



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL

July 3, 2019

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

RE: A-2018-3003018

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 blue ink, appearing to read "Jennifer Brown-Sweeney".

Jennifer Brown-Sweeney
Assistant Counsel

Cc: Parties of Record
Mark Chappell, Acting Highway Delivery Division Chief
Daniel D. Leonard, Grade Crossing Engineer, Central Office, KCB 7th Floor
Rodney O. Rehnert, District Grade Crossing Engineer, District 5-0

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Pennsylvania Department of Transportation	:	A-2018-3003018
for approval to alter the public crossing (DOT 592 503 B) by	:	
replacement and rehabilitation of the existing bridge where	:	
Interstate 0078 crosses, above grade, the tracks of Reading	:	
Blue Mountain and Northern Railroad Company located in	:	
Tilden Township, Berks County.	:	

PETITION FOR EXTENSION OF TIME

AND NOW, comes the Commonwealth of Pennsylvania, Department of Transportation, (“Department”), by and through its counsel, Jennifer Brown-Sweeney, 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 and states as follows:

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:

Jennifer Brown-Sweeney, Assistant Counsel
Commonwealth of Pennsylvania
Department of Transportation
Office of Chief Counsel
P.O. Box 8212
Harrisburg, Pennsylvania 17105-8212

3. By Secretarial Letter entered June 3, 2019 the Pennsylvania Public Utility Commission (“Commission”) directed that “[a]ll work necessary to complete the alteration of the subject crossing be done in a manner satisfactory to this Commission on or before December 31, 2022...” and as otherwise set forth therein.

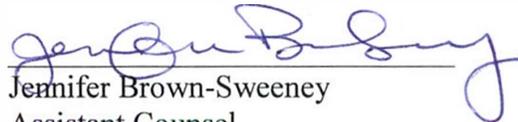
4. The original date listed in the Secretarial Letter was given early in the design process. Updated time estimates by the design team indicates that the project will take up to an additional two and a half years to complete.
5. Therefore, the Department respectfully requests an extension of time from December 31, 2022, contained in the June 3, 2019 Secretarial Letter to the extended date of June 30, 2025, and that the Secretarial Letter dated June 3, 2019 be modified as follows:

13. All work necessary to complete the alteration of the subject crossing be done in a manner satisfactory to this Commission on or before ~~December 31, 2022~~ June 30, 2025, and that on or before said date, Pennsylvania Department of Transportation report to this Commission in writing the date of actual completion of the work.

WHEREFORE, the Department of Transportation respectfully requests that the Public Utility Commission Secretarial Letter, entered on June 3, 2019 be modified consistent with this Petition.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION



Jennifer Brown-Sweeney

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 314884

jbrownswee@pa.gov

DATED: July 3, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Pennsylvania Department of Transportation : A-2018-3003018
for approval to alter the public crossing (DOT 592 503 B) by :
replacement and rehabilitation of the existing bridge where :
Interstate 0078 crosses, above grade, the tracks of Reading :
Blue Mountain and Northern Railroad Company located in :
Tilden Township, Berks County. :

VERIFICATION

I, Rodney O. Rehnert, District Grade Crossing Administrator, 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 Administrator 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: 7/3/2019


Rodney O. Rehnert
District Grade Crossing Administrator

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Pennsylvania Department of	:	A-2018-3003018
Transportation for approval to alter the public	:	Electrically filed
crossing (DOT 592 503 B) by replacement and	:	
rehabilitation of the existing bridge where	:	
Interstate 0078 crosses, above grade, the tracks	:	
of Reading Blue Mountain and Northern	:	
Railroad Company located in Tilden Township,	:	
Berks County.	:	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Department's *Petition for Time of Extension* was served upon the parties listed below, by first class mail, postage prepaid this 3rd day of July 2019.

Chris Goetz
Reading Blue Mountain & Northern Railroad
Company
P.O. Box 218
Port Clinton, PA 19549

Christian Leinbach
Berks County Commissioners
633 Court Street, 13th Floor
Reading, PA 1960

Al Nerino
Met-Ed
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612

Comcast Cable Communications
400 Riverfront Drive
Reading, PA 19602

Matt Cochran
Panther Creek Power Operating, LLC
4 Dennison Rd
Nesquehoning, PA 18240

Cheryl Haus
Tilden Township
874 Hex Highway
Hamburg, PA 19526

Jeffrey Kramer
Verizon Pennsylvania Inc
409 Washington Street
Reading, PA 19601

Gene Schappell, Chairman
Tilden Township Supervisors
874 Hex Highway
Hamburg, PA 19526

Peter Kalabisko, Mayor
Borough of Hamburg
61 North Third St
Hamburg, PA 19526

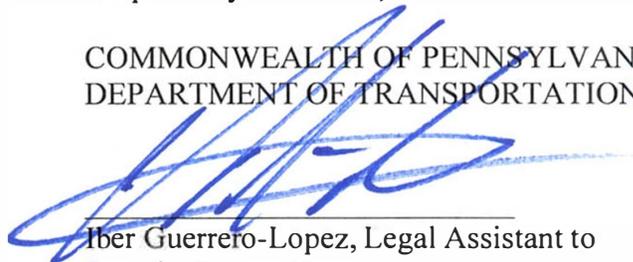
Keith L. Brobst
Hamburg Municipal Authority
61 North 3rd St
Hamburg, PA 19526

Mike Leshko
UGI Central Penn Gas, Inc
225 Morgantown Road
Reading, PA 19611

David Gettle
Blue Mountain Water Cooperative
P.O. Box 373
Myerstown, PA 17067

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION



Iber Guerrero-Lopez, Legal Assistant to
Jennifer Brown-Sweeney
Assistant Counsel
Office of Chief Counsel
P.O. Box 8212
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Fax No.: 717/772-2741

DATED: July 3, 2019