



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

May 12, 2016

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

RE: **Docket No. I-2016-2527248**

Dear Secretary Chiavetta:

Enclosed for filing please find the Department's *Notice of Appearance*, in the above-captioned matter.

I hereby certify that a copy has been sent to all parties of record as indicated by the Certificate of Service.

Very truly yours,

A handwritten signature in blue ink, appearing to read "N. D. Mertens".

Nicholas D. Mertens  
Assistant Counsel

Enclosure

cc: Steven K. Haas, Administrative Law Judge  
Parties of Record  
Mark J. Chappell, P.E., Chief, Utilities and Right-of-Way Section  
Gregory J. Vaughn, Grade Crossing Engineer, Utilities and Right-of-Way Section  
Ahmed Lasloudji, District Grade Crossing Engineer, District 8-0

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation Upon The Commission's :  
Motion Into Matters Pertaining to the : I-2016-2527248  
Proper Safety of the Traveling Public :  
Traversing the Crossing Where : **Electronically Filed**  
Lighthouse Road (DOT 535148L) :  
Crosses, at Grade, One Track of Norfolk :  
Southern Railway Company in Guilford :  
Township, Franklin County :

**NOTICE OF APPEARANCE**

Please enter the appearance of Nicholas D. Mertens, Assistant Counsel, on behalf of the Commonwealth of Pennsylvania, Department of Transportation, in the above-referenced action. I am authorized to accept service on behalf of the Department in this matter. On the basis of this notice, I request a copy of each document hereafter issued by the Commission in this matter. I will accept service on behalf of the individual at the address below which may be deleted from the service list:

Gina M. D'Alfonso, Esquire  
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Office of Chief Counsel  
PO Box 8212  
Harrisburg, PA 17105-8212

William J. Cressler, Esquire  
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Mark Chappell, P.E., Chief  
PennDOT  
Bureau of Design ROW & Utility Div.  
PO Box 3362  
Harrisburg, PA 17105-3362

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



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Nicholas D. Mertens  
Assistant Counsel  
Commonwealth of Pennsylvania  
Department of Transportation  
Office of Chief Counsel  
P.O. Box 8212  
Harrisburg, PA 17105-8212  
Telephone No. (717) 787-3128  
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Pennsylvania Attorney I.D. Number 313998  
nimertens@pa.gov

DATED: May 12, 2016

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Department's **Notice of Appearance** was served upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54, by First-Class mail, postage prepaid; this 12<sup>th</sup> day of May, 2016:

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Norfolk Southern Railway Company  
Three Commercial Place  
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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



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