

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 25-1543-PET

Petition of Bell Atlantic Mobile Systems, LLC and The Towers, LLC requesting a certificate of public good, pursuant to 30 V.S.A. § 248a, authorizing the installation of telecommunications equipment at 2264 U.S. Route 2 in Marshfield, Vermont	
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**FIRST SET OF INFORMATION REQUESTS SERVED UPON
BELL ATLANTIC MOBILE SYSTEMS, LLC AND THE TOWERS, LLC
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service (“Department” or “DPS”), by its counsel, Caroline Daniels, hereby serves this First Set of Information Requests upon Bell Atlantic Systems, LLC and The Towers, LLC (the “Petitioners”) in accordance with Vermont Public Utility Commission (“Commission”) Rule 2.214, in the above-referenced matter. The Department requests that Petitioners answer the requests herein, conforming to Commission Rule 2.214 and 2.230, and deliver its answers and all requested documents and materials to the Department no later than **Monday, December 15, 2025**. Please provide Petitioners’ answers in electronic format (i.e. Word document or other standard file form readable by the Department) and please provide any spreadsheets in an electronic format.

INSTRUCTIONS

1. Reproduce the request being answered above your response thereto, pursuant to Commission Rule 2.230(M).
2. Responses to any and all Department requests, either contained herein or filed subsequently, should be submitted to the Department as soon as Petitioners are able to provide an answer or production. In other words, Petitioners should not withhold a response to any requests for which it has responsive data, documents, etc. until Petitioners are able to fully answer all pending requests when a reply is forthcoming for some questions.
3. Commission Rule 2.230(M)(3) requires the response to each request to be made under oath by a person competent to testify concerning the response, as well as all documents and exhibits produced as part of the response. When responding to each request please state: (1) the

name(s) and title(s) of the person(s) responsible for preparing the response; (2) the administrative unit which maintains the records being produced or the data from which an answer was derived; and (3) the date upon which the question was answered.

4. Where requested information is unavailable in the exact format requested in the question, or is not available for the entire range (e.g. a span of time, such as years, or other periods and classifications) requested in a series, please provide all available information that is responsive to the subject matter of the question.

5. These requests shall be considered continuing and shall be supplemented and updated as provided for in Commission Rule 2.230(D). Petitioners must supplement, update, correct, and change their answers to be consistent with all relevant information as it becomes available to Petitioners. For example, actual data must be substituted for estimated data. Responses to requests for information regarding a period of time not entirely in the past (or for which complete actual data is yet to be available) should include all actual data available when requested and be supplemented with the remaining actual data as it becomes obtainable.

6. Whenever and wherever responses include estimated information please include an explanation, or reference to a previous explanation, of the methodology and calculations used to derive the estimates.

7. Some of the Department's requests may reference a particular portion of Petitioners' filing. Notwithstanding the specific citation, all such requests should be understood to seek all available information that is responsive to the question.

8. With respect to each document produced by Petitioners, please identify the person who prepared the document and the date on which it was prepared.

9. If any interrogatory or request necessitates a response that Petitioners believe is totally or partially privileged, please state the complete legal and factual basis for the claim of privilege as described in Commission Rule 2.230(A)(6) and respond to all parts of the interrogatory or request of which no claim of privilege is asserted.

10. If any interrogatory or request is objected to in whole or in part, please describe the complete legal and factual basis for the objection and respond to all parts of the interrogatory or request to the extent to which it is not objected. If an objection is made regarding any requested document(s), please identify the document by author, title, date, recipient(s), and generally describe the nature and subject matter of the document(s) in addition to providing the complete legal and factual basis for the objection.

11. To expedite the discovery process and the resolution of this case, if Petitioners wish for clarification on any of these information requests it should contact the Department as soon as possible and before the deadline for response indicated above.

12. The Department reserves the right to submit additional information requests to Petitioners.

DEFINITIONS

13. “Document,” as used herein, shall be construed as broadly as possible to encompass any and all means and media by which information can be recorded, transmitted, stored, retrieved, or memorialized in any form. “Document” shall also include all drafts, copies, or versions which differ in any respect from the original. All spreadsheets submitted must have all formulae accessible and intact.

14. “Petitioner” or “Petitioners,” as used herein, means Bell Atlantic Systems, LLC, d/b/a/ Verizon Wireless and The Towers, LLC, d/b/a Vertical Bridge, jointly and severally.

15. “Petition,” as used herein, means the petition filed by Petitioners and associated attachments, including prefiled testimony and exhibits, filed in the above captioned docket with the Vermont Public Utility Commission, unless context indicates otherwise.

INTERROGATORIES AND REQUESTS TO PRODUCE

Q.DPS.PET.1-1. Please refer to Petitioners’ Exhibit LH-1 Permit Plan. Please produce sheets C-1, C-4, C-5, and C-6 of Exhibit LH-1 in an AutoCAD-compatible format (.DWG or .DXF). The requested documents should include the following layers and features:

- a. Existing topographic contours
- b. Existing vegetation
- c. Proposed grading and earthwork
- d. Limits of proposed vegetation clearing
- e. All project components, including but not limited to:
 1. Tower location
 2. Access road alignment
 3. Fence layout
 4. Equipment pads
 5. Utility infrastructure

Please ensure the documents include the appropriate layer naming and coordinate system information to be geolocated.

Q.DPS.PET.1-2. Please refer to Petitioners’ Exhibit LH-1 Permit Plan. Please produce the tower design information shown in sheets C-7 and C-11 of Exhibit LH-1 in AutoCAD-compatible format (.DWG or .DXF).

Q.DPS.PET.1-3. Please refer to Petitioners’ Exhibit LH-4 Photo Simulations. Please produce the 3D model of the tower used in the preparation of photo simulations in Exhibit LH-4 in AutoCAD-compatible format (.DWG or .DXF).

Q.DPS.PET.1-4. Please refer to Petitioners’ Exhibit LH-4 Photo Simulations. Regarding the photo simulations in Exhibit LH-4, please produce:

- a. Original versions of all photos included in Exhibit LH-4 with all associated meta data.
- b. Original versions of any additional photos taken in the process of conducting the photo simulations that were not included in Exhibit LH-4, with all associated meta data.

Q.DPS.PET.1-5. Please refer to page 6 of the prefiled testimony of Louis Hodgetts, which states, “We floated balloons on a string at a height approximating the height of the Monopole, then used software to transpose a simulation of the Tower’s height and width as viewable in that location.” Please produce the digital files used to “transpose a simulation of the Tower’s height and width as viewable in that location.”

DATED at Montpelier, Vermont, this 14th day of November 2025.

Respectfully submitted,
VERMONT DEPARTMENT OF PUBLIC SERVICE

By: /s/ Caroline Daniels
Caroline Daniels, Special Counsel
112 State Street
Montpelier, VT 05620
(802)-522-2681
caroline.daniels@vermont.gov