

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of the City of Philadelphia : Docket No.
for approval of the alteration of the crossing :
carrying Delaware Avenue (Pennsylvania State :
Route 32) over at-grade the right-of-way of the :
Philadelphia Belt Line Railroad Company, located :
in the City of Philadelphia, Philadelphia County, :
and the allocation of certain costs and expenses :
incident thereto. :

APPLICATION

1. The name and address of the Applicant is The City of Philadelphia, 1401 John F. Kennedy Boulevard, Suite 1400, Philadelphia, PA 19102.

2. The name and address of the attorneys for the Applicant are:

Michele Sarkos
Travis Kniffin
City of Philadelphia, Law Department
1515 Arch Street, 16th Floor
Philadelphia, PA 19102-1595

3. The City of Philadelphia (“City”) is a municipal corporation and body politic and a City of the First Class, operating pursuant to a Home Rule Charter under Pennsylvania Law.

4. By this Application, the City seeks approval from the Pennsylvania Public Utility Commission (“Commission”) for:

(a) The alteration of the crossing carrying Delaware Avenue over the right-of-way, at grade, of the Philadelphia Belt Line (“PBL”) in the City of Philadelphia (the “Crossing”); and

(b) The allocation of certain costs and expenses incident thereto.

5. The general location of the Crossing is shown on the map attached hereto as Exhibit “A.”

6. The names and addresses of the persons, parties and entities concerned in, or affected by the alteration project are attached hereto as Exhibit “B.”

7. Funding for this project is anticipated to be 100% Commonwealth of Pennsylvania.

8. The Crossing is located between Delaware Avenue and Christopher Columbus Boulevard, approaching Packer Avenue and beneath the Walt Whitman bridge, in the City of Philadelphia. Delaware Avenue and Christopher Columbus Boulevard run in a north-south direction. The existing Crossing cuts between them east-west.

9. The active railroad facilities in the project area consist of tracks owned by PBL and utilized by CSX Transportation Corporation (“CSX”) and the Norfolk Southern Railroad (“Norfolk Southern”). Private vehicles travel westbound along Packer Avenue via the Crossing.

10. While PBL retains a right-of-way for its tracks along Delaware Avenue and Columbus Boulevard, it does not hold a fee title or other real estate interest in the track bed or other land surrounding the tracks.

11. The alteration of the Crossing is necessary and proper because the existing width of Packer Avenue is insufficient and must be increased significantly. The Crossing serves the Philadelphia Port (“PhilaPort”) which has grown significantly and anticipates further growth, in conjunction with planned new development in the area that requires increased scale of ingress and egress from Packer Avenue to Columbus Boulevard and

Delaware Avenue. Rail operations at the Crossing currently occur sparingly, with only one set of active tracks. PBL is supportive of the expansion, and performing this work will (1) alleviate congestion; (2) spur growth; and (3) help accommodate anticipated transportation demand from commercial, industrial, residential, and tourism sectors.

12. The City has provided the parties listed in Exhibit B with location maps and plans and has requested that said parties accept the proposed alterations.

13. All non-railroad utilities should be ordered to furnish all material and to perform all work necessary to relocate their facilities to accommodate this reconstruction project at the utilities' sole cost and expense.

14. The City anticipates soliciting bids for the alteration of the Crossing within one calendar year and anticipates issuing a Notice to Proceed shortly thereafter.

15. If all parties cooperate in this project, construction should take approximately Two Hundred Seventy (270) days.

16. The proposed alteration of the Crossing, as described herein, is compatible with the public interest, safety and well being.

WHEREFORE, The City of Philadelphia respectfully requests that the Commission:

1. Conduct a field conference as promptly as possible;
2. Approve this application and the attached plans;
3. Order all non-railroad utilities to furnish all material and perform all work necessary to relocate their facilities to accommodate this reconstruction project at the utilities' sole cost and expense;

4. Order all other concerned parties, at their initial cost and expense, to furnish all materials and do all work which may be required on their respective facilities in connection with this project and to fully cooperate with the City of Philadelphia, its consultants and contractors in the design and construction of the Crossing alteration;
5. Order all parties to timely review all submissions of the City of Philadelphia and its consultants and contractors in the design and construction of the Crossing; and
6. Conduct a formal hearing, if necessary, for the allocation of costs incurred and not already allocated after reconstruction of the Crossing is completed.

