

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DW 22-058

BEDFORD WASTE SERVICES CORPORATION

Request for Change in Rates

BEDFORD WASTE SERVICES CORPORATION

DW 22-054¹

Petition for Approval of Financing

**Order Approving Settlement Agreement, Resulting Permanent Rates
and Authorizing Financing**

O R D E R N O. 26,884

September 12, 2023

In this order the Commission approves a permanent rate increase of 36.49 percent for Bedford Waste Services Corporation (Bedford), a sewer utility providing sewer services to 78 customers in Bedford, New Hampshire. The resulting annual customer rate of \$850.45 will reflect an increase of \$56.84 per quarter, or \$227.37 per year relative to the previously approved permanent rates of \$623.08, and an increase of \$126.51 per year relative to the temporary rates currently in effect. Prior to 2022, Bedford last requested a rate increase in 2004. See Docket DW 04-144, Order No. 24,479 (July 1, 2005).

¹ Pursuant to NH Admin. Rule Puc 203.30 and NH Admin Rule Puc 201.05, the Commission reopens DW 22-054 for the limited purpose of authorizing the final two debt instruments discussed in Order No. 26,800.

The Commission also approves a first step adjustment, yielding a 10.64 percent increase over the new permanent rate, to account for Bedford's 2022 pump replacements.

The Commission further authorizes Bedford to enter two debt instruments with its shareholder, Robert D. LaMontagne.

All docket filings, other than any information for which confidential treatment is requested of or granted by the Commission, are available on the Commission's website at [New Hampshire Public Utilities Commission \(nh.gov\)](https://www.nh.gov/energy/public-utilities-commission).

I. PROCEDURAL HISTORY

On September 15, 2022, Bedford filed its Notice of Intent to File Rate Schedules with the Commission. The Department of Energy (DOE) filed an appearance on September 19, 2022. Bedford filed its proposed permanent rate schedules and a request for temporary rates on October 17, 2022 (Petition). The Commission issued Order No. 26,717 on November 1, 2022, suspending the proposed tariffs and scheduling a prehearing conference.

On March 16, 2023, the parties filed a settlement agreement on the issue of temporary rates. The Commission issued Order No. 26,793 on March 29, 2023. The Commission approved, on a temporary basis, a 16.19 percent increase to Bedford's revenue requirement from current rates effective November 17, 2022.

On June 28, 2023, the parties filed a settlement agreement (Settlement) on permanent rates. The Settlement included approval of two debt instruments between Bedford and its owner, Robert D. LaMontagne, Bedford's sole shareholder.² The first

² Running concurrent to DW 22-058 was DW 22-054. DW 22-054 involved a petition for authority to borrow funds. The majority of the request involved a long-term debt instrument in the amount of \$186,207.24 from the shareholder with repayment over 15 years at 6.80 percent. This agreement was approved by the PUC in order number 26,800 (April 12, 2023). However, DW 22-054 also included a request to approve a non-interest bearing advance by the shareholder in the amount of approximately \$30,000 related to the expenses associated with pursuit of Bedford's rate proceeding in DW 22-058 and a working

debt instrument was for an amount to pay the fees associated with the 2022-2023 rate proceeding at an interest rate of 0 percent. The second instrument was a \$12,000.00 line of credit at an interest rate equal to the Wall Street Journal prime rate, plus .50 percent. The proceeds of the line of credit were to be used for the pump replacements comprising a second step adjustment from the proposed rate increase. On July 12, 2023, the parties appeared for a hearing regarding the Settlement on the permanent rate.

Although there were no formal intervenors, at the time of the hearing, Bedford customer Steven Rizzo appeared and pursuant to New Hampshire Code of Administrative Rule Puc 203.18 he was provided with the opportunity to provide public comment on the proposed rate change and the approval of the financial agreements being requested.

II. POSITIONS OF THE PARTIES

A. Bedford

Bedford is a sewer utility providing sewer services to 78 customers in Bedford, New Hampshire. Bedford noted that it has been 17 years since its last rate case that was filed in 2004. *See* Docket DW 04-144, Order No. 24,479 (July 1, 2005). Bedford's initial petition requested a 39.47 percent increase to existing rates that would result in an 8.09 percent rate of return. Furthermore, Bedford requested approval of a line of credit and a zero percent advance in the amount of approximately \$30,000.00 to pay for the expenses related to the rate case.

line of credit from the shareholder in the amount not to exceed \$12,000.00, relative to Bedford's existing working capital requirements, at a variable interest rate tied to the Wall Street Journal prime rate plus .50 percent. The Commission approved the long-term debt agreement in the amount of \$186, 207.24 via order no. 26,800. The remaining requests associated with DW 22-054 were deferred to the final hearing in DW 22-058. The parties provided testimony as to the additional financial requests contained in 22-054 at the July 12, 2023 hearing. Therefore, this order shall address both the petition for permanent rate change contained in DW-058 and the remaining financial requests of DW 22-054. A copy of this order shall also be placed in Docket 22-054.

Bedford asserted that a rate increase was necessary to cover the increase in rate base and increases in expenses. *See* Petition at paragraph 3. Bedford's Petition noted that the proposed increase would allow it to continue to provide reliable sewer service at a reasonable cost. *See Id* at 5.

Bedford's rate increase included two step adjustments to recover 2022 (Step 1) and 2023 (Step 2) capital expenditures associated with pump replacements. At the time of his testimony, Mr. St. Cyr noted that Bedford had already replaced 4 pumps at a cost of \$17,176 and was anticipating an additional 3 pumps to be replaced at a cost of \$12,882 between September and December 2022. The total initial expenditure associated in Step 1 was anticipated to be \$30,057. Bedford's initial proposal for Step 2 included replacement of 7 additional pumps at the cost of \$30,057. Costs for Step 1 and Step 2 were inclusive of associated depreciation as well as state and local property taxes. Bedford submitted the testimony of Stephen St. Cyr in support of its request for a temporary rate increase, permanent rate increase and approval of the step adjustments.

B. Department of Energy

On October 27, 2022, the DOE filed a position statement requesting that the Commission deny the initial request concerning the rate increases and the financing approval. The DOE recommended hearing both matters together pursuant to NH Admin. Rule Puc 203.19 and scheduling the matters for formal review.

The DOE participated in negotiating the settlement agreement for the temporary rate, the financing agreements in DW 22-054 and the Settlement for permanent rates. The DOE filed a notice of support for the proposed Settlement and recommended approval of the rates and terms contained in the Settlement. On December 22, 2022, the DOE completed a final audit on Bedford's permanent rate filing. *See* Hearing

Exhibit 6, at 234-258. On July 11, 2023, DOE provided an audit of the step adjustments proposed in the Settlement related to pump replacements in 2022 and 2023. The DOE audit verified the costs associated with the pump replacements and the proposed step adjustments. See New Hampshire Department of Energy Step 1 Audit Report filed on July 11, 2023.

C. Mr. Rizzo

Mr. Rizzo appeared at the July 12, 2023 hearing and testified that he is and has been a customer of Bedford for 18 years. Mr. Rizzo expressed his concern as to Bedford's lack of communication with its customer base and failure to properly utilize its revenue to support operations. Mr. Rizzo stated that he does not believe that Bedford informs its customers of expenditures and Mr. Rizzo questions the shareholder intentions when managing Bedford. Mr. Rizzo further questioned Bedford's handling of its bad debt and claimed that the lack of action in collection of the debt has resulted in the rate increase for its existing customers. Finally, Mr. Rizzo stated that in Bedford's accounting practices, depreciation was recorded as cash and was not placed in the reserve fund. Mr. Rizzo asserted that this practice has led to additional costs for the Bedford customers.

III. SETTLEMENT AGREEMENT

The Settlement reached by Bedford and DOE reflects the resolution of all issues to the reasonable satisfaction of the Settling Parties with respect to Bedford's Petition for permanent rates in this docket. The agreed terms encompass an initial permanent rate adjustment followed by two step adjustments (Step 1 and Step 2), as outlined below. The Settlement also recommended two additional financing arrangements between Bedford and the shareholder that were also the subject of Docket No. DW 22-054. Key terms from the Settlement are summarized below:

