

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

NOTICE OF ELECTRONIC FILING BY CELLCO	)	
PARTNERSHIP D/B/A VERIZON WIRELESS AND	)	
TOWERCOM FOR ISSUANCE OF A CERTIFICATE	)	
OF PUBLIC CONVENIENCE AND NECESSITY TO	)	CASE NO.
CONSTRUCT A WIRELESS COMMUNICATION	)	2024-00214
FACILITY IN THE COMMONWEALTH OF	)	
KENTUCKY IN THE COUNTY OF CLINTON	)	

SITE NAME: AGEE RIDGE

\* \* \* \* \*

**RESPONSE TO JULY 1, 2024 NOTICE OF  
ELECTRONIC FILING APPLICATION OF CELLCO  
PARTNERSHIP D/B/A VERIZON WIRELESS AND  
TOWERCOM 2024-00214**

Cellco Partnership, d/b/a Verizon Wireless and TowerCom (“Applicants”), by counsel, pursuant to 807 KAR 55:063 (3), Section 8, submitted a notice of electronic filing on July 1, 2024. Applicant received acknowledgement of notice of electronic filing on July 1, 2024 and assigned case no. 2024-00214. At this time, on behalf of our clients, we would request withdrawal of the Notice of Intent to Use Electronic Filing, Case No. 2024-00214.

Exhibits:

1. Applicant submitted Notice of Intent to Use Electronic Filing on July 1, 2024, attached hereto as Exhibit A.
2. Applicant received acknowledgement of Notice of Intent to Use Electronic Filing on July 1, 2024, attached hereto as Exhibit B.
3. Attached hereto as Exhibit C, please find an Affidavit of Certification for all information contained in this Request.

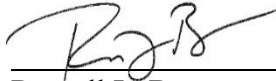
All Exhibits to this Request are hereby incorporated by reference.

All responses and requests associated with this Request may be directed to:

Russell L. Brown  
Clark, Quinn, Moses, Scott & Grahn, LLP  
320 North Meridian Street, Suite 1100  
Indianapolis, IN 46204  
Phone: (317) 637-1321  
FAX: (317) 687-2344  
Email: rbrown@clarkquinnlaw.com

WHEREFORE, Applicant respectfully request that the PSC accept the foregoing request to Withdraw the Notice of Intent to use electronic filing (2024-00214).

Respectfully submitted,



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Russell L. Brown  
Clark, Quinn, Moses, Scott & Grahn, LLP  
320 North Meridian Street, Suite 1100  
Indianapolis, IN 46204  
Phone: (317) 637-1321 / FAX: (317) 687-2344  
Email: rbrown@clarkquinnlaw.com  
Attorney for Celco Partnership d/b/a Verizon Wireless  
and TowerCom

Dated October 9, 2024

#### **LIST OF EXHIBITS**

- A. PSC Notice for Electronic Filing
- B. PSC Acknowledgement
- C. Affidavit of Certification

**NOTICE OF ELECTION OF USE OF ELECTRONIC FILING PROCEDURES**

(Complete All Shaded Areas and Check Applicable Boxes)

In accordance with 807 KAR 5:001, Section 8, TowerCom & Cellco Partnership d/b/a Verizon Wireless gives notice of its intent to file an application for Certificate of Public Convenience and Necessity with the Public Service Commission no later than September 30, 2024 and to use the electronic filing procedures set forth in that regulation.

Tower Com & Cellco Partnership a/b/a Verizon Wireless further states that:

- |  | Yes                                 | No                       |
|--|-------------------------------------|--------------------------|
| 1. It requests that the Public Service Commission assign a case number to the intended application and advise it of that number as soon as possible;   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. It or its authorized representatives have registered with the Public Service Commission and are authorized to make electronic filings with the Public Service Commission;   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Neither it nor its authorized representatives have registered with the Public Service Commission for authorization to make electronic filings but will do so no later than seven days before the date of its filing of its application for rate adjustment; | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. It or its authorized agents possess the facilities to receive electronic transmissions;   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. The following persons are authorized to make filings on its behalf and to receive electronic service of Public Service Commission orders and any pleadings filed by any party or the Public Service Commission Staff:                                       |                                     |                          |

Name	Electronic Mail Address
Elizabeth Bentz Williams	ebw@clarkquinnlaw.com
Russell L. Brown, Attorney	rbrown@clarkquinnlaw.com

- |  |                          |                          |
|--|--------------------------|--------------------------|
| 6. It and its authorized representatives listed above have read and understand the procedures for electronic filing set forth in 807 KAR 5:001 and will fully comply with those procedures unless the Public Service Commission directs otherwise. | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|

Signed Elizabeth Bentz Williams

Name: Elizabeth Bentz Williams, AICP

Title: Land Use Consultant

Address: Clark, Quinn, Moses, Scott & Grahn,  
320 N. Meridian Street, Ste 1100,  
Indianapolis, IN 46204

Telephone Number: 317-637-1321

Andy Beshear  
Governor

Rebecca W. Goodman  
Secretary  
Energy and Environment Cabinet



Commonwealth of Kentucky  
**Public Service Commission**  
211 Sower Blvd.  
P.O. Box 615  
Frankfort Kentucky 40602-0615  
Telephone: (502) 564-3940  
psc.ky.gov

Kent A. Chandler  
Chairman

Angie Hatton  
Vice Chairman

Mary Pat Regan  
Commissioner

July 1, 2024

## PARTIES OF RECORD

RE: Case No. **2024-00214**

Cellco Partnership dba Verizon Wireless  
(Construct Cell Site - No P&Z Commission)  
Agee Ridge site; Highway 127 Crow Creek Road / KY-3063, Kentucky

This letter is to acknowledge receipt of notice of election of use of electronic filing procedures to file an application in the above case. The notice was date-stamped received July 1, 2024, and has been assigned Case No. 2024-00214. In all future correspondence or filings in connection with this case, please reference the above case number.

All documents submitted to the Commission in this proceeding must comply with the rules of procedure adopted by the Commission found in 807 KAR 5:001. Any deviation from these rules must be submitted in writing to the Commission for consideration. Additionally, confidential treatment of any material submitted must follow the requirements found in 807 KAR 5:001 (13).

Materials submitted to the Commission which do not comply with the rules of procedure, or that do not have an approved deviation, are subject to rejection by Commission pursuant to 807 KAR 5:001 (3). In order to ensure cases are processed in a timely manner and accurate reliable records are created, please make sure that the rules of procedure are followed. Should you have any questions, please contact Brandon Bruner in the Filings Branch at 502-564-3940.

Sincerely,

A handwritten signature in blue ink that reads "Linda C. Bridwell".

Linda C. Bridwell  
Executive Director

LCB/AH

\*Elizabeth Bentz Williams  
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