

# State of Vermont Public Utility Commission

## Motion to Intervene Form

| Intervenor and Case Information                                                                                                                                                                                                                                                                                                                                               |                                                                                             |
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| <b>Case Number</b>                                                                                                                                                                                                                                                                                                                                                            | 26-0574-PET                                                                                 |
| <b>Name</b>                                                                                                                                                                                                                                                                                                                                                                   | Derek J Jones & Colleen Sheppard                                                            |
| <b>Mailing Address</b>                                                                                                                                                                                                                                                                                                                                                        | Street and #    P.O Box 72<br>Town             Fairfield<br>State and Zip    Vermont, 05450 |
| <b>Daytime Phone</b>                                                                                                                                                                                                                                                                                                                                                          | 802-933-4892                                                                                |
| <b>E-mail Address</b>                                                                                                                                                                                                                                                                                                                                                         | djjmtl@sympatico.ca                                                                         |
| <b>Name of Legal Counsel (if any)</b>                                                                                                                                                                                                                                                                                                                                         |                                                                                             |
| <b>Mailing Address of Legal Counsel (if any)</b>                                                                                                                                                                                                                                                                                                                              | Street and #<br><br>Town<br><br>State and Zip                                               |
| <b>E-mail Address of Legal Counsel (if any)</b>                                                                                                                                                                                                                                                                                                                               |                                                                                             |
| The Rule 2.209 Criteria                                                                                                                                                                                                                                                                                                                                                       |                                                                                             |
| <p><b><u>Intervention as of Right by Statute or Commission Rule</u></b><br/>         (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> |                                                                                             |

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| <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><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>Our home lies in the heart of the dozen civil war era 19th century houses, barns and associated buildings that comprise the hamlet of Bordoville, designated for decades a Historic Village by the Vermont Department of historic preservation. We continue to renovate the circa 1860 ancestral home of the founder of Bordoville (Augustin Bourdeau). He built it before building the community's house of worship, Bordoville's 7th Day Adventist Church (circa 1865).</p> <p>Industrial's erection of a 136-foot (120 + 16) radio tower less than half a mile from us would violate the scenic rural beauty of our hamlet, obstruct our view of Cold Hollow, and destroy the peaceful enjoyment of our property and community life.</p> <p>We seek to intervene because of the proposal's significant and undue impact on the historic, religious, aesthetic resources, and for its non-compliance with the Northwest Vermont Regional Plan and the Enosburgh Town Plan and Bylaws. The proposal fails to respect the Plans' "sensitive-siting" and Orderly Development principles, and violates the "least intrusive-obtrusive technologies" requirement for telecommunications development.</p> <p>We request:</p> <ul style="list-style-type: none"> <li>• that, before the application proceeds further, Industrial conduct a balloon test with engagement of the community;</li> <li>• that the balloon test specifically include an assessment of the visual and aesthetic impact on Bordoville's civil war cemetery, the highest viewpoint from the Village of Bordoville Historic District;</li> <li>• that alternative less obtrusive sites be explored on the designated property;</li> <li>• a hearing to address the significant and substantive issues that the proposed tower raises.</li> </ul> <p>Our interests are not represented by anyone else. Our participation will not cause unnecessary delay. We participated in Industrial's previous tower application that the PUC denied.</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>Derek J Jones &amp; Colleen Sheppard</u></p> <p>Signature        <u>Derek J Jones &amp; Colleen Sheppard</u>      Date      <u>30 April 2026</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> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |