

Job Location:

<u>Item #</u>	<u>Description</u>	<u>Hrs</u>	<u>Rate</u>	<u>Amount</u>
1	General Management - monthly fee			\$ 275.00
2	Refinancing Case	0.25	\$ 125	31.25
3	Rate Case	5.42	125	677.08

Total Amount due this invoice: \$ 983.33

Invoice No. NHBL-2023-9-25-1

Attachment DOE 3-4

REDACTED



20 Noble Street
 Somersworth, NH 03878
 (603) 219-4911

INVOICE

Invoice No.: NHBL-2023-9-25-1

Date: 9/25/2023

Updated: 10/17/2023

Return to: Marcia A. Brown, Esq.

Bedford Waste Services Corporation
 c/o Stephen P. St. Cyr & Associates
 17 Sky Oaks Drive
 Biddeford, ME 04005

NH Brown Law, PLLC
 20 Noble Street
 Somersworth, NH 03878

Rate Proceeding

Telephone: (603) 291-4911

AMOUNT DUE:

\$1,465.00

Detail of Services

Date	Professional	Description	Hours	Rate	Amount
9/13/23	mab	Reviewed final order. Reviewed timing of action items. Corresponded with client team regarding elements of the order and who is responsible for which action items.			\$120.00
9/18/23	mab	Prepared tariff compliance filing and rate case expense filing.			\$500.00
9/19/23	mab	Researched correct tariff revision number for compliance filing. Revised cover letter to inform NHPUC of outdated NHPUC web posting.			\$100.00
9/20/23	mab	Telephone call with client regarding rate case expenses and tariffs.			\$80.00
9/25/23	mab	Finalized rate case expense documentation for filing with Commission. Sought concurrence on motion from DOE.			\$220.00
9/26/23	mlt	Prepared documents for filing.			\$95.00
9/27/23	mlt	Prepared and corrected PDF errors in rate case expense filing.			\$190.00
9/27/23	mab	Revised tariff pages per discussions with DOE. Corresponded with DOE regarding changes. Corresponded with client.			\$160.00
				Total:	\$1,465.00

Invoice No. NHBL-2023-10-18-1

Attachment DOE 3-4

REDACTED



20 Noble Street
 Somersworth, NH 03878
 (603) 219-4911

INVOICE

Invoice No.: NHBL-2023-10-18-1

Date: 10/18/2023

Bedford Waste Services Corporation
 c/o Stephen P. St. Cyr & Associates
 17 Sky Oaks Drive
 Biddeford, ME 04005

Return to: Marcia A. Brown, Esq.

NH Brown Law, PLLC
 20 Noble Street
 Somersworth, NH 03878

Rate Proceeding

Telephone: (603) 291-4911

AMOUNT DUE:

\$1,020.00

Detail of Services

Date	Professional	Description	Hours	Rate	Amount
OLD: Estimated Sept/October	mab	Expected review of rate case expense discovery requests and responses.			\$400.00
OLD: Estimated October	mab	Expected filing of post RCE discovery tariff compliance filing and any corrected rate case expense filing.			\$200.00
10/2/23	mab	Drafted proposed procedural schedule. Telephone call with client regarding dates. Conveyed proposed procedural schedule dates to DOE for position.			\$80.00
10/5/23	mab	Revised and filed proposed procedural schedule.			\$40.00
10/8/23	mab	Reviewed data requests from DOE and draft responses from client. Legal research.			\$120.00
10/17/23	mab	Reviewed draft data responses for completeness. Corresponded with client regarding same.			\$280.00
NEW October Estimated	mab	responses, technical session, or post RCE filing of RCE materials and compliance tariff.			\$500.00
				Total:	\$1,020.00

