

ORIGINAL

Law Offices

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CALVIN D. SPITLER
KEITH L. KILGORE
PAUL W. KILGORE

ELLEN O. WARGO

**DOCUMENT
FOLDER**

April 11, 1997

000094

DOCKETED

Mr. John G. Alford, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, Pennsylvania 17120

APR 28 1997

KJR

RE: Replacement of Conrail Bridge over Wilhelm Avenue
South Lebanon Township, Lebanon County
PUC Docket Number A-00109901
Related Docket Number: C-00970126
C-00970106
C-00970107

RECEIVED
PROTHONOTARY'S OFFICE

97 APR 14 AM 11:41

Dear Mr. Alford:

Please be advised I represent South Lebanon Township regarding Docket Number A-00109901 and C-00970106. I am particularly concerned regarding A-00109901 concerning the alteration of the crossing at Wilhelm Avenue in South Lebanon Township, Lebanon County, Pennsylvania. Your last order was dated February 14, 1997 (A copy of which is enclosed herein).

The above referenced order sets forth your office does not anticipate any further requests for an extension of time from South Lebanon Township. Currently, Conrail is either abandoning the line or attempting to sell it to a new owner. As a result, we would request an immediate hearing to see which option Conrail intends to follow.

The immediate hearing is necessary in order for the Township to complete plans to meet your deadline of December 31, 1997 to submit all plans of record for review.

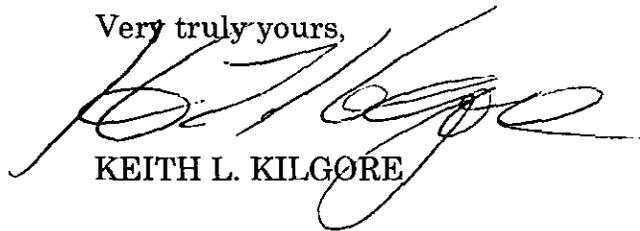
Currently, there is no rail service provided on the line in question by Conrail, and to our knowledge, there is no client on the line that is either requested or wants rail service.

As a result of the recent take over of Conrail, there has been no action regarding this particular matter. We do not see the need to expend in excess of \$800,000.00 of taxpayer's money for an at grade crossing since the removal of the structure and widening of the road would cost considerably less.

There are related docket numbers concerning the same line to Numbers C-00970126, C-00970106, and C-00970107.

We appreciate if we could expedite a hearing for sometime in June of this year. I await your most immediate reply. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read "Keith L. Kilgore", written over the typed name below.

KEITH L. KILGORE

KLK:pja

cc: Dave Wilhelm

William Knerr

Raymond Britcher

Curtis E. Kulp

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION

Office of Chief Counsel
Forum Place

555 Walnut Street - 9th Floor
Harrisburg, Pennsylvania 17120
Telephone No. (717) 787-3128
Fax No. (717) 772-2741



RECEIVED
OFFICE OF D.A.L.S.

97 APR 28 AM 10:01

PA PUC

Bob

DOCUMENT
FOLDER

April 24, 1997

Honorable Robert A. Christianson
Acting Chief Administrative Law Judge
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

via
letter

Re: C-00970126; C-00970106; C-00970107; A-00109901

Consolidate?

Dear Judge Christianson:

(Hbg.)

It is my understanding that the above-captioned cases have been forwarded to the scheduling office for hearings to be scheduled. I have been asked by my client to respectfully request that these cases be scheduled in a timely fashion in the interest of the safety of the motoring public. It is my belief that all of the complaint dockets can be scheduled at one time.

If you should require any additional information from me, please do not hesitate to contact me.

DOCKETED
JIA: 04 1997

Very truly yours,

Gina M. D'Alfonso
Gina M. D'Alfonso
Assistant Counsel in Charge

220/GMD:sls

- cc: David A. Salapa, Esquire
- Scott K. Wasserkrug, Esquire
- Keith L. Kilgore, Esquire
- Samuel G. Weiss, Esquire
- William D. Pickering, P.E., Chief
- Engineering District 8-0 (Attn: Raymond Britcher)

RECEIVED
97 JUN 25 AM 9:33
PROPHONARY'S OFFICE

COLT

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during
May

to
S/H call Gina
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S/H C ✓
? summer by - yes
Eric memo?

CALVIN D. SPITLER
KEITH L. KILGORE
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ELLEN O. WARGO

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ORIGINAL

003109

**DOCUMENT
FOLDER**

June 25, 1997

REC'D

John G. Alford, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, Pennsylvania 17120

97 JUN 27 AM 9:19
RECEIVED
PROTHONOTARY'S OFFICE

RE: Replacement of Conrail Bridge over Wilhelm Avenue
South Lebanon Township, Lebanon County
PUC Docket Number A-00109901 *File*
Related Docket Number: ~~C-0090126~~ *A-970126*
C-00970106
C-00970107

Dear Mr. Alford:

On April 11, 1997, I wrote to you regarding the above requesting an expedited hearing and set forth the related document numbers. A copy of my letter is enclosed herein.

There is currently a hearing scheduled before Administrative Law Judge Herbert S. Cohen on Tuesday, August 5, 1997 at 10:00 a.m. regarding the above related docket numbers. It is respectfully requested you combine the related docket number with PUC docket number A-00109901.

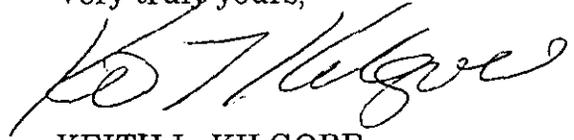
The facts are similar and the problem is the same in all of the cases. All of the parties will be present for the August hearing, and all the issues can be presented to an Administrative Law Judge at the same time for resolution.

I respectfully request again you combine all the above docket numbers for one hearing before Judge Cohen on August 5, 1997. If you have any questions, please feel free to contact me.

**DOCKETED DOCUMENT
FOLDER
JUL 21 1997**

63

Very truly yours,



KEITH L. KILGORE

KLK:pja

Enclosure

Cc: w/encl.:

Curtis E. Kulp

Allen E. Freed, Chairman

Andrew F. Gordon, Esquire

Jamie A. Wolgemuth

Timothy D. Sheffey, Esquire

Gina M. D'Alfonso, Esquire

Edward M. Keener

Scott Wasserkrug, Esquire

David A. Salapa, Esquire

William D. Pickering, Engineer

John Herzog, Esquire

J.D. Cossell, Chief Engineer

Adrienne C. Snelling, Esquire

Rick Corman

Samuel G. Weiss, Esquire