

# VERMONT PUBLIC SERVICE BOARD

November 12, 2015

2015 NOU 16 RM 9 32

Susan Hudson, Clerk Vermont Public Service Board 112 State Street Montpelier, VT 05620-2701

Re: Docket No. 8585

Dear Ms. Hudson,

Attached please find

- 1. Motion to Intervene
- 2. Certificate of Service

in the above-referenced matter.

Electronic copes are attached to this email.

Hard copies are being mailed to the Service List, as noted on the Certificate of Service.

Thank you.

Sincerely, Ralland Halland

Robert R. Holland, MD *Pro se* representative of

Town of Irasburg

P.O. Box 88

Irasburg, VT 05845-088

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## VERMONT PUBLIC SERVICE GOARD

### STATE OF VERMONT PUBLIC SERVICE BOARD

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Docket No. 8585

Investigation into Meterological Tower at 700	•
Kidder Hill Road in Irasburg, Vermont	

# MOTION TO INTERVENE OF TOWN OF IRASBURG

Now comes the Town of Irasburg to petition to intervene in the matter referenced above pursuant to Public Service Board Rule 2.209(B).

- 1. The Town of Irasburg has substantial particularized interests protected by Section 248 and related to criteria of §§ 30 and 209 which are relevant to the outcome of the proceedings in this matter.
- 2. The Town of Irasburg has a substantial, particularized interest in making sure that there is a penalty sufficient to create an incentive for David Blittersdorf to follow the law in the future.

The Town of Irasburg has a substantial interest that may be adversely affected by the outcome of this proceeding. No other party will adequately protect those interests and there are no alternative means by which those interests may be protected.

Intervention is timely and will not unduly delay these proceedings or prejudice the interests of existing parties or of the public.

Wherefore, the Town of Irasburg prays that they be permitted to participate in this Docket No. 8561 as parties in accordance with PSB Rule 2.209(B).

Dated this 12<sup>th</sup> day of November, 2015 in Irasburg, Vermont.

Dr. Robert R. Holland Appointed Representative

Town of Irasburg

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## STATE OF VERMONT PUBLIC SERVICE BOARD

Docket No. 8585

Investigation into Meteorological Tower at 700 Kidder Hill Road in Irasburg, Vermont )

### CERTIFICATE OF SERVICE

I hereby certify that hard copies of the foregoing filing were sent by U.S. Mail on November 12, 2015 to the parties in this docket, listed below.

Dr. Robert R. Holland Appointed Representative Town of Irasburg PO Box 88 / 4328 Route 14 Irasburg, VT 05845 kcf.rrh@gmail.com

Laur & Wallame

### SERVICE LIST

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