

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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|--|---|------------|
| ELECTRONIC APPLICATION OF CELLCO |) | |
| PARTNERSHIP D/B/A VERIZON WIRELESS AND |) | |
| TOWERCO 2013, LLC FOR ISSUANCE OF A |) | |
| CERTIFICATE OF PUBLIC CONVENIENCE AND |) | CASE NO. |
| NECESSITY TO CONSTRUCT A WIRELESS |) | 2024-00134 |
| COMMUNICATIONS FACILITY IN THE |) | |
| COMMONWEALTH OF KENTUCKY IN THE |) | |
| COUNTY OF BRECKINRIDGE |) | |

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS AND TOWERCO 2013, LLC

Cellco Partnership d/b/a Verizon Wireless and TowerCo 2013, LLC (Verizon Wireless), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on August 27, 2024. The Commission directs Verizon Wireless 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

¹ 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.

Verizon Wireless shall make timely amendment to any prior response if Verizon Wireless obtains 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 Verizon Wireless fails or refuses to furnish all or part of the requested information, Verizon Wireless shall provide a written explanation of the specific grounds for its 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, Verizon Wireless shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, Exhibit C, which shows the location of the tower and identifies every owner of real estate within 500 feet of the proposed tower. Confirm which parcel the tower will be located on.

2. Refer to the Application, Exhibit C. Reconcile the map on page 55 with the map on page 58. Specifically, reconcile the two Biddle properties.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED JUL 31 2024

cc: Parties of Record

Case No. 2024-00134

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