

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

THE APPLICATION OF)
NEW CINGULAR WIRELESS PCS, LLC,)
A DELAWARE LIMITED LIABILITY COMPANY,)
D/B/A AT&T MOBILITY)
AND TILLMAN INFRASTRUCTURE LLC, A DELAWARE)
LIMITED LIABILITY COMPANY)
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC) CASE NO.: 2024-00284
CONVENIENCE AND NECESSITY TO CONSTRUCT)
A WIRELESS COMMUNICATIONS FACILITY)
IN THE COMMONWEALTH OF KENTUCKY)
IN THE COUNTY OF GRAYSON)

SITE NAME: FALLING BRANCH

* * * * *

APPLICANTS' REQUESTS FOR INFORMATION TO INTERVENERS

New Cingular Wireless PCS LLC d/b/a AT&T Mobility (“AT&T”) and Tillman Infrastructure LLC, a Delaware limited liability company (“Tillman”) (collectively, “Applicants”), by counsel, hereby files and serves to Interveners these Requests for Information as contemplated and authorized by prior Order of the Public Service Commission of Kentucky entered January 7, 2025:

APPLICANTS' REQUESTS FOR INFORMATION TO INTERVENERS

Definitions Applicable to these Requests: The real property owned by Terry and Kimberly Newton as repeatedly referenced below is more particularly described in Deed Book 444, Page 461 in the office of the Grayson County Clerk and is depicted in Exhibit B to the Application in the within proceeding. "Your property in Grayson County" as repeatedly referenced below is the multiple parcels owned by you which are described in Deed Book 466, Page 202 and Deed Book 452, Page 205 in the office of the Grayson County Clerk and depicted in Exhibit B to the Application in the within proceeding.

Instructions: Applicants are to comply with Orders of the Public Service Commission of Kentucky in this proceeding and its regulations found at Title 807 of the Kentucky Administrative Regulations in answering these Requests for Information.

- 1 . Please provide copies of any documents indicating either of you have any credentials, degree, license or certification in the appraisal and/or valuation of real property.
2. Please provide copies of any documents indicating either of you have any credentials, degree, license or certification in radio frequency engineering.
3. Please provide copies of any documents indicating you have water service from a public entity or utility to your property in Grayson County?
4. Please provide copies of any easement, contract, plat or other document, whether or not recorded with the Grayson County Clerk, which relates to whether you have any rights as to water flow or usage from the property now owned by Terry and Kimberly Newton.
5. Please provide copies of any correspondence of any kind including emails with any current or former owner of property adjoining your property which relates to potential water rights or water access for your Grayson County property.
6. Please provide copies of any surveys or government documents in your possession which describe, depict, or address water flow between the property of Terry and Kimberly Newton and your property in Grayson County.
7. Please provide any documents of any kind in your possession indicating whether you have utilized water from a stream on the property of Terry and Kimberly Newton to serve a residence or other structure on your property.
8. Please provide copies of any document or correspondence indicating whether any author of a report, study, or article cited in your testimony in this proceeding has visited your Grayson County property in person since 2021.

9. Please provide copies of any correspondence including e-mail which you have sent to any third parties (other than legal counsel representing you) making them aware of this proceeding or Public Service Commission Case No. 2021-0398 and/or requesting or suggesting they file public comments in this proceeding or case No. 2021-0398.

10. Please provide copies of any report, study, or correspondence in your possession from an engineer or scientist which discusses water flow or hydrology on your property in Grayson County or the adjoining property of Terry and Kimberly Newton.

11. Please provide copies of any governmental documents of any kind indicating your property has been deemed or granted any special designation of any kind which would differentiate it from surrounding properties or generally from other property in Grayson County.

12. Please provide copies of any option agreement (including any amendment), purchase agreement (including any amendment), seller's disclosure, or buyer's waiver, acknowledgement, indemnification or stipulation associated with the purchase of any of your real property in Grayson County in the vicinity of the property of Terry and Kimberly Newton, with any social security numbers or personal financial information redacted.

13. Has there been any period since purchase of your property in Grayson County during which you have not used water from a spring on the property of Terry and Kimberly Newton for service to a residence on your property?

WHEREFORE, Interveners are to respond to the foregoing Requests for Information by filing Responses with the Public Service Commission of Kentucky in this proceeding on or before February 22, 2025 pursuant to the above-referenced Order of the PSC entered January 7, 2025.

CERTIFICATE OF SERVICE

We hereby certify that the within was served on Interveners Roger & Janelle Nicolai, having a mailing address of 2663 Blue Bird Road, Falls of Rough, KY 40119, by First Class U.S. Postal Service Mail, postage prepaid, and via e-mail to janelle.nicolai@gmail.com on this 12th day of February 2025. The email to Mrs. Nicolai includes a Word copy of the Requests for Intervention to facilitate preparation of a Response.

Respectfully submitted,



David A. Pike
and



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