



October 23, 2024

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

Re: Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to upgrade the public at grade crossing by the installation of new active traffic control devices where State Route 322 (13<sup>th</sup> Street) crosses at-grade the track(s) of Western New York & Pennsylvania Railroad DOT # 262 836 S, located in the City of Franklin, Venango County *all in accordance with the Federal Grade Crossing Program* and the allocation of costs incident thereto.

Dear Secretary, Chiavetta:

Enclosed for filing, please find the Application of the Department of Transportation.

A copy of this Application and Exhibits has been served upon the parties in the Certificate of Service to the Application by email.

Sincerely,

Mohammad Arghoshi  
Digitally signed by marghoshi  
Date: 2024.10.24 07:12:43  
-04'00'

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Mohammad Arghoshi  
Grade Crossing Engineer  
Engineering District 1-0  
Department of Transportation

Attachments

cc: Parties of Record  
M. J. Chappell, P.E., Chief, Right-of-Way, Utilities, and Grade Crossing Division  
Karen L. Cummings, Senior Counsel, Office of Chief Counsel  
William M. Sinick, P.E., Supervisor, Rail Safety Engineering Section, PUC

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to upgrade the public at grade crossing by the installation of new active traffic control devices where State Route 322 (13th Street) crosses at-grade the track(s) of Western New York & Pennsylvania Railroad DOT # 262 836S, located in the City of Franklin, Venango County *all in accordance with the Federal Grade Crossing Program* and the allocation of costs incident thereto.

Application  
Docket No. \_\_\_\_\_

**Electronically Filed**

APPLICATION OF THE COMMONWEALTH OF PENNSYLVANIA, DEPARTMENT OF  
TRANSPORTATION

Applicant, Commonwealth of Pennsylvania, Department of Transportation, files this Application pursuant to the provisions of 66 Pa.C.S § 2702 and 52 Pa. Code § 5.13 for the alteration of the public at grade where State Route 322 (13<sup>th</sup> Street) crosses tracks of Western New York and Pennsylvania Railroad at DOT Number DOT 262836S, located in Franklin City, Venango County in Franklin City, Venango County as described below:

1. The name and address of Applicant are Commonwealth of Pennsylvania, Department of Transportation, Thomas J. McClelland, P.E., Assistant District Executive, Engineering District 1-0, 255 Elm Street, Oil City, PA 16301.
  
2. The name and address of attorney for the Applicant are Karen Cummings, Senior Counsel, Commonwealth of Pennsylvania, Department of Transportation, Office of Chief Counsel, PO Box 8212, Harrisburg, PA 17105-8212.

3. The Applicant is an agency of Commonwealth of Pennsylvania, organized and existing under the Administrative Code of 1929, 71 P.S. § 511, et seq. and generally 36 P.S. § 670 - 401 et seq.

4. The names and addresses of the persons, parties and entities concerned in, or affected by the proposed construction, to the best of the Applicant's knowledge, are shown in the certificate of service. In addition to those served, the Applicant requests that the following also receive service of all documents in this matter:

M. J. Chappell, P.E., Chief, Right-of-Way,  
Utilities, and Grade Crossing Division  
Pennsylvania Department of Transportation  
PO Box 3362  
Harrisburg, PA 17105-3362  
[babasom@pa.gov](mailto:babasom@pa.gov)

Karen L. Cummings  
Office of Chief Counsel  
Pennsylvania Department of Transportation  
PO Box 8212  
Harrisburg, PA 17105-8212  
[kcummings@pa.gov](mailto:kcummings@pa.gov)

5. The Applicant is seeking approval for Western New York and Pennsylvania Railroad to alter the subject crossing by the installation of new automatically operated flashing railroad warning signals with gates, new circuitry and maintain existing railroad preemption with adjacent traffic signal located in the City of Franklin, pursuant to the Federal Grade Crossing Program.

No	Highway	DOT No.	Municipality	Device Type
1	SR 322 (13 <sup>th</sup> Street)	262 836S	Franklin City	Install a 6'X6' House, PMD-4R Redundant Motion Detector, 2 Flasher/Gates, New Led Flashlights

A Location Map is attached hereto and marked as Exhibit "A".

