



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

April 14, 2021

Via Electronic Mail

Megan M. Turnbull, Esquire
Danielle Guarascio, Esquire
Weiss Burkardt Kramer LLC
445 Fort Pitt Boulevard, Suite 503
Pittsburgh, PA 915219
mturnbull@wbklegal.com
dguarascio@wbklegal.com

Re: Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to alter the crossings where State Route 3104 crosses, above grade, the tracks of CSX Transportation Inc. (DOT 584 825 U), Norfolk Southern Railway Company (DOT 507 455 K), and the Pittsburgh and Ohio Central Railroad Company (DOT Unknown) in the City of Pittsburgh, Stowe Township and McKees Rocks Borough, Allegheny County.
Docket No. A-2020-3020667
(I&E's Interrogatories and Requests for Production of Documents directed to McKees Rocks Borough - Set I)

Dear Attorney Turnbull and Attorney Guarascio:

Enclosed please find the Bureau of Investigation and Enforcement's ("I&E") **Interrogatories and Requests for Production of Documents directed to McKees Rocks Borough - Set I** in the above referenced matter. Pursuant to 52 Pa. Code § 5.342(d), please provide your responses to the Interrogatories within twenty (20) days of service.

Please provide copies of your responses and forward them to me via email at karost@pa.gov. If you have any questions, please contact me at karost@pa.gov.

Sincerely,

Kayla L. Rost
Prosecutor
Bureau of Investigation & Enforcement
PA Attorney ID No. 322768
(717) 787-1888
karost@pa.gov

KLR/ac
Enclosures

cc: Secretary Chiavetta (*E-File Cover Letter and Certificate of Service only*)
ALJ Conrad A. Johnson (*Cover Letter and Certificate of Service only – via email*)
Nicholas Miskanic, Legal Assistant (*Cover Letter and Certificate of Service only – via email*)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of :
Transportation of the Commonwealth of :
Pennsylvania for approval to alter the crossings :
where State Route 3104 crosses, above grade, :
the tracks of CSX Transportation Inc. (DOT :
584 825 U), Norfolk Southern Railway : Docket No. A-2020-3020667
Company (DOT 507 455 K), and the Pittsburgh :
and Ohio Central Railroad Company (DOT :
Unknown) in the City of Pittsburgh, Stowe :
Township and McKees Rocks Borough, :
Allegheny County. :

CERTIFICATE OF SERVICE


I hereby certify that I have this day served a true copy of the foregoing **Interrogatories and Requests for Production of Documents directed to McKees Rocks Borough- Set I**, dated April 14, 2021, upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Service by Electronic Mail:

Benjamin C. Dunlap Jr., Esquire
Nauman Smith Shissler & Hall
200 North Third Street, 18th Floor
Harrisburg, PA 17101
bdunlapjr@nssh.com

Jennifer Brown-Sweeney, Esquire
Pennsylvania Department of Transportation
Office of Chief Counsel
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(*McKees Rocks Borough Solicitor*)



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