## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

## In the Matter of:

ELECTRONIC APPLICATION OF VERIZON	)	
WIRELESS PARTNERSHIP D/B/A VERIZON	)	
WIRELESS FOR ISSUANCE OF A CERTIFICATE	)	
OF PUBLIC CONVENIENCE AND NECESSITY	)	CASE NO.
TO CONSTRUCT A WIRELESS	)	2023-00074
COMMUNICATIONS FACILITY IN THE	)	
COMMONWEALTH OF KENTUCKY IN THE	)	
COUNTY OF CARROL	)	

## COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO VERIZON WIRELESS PARTNERSHIP D/B/A VERIZON WIRELESS

Skyway Towers, LLC Verizon Wireless Partnership d/b/a Verizon Wireless (Joint Applicants), pursuant to 807 KAR 5:001E, shall file with the Commission an electronic version of the following information. The information requested is due on June 16, 2023. The Commission directs Joint Applicants to the Commission's July 22, 2021, Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a

<sup>&</sup>lt;sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID- 19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Joint Applicants shall make timely amendment to any prior response if Joint Applicants obtain information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Joint Applicants fail or refuse to furnish all or part of the requested information, Joint Applicants shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Joint Applicants shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to KRS 278.665(2) and 807 KAR 5:063, Section 1(1)(a)(l)(1). Also refer to Joint Applicants' Amended Application and Supplemental Response to Staff's Commission Staff's First Request for Information. Provide all documentation, including the original documents obtained from the Carroll County Property Valuation

Administration (PVA), that Joint Applicants relied upon to create the list of adjacent

property owners entitled to notification.

2. Refer to KRS 278.665(2) and 807 KAR 5:063, Section 1(1)(a)(l)(1). Also

refer to Joint Applicants' Amended Application and Supplemental Response to

Commission Staff's First Request for Information regarding undeliverable notices to

adjacent land. State whether Joint Applicants accessed the Carroll County PVA records

to confirm that the name and contact information for the owner of the property at 1086 W

Prong Locust Road, Milton, Kentucky, had not been updated since Joint Applicants

obtained the information prior to sending notice. If yes, provide the date Joint Applicants

accessed the Carroll County PVA records. If the records were not accessed, explain why

not.

3. Refer to KRS 278.665(2) and 807 KAR 5:063, Section 1(1)(a)(l)(1). Also

refer to Joint Applicants' Amended Application and Supplemental Response to

Commission Staff's First Request for Information. For all property owners for whom

signed green cards were returned as undeliverable, state all additional steps taken, and

resources utilized by Joint Applicants to search for viable alternative addresses.

inda C. Budwell, PE

**Executive Director** 

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED <u>MAY 31 2023</u>

cc: Parties of Record

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