

STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

WATER AND SEWER UTILITIES

Bedford Waste Services Corporation and Alpine Pacific, Inc.  
Joint Petition for Approval to Change Ownership of Bedford Waste Services Corporation

Docket No: DW 24-117

**PETITION TO INTERVENE**

**BEDFORD THREE CORNERS OWNERS ASSOCIATION**

Pursuant to the Commencement of Adjudicative Proceeding and Notice of Prehearing Conference issued by the Commission as a result of the December 13, 2024 joint filed petition requesting the Commission approve Alpine Pacific, Inc. (Alpine Pacific) acquisition of Bedford Waste Services Corporation (Bedford Waste) pursuant to RSA:374.30, Bedford Three Corners Owners Association (Bedford 3 Corners) hereby petitions to intervene in this proceeding consistent with N.H. Admin. R, Puc 203.17 and Puc 203.02. In support thereof, Bedford 3 Corners states as follows:

1. Bedford 3 Corners ratepayers rights and interests will be directly affected by the approval of this acquisition and therefore should be permitted to intervene in this action.
2. Since the inception of Bedford Waste in 1995, there has been a severe underfunding of this entity and the proposed acquisition by Alpine Pacific in testimony by one of the principals Mr. Justin Ahmann, does not show any improvement. All this acquisition will lead to is increased costs to the ratepayers and how is that good for the Public Interest?
3. As part of the Due Diligence on the part of Bedford 3 Corners, we have found that the Business certificates for Alpine Pacific's subsidiaries located in New Hampshire named Alpine

Pacific Utilities Hydro, LLC incorporated in Montana on June 27, 1998, business ID 797982, with a business address at 19 Chamberlain, Street, Greenville, NH, 03048 is registered as a Foreign LLC and not Domestic with Mr. Justin Ahmann as the principal. Additionally, another subsidiary Alpine Pacific Power & Water, LLC incorporated in Delaware on May 25, 2023, business ID 11821882, with a business address at 68 Edwardsen Street, Danielson, CT, 06239 is registered as Foreign with Mr. Justin Ahmann as the principal. Bedford 3 Corners is asking why these have foreign registrations and is that congruent with the PUC Act of 1935?

4. Concerning the Annual Report filed by Bedford Waste for 2023, there are discrepancies in the statements for bad debts, lack of a reserve fund allowance and miscellaneous expense with no explanation or resolution.


5. In the testimony of Alpine Pacific principals Mr. Justin Ahmann and Mr. Marc Liechti before the Commission on December 13, 2024, on page 7, lines 15-17, it was stated in answer to the question of adequate capital needed for Bedford Waste, that "Mr. LaMontagne will contribute capital to Bedford in order for Bedford to pay Mr. LaMontagne and transfer Bedford without his debt." This is a troubling statement to Bedford 3 Corners and it should be to the Commission as well. Over the years, Mr. LaMontagne never addressed the long term capital needs of Bedford Waste but suddenly has the capital to make it whole with a sale in sight?

6. Why is the purchase price that Alpine Pacific is paying being kept confidential and how is that not going to impact Bedford 3 Corners ratepayers in a positive way? Bedford 3 Corners is asking for total transparency on how this acquisition will play out and we understand

that there are many options available to the current principals but how is that best for the Public Trust, which this acquisition is not supposed to harm?

7. The rights, privileges, duties, immunities, economic and other substantial interests of Bedford 3 Corners and its ratepayers will be affected by decisions made by this Commission in this docket. Accordingly, Bedford 3 Corners respectfully requests that this Commission approve this Motion to Intervene in this docket.

Respectfully submitted on this 6<sup>th</sup> day of February, 2025.

By:   
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CC: I hereby certify that a copy of the Motion was delivered electronically to the Service List of record on this date in Docket DW 24-117.