



**NAUMAN
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April 25, 2022

Via Electronic Filing

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

**Re: Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to alter the five (5) public at grade crossings by the installation of new active traffic control devices where South Hoover Street, Brubaker Avenue, Custer Avenue, South Railroad Avenue and Brimmer Ave. (SR 1011), cross the tracks of Norfolk Southern Railway Company in New Holland Borough, Lancaster County, all in accordance with the Federal Grade Crossing Program and the allocation of costs incident thereto.
Docket No. A-2020-3021103**

Dear Secretary Chiavetta:

Enclosed for filing in the above-captioned matters, please find the Petition for Extension of Time, of Norfolk Southern Railway Company. Copies have been served upon all interested parties as indicated on the Certificate of Service.

Sincerely yours,

Benjamin C. Dunlap, Jr.

BCDjr/ino
Enclosure

cc: All parties of record

plans, to PennDOT for review and to the Pennsylvania Utility Commission (“Commission”), for approval, prior to the start of construction.

4. Norfolk Southern submitted the plans on February 23, 2021 and per Secretarial Letter dated April 6, 2021 the plans were approved.

5. Norfolk Southern received authorization on November 17, 2021 to begin the construction of the subject crossings and subsequently ordered the materials needed.

6. Norfolk Southern currently has many other construction projects that are already in progress and will not have the resources needed to begin this one due to the many electrical lines, both overhead and underground, utility poles and facilities that will need to be coordinated and relocated, prior to the start of construction.

7. Norfolk Southern respectfully requests that the aforementioned Order be modified to extend the completion date stated in paragraph 15, from May 31, 2022 to May 31, 2023.

WHEREFORE, Norfolk Southern Railway Company, respectfully requests that it be granted an extension of time until May 31, 2023, to complete all work needed to alter the subject crossings.

Respectfully submitted,

NAUMAN, SMITH, SHISSLER & HALL, LLP

By: *Benjamin C. Dunlap, Jr.*
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Supreme Court ID #66283
200 North Third Street, 18th Floor
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Attorneys for Norfolk Southern Railway Corporation

Date: April 25, 2022

VERIFICATION

I, Kurt J. Young, Administrator, Grade Crossing Program, of Norfolk Southern Railway Company, hereby states that the facts set forth in the attached *Petition for Extension of Time* in the forementioned matter is true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. §4904 (relating to unsworn falsification to authorities).

Kurt J. Young

Kurt J. Young
Administrator, Grade Crossing Program

Date: April 22, 2022

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to alter the five (5) public at grade crossings by the installation of new active traffic control devices where South Hoover Street, Brubaker Avenue, Custer Avenue, South Railroad Avenue and Brimmer Ave. (SR 1011), cross the tracks of Norfolk Southern Railway Company in New Holland Borough, Lancaster County, all in accordance with the Federal Grade Crossing Program and the allocation of costs incident thereto. :
: **Docket No. A-2020-3021103**
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: **Electronically Filed**
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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Petition for Extension of Time in the above-captioned action this day via electronic mail, in Harrisburg, Pennsylvania, addressed to:

Via Electronic Mail

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Date: April 25, 2022

/s/ Ijeoma Okereke
Ijeoma Okereke