# Dinsmôre

Legal Counsel.

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JUL 2 9 2019

PUBLIC SERVICE COMMISSION

<u>Via Federal Express</u> Gwen R. Pinson Executive Director Public Service Commission 211 Sower Blvd. P.O. Box 615 Frankfort, KY 40602-0615

> Application of Kentucky RSA #3 Cellular General Partnership for Approval to Construct and Operate a New Cell Facility to Provide Cellular Radio Service (Wax) in Rural Service Area #3 (Grayson County), before the Public Service Commission of the Commonwealth of Kentucky, Case No. 2019-00045

Dear Director Pinson:

Enclosed are one (1) original and eleven (11) copies of the response to Commission Staff's July 18, 2019 request for information filed on behalf of Kentucky RSA #3 Cellular General Partnership in the above referenced case

Please return a file stamped copy in the enclosed self-addressed prepaid envelope.

July 26, 2019

Thank you and if you have any questions with respect to this matter, please call me.

Regards,

DINSMORE & SHOHL LLP

Felix H. Sharpe, II

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

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JUL 2 9 2019

PUBLIC SERVICE COMMISSION

#### **IN THE MATTER OF:**

APPLICATION OF KENTUCKY RSA #3 CELLULAR GENERAL PARTNERSHIP FOR APPROVAL TO CONSTRUCT AND OPERATE A NEW CELL FACILITY TO PROVIDE CELLULAR RADIO SERVICE (WAX) IN RURAL SERVICE ARE #3 (GRAYSON COUNTY) OF THE COMMONWEALTH OF KENTUCKY

CASE NO. 2019-00045

# KENTUCKY RSA #3 CELLULAR GENERAL PARTNERSHIP'S RESPONSE TO THE COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

For its response to the first request for information of the Staff of the Public Service Commission of the Commonwealth of Kentucky (the "Commission"), Kentucky RSA #3 Cellular General Partnership ("Kentucky RSA #3"), by counsel hereby states as follows.

### **REQUEST FOR INFORMATION**

**<u>REQUEST</u>**: Refer to Edmonson County Water District's (Edmonson District) comments that were filed into the pending case, in which Edmondson District states that it has no objection to the proposed tower as long as no permanent structures are built on Edmonson District's property or existing easements. Provide a response to Edmonson District's comments, and specifically explain whether Kentucky RSA #3

intends to build the proposed tower on any permanent structure on Edmonson District's property or existing easements.

**RESPONSE:** Kentucky RSA #3 affirms that no permanent structure will be built on the Edmondson County Water District's property or existing easements. The location of the center of proposed tower is approximately 210' from center of the Edmondson County Water District's water tank. Attached is a copy of a map that identifies the location of both the proposed tower and water tank and the distance between them. (also identified in Exhibit "G" to Kentucky RSA #3's Application.)

## **Responsible Witness: Doug Updegraff**

Respectfully submitted,

Jøhn E. Selent Felix H. Sharpe, II **DINSMORE & SHOHL LLP** 101 South Fifth Street Suite 2500 Louisville, KY 40202 tel: (502) 540-2300 fax: (502) 585-2207 john.selent@dinsmore.coms felix.sharpe@dinsmore.com

Counsel to Kentucky RSA #3 Cellular General Partnership

Date:

#### **CERTIFICATION**

I hereby certify that I have supervised the preparation of Kentucky RSA #3 Cellular General Partnership's response to the request for information of the Commission Staff and that the response contained herein (and for which I am designated the responsible witness) is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.

**Doug Updegraff** Vice President – Chief Technology Officer

# **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by was served via firstclass United States mail, sufficient postage prepaid, on the following individuals this <u>uch</u> day of July, 2019:

Edmonson County Water District P.O. Box 208 Brownsville, Kentucky 42210

Counsel to Kentucky RSA #3 Cellular General Partnership