6. The Applicant is aware of prior Public Utility Commission orders for these crossings at Docket Number(s): C-2009-2134650

7. The average daily traffic for City of Franklin at this crossing is.

No.	Highway	DOT No.	AADT	Percent of Trucks
1	SR 322 (13 <sup>th</sup> St)	262 836S	5174	6

8. The estimated cost of the project described above is \$470,541.00. The Applicant agrees to reimburse 100% federal funds for its actual costs for this project in accordance with the Federal Grade Crossing Program.

9. This project is necessary and proper for the safety and convenience of the public.

10. A conference of all parties of interest should be held to discuss the proposed project.

Wherefore, Applicant respectfully requests that the Public Utility Commission approve this Application.

Respectfully Submitted:

*Thomas J McClelland* 2024.10.23  
15:29:49 -04'00'

Thomas J. McClelland, P.E.  
Assistant District Executive-Design  
Engineering District 1-0  
Department of Transportation  
255 Elm Street  
Oil City, PA 16301  
Phone: (814) 678-7081  
Fax: (814) 678-7030  
[THMCCLELLA@pa.gov](mailto:THMCCLELLA@pa.gov)

Dated: \_\_\_\_\_

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to upgrade the public at grade crossing by the installation of new active traffic control devices where State Route 322 (13<sup>th</sup> Street) crosses at-grade the track(s) of Western New York & Pennsylvania Railroad DOT # 262 836S, located in the City of Franklin, Venango County *all in accordance with the Federal Grade Crossing Program* and the allocation of costs incident thereto

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VERIFICATION

I, Mohammad Arghoshi, Grade Crossing Engineer, hereby state that the facts above set forth 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: \_\_\_\_\_

Mohammad Arghoshi Digitally signed by marghoshi  
Date: 2024.10.24 07:13:11  
-04'00'

\_\_\_\_\_  
Mohammad Arghoshi  
Grade Crossing Engineer  
Engineering District 1-0  
Department of Transportation

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to upgrade the public at grade crossing by the installation of new active traffic control devices where State Route 322 (13th Street) crosses at-grade the track(s) of Western New York & Pennsylvania Railroad DOT # 262 836S, located in the City of Franklin, Venango County *all in accordance with the Federal Grade Crossing Program* and the allocation of costs incident thereto.

Application  
Docket No. \_\_\_\_\_

**Electronically Filed**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below by electronic email, in accordance with Emergency Order at M-2020-3019262.

Corey Zeh, General Manager  
Western New York and Pennsylvania Railroad  
3146 Constitution Avenue  
Olean, NY 14760  
[corey.zeh@lalrr.com](mailto:corey.zeh@lalrr.com)

Doug Olszewski  
Comcast Cable  
COMMUNICATIONS (CTV)  
1 Comcast Drive  
Blairsville, PA. 15717  
[douglas\\_olszewski@comcast.com](mailto:douglas_olszewski@comcast.com)

Kyle Boehme  
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Administrator, Grade Crossing Program  
650 W. Peachtree Street NW, Box 41  
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[Kyle.Boehme@nscorp.com](mailto:Kyle.Boehme@nscorp.com)

