

**BEFORE THE PENNSYLVANIA  
PUBLIC UTILITY COMMISSION**

Application of Norfolk Southern Railway Company for approval to reconstruct the Crossing of the North Avenue/Brighton Road Bridge crossing above its tracks in The City of Pittsburgh, Allegheny County (DOT No. 507450B), and for an exemption From the Commission's overhead clearances regulations

Docket No. A-2018-3006432

Application of Norfolk Southern Railway Company for approval to reconstruct the Rehabilitation of the below-grade crossing (DOT No. 507446L) where Merchant Street passes under the tracks of Norfolk Southern Railway Company in the City of Pittsburgh, Allegheny County

Docket No. A-2018-3001039

Application of the City of Pittsburgh for leave to continue prior overhead clearance for certain bridges over tracks operated by Norfolk Southern Corporation in the City of Pittsburgh, Allegheny County

Docket No.: A-00119378

Application of the City of Pittsburgh for approval of the alteration of the railroad crossings at Ridge Avenue, West Ohio Street, and North Avenue and Brighton Road Bridges which carry said streets above the tracks operated by Norfolk Southern Corporation in the City of Pittsburgh, Allegheny County; as amended by the City of Pittsburgh to request approval of the abolition of the railroad crossing at Ridge Avenue

Docket No.: A-00119379

Application of Norfolk Southern Railway Company for approval of an exemption from the Commission's overhead clearance requirements at 52 Pa. Code § 33.121 for a track operated by Norfolk Southern Railway Company, located in the City of Pittsburgh in Allegheny County

Docket No.: A-2011-2233889

**JOINDER TO PETITION FOR RECONSIDERATION  
OF FIRST INTERIM ORDER MOTION TO CONSOLIDATE**

AND NOW, comes The Northside Leadership Conference (“NSLC”), by and through its attorneys, David A. Wolf, Esquire, Deborah R. Erbstein, Esquire and the law firm of Goldberg, Kamin & Garvin, LLP, files the within Joinder to Petition for Reconsideration of First Interim Order Motion to Consolidate filed by Rail Pollution Protection Pittsburgh (“RP3”), and avers the following:

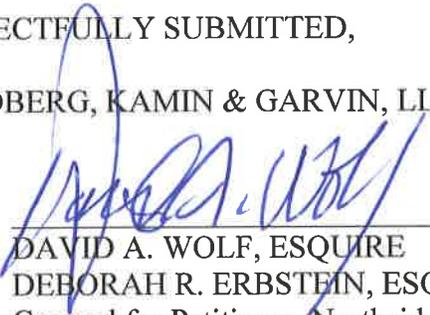
1. RP3 has filed a Petition for Reconsideration of the First Interim Order on the parties’ the Motion to Consolidate the above-captioned matters.
2. NSLC joins in RP3’s Petition seeking the same relief.

WHEREFORE, the NSLC respectfully requests that the Commission grant the within Petition for Reconsideration, permit the consolidation of the within captioned matters, together with such other relief as this Commission deems just and appropriate.

RESPECTFULLY SUBMITTED,

GOLDBERG, KAMIN & GARVIN, LLP

BY:

  
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DAVID A. WOLF, ESQUIRE  
DEBORAH R. ERBSTEIN, ESQUIRE  
Counsel for Petitioner, Northside  
Leadership Conference, a Pennsylvania  
non-profit

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 22<sup>ND</sup> day of March, 2019, one (1) copy of the foregoing **Joinder to Petition for Reconsideration** was delivered by US First Class Mail, Postage Pre-Paid, addressed as follows:

<p>Mark Chappell, P.E. Chief Right-of-Way &amp; Utilities Division Bureau of Design Penn DOT P.O. Box 3362 Harrisburg, PA 17105-3362</p>	<p>Allegheny County Solicitor Dept. Of Law 445 Fort Pitt Blvd. Pittsburgh, PA 15219</p>	<p>Engineering District 11-0 Pennsylvania Dept. of Transportation Attn: Cheryl Moon-Sirianni, P.E. and/or Lou Ramano 45 Thoms Run Road Bridgeville, PA 15017</p>
<p>DQE Communications ATTN: Shawn Blanner 424 S. 27th Street, St. 220 Pittsburgh, PA 15203</p>	<p>Community College of Allegheny County Facilities Management Division Attn: Rich Schlegel 800 Allegheny Ave. Pittsburgh, PA 15233</p>	<p>Windstream c/o Damage Group Personnel 929 Martha's Way Hiawatha, IA 52233</p>
<p>NRG Energy Center Pittsburgh Attn: Bryan Sarti 111 S. Commons Ave. Pittsburgh, PA 15212</p>	<p>Comcast Cablevision Attn: Joseph Bechtold 1530 Chartiers Ave. Pittsburgh, PA 15204</p>	<p>Bradley R. Gorter, Esquire PA PUC Bureau of Trans. &amp; Safety PO Box 3265 Harrisburg, PA 17105</p>
<p>Century Link f/k/a Embarq Attn: George McElvain Grid No. UTOO-D27.34 700 W. Mineral Ave. Littleton, CO 80120</p>	<p>Gina M. D'Alfonso, Esquire Jason D. Sharp, Esquire Office of Chief Counsel - PennDOT P. O. Box 8212 Harrisburg, PA 17105-8212</p>	<p>Anthony M. Bilan, Esq. City of Pgh - Dept. Of Law 313 City-County Building 414 Grant Street Pittsburgh, PA 15219 (City of Pittsburgh)</p>