- 1) A total annual permanent rate revenue requirement of \$66,335 resulting in a net annual operating income of \$6,976 as shown in Schedule 1 of Attachment A of the Settlement. This represents an increase of \$17,735, or 36.49 percent, over Bedford's 2021 test year revenues derived from customer rates of \$48,600.
- 2) The proposed revenue requirement will result in an annual customer rate of \$850.45 (\$212.61 per quarter). This represents an increase of \$227.37 (\$56.84 per quarter) over Bedford's previously approved permanent rates of \$623.08 (\$155.77 per quarter) and an increase of \$126.51 (\$31.63 per quarter) over Bedford's temporary rates currently in effect of \$723.94 (\$180.99 per quarter).
- 3) Bedford agrees to file its reconciliation of temporary rates to permanent rates within 30 days of this order, and the DOE will have an opportunity to review the recoupment proposal and provide a recommendation for Commission consideration.
- 4) Bedford shall be allowed to recover its reasonable and prudently incurred rate case expenses for this proceeding on permanent rates through a separate customer surcharge.
- 5) The Settlement provides for a Step 1 adjustment, concurrent with the proposed permanent rate increase, to allow for the inclusion of Bedford's 2022 pump replacements in rate base. If approved, Step 1 will result in an annual rate of \$940.98 (\$235.25 per quarter) per customer. This represents an additional increase of \$90.53 (\$22.63 per quarter), or 10.64 percent, over the proposed permanent rate of \$850.45 (\$212.61 per quarter).

- 6) A Step 2 adjustment is limited to the actual cost and expenses associated with Bedford's first three pump replacements made during 2023.
- 7) The Settlement provides for approval of two debt instruments between Bedford and the shareholder. The first debt instrument includes a 0 percent interest advance to cover the rate case expenses associated with the instant docket. The second debt instrument is a 7-year term loan in the amount of \$12,000 at a rate of wall street journal prime rate plus 0.5 percent to be used for working capital needed for the limited Step 2 pump replacements in 2023.

Finally, the parties agree that the management agreement between Bedford and Lamontagne Management Corporation (LMC) is just and reasonable. The parties agree that the annual calculation of deposits to the depreciation fund account, ordered originally in Docket No. DW 99-051, Order No. 23,388 (January 7, 2000) at 14, shall continue to be filed with the annual report. The parties agree that Bedford should reassess the condition of its leach fields and file a report of the results to the DOE no later than January 1, 2027.

IV. COMMISSION ANALYSIS

A. Permanent Rate Increase

The Commission is authorized to fix rates after a hearing, upon determining that rates, fares, and charges are just and reasonable. RSA 378:7. In circumstances where a utility seeks to increase rates, the utility bears the burden of proving the necessity of the increase pursuant to RSA 378:8. In determining whether rates are just and reasonable, the Commission must balance the customers' interest in paying no higher rates than are required against the investors' interest in obtaining a reasonable return on their investment. *Eastman Sewer Company, Inc.*, 138 N.H. 221, 225 (1994).

In this way, the Commission serves as arbiter between the interests of customers and those of regulated utilities. See RSA 363:17-a; see also *EnergyNorth Natural Gas, Inc. d/b/a National Grid NH*, Order No. 25,202 at 17 (March 10, 2011).

Unless precluded by law, disposition may be made of any contested case at any time prior to the entry of a final decision or order. RSA 541-A:31, V(a). Pursuant to N.H. Admin. R., Puc 203.20(b), the Commission shall approve the disposition of any contested case by stipulation if it determines that the result is just and reasonable and serves the public interest. The Commission encourages parties to settle disagreements through negotiation and compromise because it is an opportunity for creative problem solving, allows parties to reach a result in line with their expectations, and is often a better alternative to litigation. *Hampstead Area Water Company, Inc.*, Order No. 26,131 at 3 (May 3, 2018). Nonetheless, the Commission cannot approve a settlement, even when all parties agree, without independently determining that the result comports with applicable standards. *Id.*

Each of the Settling Parties testified at the hearing in support of the Settlement provisions as just and reasonable. Prior to reviewing the evidence regarding the permanent rates proposed by Bedford in its Petition and in the terms of the Settlement as presented in written testimony and in oral testimony at the hearing held on July 12, 2023, it is important to address the concerns raised by Mr. Rizzo in his public comment.

