

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Bell Atlantic Mobile Systems, LLC
d/b/a Verizon Wireless and Vertex Towers, LLC
for a Certificate of Public Good, pursuant to Case No. 24-0097-PET
30 V.S.A. § 248a, authorizing the construction
Of a telecommunications facility in Manchester Vermont

TOWN OF MANCHESTER'S MOTION TO INTERVENE

The Town of Manchester (“Town”), by and through its counsel, Woolmington, Campbell, Bent & Stasny, P.C., hereby moves to intervene.

The Town requests intervention as of right under Public Utility Commission Rule 2.209(A), and 30 V.S.A. § 248a(m); and in the alternative, permissive intervention under Public Utility Commission Rule 2.209(B).

On July 18, 2023, Bell Atlantic Mobile Systems, LLC d/b/a Verizon Wireless and Vertex Towers, LLC (“Petitioner”) submitted its 60-Day Advance Notice to the Town of Manchester pursuant to 30 V.S.A. § 248a, of its intent to submit to the PUC a petition for approval to construct and install a new telecommunications facility (“proposed Facility”) on a parcel of land located at 410 Hunter Park Road in Manchester Center, Vermont. On January 2, 2024, following a public information section provided by the applicant, the Town’s Selectboard voted to oppose the proposed Facility. The Petitioner has since filed its petition.

The Town is a party as of right pursuant to 30 V.S.A. § 248a(m). Without waiving its claim of participation as of right, in the event that the Commission declines to grant such status to the Town for any reason, the Town requests permissive party status under Rule 2.209(B). This alternative request is based on the Town’s substantial interests in

the implementation of its Town Plan and Land Use Ordinance, and in the adverse impacts of the proposed Facility.

WHEREFORE, the Town of Manchester respectfully requests that the Public Utility Commission Grant the Town intervention in this proceeding under Rule 2.209 and such other relief the Commission deems just and proper.

Dated at Manchester, Vermont this 24th day of January, 2024

/s/ Merrill E. Bent
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