Respectfully submitted,

The City of Philadelphia

By: _____

Michele Sarkos, I.D. # 83436
Travis Kniffin, ID # 335187
City of Philadelphia, Law Department
1515 Arch Street, 16th Floor
Philadelphia, PA 19102-1595
Phone: 215-683-5185
Fax: 215-683-5175
Michele.Sarkos@phila.gov
Travis.Kniffin@phila.gov

EXHIBIT A

MAP OF PROPOSED CROSSING ALTERATION LOCATION

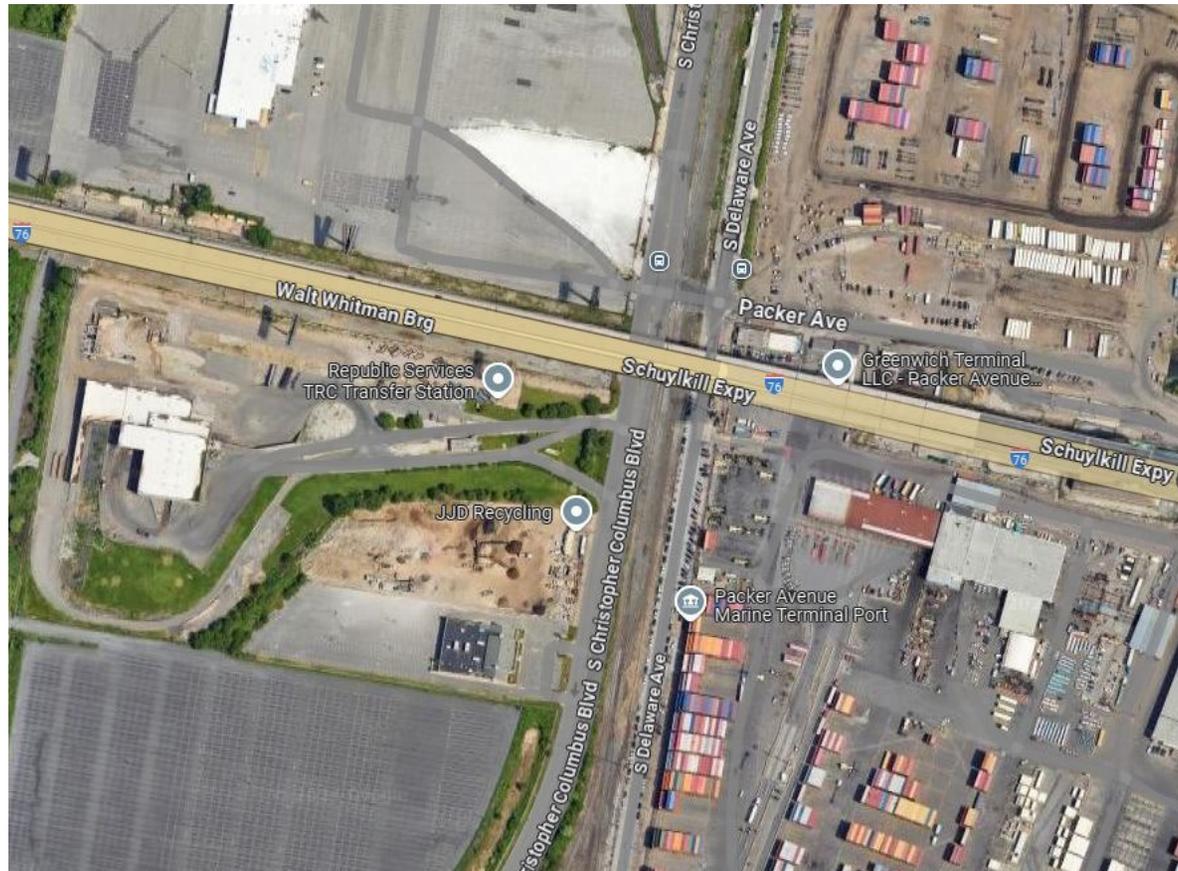


EXHIBIT B

LIST OF STAKEHOLDERS

Pennsylvania Department of Transportation, Multimodal Deputate
Denise Soisson, Manager of PA Ports Program
400 North Street, 7th Floor
Harrisburg, PA 17120
dsoisson@pa.gov

Pennsylvania Department of Transportation, District 6-0
Paul Shultes
7000 Gerdes Blvd,
King of Prussia, Pa 19406
c-pshultes@pa.gov

Kimley-Horn
Stephen Buckley, Consultant Project Manager
50 S. 15th St., Suite 360
Philadelphia, PA 19102
stephen.buckley@kimley-horn.com

Philadelphia Belt Line
George Woodward, Board Member
325 Chestnut St., Suite 360
Philadelphia PA, 19106
george.c.woodward@verizon.net

CSX
Rob Girardot, Board Member
3400 S. Christopher Columbus Boulevard
Philadelphia, PA 19148
rob_girardot@csx.com

Norfolk Southern
Jeremy Shoemaker, Regional Executive Director of State Relations
Jeremy.Shoemaker@nscorp.com

Conrail
Greg Reiman, General Manager of Engineering
330 Fellowship Road, Suite 300
Mount Laurel, NJ 08054
gregory.reiman@conrail.com

