



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

October 30, 2023

**Via Electronic Filing**

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


**RE: Application of CSX Transportation, Inc. for approval to abolish four (4) at grade crossings where East Bayfront Parkway (DOT # 918 322 D) Ore Dock Road (DOT # 976 924 B and 932 473 C); and East Bay Drive (DOT #A918 325 Y) cross at-grade the tracks of CSX Transportation, Inc. in the City of Erie, Erie County, Pennsylvania  
Docket No. A-2023-3041598**

Dear Secretary Chiavetta,

Enclosed for electronic filing please find the Department's *Withdrawal of Appearance* of Jillian G. Fellows and *Notice of Appearance* of Caroline G. Robelen 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,



/s/ Caroline G. Robelen  
Caroline G. Robelen  
Assistant Counsel

cc: Parties of Record  
Mark Chappell, P.E., Chief, Highway Delivery Division (Email)  
Mohammad Arghoshi, District Grade Crossing Manager, District 1-0 (Email)  
Brian A. McNulty, P.E., Engineering District 1-0 (Email)  
Thomas J. McClelland, P.E., Assistant District Executive, Engineering District 1-0 (Email)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of CSX Transportation, Inc. : Docket No. A-2023-3041598**  
**for approval to abolish four (4) at grade : :**  
**crossings where East Bayfront Parkway : Electronically Filed**  
**(DOT # 918 322 D) Ore Dock Road (DOT : :**  
**# 976 924 B and 932 473 C); and East Bay : :**  
**Drive (DOT #A918 325 Y) cross at-grade : :**  
**the tracks of CSX Transportation, Inc. in : :**  
**the City of Erie, Erie County, : :**  
**Pennsylvania : :**

**WITHDRAWAL OF APPEARANCE**

Please withdraw my appearance in the above-designated matter on behalf of Commonwealth of Pennsylvania, Department of Transportation’s Engineering District 1-0 (District 1).

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION

By: /s/ 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  
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Pennsylvania Attorney I.D. 324156  
[jfellows@pa.gov](mailto:jfellows@pa.gov)

/s/ Caroline G. Robelen  
Caroline G. Robelen  
Assistant Counsel  
Commonwealth of Pennsylvania  
Department of Transportation  
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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**Drive (DOT #A918 325 Y) cross at-grade : :**  
**the tracks of CSX Transportation, Inc. in : :**  
**the City of Erie, Erie County, : :**  
**Pennsylvania : :**

**Notice of Appearance**

Please enter the appearance of Caroline G. Robelen, as Counsel on behalf of the Commonwealth of Pennsylvania, Department of Transportation, in the above-referenced action. The undersigned is authorized to accept service on behalf of the Department in this matter. Karen L. Cummings should remain as Counsel of record for the Department in addition to the undersigned. All other Department of Transportation employees may be removed from the Parties of Record.

Respectfully Submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION

/s/ 

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Caroline G. Robelen  
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. 328743  
[crobelen@pa.gov](mailto:crobelen@pa.gov)

DATED: October 30, 2023

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**the City of Erie, Erie County, : :**  
**Pennsylvania : :**  
**: :**  
**: :**  
**: :**

**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:

**Service by Electronic Mail**

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**Service by US Mail**

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Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION

/s/



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