



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL

February 1, 2022

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street 2nd FL
Harrisburg, PA 17120

RE: A-2018-3000172

Dear Secretary Chiavetta,

Enclosed for filing please find the Department's *Petition for Time of Extension* 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 cursive script that reads "Jillian G. Fellows".

Jillian G. Fellows
Assistant Counsel

Cc: Parties of Record
Mark Chappell, P.E., Utilities and Right of Way Section Chief (*email*)
Gregory J. Vaughn, Grade Crossing Engineer, Central Office, KCB 7th Floor (*email*)
Rodney Rehnert, District Grade Crossing Administrator, District 5-0 (*email*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of the Department of : Docket No. A-2018-3000172
Transportation of the Commonwealth of :
Pennsylvania for the approval to replace the : Electronically Filed
existing bridge where State Route 0183, Section :
05B (Schuylkill Avenue) crosses over two :
tracks of the Norfolk Southern Railroad (DOT :
592 216 N) in the City of Reading, Berks :
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, Jillian G. Fellows, 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 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:

Jillian G. Fellows, Assistant Counsel
Commonwealth of Pennsylvania
Department of Transportation
Office of Chief Counsel
P.O. Box 8212
Harrisburg, Pennsylvania 17105-8212
jfellows@pa.gov

3. On February 22, 2018, the Department filed an Application to replace the existing three-span bridge which carries State Route 0183, Section 05B, over the railroad, in the City of Reading, Berks County, with a new one-span bridge that meets current requirements.

4. By Order entered May 21, 2018, the Pennsylvania Public Utility Commission (“Commission”) directed that “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, 2021...”
5. The December 31, 2021 completion date was not met due to the construction funding being pushed back a few years ago and the design being put on hold at that time.
6. For the reason stated above, the Department respectfully requests an extension of time from the December 31, 2021 date contained in the May 21, 2018 Order to the extended date of June 30, 2025, and that the Secretarial Letter dated May 21, 2018 be modified as follows:
 11. 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, 2021~~, 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.

[Remainder of Page Left Blank Intentionally]

WHEREFORE, the Department of Transportation respectfully requests that the Public Utility Commission Order entered on May 21, 2018, be modified consistent with this Petition.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION

Jillian G. Fellows

Jillian G. Fellows

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 324156

jfellows@pa.gov

DATED: February 1, 2022

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VERIFICATION

I, Rodney 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 District 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: February 1, 2022

Rodney o. Rehnert

Rodney Rehnert
District Grade Crossing Administrator

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below, in accordance with the requirements of 52 Pa. Code §1.54, by first class mail, postage prepaid:

Douglas Starling
Senior Engineer Public Improvements
Norfolk Southern Corporation
1200 Peachtree Street
Atlanta, GA 3009

Jason M. Morris, Esquire
Norfolk Southern Corporation
3 Commercial Place
Norfolk, VA 23510-9241

Christian Y. Leinbach, Chairman
Berks County Commissioners
633 Court Street, 13th Floor
Reading, PA 19601

Wally Scott, Mayor
City Hall
815 Washington Street
Reading, PA. 19601

Kurt Zielaskowski
UGI Utilities
225 Morgantown Road
Reading, PA 19611

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50 Patricia Drive
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City of Reading
815 Washington Street
Reading, PA 19601

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Birdsboro, PA 19508

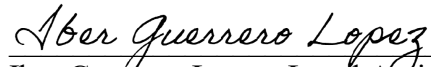
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Respectfully submitted,
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION



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Fax No.: 717/772-2741

DATED: February 2, 2022