



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

March 21, 2022

**Via Electronic Mail**

Honorable Emily I. DeVoe  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
301 Fifth Avenue  
Suite 220, Piatt Place  
Pittsburgh, PA 15222  
[edevoe@pa.gov](mailto:edevoe@pa.gov)

Re: Complaint filed by Reading Blue Mountain & Northern Railroad Company involving the deteriorated condition of the railroad crossing surface and roadway approaches at the public crossing (DOT 361 425 J) where SR 2019 (Oak Street) crosses, at grade, the tracks of Reading Blue Mountain & Northern Railroad Company, located in the Pittston Township, Luzerne County.  
**Docket No. C-2020-3016069**

Dear Judge DeVoe:

Enclosed for filing please find the Pennsylvania Department of Transportation's ("PennDOT") ***Direct Testimony of the Department of Transportation*** in the above-captioned matter.

I hereby certify that a copy has been served on all parties of record as indicated by the Certificate of Service.

Very truly yours,

*Jillian G. Fellows*

Jillian G. Fellows  
Assistant Counsel

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service only – via e-file*)  
Daniel D. Leonard, Grade Crossing Engineer, Central Office (*via email*)  
Sarah J. Fenton, District Grade Crossing Administrator, Engineering District 4-0 (*via email*)  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Complaint filed by Reading Blue Mountain : Docket No.: C-2020-3016906  
& Northern Railroad Company involving :  
the deteriorated condition of the railroad :  
crossing surface and roadway approaches at :  
the public crossing (DOT 361 425 J) where : **Electronically Filed**  
SR 2019 (Oak Street) crosses, at grade, the :  
tracks of Reading Blue Mountain & :  
Northern Railroad Company, located in the :  
Pittston Township, Luzerne County. :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing **Direct Testimony of the Department of Transportation** dated March 21, 2022, 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 Only**

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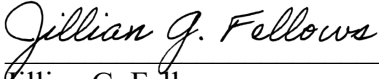
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Respectfully Submitted,  
COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION

  
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DATED: March 21, 2022