Mr. Rizzo's concerns, as expressed at the hearing, are valid concerns. Further, these concerns are similar to concerns expressed by other Bedford customers in Bedford's last rate making docket. See *DW 04-144*. In 2004, Bedford petitioned the Commission for a rate increase. During those rate proceedings, the Bedford Three Corners Owners Association (Association) intervened. The final settlement agreement

in Docket No. DW 04-144 included detailed instructions to Bedford concerning its responsibilities in keeping the Association informed on its accounting practices. *See* Order No. 24,479 (July 1, 2005) at 2. Furthermore, Bedford was required to maintain a depreciation fund and comply with the Commission's Uniform System of Accounts for Sewer Practices as identified in N.H. Admin. Rule, Puc 706. *See* Order No. 24,479 (July 1, 2005) at page 7.

Mr. Rizzo's public comment concerning the 2023 proposed Settlement revolves around his view that Bedford has failed to communicate and provide transparency to its customers. Mr. Rizzo claims that the only communication between the residents and Bedford is the quarterly bill. *See* Transcript July 12, 2023 at 20. Mr. Rizzo observes that there is no website for Bedford. *See Id.* Mr. Rizzo's further stated that he does not view Bedford's financial statements as meeting general accounting principles. *See Id* at 70.

Having reviewed the evidence, the Commission appreciates Mr. Rizzo's comments but does not find them to be offered in search of a specific remedy with respect to the case at hand. The Commission continues to express concern regarding Bedford's communication practices and transparency to customers. The Commission notes that Mr. Rizzo's concerns regarding mismanagement of depreciation are addressed in the Settlement. *See* Settlement Agreement at page 13. The Commission also notes that the uncollected debt address by Mr. Rizzo is not included in the revenue requirement and therefore recovery of that uncollected debt is not included in the proposed rates.

Requirements for Bedford to file its annual report with the PUC remain in place. See NH Admin. Rule PUC 708.03. Bedford has timely filed those reports since 2004.³ Furthermore, Puc 1203.14 provides a mechanism for customers and utilities to mediate complaints. The parties’ ability to work together in the future may alleviate some of the concerns articulated by Mr. Rizzo in his public comments at hearing.

With respect to the petition itself and the just and reasonableness of the parties’ Settlement, the Commission finds that operating costs and expenses have changed significantly since Bedford’s last rate case 17 years ago. We recognize the need to revisit Bedford’s revenue requirement to account for these costs increases. Applying the standards as articulated, and after reviewing the record, we find the rates proposed by in the Settlement to be just and reasonable. A summary of the proposed rate changes can be seen in the following table.

	DW 04-144 Permanent Rate	Temporary Rate per Order No. 26,793	Permanent Rate	Step 1 Rate	Step 2 Rate
Annual Rate	\$623.08	\$723.94	\$850.45	\$940.98	\$975.46

Overall, the rate of \$850.45 is \$227.37 more per year over the previously approved permanent rates and \$126.51 more per year over the existing temporary rates. See Settlement at 8. The Commission also notes that the settled rate increase of 36.49⁴ percent over the previously approved permanent rate is roughly 3 percent less than the initially requested increase of 39.47 percent in Bedford’s Petition.

³ See <https://www.energy.nh.gov/utilities-providers/regulated-utility-services/water-sewer/water-sewer-annual-reports#sewer>.

⁴ The Commission notes that from 2005 (date of the previous permanent rate) to 2022 (effective date of the proposed permanent rate) is 17.75 years. Over this period, the annual rate increase for a Bedford customer is roughly 1.8 percent.

A review of Bedford's accounting depicts multiple years with negative ending balances. See Hearing Exhibit 6 at 248. The shareholder has been making yearly capital contributions to cover the cost of operations. *Id* at 244. The Commission notes that the permanent annual rate of \$623.08 charged to customers was set in 2004, and accordingly does not accurately reflect the amount needed to manage the current costs of operation and maintenance for Bedford.

The DOE has conducted extensive discovery and a final audit concerning Bedford's proposed rate increases. See DOE Step 1 Audit Report, filed July 11, 2023 and Hearing Exhibit 6 at 234-258. The DOE reviewed in detail Bedford's records and management of its assets. The review included the test year of 2021, as well as records from 2019 and 2020. After completing the audit, the DOE entered into the Settlement and assented to the proposed permanent rate increase and subsequent step adjustment rate increases.

The Commission finds that the DOE Audit, the testimony by Stephen St. Cyr for Bedford, and the testimony of Robyn J. Descoteau for the DOE, in support of the Settlement and the exhibits entered at hearing as credible and persuasive. We find the proposed rate increase to be just and reasonable. Furthermore, the Commission finds the proposed rate increase to be prudent and in the public interest for Bedford's customers who rely on Bedford's financial stability to provide safe and reliable sewer service.

