



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

February 25, 2020

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

**RE: C-2018-3002326**

Dear Secretary Chiavetta,

Enclosed for filing please find the Department's *Petition for Extension of Time* in the above referenced 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 that reads "Gina M. D'Alfonso".

Gina M. D'Alfonso  
Senior Counsel in Charge

cc: Parties of Record  
Daniel D. Leonard., Acting Chief, Utilities and Right-of-Way Section  
Gregory J. Vaughn, Grade Crossing Engineer, Central Office, KCB 7<sup>th</sup> Floor  
John Krafczyk, ADE Maintenance, District 6-0  
Mary Ann Lang, District Utility Manager, District 6-0  
Robert Magee, District Grade Crossing Engineer, District 6-0

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Andrew Boden	:	
	:	<b>Docket No. C-2018-3002326</b>
	:	
Complainant	:	<b>Electronically Filed</b>
	:	
v.	:	
	:	
	:	
CSX Transportation, Inc., City of	:	
Philadelphia, PennDOT	:	
Respondents	:	

**PETITION FOR EXTENSION OF TIME**

And Now, comes the Commonwealth of Pennsylvania, Department of Transportation, (“Department”) by and through its counsel, Gina M. D’Alfonso, Senior Counsel in Charge, and offers the following in support of its Petition for Extension of Time.

1. The name and address of your Petitioner is the Commonwealth of Pennsylvania, Department of Transportation, 400 North Street, Harrisburg, Pennsylvania 17110.
2. The name and address of counsel for the Petitioner is Gina M. D’Alfonso, Senior Counsel in Charge, Office of Chief Counsel, Department of Transportation of the Commonwealth of Pennsylvania, P.O. Box 8212, Harrisburg, Pennsylvania 17105-8212.
3. By Order entered October 24, 2019 the Department was ordered to complete certain items of work by December 31, 2019. Traffic control plans took longer than expected to be prepared and the City of Philadelphia requested changes. The changes

to the traffic control plans are in process. The Department is also awaiting a permit from the City of Philadelphia. For these reasons the project has been delayed.

4. The Department requests an extension of time within which to complete this work until June 30, 2020 and requests that ordering paragraph 5 be modified as follows:
  5. That all work be completed by June 30, 2020, unless another date is agreed to by the parties.

WHEREFORE, your Petitioner, Commonwealth of Pennsylvania, Department of Transportation requests your Honorable Commission, to modify the Order entered October 24, 2019 consistent with this Petition.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



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Gina M. D'Alfonso  
Senior Counsel in Charge  
Commonwealth of Pennsylvania  
Department of Transportation  
Office of Chief Counsel  
P.O. Box 8212  
Harrisburg, PA 17105-8212  
Telephone No. (717) 787-3128  
Fax No. (717) 772-2741  
Pennsylvania Attorney I.D. Number 46767

Dated: February 25, 2020

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Andrew Boden

Complainant

v.

CSX Transportation, Inc., City of  
Philadelphia, PennDOT  
Respondents


**Docket No. C-2018-3002326**

**Electronically Filed**

**VERIFICATION**

I, Robert Magee, P.E., District 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: February 24, 2020

  
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Robert Magee, P.E.  
District Grade Crossing Engineer

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Andrew Boden	:	
Complainant	:	<b>Docket No. C-2018-3002326</b>
	:	
v.	:	<b>Electronically Filed</b>
	:	
CSX Transportation, Inc., City of	:	
Philadelphia, PennDOT	:	
Respondents	:	

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Department's *Extension of Time* was served upon the parties listed below, in accordance with the requirements of §1.54, by First-Class mail, postage prepaid, and electronically as indicated this 25th day of February 2020.

Kayla L. Rost, Esquire  
PA PUC Bureau of Investigation and  
Enforcement  
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Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



Iber Guerrero-Lopez, Legal Assistant to  
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Senior Counsel in Charge  
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DATED: February 25, 2020