

# Morgan Lewis

## Catherine Wang

Partner  
+1.202.373.6037  
catherine.wang@morganlewis.com

## Brett P. Ferenchak

Of Counsel  
+1.202.373.6697  
brett.ferenchak@morganlewis.com

February 21, 2024

## VIA ELECTRONIC FILING

Patricia Van Gerpen, Executive Director  
South Dakota Public Utilities Commission  
Capital Building, 1st Floor  
500 East Capital Avenue  
Pierre, South Dakota 57501-5070

## Re: Request for Cancellation of the Certificate of Authority of Electric Lightwave, LLC d/b/a Allstream

Dear Director Van Gerpen:

This letter requests that the Commission cancel the Certificate of Authority of Electric Lightwave, LLC d/b/a Allstream ("Electric Lightwave") in connection with a *pro forma* consolidation of Electric Lightwave into Zayo Group, LLC ("Zayo Group" and together with Electric Lightwave, the "Parties") that was completed on December 31, 2023, with Zayo Group remaining as the surviving entity (the "*Pro Forma Consolidation*").<sup>1</sup> Since Electric Lightwave no longer exists as a separate corporate entity, its Certificate of Authority to provide local exchange and interexchange telecommunications services granted in Docket No. TC21-113 should be cancelled effective January 1, 2024.

As a result of the *Pro Forma Consolidation*, Electric Lightwave no longer exists as a separate corporate entity. Further, Zayo Group provides telecommunications to Electric Lightwave's customers pursuant to its Certificate of Authority.<sup>2</sup> Since Electric Lightwave no longer exists and Zayo Group provides services to Electric Lightwave's customers, the public will not be harmed by the cancellation of Electric Lightwave's Certificate of Authority and such cancellation is reasonable, necessary and will not be disruptive to the present or future public convenience. As

---

<sup>1</sup> See Notice of Proposed *Pro Forma Consolidations* Affecting Zayo Group, LLC and Electric Lightwave, LLC d/b/a Allstream, Docket No. 2022 Info TC121 (filed Nov. 30, 2022).

<sup>2</sup> Zayo holds a Certificate of Authority to provide local exchange and interexchange telecommunications services granted in Docket No. TC12-191.

## Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW  
Washington, DC 20004  
United States

T +1.202.739.3000  
F +1.202.739.3001

Patricia Van Gerpen, Executive Director  
February 21, 2024  
Page 2

stated above, the cancellation of Electric Lightwave's Certificate of Authority should be effective January 1, 2024.

Questions or inquiries regarding any outstanding regulatory obligations of Electric Lightwave, LLC should be directed to:

Donna Heaston  
Senior Corporate Counsel  
Zayo Group  
2800 Campus Drive, Suite 140  
Plymouth, MN 55441  
donna.heaston@zayo.com

Please acknowledge receipt of this electronic filing. Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

A handwritten signature in blue ink that reads "Brett P Ferenchak".

Catherine Wang  
Brett P. Ferenchak

Counsel for Zayo Group  
(successor-in-interest to Electric Lightwave, LLC)

## VERIFICATION

I, Lauren Lantero, state that I am SVP, General Counsel of Zayo Group, LLC; that Zayo Group, LLC is the successor in interest to Electric Lightwave, LLC (together, the "Company"); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents thereof and the certifications contained therein regarding the Company and its affiliates, are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 31<sup>st</sup> day of January, 2024.



Lauren Lantero  
SVP, General Counsel  
Zayo Group, LLC