Philadelphia Water Department
Matthew Fulmer, Project Controls

1101 Market Street
Philadelphia, PA 19107
matthew.fulmer@phila.gov

Greenwich Terminals LLC (PAMT)/Holt Logistics
David Whene, President
3301 S Christopher Columbus Blvd, Building 9
Philadelphia, PA 19148
dwhene@holtlogistics.com

Challenger Realty Group (DVR)
Edwin Esposito
100 Essex Avenue Suite 203
Bellmawr, New Jersey 08031
ed@challengerrealtygroup.com

Glovis Southport
John Zakutny
4 East Oregon Ave
Philadelphia, PA 19148
jzakutny@glovisusa.com

Philadelphia Industrial Development Corporation
Kate McNamara, Senior Vice President of Navy Yard
4147 South Broad Street, Bldg.101, Ste.101
Philadelphia, PA 19112
kmcnamara@PIDCphila.com

ECO Energy
Justin Knapp
6100 Tower Circle, Suite 500
Franklin, TN 37067
justink@eco-energy.com

INEOS Chemical
Scott Wright
13 S. Delaware Ave
Philadelphia, PA 19148

Dependable Distribution Services, Inc.
Bill Golden
2401 Columbus Blvd, Pier 84
Philadelphia, PA 19148
william@ddscocoa.com

VERIFICATION

I, Michael Carroll, Deputy Managing Director of the Office of Transportation and Infrastructure Systems, certify that I have read the foregoing Application, and the factual averments stated therein are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to the penalties of Pa. C.S. 4904 relating to unsworn falsification to authorities.



Dated: September 17, 2024

Deputy Managing Director, Office
of Transportation and Infrastructure
Systems

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of the City of Philadelphia	:	Docket No.
for approval of the alteration of the crossing	:	
carrying Delaware Avenue (Pennsylvania State	:	
Route 32) over at-grade the right-of-way of the	:	
Philadelphia Belt Line Railroad Company, located	:	
in the City of Philadelphia, Philadelphia County,	:	
and the allocation of certain costs and expenses	:	
incident thereto.	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this 19th day of September, 2024, served a true copy of the foregoing Application of the City of Philadelphia on the parties, listed below in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

Served via Electronic Mail Only

Pennsylvania Department of Transportation, Multimodal Deputate
Denise Soisson, Manager of PA Ports Program
400 North Street, 7th Floor
Harrisburg, PA 17120
dsoisson@pa.gov

Pennsylvania Department of Transportation, District 6-0
Paul Shultes
7000 Gerdes Blvd,
King of Prussia, Pa 19406
c-pshultes@pa.gov

Kimley-Horn
Stephen Buckley, Consultant Project Manager
50 S. 15th St., Suite 360
Philadelphia, PA 19102
stephen.buckley@kimley-horn.com

Philadelphia Belt Line
George Woodward, Board Member
325 Chestnut St., Suite 360
Philadelphia PA, 19106
george.c.woodward@verizon.net

CSX

Rob Girardot, Board Member
3400 S. Christopher Columbus Boulevard
Philadelphia, PA 19148
rob_girardot@csx.com

Norfolk Southern

Jeremy Shoemaker, Regional Executive Director of State Relations
Jeremy.Shoemaker@nscorp.com

Conrail

Greg Reiman, General Manager of Engineering
330 Fellowship Road, Suite 300
Mount Laurel, NJ 08054
gregory.reiman@conrail.com

Philadelphia Water Department
Matthew Fulmer, Project Controls
1101 Market Street
Philadelphia, PA 19107
matthew.fulmer@phila.gov

Greenwich Terminals LLC (PAMT)/Holt Logistics
David Whene, President
3301 S Christopher Columbus Blvd, Building 9
Philadelphia, PA 19148
dwhene@holtlogistics.com

Challenger Realty Group (DVR)
Edwin Esposito
100 Essex Avenue Suite 203
Bellmawr, New Jersey 08031
ed@challengerrealtygroup.com

Glovis Southport

John Zakutny
4 East Oregon Ave
Philadelphia, PA 19148
jzakutny@glovisusa.com

Philadelphia Industrial Development Corporation
Kate McNamara, Senior Vice President of Navy Yard
4147 South Broad Street, Bldg.101, Ste.101
Philadelphia, PA 19112
kmcnamara@PIDCphila.com

ECO Energy
Justin Knapp
6100 Tower Circle, Suite 500
Franklin, TN 37067
justink@eco-energy.com

INEOS Chemical
Scott Wright
13 S. Delaware Ave
Philadelphia, PA 19148

Dependable Distribution Services, Inc.
Bill Golden
2401 Columbus Blvd, Pier 84
Philadelphia, PA 19148
william@ddscocoa.com

*/s/*Michele Sarkos
Michele Sarkos, Esq.
PA Attorney I.D. # 83436
Travis Kniffin, Esq.
PA Attorney I.D. #335187
Counsel for the City of Philadelphia
Philadelphia Law Department
1515 Arch Street, 16th Floor
Philadelphia, PA 19102