B. Step Adjustments

In addition to the permanent rate increase requested in the Petition, Bedford has requested two additional step increases. Step 1 represents recoupment of the expenses associated with the 2022 pump replacements and Step 2 represents recoupment of the projected expenses for the 2023 pump replacements.

The Commission has approved step adjustments for limited use as a mechanism between full rate cases to allow a utility to collect additional revenue on investments that are non-revenue producing and are made to improve safe and reliable service. *See Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty*, Order No. 26,661 (July 29, 2022) at 4, *citing Public Service Company of New Hampshire d/b/a Eversource Energy*, Order No. 26,504 (July 30, 2021) at 5. Step adjustments are generally limited in scope and permit recovery for investments similar to those that have been reviewed in the underlying rate case that established the step adjustment provision. *Id.* Utilities have the burden of showing that capital investments included in a step adjustment are prudent, in service, and used and useful. *Id.*

i. Step 1

In considering the proposed Step 1, the Commission is required to determine whether the 2022 pump replacements by Bedford were prudent, used, and useful as defined by RSA 378:28. The cost associated with the replacement pumps in 2022 was \$31,506.00 and this drives a rate increase of 10.64 percent over the proposed permanent rate increase of \$850.45. Concerning Step 1, the DOE Final Audit reviewed the expenditures associated with Step 1. The DOE testified that after reviewing the expenditures associated with Step 1, nothing of materiality was noted. *See* July 12, 2023 transcript at page 57.

Based on the parties' testimony and DOE Final Audit, we find that the 2022 replacements and maintenance of Bedford's pump system using a systematic approach, prior to failure, to be prudent used and useful.

ii. Step 2

Step 2 involves the planned replacement of three additional pumps in 2023 and drives a 3.66 percent increase over the rates arising from Step 1 for the average

customer. The proposed rationale for Step 2 is the same as Step 1. The systematic, planned upkeep of Bedford's Plant in Service results in safe and reliable service to customers.

Bedford shall file a petition for the proposed Step 2 Adjustments, no sooner than January 1, 2024, to be reviewed in a separate proceeding with the participation of the New Hampshire Department of Energy.

C. Authorized Financing Mechanisms

Concerning approval of the remaining two financing mechanisms that were not finalized by Order No. 26,800, RSA 369:1 states that a utility may, "with the approval of the commission but not otherwise, issue and sell ... notes and other evidence of indebtedness payable more than 12 months after the date thereof for lawful corporate purposes." The Commission shall authorize the financing "if in its judgment the issue of such securities upon the terms proposed is consistent with the public good." RSA 369:4. The Commission reviews the amount to be financed, the reasonableness of the terms and conditions, the proposed use of proceeds, and the effect on rates. *Appeal of Easton*, 125 NH 205, 211 (1984) (*Easton*).

"[C]ertain financing related circumstances are routine, calling for more limited Commission review of the purposes and impacts of the financing." See, e.g., *Lakes Region Water Company, Inc.*, Order No. 25,753 (January 13, 2015) at 4-5, and *Pennichuck Water Works, Inc.*, Order No. 26,247 at 4 (May 3, 2019). "A routine request is one 'that will have no discernible impact on rates or deleterious effect on capitalization, [and] in which the funds are to enable ... investments appropriate in the ordinary course of utility operations.'" *Id.* (citing *Public Service Company of New Hampshire*, Order No. 25,050 at 13 (December 8, 2009))

In Order No. 26,800, the Commission found the financing agreements between Bedford and the Shareholder to be reasonable. See Order No. 26,800 at page 4. The Commission noted that the financing was consistent with the public good and would support investments made in the ordinary course. The Settlement in this docket reiterates the terms of the non-interest bearing advance and the capital line of credit that were previously reviewed in Docket No. DW 22-054.

Given the interest terms and rationale explained in the Settlement, the Commission finds, as it did in Order No. 26,800, that the proposed terms of financing are reasonable; the proposed use of the financing is consistent with the public good; and the borrowed funds will support investments made in the ordinary course of Bedford Waste's operations. We further find the proposed financing is not likely to have a discernible impact on customer rates, and the funds are intended to permit investments that are appropriate in the ordinary course of utility operations. The non-interest-bearing advance from Mr. LaMontagne and the limits imposed on the proposed working capital line-of-credit and short-term debt in the Settlement serve to ensure the ongoing stability of the utility.