DW 22-058
 Bedford Waste Services
 Rate Case Expenditures

Invoice Date	Period	Service Provider	Total
2/3/22	Jan-22	St. Cyr & Assoc.	\$ 16.88
3/1/22	Feb-22	St. Cyr & Assoc.	101.25
5/3/22	Apr-22	St. Cyr & Assoc.	8.44
6/6/22	May-22	St. Cyr & Assoc.	210.94
7/2/22	Jun-22	St. Cyr & Assoc.	236.25
8/1/22	Jul-22	St. Cyr & Assoc.	1,366.88
9/1/22	Aug-22	St. Cyr & Assoc.	202.50
10/1/22	Sep-22	St. Cyr & Assoc.	1,965.94
11/1/22	Oct-22	St. Cyr & Assoc.	2,607.19
12/1/22	Nov-22	St. Cyr & Assoc.	1,057.59
1/4/23	Dec-22	St. Cyr & Assoc.	1,412.81
2/3/23	Jan-23	St. Cyr & Assoc.	2,590.31
3/3/23	Feb-23	St. Cyr & Assoc.	978.75
4/1/23	Mar-23	St. Cyr & Assoc.	3,225.24
4/30/23	Apr-23	St. Cyr & Assoc.	2,176.88
6/1/23	May-23	St. Cyr & Assoc.	2,463.75
7/1/23	Jun-23	St. Cyr & Assoc.	1,957.50
8/1/23	Jul-23	St. Cyr & Assoc.	1,254.13
9/1/23	Aug-23	St. Cyr & Assoc.	379.69
10/1/23	Sep-23	St. Cyr & Assoc.	1,486.07
10/17/23	Oct-23	St. Cyr & Assoc.	1,231.88
Total			\$ 26,930.87
9/30/22	Sep-22	LaMontagne Mgmt Corp	\$ 312.50
10/31/22	Oct-22	LaMontagne Mgmt Corp	250.00
11/30/22	Nov-22	LaMontagne Mgmt Corp	93.75
12/31/22	Dec-22	LaMontagne Mgmt Corp	500.00
1/31/23	Jan-23	LaMontagne Mgmt Corp	125.00
2/28/23	Feb-23	LaMontagne Mgmt Corp	270.83
3/31/23	Mar-23	LaMontagne Mgmt Corp	885.42
4/28/23	Apr-23	LaMontagne Mgmt Corp	677.08
5/31/23	May-23	LaMontagne Mgmt Corp	395.83
6/30/23	Jun-23	LaMontagne Mgmt Corp	312.50
7/31/23	Jul-23	LaMontagne Mgmt Corp	614.58
8/31/23	Aug-23	LaMontagne Mgmt Corp	31.25
9/30/23	Sep-23	LaMontagne Mgmt Corp	250.00
12/31/23	4th Qtr est	LaMontagne Mgmt Corp	562.50
Total			\$ 5,281.24
3/6/23	Feb-23	NHBrown Law	\$ 610.00
4/10/23	Mar-23	NHBrown Law	2,240.00
5/2/23	Apr-23	NHBrown Law	1,340.00

6/1/23	May-23	NHBrown Law	1,820.00
7/5/23	Jun-23	NHBrown Law	2,760.00
8/16/23	Jul-23	NHBrown Law	2,060.00
9/18/23	Aug-23	NHBrown Law	560.00
10/17/23	Sept-23	NHBrown Law	1,465.00
10/18/23	23-Oct	NHBrown Law	1,020.00
Total			<u>\$ 13,875.00</u>
11/18/22	Sept & Oct 22	State of NH / Brogan	\$ 225.00
2/13/23	Dec-Feb 23	State of NH / Brogan	975.00
5/1/23	Mar-Apr 23	State of NH / Brogan	525.00
Total			<u>\$ 1,725.00</u>
3/2/23	Dec. 2022	Steven E. Patnaude, LCR	\$ 301.00
5/25/23	Mar. 2023	Steven E. Patnaude, LCR	433.00
9/6/23	July 2023	Steven E. Patnaude, LCR	672.50
			<u>\$ 1,406.50</u>
Grand Total			<u>\$ 49,218.61</u>

SPSt. Cyr
 10/18/23

Bedford Waste
Proposed Temp-Perm plus Rate Case Expense Surcharge

Temporary vs. Permanent Difference	\$ 7,101.29
Rate Case Expenditures	<u>49,218.61</u>
Total Expenditures to be Recovered	\$ 56,319.90
Number of Customers	<u>78</u>
Proposed Surcharge per Customer	<u>\$ 722.05</u>
Proposed Surcharge per Customer per Quarter for 8 Quarters	<u>\$ 90.26</u>

SPSt. Cyr
10/18/23

Bedford Waste
 Temporary vs Permanent Rate Calculation

			<u>1/1/2023</u>	<u>4/1/2023</u>	<u>7/1/2023</u>
			Billing	Billing	Billing
Actual Billing					
# of Customers			78	78	78
Quarterly Billing Rate			\$ 155.77	\$ 180.99	\$ 180.99
Quarterly Revenue			\$ 12,150.06	\$ 14,117.22	\$ 14,117.22
Temporary Rate Date	11/17/2022	45/92	48.91%		
Revenue subj to Temp vs Perm Diff			\$ 5,942.96	\$ 14,117.22	\$ 14,117.22
Permament Billing Rate			\$ 212.61	\$ 212.61	\$ 212.61
Quarterly Revenue	11/17/2022	45/92	\$ 16,583.58	\$ 16,583.58	\$ 16,583.58
Temporary Rate Date			48.91%		
Revenue subj to Temp vs Perm Diff			\$ 8,111.53	\$ 16,583.58	\$ 16,583.58
Temp vs Perm Diff			\$ 2,168.57	\$ 2,466.36	\$ 2,466.36
Total Temp vs. Perm Diff					\$ 7,101.29

