

## State of Vermont Public Utility Commission

### Motion to Intervene Form

Intervenor and Case Information	
<b>Case Number</b>	25-2931-PET
<b>Name</b>	Jacob & Bonnie Wildwood, Mary & Bob Atwood
<b>Mailing Address</b>	Street and # 645 VT Route 100 S Town Rochester State and Zip VT 05767
<b>Daytime Phone</b>	802-230-8161
<b>E-mail Address</b>	jakewildwood@gmail.com
<b>Name of Legal Counsel (if any)</b>	
<b>Mailing Address of Legal Counsel (if any)</b>	Street and #  Town  State and Zip
<b>E-mail Address of Legal Counsel (if any)</b>	
<u>The Rule 2.209 Criteria</u>	
<p><b><u>Intervention as of Right by Statute or Commission Rule</u></b>                      (This is uncommon; leave blank if not applicable to your situation.)</p> <p><b>Please identify any statute or Commission rule that you think gives you a legal right to be a party in the case.</b></p>	
<p><b><u>Intervention as of Right without Statute or Commission Rule</u></b></p> <p><b>Please identify the interest you have that must be decided in this proceeding and explain (a) why a decision in this proceeding will impair your ability to protect that interest, and (b) why another existing party to the case does not adequately represent that interest.</b></p>	

<p><b><u>Permissive Intervention by Statute or Commission Rule</u></b></p> <p><b>Please identify any statute or Commission rule that you believe gives you a conditional right to intervene in this proceeding, and explain why you believe the conditions have been met. Please also explain why your participation as a party will not unnecessarily delay this proceeding or otherwise unduly prejudice the interests of existing parties.</b></p>	<p>Orderly Development of the Region [30 V.S.A. § 248(b)(1)] 30 V.S.A. § 248(b)(1). And also The Municipal and Regional Plan [30 V.S.A. § 248(b)(1)(C)]</p> <p>The proposed tower site, access, and construction does not meet the requirements of our town plan and would adversely affect our area.</p> <p>The builders (Vertex) have not sought co-location with the AT&amp;T tower already in use and the user (Verizon) has not sought-out alternate forms of transmission which would be less invasive and more practical to expand coverage beyond where it already is.</p> <p>This proposed tower would mostly duplicate AT&amp;T</p>
<p><b><u>Permissive Intervention without Statute or Commission Rule</u></b></p> <p><b>Please identify the interest you have that must be decided in this proceeding and explain why your participation as a party will not unnecessarily delay this proceeding or otherwise unduly prejudice the interests of existing parties.</b></p>	<p>My wife, Bonnie and I, are speaking for ourselves and her parents, Mary and Bob Atwood, who own the property we live in, which abuts the proposed tower site property.</p> <p>The project involves reckless construction up steeper grades than reported by Vertex with road construction that may yield runoff that could be destructive to our neighbors in the future.</p> <p>It also visually impacts our area and we have a business that relies on tourism which is located directly on the scenic byway this would overlook.</p> <p>Property values (like ours) next to cell tower development are also reduced.</p>
<p><b><u>Certification</u></b> This section may be completed by the intervenor or a duly authorized representative.</p>	
<p><b>I certify that the information provided on this form is true and accurate to the best of my knowledge.</b></p> <p>Print Name <u>Jacob &amp; Bonnie Wildwood and Mary &amp; Bob Atwood</u></p> <p>Signature _____ Date <u>1/10/25</u></p> <p><i>Note: A signature is not required if this form is filed using ePUC, the Commission's online document management system, which is accessible at <a href="https://epuc.vermont.gov">https://epuc.vermont.gov</a></i></p>	