



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

December 23, 2015

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

RE: **Docket No. A-2008-2067958**

Dear Secretary Chiavetta:

Enclosed for filing please find the Department's *Petition for Extension of Time*, 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 black ink, appearing to read "Nick Mertens".

Nicholas D. Mertens  
Assistant Counsel

Enclosure

220/NDM:aca

cc: Parties of Record  
Mark J. Chappell, P.E., Chief, Utilities and Right-of-Way Section  
Thomas A. Ryczek, District Grade Crossing Engineer, District 12-0

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of	:	
Transportation of the Commonwealth of	:	A-2008-2067958
Pennsylvania for the approval to widen S. R.	:	
0019, Section P02, which crosses under-one	:	<b>Electronically Filed</b>
track of Norfolk Southern Railway	:	
Company (DOT 367 280 V) in Waynesburg	:	
Borough, Greene County and the allocation	:	
of costs incident thereto.	:	

**PETITION FOR EXTENSION OF TIME**

AND NOW, comes the Commonwealth of Pennsylvania, Department of Transportation, (“Department”), by and through its counsel, Nicholas D. Mertens, Assistant Counsel, and offers the following in support of its Petition for Extension of Time, pursuant to 52 Pa. Code § 5.41, in the above referenced matter:

1. The name and address of the Petitioner is:

Commonwealth of Pennsylvania  
Department of Transportation  
Bureau of Project Delivery  
P.O. Box 3362  
Harrisburg, Pennsylvania 17105-3362

2. The name and address of Counsel for the Petitioner is:

Nicholas D. Mertens, Assistant Counsel  
Commonwealth of Pennsylvania  
Department of Transportation  
Office of Chief Counsel  
P.O. Box 8212  
Harrisburg, Pennsylvania 17105-8212


3. The Secretarial Letter dated January 26, 2011, approved the Department’s Application to widen SR 0019, Section P02, where the public highway crosses under one track of the Norfolk Southern Railway Company (DOT # 367 280 V) in Waynesburg Borough, Greene County.

4. The Secretarial Letter ordered that all work was to be completed on or before June 30, 2015.
5. Due to utility and construction delays, the Department was unable to complete the alteration project by June 30, 2015. As such, the Department respectfully requests an extension of time to complete the alteration project.
6. The Department respectfully requests that the Secretarial Letter dated January 26, 2011 be modified as follows (modification in **bold**):
  8. The crossing alteration project be completed on or before **December 31, 2017**, and that on or before said date, Pennsylvania Department of Transportation report the date of actual completion of the work and certify to this Commission that the work has been completed satisfactorily in accordance with the approved plans and this Secretarial Letter.

**WHEREFORE**, the Department of Transportation respectfully requests that the Secretarial Letter, dated January 26, 2011, be modified consistent with this Petition.

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  
Fax Number (717) 772-2741  
Pennsylvania Attorney I.D. Number 313998  
nimertens@pa.gov

DATED: December 23, 2015

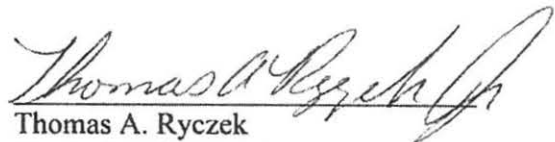
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Borough, Greene County and the allocation	:	
of costs incident thereto.	:	

**VERIFICATION**

I, Thomas A. Ryczek, Grade Crossing Engineer, Commonwealth of Pennsylvania, Department of Transportation, in the foregoing document, make the following statement subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsifications to authority, and do state that as the Grade Crossing Engineer for the Commonwealth of Pennsylvania, Department of Transportation, I am authorized to make this statement on behalf of the Commonwealth of Pennsylvania, Department of Transportation, and that the facts set forth in the foregoing document are true and correct to the best of my information, knowledge, and belief.

DATED: 12-23-15



Thomas A. Ryczek  
Grade Crossing Engineer  
Engineering District 12-0

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of :  
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Pennsylvania for the approval to widen S. R. :  
0019, Section P02, which crosses under-one : **Electronically Filed**  
track of Norfolk Southern Railway :  
Company (DOT 367 280 V) in Waynesburg :  
Borough, Greene County and the allocation :  
of costs incident thereto. :

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Department's *Petition for Extension of Time* was served upon the parties listed below, in accordance with the requirements of §1.54, by First-Class mail, postage prepaid, this 23<sup>rd</sup> day of December, 2015:

Bob Dern  
Windstream LLC  
427 Jefferson Road  
Waynesburg, PA 15370

Lisa Marinelli  
Allegheny Power d/b/a/ West Penn Power Co.  
800 Cabin Hill Drive  
Greensburg, PA 15601

Pam Snyder, Chairman  
Greene County Courthouse  
93 East High Street  
Waynesburg, PA 15370

T. Reed Kiger  
Franklin Township  
568 Rolling Meadows Road  
Waynesburg, PA 15370

Edward G. Howard, Borough Manager  
Borough of Waynesburg  
90 East High Street  
Waynesburg, PA 15370

Randy Putt  
Duke Energy Gas Transmission  
217 University Drive  
Lemont Furnace, PA 15446

Earl Cook  
Equitrans LP  
175 Industrial Road  
Waynesburg, PA 15370

Denise Richter  
Columbia Gas Transmission  
950 Manifold Road  
Washington, PA 15301

Randal S. Noe, Esq.  
Norfolk Southern Corporation  
Three Commercial Place  
Norfolk, VA 23510

Dennis Mills  
Dominion Peoples Gas Company  
1291 West Main Street  
Monongahela, PA 15063

Joe Simatic  
Southwest PA Water Authority  
1442 Jefferson Road  
P.O. Box 219  
Jefferson, PA 15344-0187

David Wyatt  
System Engineer  
Norfolk Southern Corporation  
1200 Peachtree Street N.E.  
Atlanta, GA 30309

David L. Spencer, Jr.  
EQT Midstream  
175 Industry Road  
Waynesburg, PA 15370

George Scott  
Franklin Township Sewer Authority  
568 Rolling Meadows Road  
P.O. Box 752  
Waynesburg, PA 15370

Thomas Bracey  
Norfolk Southern Corporation  
1200 Peachtree Street N.E.  
Atlanta, GA 30309

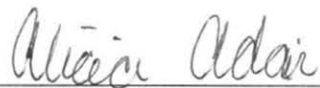
Tim Blasinsky  
Allegheny Power Company  
Jefferson Division  
1879 Jefferson Road  
Rice Landing, PA 15357

Rick Moslen  
Comcast  
1530 Chartiers Ave.  
Pittsburgh, PA 15204

John Dulany  
Alltel of Pennsylvania Inc.  
427 Jefferson Road  
Waynesburg, PA 15370

Alan Barker  
Dominion Transmissions, Inc.  
466 E. Pittsburgh Street  
Greensburg, PA 15601

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



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Alicia Adair, Legal Assistant to  
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

DATED: December 23, 2015