SPSt. Cyr
 6/13/2023

Attachment DOE 3-6

Stephen P. St. Cyr & Associates
17 Sky Oaks Drive
Biddeford, Me. 04005
207-423-0215
stephenpstcyr@yahoo.com

July 14, 2022

Robert S. LaMontagne
LaMontagne Management Corp.
317 South River Road
Bedford, N. H. 03110

Re: Bedford Waste 2022 Rate Case

Dear Mr. LaMontagne:

This letter states my understanding of the objectives of the engagement, the nature of the service and the terms of the arrangement.

1. Review the financial statements and PUC Annual Report and supporting financial data for the twelve months ended December 31, 2021.
2. Determine the actual rate of return and revenue deficiency for the twelve months ended December 31, 2021.
3. Prepare notice of intent to file for change in rates.
4. Prepare initial rate filing including the following:
 - (1) Cover Letter
 - (2) Summary of Requested Rate Relief
 - (3) Report of Proposed Rate Change and Calculation of Rates
 - (4) Proposed Tariff Rate Page
 - (5) Direct Testimony of Stephen P. St. Cyr for both temporary and permanent rates
 - (6) Rate Case Exhibits (including proforma adjustments) for both temporary and permanent rates
 - (7) Proposed Statement to be transmitted to customers
 - (8) Prepare NHPUC 1604.01 requirements
 - (9) An attestation regarding the rate filing being an accurate reflection of the Company's books

Stephen P. St. Cyr & Associates
17 Sky Oaks Drive
Biddeford, Me. 04005
207-423-0215
stephenpstcyr@yahoo.com

5. Prepare for and participate in prehearing conference and technical session.
6. Prepare for and participate in NHDOE Audit. Review/Respond to Audit Requests. Review/Respond to Audit Report.
7. Review/Respond to Staff/Intervener Data Requests for both temporary and permanent rates.
8. Prepare for and participate in Settlement Conferences for both temporary and permanent rates. Negotiate Settlement Agreement.
9. Prepare for and participate at hearing on merits for both temporary and permanent rates.
10. Review NHPUC orders. Implement NHPUC orders.

The hourly fee for preparation of the rate filing and work performed in connection with the rate filing is \$140.00 per hour. Out of pocket expenses (i.e., mileage, copies, postage, telephone, etc.) will also be billed. It assumes that the financial information is readily available, properly recorded and accurate. It also assumes that you and your Staff work cooperatively with me in obtaining the information required for the preparation of the initial filing and throughout the rate proceeding. Billing for such services will be monthly in arrears at \$140.00 per hour. Payment is due upon receipt of billing.

I appreciate the opportunity to be of service to you. I believe this letter accurately summarizes the significant tasks and terms of the engagement. If you have any questions, please call me at 207-423-0215 or email me at stephenpstcyr@yahoo.com. If you agree with the tasks and terms of the engagement as described in this letter, please sign the letter and return it to me.

Very truly yours,



Stephen P. St. Cyr

Stephen P. St. Cyr & Associates
17 Sky Oaks Drive
Biddeford, Me. 04005
207-423-0215
stephenstcyr@yahoo.com

This letter sets forth the tasks and terms of the service to be performed and the fee and billing arrangement by Stephen P. St. Cyr & Associates for Bedford Waste Services.



Robert S. LaMontagne

LaMontagne Management Corp.
317 south River Rd.
Bedford, NH 03110
603 668-7933

September 7, 2022

Stephen P. St. Cyr & Associates
17 Sky Oaks Drive
Biddeford, Me. 04005
207-423-0215
stephenpstcyr@yahoo.com

Re: Bedford Waste 2022 Rate Case

Dear Mr. St. Cyr:

This letter states my understanding of the objectives of the engagement, the nature of the service and the terms of the arrangement.

