

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CELLCO)	
PARTNERSHIP D/B/A VERIZON WIRELESS AND)	
HORVATH TOWERS VI, LLC FOR ISSUANCE)	
CASE NO. 2024-00132 OF A CERTIFICATE OF)	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY TO)	2024-00132
CONSTRUCT A WIRELESS COMMUNICATIONS)	
FACILITY IN THE COMMONWEALTH OF)	
KENTUCKY IN THE COUNTY OF FLEMING)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CELLCO PARTNERSHIP DBA VERIZON WIRELESS

Cellco Partnership dba Verizon Wireless (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 March 3, 2025. 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 governmental agency, be accompanied by a signed certification of the preparer or the

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).

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 for Construction of Wireless Communication Facility pages 4 and 5. Verizon Wireless stated it was unable to provide a tower and foundation design and a geotechnical engineering report due to a potential federal endangered plant species on the property. Now that the required reports have been provided, provide a

copy of the survey that was conducted during flowering season as well as any correspondence and approval from U.S. Fish and Wildlife Service.

2. Refer to pages 21 and 39 of the Supplemental Information Post Order that was filed on November 11, 2024. The customer listed on the reports is Horvath Towers V, LLC; however, Horvath Towers VI, LLC is the customer's name listed on the application. Reconcile the discrepancy.

3. Provide the status of the two outstanding certified green cards for the property owners within 500 feet of the proposed tower.

4. Provide the resumes for the names listed on page 44 of the Supplemental Information Post Order filed November 11, 2024.


Linda C. Bridwell, PE
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Public Service Commission
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DATED **FEB 13 2025**

cc: Parties of Record

Case No. 2024-00132

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