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1600 West First Street  
Oil City, PA 16301  
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City Manager  
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Franklin, PA 16323  
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Sam Breene, Chairman  
Venango County  
1174 Elk Street  
Courthouse Annex, 2nd Floor  
Franklin, PA 16323  
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Pennsylvania Electric Company  
1600 West First Street, Oil City, PA  
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430 Thirteenth Street, Franklin, PA  
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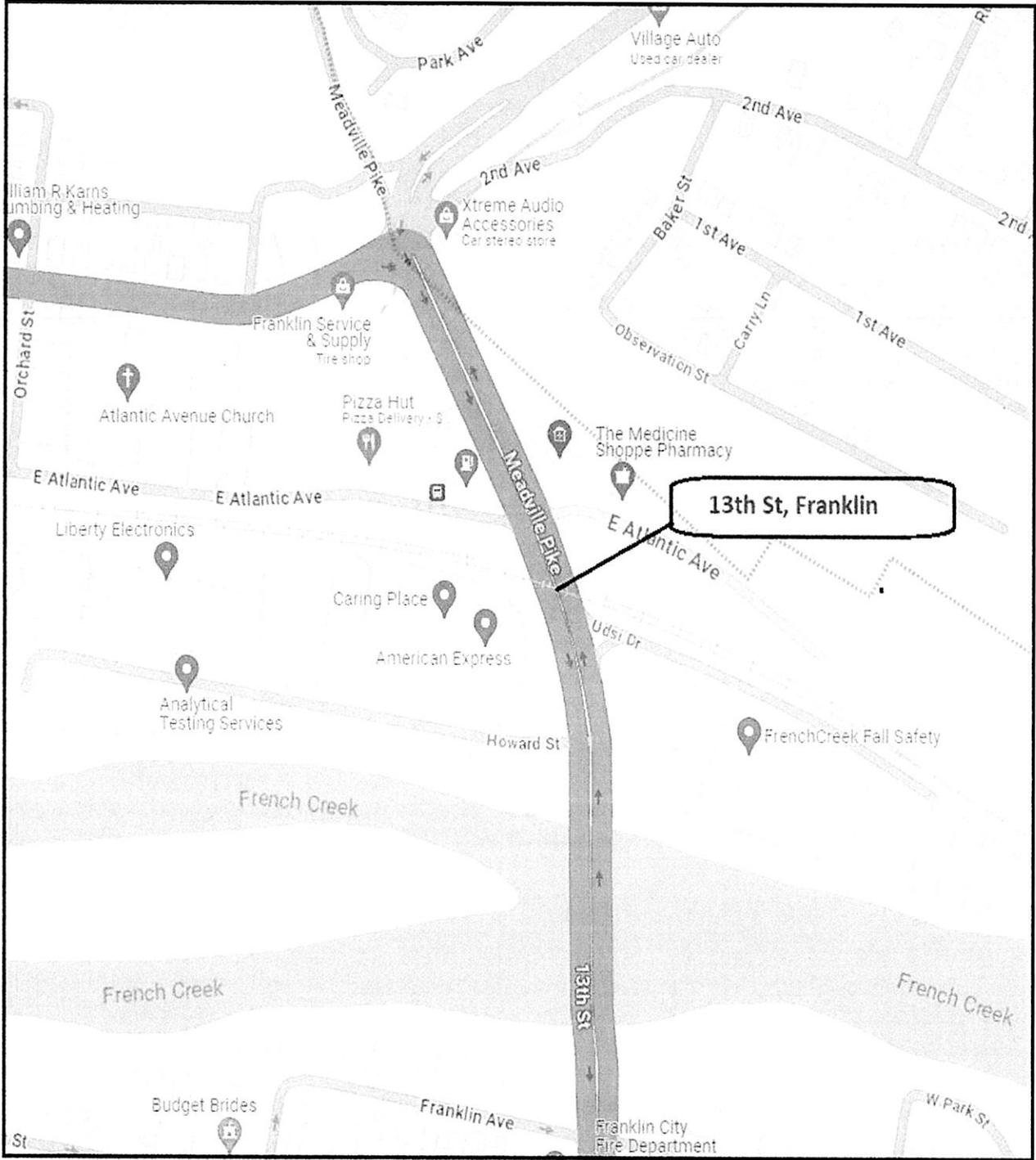
Blaise Bucha  
Venango County Maintenance Manager  
1460 Pittsburgh Road  
Franklin, PA 16323  
[bbucha@pa.gov](mailto:bbucha@pa.gov)

Dated this 24 Day of October, 2024

Mohammad Arghoshi Digitally signed by marghoshi  
Date: 2024.10.24 07:13:26  
-04'00'

Mohammad Arghoshi  
Grade Crossing Engineer  
Engineering District 1-0  
Department of Transportation

**Venango County-City of Franklin**  
**Western New York & Pennsylvania Railroad**  
**DOT # 262836S**



**Exhibit-A**  
**Page 1 of 1**