1. Review the financial statements and PUC Annual Report and supporting financial data for the twelve months ended December 31, 2021.
2. Oversee the determination of the actual rate of return and revenue deficiency for the twelve months ended December 31, 2021.
3. Review notice of intent to file for change in rates.
4. Oversee/Review initial rate filing including the following:
 - (1) Cover Letter
 - (2) Summary of Requested Rate Relief
 - (3) Report of Proposed Rate Change and Calculation of Rates
 - (4) Proposed Tariff Rate Page
 - (5) Direct Testimony of Stephen P. St. Cyr for both temporary and permanent rates
 - (6) Rate Case Exhibits (including proforma adjustments) for both temporary and permanent rates
 - (7) Proposed Statement to be transmitted to customers
 - (8) Prepare NHPUC 1604.01 requirements
 - (9) An attestation regarding the rate filing being an accurate reflection of the Company's books

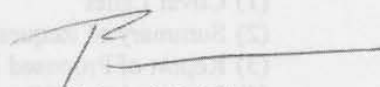
LaMontagne Management Corp.
317 south River Rd.
Bedford, NH 03110
603 668-7933

5. Prepare for and participate in prehearing conference and technical session.
6. Oversee audit and response to audit requests and review audit report.
7. Oversee/Review respond to Staff/Intervener Data Requests for both temporary and permanent rates.
8. Prepare for and participate in Settlement Conferences for both temporary and permanent rates. Participate in negotiations Settlement Agreement.
9. Prepare for and participate at hearing on merits for both temporary and permanent rates.
10. Review NHPUC orders. Oversee implementation of NHPUC orders.

The hourly fee for oversight and review of the rate filing and work performed in connection with the rate filing is \$125.00 per hour. Out of pocket expenses (i.e., mileage, copies, postage, telephone, etc.) will also be billed. Billing for such services will be monthly in arrears at \$125.00 per hour. Payment is due upon receipt of billing.

We appreciate the opportunity to be of service to you. We believe this letter accurately summarizes the significant tasks and terms of the engagement. If you have any questions, please call Carleton Roberts at 603-668-7933 or email him at croberts@lbimail.com. If you agree with the tasks and terms of the engagement as described in this letter, please sign the letter and return it to me.

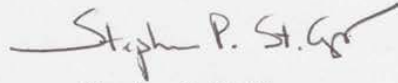
Very truly yours,



Robert S. LaMontagne

LaMontagne Management Corp.
317 south River Rd.
Bedford, NH 03110
603 668-7933

This letter sets forth the tasks and terms of the service to be performed and the fee and billing arrangement by LaMontagne Management Corporation for Bedford Waste Services.



Stephen P. St. Cyr



Marcia A. Brown
Attorney at Law

Environmental Law ■ Utility Law

January 26, 2023

VIA ELECTRONIC DELIVERY

Stephen P. St. Cyr, Manager
Bedford Waste Services, Corp.
c/o Stephen P. St. Cyr & Associates
17 Sky Oaks Drive
Biddeford, ME 04005

RE: Proposal for Legal Representation and Engagement Letter
Financing and Rate Case, Dockets DW 22-054 and DW 22-058

Dear Steve:

This letter is to outline the terms of Bedford Waste Services, Corp.'s ("Bedford") engagement of NH Brown Law for legal services, which the New Hampshire Rules of Professional Conduct for lawyers require that I advise Bedford of in writing.

I will take primary responsibility for overseeing the provision of legal services under this engagement. I do not expect to call upon the services of other attorneys although I may call upon the services of legal assistants or secretaries to participate in my provision of legal services to Bedford.

NH Brown Law typically requires payment of an advance retainer but in this instance I will waive it. If, however, invoices are not paid when due, a retainer may be required, to be applied against Bedford's account. If we are unable to agree on the amount of any retainer, Bedford authorizes me to withdraw as its counsel.

NH Brown Law will send out monthly bills, shortly after the first of the month. Kindly review all bills promptly upon receipt and advise me immediately if there are any questions respecting the details of the bills so that I can investigate such questions and respond to them while memories are still fresh. Bills are payable within 30 days of receipt of the invoice. If a bill is not questioned by the time payment becomes due, I will rely on our understanding that the amount and details of the bill are self-explanatory and satisfactory. If a particular charge or item is questioned, Bedford agrees to pay the undisputed items in the bill without awaiting resolution of any disputed ones.

Bedford Waste Services Corporation
Attachment DOE 3-6
January 26, 2023
Page 2 of 3

Interest will be charged on any overdue balance at the rate of one and one-half percent per month and Bedford agrees to be responsible for any reasonable costs, including legal fees, I may incur in collecting any overdue balance. If invoices from NH Brown Law are not paid when due, Bedford authorizes me to withdraw as its counsel.

This engagement and representation may be terminated at any time by any party, subject to my obligations under the New Hampshire Rules of Professional Conduct. If our engagement terminates, Bedford will remain obligated to pay me in full at the specified hourly rate for all past services and expenses, in accordance with the terms of this letter.

