

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 25-1679-PET

Application of Industrial Tower and Wireless, LLC For a Certificate of Public Good pursuant to 30 V.S.A. § 248a, authorizing the construction of a wireless telecommunications facility in Tinmouth, Vermont	
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**TOWN OF TINMOUTH’S RESPONSE TO PETITIONER’S MOTION FOR NON-
SUBSTANTIAL CHANGE**

NOW COMES Town of Tinmouth, through counsel, DesMeules, Olmstead & Ostler, and does not oppose the Petitioner’s Motion for Non-Substantial Change in the above-captioned matter.

However, the Town reasserts and reincorporates by reference herein all continuing relevant portions of its Recommendations and Comments and previous positions asserted in this matter. The Town unequivocally and vigorously opposes the Petition, whether the proposal is 130’ AGL or 160’ AGL.¹ It is the Town’s position that the proposed reduction in height does not address the fundamental problems in the Petition, and, very likely, exacerbates at least some of them. Accordingly, it does not waive any argument previously made and expressly preserves each.

WHEREFORE, the Town does not oppose the Motion for Non-Substantial Change, but continues to oppose the Petition and respectfully requests the Commission to deny the CPG.

¹ Although neither is, strictly speaking, true. The revised plans indicate that the top of the antennas will reach 143’ AGL. Exhibit LH-7 (revised) at C-7.

Dated at Norwich, this 20th day of April, 2026.

Town of Tinmouth

BY: DesMeules, Olmstead & Ostler

Signed: /s/ Andrew D. Cliburn
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