For these reasons, we conclude that this financing is for the public good. Accordingly, we approve the Company's request pursuant to RSA 369:1 and 369:4. Our approval of this financing does not foreclose or limit our review of the prudence, use, and usefulness of any specific cost financed directly or indirectly in a future rate case under RSA 378:28. The Commission retains the authority under RSA 374:4 to keep informed regarding the Company's use of the proceeds of this financing, independently and apart from any RSA 378:28 review.

We find the Settlement Agreement to be just and reasonable and approve it based on our interpretation of the Settlement language. Accordingly, we approve the

requested permanent rates pursuant to RSA 378:7, RSA 378:28 and Puc 203.20(b), as discussed above.

Based upon the foregoing, it is hereby

ORDERED, that the annual revenue increase of \$66,335 and resulting rates of \$850.45 per year and (\$212.61 per quarter) per the Settlement regarding permanent rates submitted by Bedford and supported by the parties in this docket is **APPROVED**; and it is

FURTHER ORDERED, that the Step 1 additional increase in annual revenue of \$90.53 (\$22.63 per quarter) per customer, or 10.64 percent, over the proposed permanent rate and resulting in an annual rate of \$940.98 (\$235.25 per quarter) per customer as articulated in the Settlement submitted by Bedford and supported by the parties in this docket is **APPROVED**; and it is

FURTHER ORDERED, that pursuant to N.H. Code Admin. Rules Puc 1603, Bedford shall submit properly annotated revised tariff pages within 15 days of the date of this order; and it is

FURTHER ORDERED, that DOE shall review the annotated revised tariff pages and submit its assessment of the annotated changes within 10 days of Bedford's submission of the revised tariff pages; and it is

FURTHER ORDERED, that Bedford shall file, within 30 days of the date of this order, documentation of the difference between temporary rates pursuant to Order No. 26,793 and the permanent rates approved herein, and a proposed surcharge for recovering the difference from customers, to be subsequently reviewed and accepted by the New Hampshire Department of Energy; and it is

FURTHER ORDERED, that Bedford shall file, no later than 30 days after the date of this order, a request for recovery of its rate case expenses with the Commission; and it is

FURTHER ORDERED, that Bedford shall file all necessary documentation and reports in support of regulatory costs noted above, as required by the Settlement; and it is

FURTHER ORDERED, that Bedford shall file a petition for the proposed Step 2 Adjustments, no sooner than January 2, 2024, to be reviewed in a separate proceeding with the participation of the New Hampshire Department of Energy; and it is

FURTHER ORDERED, that any Step 2 adjustment proposed by Bedford and reviewed by the New Hampshire Department of Energy, if approved by the Commission, shall not take effect before April 1, 2024, respectively; and it is

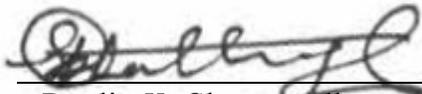
FURTHER ORDERED, that Bedford's request for approval of a non-interest bearing advance from the shareholder in the amount of approximately \$30,000 for prudently incurred rate case expenses related to this proceeding, is hereby **GRANTED**; and it is

FURTHER ORDERED, that Bedford's request for a working capital line-of-credit from the Shareholder in the amount not to exceed \$12,000, relative to Bedford's working capital requirements, at a variable interest rate based on the Wall Street Journal prime rate plus .50 percent is hereby **GRANTED**; and it is

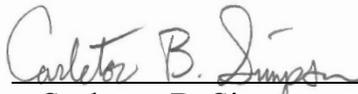
FURTHER ORDERED, that all other provisions of the Settlement Agreement, including commitments made by the New Hampshire Department of Energy to review the Company's filings and provide reports to the Commission, are **APPROVED** and shall remain in effect unless and until the Commission rules otherwise, pursuant to

the subsequent submission by the Settling Parties of petitions requesting any alteration of those commitments.

By order of the Public Utilities Commission of New Hampshire this twelfth day of September 2023.



Pradip K. Chattopadhyay
Commissioner



Carleton B. Simpson
Commissioner

Service List - Docket Related

Docket#: 22-058

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Service List - Docket Related

Docket#: 22-054

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