

**STATE OF CONNECTICUT
SITING COUNCIL**

DOCKET NO. 502 - Cellco Partnership d/b/a Verizon Wireless application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 118 Newton Road, Woodbridge, Connecticut

JULY 23, 2021

**WNNET'S OBJECTION TO APPLICANT'S SECOND EXTENSION OF TIME TO
RESPOND TO WNNET's INTERROGATORIES**

WNNET, Intervenor in these proceedings, hereby objects to Applicant's second extension of time to respond to WNNET's First Set of Interrogatories on the grounds that this extension of time will impede WNNET's presentation of its case. The interrogatories were served on June 29, 2021 with the express purpose of discovering information in the possession of Applicant so that WNNET may prepare its case.

At that time, Verizon applied for an extension of time to July 23rd on the representation that "If the request is granted, Cellco expects to be in a position to file these responses with the Council on or before July 23, 2021."

Now, on July 23rd Verizon represents without explanation that it needs up until the next pre-hearing filing deadline to respond to these same interrogatories. If the responses are indeed served at that time, WNNET's experts will be unable to process the information and include the results of their analysis in their pre-filed testimony, thus materially hindering Intervenor's participation in this case and diminishing the quality of its presentation to the Council or extending the proceedings.

Wherefore, the extension of time should not be granted, or WNNET's experts should be assigned a later date upon which to file their pre-filed testimony.

Respectfully Submitted,

WNNET,

By _____

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CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was deposited in the United States mail, first-class, postage pre-paid this 23rd day of July 2021 and addressed to:

Ms. Melanie Bachman, Executive Director, Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051 (15 orig, plus 1 electronic) (US Mail/electronic) siting.council@ct.gov .

And electronic copies to the service list as attached:

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