

October 21, 2024

C-2020-3016906

Rosemary Chiavetta, Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Letter of Petition – Time Extension Request

RE RE: Bureau of Investigation & Enforcement v.
Reading Blue Mountain and Northern Railroad,
Docket No. C-2020-3016906
I&E Compliance Demand

Dear Secretary Chiavetta,

The Reading & Northern Railroad respectfully submits this Letter of Petition to request an extension from October 29, 2024 to December 31, 2024 to submit to the Commission a crossing surface construction plan for the Oak Street Crossing in Pittston, Luzerne County.

This Letter of Petition to request a time extension comes in response to the letter dated October 8, 2024 from I&E Prosecutor Grant Rosul advising that crossing surface construction plans for this crossing must be submitted to the Commission by October 29, 2024. The Reading & Northern Railroad respectfully requests this time extension as the Reading & Northern Railroad does not employ an in-house engineer and has recently contracted with an engineering firm to produce the required crossing surface construction plan, however a plan has not been drafted yet for submittal to the Commission.

Sincerely,



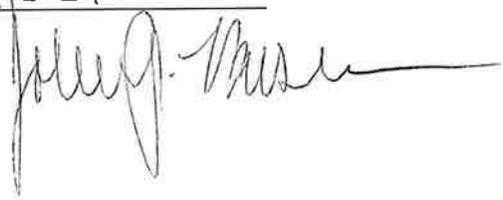
Jolene F. Busher
VP Real Estate

CC: Grant Rosul, I&E Prosecutor *via email only*
Michael L. Swindler, I&E Deputy Chief Prosecutor *via email only*
William M. Sinick, P.E., Rail Safety Division *via email only*
John Pfeiffer, PennDOT Dist 4 -0 *via email only*

VERIFICATION

I, Jolene F. Busher, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 10/21/2024

(Signature) 

Certificate of Service

I hereby certify that I have this day served a true and correct copy of the foregoing Request for Extension upon parties of record in this preceding in accordance with the requirements of 52 PA Code 1.54 (relating to service by a participant), in the manner and upon persons listed below.

Rosemary Chiavetta, Secretary
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Pennsylvania Public Utility Commission
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Harrisburg, PA 17105-3265

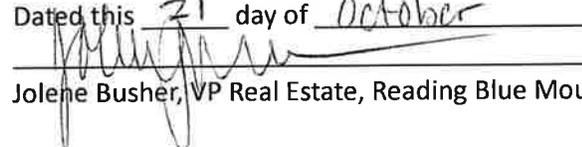
Grant Rosul, Prosecutor
Pennsylvania Public Utility Commission
grosul@pa.gov

Michael L. Swindler, I&E Deputy Chief Prosecutor
mwindler@pa.gov

William M. Sinick, P.E., Rail Safety Division
wilsinick@pa.gov

John Pfeiffer, PennDOT District 4-0
jopfeiffer@pa.gov

Dated this 21 day of October, 2024.



Jolene Busher, VP Real Estate, Reading Blue Mountain & Northern Railroad