

Bedford Waste Services Corp.

P. O. Box 2400
Biddeford, Me. 04005
603-668-5788

May 8, 2013

Debra A. Howland
Executive Director and Secretary
Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, N. H. 03301-2429



Re: DW 12-346 Bedford Waste Services Corp.
Petition for Authority to Refinance / Finance

Dear Ms. Howland:

On April 30, 2013 the Staff (“Staff”) of the Public Utilities Commission and Bedford Three Corners Owners Association (“BTCOA”) provided the Commission with their recommendations regarding refinancing / financing in this proceeding. Bedford Waste Services Corp. (“Company”) would like to provide brief comments on each recommendation.

Regarding Staff’s recommendation, the Company supports “Staff support of the granting of the petition,” including the 3 “follow-up” requirements. By way of clarification, one-half of the fifth (site 5 in Common Area E) was found to be in poor condition and the other half was found to be in fair condition. The Company would characterize its overall operation and maintenance of the system as better than adequate, though not exceptional. More time, higher costs and increased rates would be required to be exceptional.

Regarding BTCOA’s recommendation, the Company opposes BTCOA’s recommendation that “the proposed financing should be rejected because the Company has not met its burden of showing that it is in the public interest.” By way of clarification, Centrix Bank was never prepared to provide the proposed financing at a rate of 4.75%, fixed for five years and adjustable thereafter. As indicated on the September 4, 2012 Centrix Bank document, “THIS IS NOT A COMMITMENT.” Also, the initial discussion with all four financial institutions focused on a fixed rate financing, but none of the four financial institutions would consider a fixed rate financing arrangement.

BTCOA also requested that “any order issued ... direct the Company, on an on-going basis,” to meet 9 requirements. The Company has reviewed the 9 requirements and intends to adopt and implement some of the requirements. The Company does not

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believe that it is necessary for the Commission to order the Company to do so. Each additional requirement takes time and money and put upward pressure on rates.

As indicated earlier, the Company supports Staff recommendation of approval of the refinancing / financing. If you and / or the Commissioners have any questions or comments, please call me at 207-423-0215 or email me at stephenpstcyr@yahoo.com.

Sincerely,

A handwritten signature in black ink that reads "Stephen P. St. Cyr". The signature is written in a cursive style with a horizontal line extending to the left of the first name.

Stephen P. St. Cyr