<p>Crown Castle  Attn: Rebecca Caldwell  2000 Corporate Drive  Canonsburg, PA 15317</p>	<p>Pittsburgh Water &amp; Sewer  Authority  Attn: Rick Obermeier  1200 Penn Avenue  Pittsburgh, PA 15222</p>	<p>Verizon Pennsylvania, LLC  ATTN: Deborah Barum  3151 Pioneer Avenue  Pittsburgh, PA 15226</p>
<p>Benjamin C. Dunlap, Jr., Esq.  Nauman Smith  Attorneys At Law  PO Box 840  Harrisburg, PA 17108-0840  <i>(Norfolk Southern Railway Co.)</i></p>	<p>Emma Hempstead, Esquire  Ryan Hamilton, Esquire  Fair Shake Environmental Legal  Services  3495 Butler Street, Ste. 102  Pittsburgh, PA 15201  <i>(Rail Pollution Protection Pgh)</i></p>	<p>Karina Ricks  City of Pittsburgh Dept. of  Mobility &amp;  Infrastructure, RM. 215-B  City-County Bldg.  414 Grant Street  Pittsburgh, PA 15219</p>
<p>Peoples Gas Company LLC  Attn: Don Zombek  261 Center Street  McKeesport, PA 15132</p>	<p>Peoples Gas Company LLC  Attn: Debbie Ross  375 North Shore Drive  Pittsburgh, PA 15212</p>	<p>AT&amp;T Local Services  ATTN: Nancy Spence  360 Gees Mill  Business Parkway NE  Conyers, GA 30013</p>
<p>Neon Transcom  ATTN: Mike Brodar  196 Van Buren Street  Herndon, VA 20170</p>	<p>Level 3 Communications LLC  Attn: Level 3 Operator  1025 Eldorado Blvd  Broomfield, CO 80021</p>	<p>Duquesne Light Company  Attn: Shane Thieret PA-TD  2645 New Beaver Ave  Pittsburgh, PA 15233</p>
<p>Glenn Olcerst, Esquire  RP3  1200 Resaca Place  Pittsburgh, PA 15212</p>	<p>John J. Richardson, Esquire  Bernstein Burkley  707 Grant Street, Ste. 2200  Pittsburgh, PA 15219  <i>(Manchester Citizens Corp.)</i></p>	<p>Emma Hempstead, Esquire  Ryan Hamilton, Esquire  RP3  3495 Butler Street  Suite 102  Pittsburgh, PA 15201</p>
<p>Jonathan Hocker  Shawn Starling  Norfolk Southern Railway Co.  1200 Peachtree Street NE  Atlanta, GA 30309</p>		

BY:

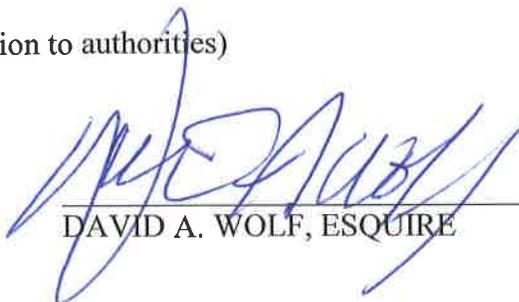
  
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DAVID A. WOLF, ESQUIRE  
DEBORAH R. ERBSTEIN, ESQUIRE  
Counsel for Petitioner, Northside  
Leadership Conference, a Pennsylvania  
non-profit

**VERIFICATION**

I, DAVID A. WOLF, ESQUIRE, as counsel for Northside Leadership Conference, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S.A. § 4904 (relating to unsworn falsification to authorities)

3/22/19

Date



DAVID A. WOLF, ESQUIRE