



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

March 27, 2024

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

**RE: C-2024-3046989**

Dear Secretary Chiavetta,

Enclosed for electronic filing please find the Department's *Notice of Appearance* 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 blue ink, appearing to read "Caroline G. Robelen".

Caroline G. Robelen  
Assistant Counsel

Cc: Parties of Record  
Daniel Leonard, PennDOT, Engineer (Email)  
Steven Betts, District 3-0, Grade Crossing Engineer (Email)  
Tami Smith, Utility Relocation Specialist (Email)  
Barry Basom, P.E., Acting Chief of Utilities & Row Section (Email)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Re: Formal Complaint of Reading Blue Mountain & Northern Railroad Company regarding the surface condition of the public crossing (DOT 591 833 D) where State Route 0054 crosses, at grade, the track of Reading Blue Mountain & Northern Railroad Company located in Conyngham Township, Columbia County.** :  
: **Docket No. C-2024-3046989**  
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**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. All other Department of Transportation employees may be removed from the Parties of Record.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



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Caroline G. Robelen, Esq.  
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Commonwealth of Pennsylvania  
Department of Transportation  
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[crobelen@pa.gov](mailto:crobelen@pa.gov)

DATED: March 27, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Re: Formal Complaint of Reading Blue :  
Mountain & Northern Railroad Company :  
regarding the surface condition of the public :     Docket No. C-2024-3046989  
crossing (DOT 591 833 D) where State Route :  
0054 crosses, at grade, the track of Reading :  
Blue Mountain & Northern Railroad :  
Company located in Conyngham Township, :     Electronically Filed  
Columbia County. :  
: :  
:**

**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:

**Electronic Mail**

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Respectfully submitted,  
COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



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DATED: March 27, 2024