While I will not disclose privileged or confidential information regarding my representation of Bedford's interests, I understand that Bedford authorizes me to disclose to persons outside my firm who are involved with this matter of the fact that I represent Bedford. Unless instructed otherwise, Bedford authorizes me to send privileged and confidential communications via facsimile and e-mail and to communicate via e-mail and voice on cell phones.

Although I perceive no present conflict that would require me to decline this engagement. It is always possible that a conflict could arise, or will become apparent for the first time, during the course of my representation of Bedford. Further, not all conflicts are waivable, despite the best intentions of those involved. It is possible that an irreconcilable, non-waivable conflict, or a conflict that Bedford does not wish to waive, might arise that as a result, under certain circumstances Bedford or I may determine that it is in our interest, or required by applicable ethical standards, that I withdraw from representing Bedford.

During the course of this matter, in the event Bedford provides me with physical documents such as tax returns, expense records, bank records, and deeds, I will hold these original records as necessary for Bedford during the pendency of this engagement. At the conclusion of this engagement, I will contact Bedford about arrangements for the return of original records it provided me or, unless Bedford objects, retain those records in the file. I will retain the balance of Bedford's electronic legal file for five (5) years in accordance with the file retention policy of my firm. It is Bedford's responsibility to make arrangements to retrieve any other information it may wish to retain from the file. If arrangements are not made for the return of information contained in the file within five years following the conclusion of this engagement matter, they will be destroyed and original records will be sent to Bedford's last available address. It is Bedford's responsibility to inform NH Brown Law of its change of address, if any.

If, for any reason, Bedford does not agree to the understandings, undertakings and waivers outlined above, or if there are any additional questions, I encourage Bedford to discuss these concerns with me or with other counsel. I appreciate Bedford's confidence in my work and I look forward to working with Bedford in this matter.

Attachment DOE 3-6

Bedford Waste Services Corporation
January 26, 2023
Page 3 of 3

If these conditions are acceptable to Bedford, please sign the signature block and return it by e-mail, mab@nhbrownlaw.com or by mail to NH Brown Law, 20 Noble Street, Somersworth, NH 03878. I look forward to working with Bedford on this matter.

Very truly yours,



Marcia A. Brown

I, Stephen P. St. Cyr on behalf of Bedford Waste Services Corporation hereby accept the terms for the scope of legal services described herein.

Date: 1/24/23 Title: Manager

Printed Name: Stephen P. St. Cyr

<End of document>

LaMontagne Management Corp

Management Agreement Monthly Hourly Matrix for Bedford Waste Services Corp.

<u>Tasks</u>	<u>J</u>	<u>F</u>	<u>M</u>	<u>A</u>	<u>M</u>	<u>J</u>	<u>J</u>	<u>A</u>	<u>S</u>	<u>O</u>	<u>N</u>	<u>D</u>	<u>I</u>	Hourly <u>Rate</u>	<u>Amount</u>
Review cash position	0.250	0.250	0.250	0.250	0.250	0.250	0.250	0.250	0.250	0.250	0.250	0.250	3.00	75.00	225.00
Reconcile bank statement	0.375	0.375	0.375	0.375	0.375	0.375	0.375	0.375	0.375	0.375	0.375	0.375	4.50	75.00	337.50
Review/Sign checks	0.125	0.125	0.125	0.125	0.125	0.125	0.125	0.125	0.125	0.125	0.125	0.125	1.50	75.00	112.50
Review financial statements	1.000			1.000			1.000			1.000			4.00	125.00	500.00
Review PUC Annual Report			1.000										1.00	125.00	125.00
Review tax return(s)			1.000										1.00	125.00	125.00
Oversee maintenance / capital replacement	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	6.00	100.00	600.00
Oversee management	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	6.00	100.00	600.00
Other administrative matters	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	6.00	75.00	450.00
Email / Confer / Meet with Management	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	6.00	75.00	450.00
Tota	3.50	2.50	4.50	3.50	2.50	2.50	3.50	2.50	2.50	3.50	2.50	2.50	36.00		\$ 3,300.00
Per month															\$ 275.00

Note: Tasks exclude any regulatory activities such as franchise expansion, financings, rate cases, audits, tax investigations, survey/questionnaires, etc.
 Also, tasks exclude preparation of RFPs and evaluation of responses to RFPs for various activities such as major repair/replacement, septic tank pumping, each feed testing and/or replacement, sale of Company, etc.

SPSt. Cyr / CRoberts
 7/22/22