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January 6, 2025

VIA ELECTRONIC FILING

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

**Re: Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to alter three (3) public at-grade crossings by the installation of new railroad warning devices where State Route 2006 (Chestnut Street) (DOT 592 142 Y), State Route 2008 (Franklin Street) (DOT 592 143 F), and Cherry Street (DOT 592 144 M) all cross, at grade, a single track of Norfolk Southern Railway Company in the City of Reading, Berks County all in accordance with the Federal Grade Crossing Program and the allocation of costs thereto
Docket No. A-2023-3039131**

Dear Secretary Chiavetta:

Enclosed for filing in the above-captioned matter, please find the Petition for Extension of Time of Norfolk Southern Railway Company. Copies have been served upon all interested parties as indicated on the Certificate of Service.

Very truly yours,

Benjamin C. Dunlap, Jr.

BCDjr :ino

Enclosure

cc: All parties of records

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of	: Docket No. A-2023-3039131
Transportation of the Commonwealth of	:
Pennsylvania for approval to alter three (3)	:
public at-grade crossings by the installation	:
of new railroad warning devices where State	:
Route 2006 (Chestnut Street) (DOT 592 142	:
Y), State Route 2008 (Franklin Street) (DOT	: Filed Electronically
592 143 F), and Cherry Street (DOT 592 144	:
M) all cross, at grade, a single track of	:
Norfolk Southern Railway Company in the	:
City of Reading, Berks County all in	:
accordance with the Federal Grade Crossing	:
Program and the allocation of costs thereto	:

PETITION FOR EXTENSION OF TIME

Norfolk Southern Railway Company (“Norfolk Southern”), by and through its attorneys, Cohen Seglias Pallas Greenhall & Furman PC files this Petition for Extension of Time to perform the work ordered in the above-referenced proceeding, as ordered in the Secretarial Letter, issued on May 25, 2023, pursuant to 52 Pa. Code §1.15(a)(1), based upon the following:

1. Ordering Paragraph 3 of the aforementioned Secretarial Letter, ordered Norfolk Southern, at the sole cost and expense of the Department of Transportation of the Commonwealth of Pennsylvania (“PennDOT”) to do all work necessary to alter the three crossings subject to this proceeding, by removing the existing railroad warning devices and replacing them with new warning devices in accordance with Part 8 of the Manual on Uniform Traffic Control Devices. All construction was ordered to be completed on or before December 31, 2024.

2. Ordering Paragraph 4 directed Norfolk Southern to prepare and submit final situation plans for the subject crossings, to all parties for review and to Pennsylvania Public Utility Commission (“Commission”) for approval.

3. Norfolk Southern filed its Situation and Circuitry Plans for the Commission’s approval on August 7, 2024 which were then subsequently approved by the Commission per the September 13, 2024 Secretarial Letter.

4. On November 5, 2024 PennDOT approved Norfolk Southern’s Situation and Circuit Plans and authorized them to proceed as evidenced by the Notice to Proceed letter attached hereto as Exhibit “A”.

5. Norfolk Southern is ready to proceed with the work; however, additional time is needed to coordinate a team and due to the large volume of concrete involved. To avoid the added costs of cold weather concrete work, Norfolk Southern will need to wait until Spring to begin the concrete portion of the work.

6. Norfolk Southern therefore requests that the Commission grant an extension of time to October 30, 2025, for the completion of the work.

7. Norfolk Southern respectfully requests that Ordering Paragraph 13 of the Secretarial Letter dated May 25, 2023, be modified as follows:

All work necessary to alter the subject crossings be completed in a manner satisfactory to this Commission on or before October 30, 2025 and that on or before said date, Department of Transportation of the Commonwealth of Pennsylvania report in writing to this Commission the date of actual completion of the work.

WHEREFORE, Norfolk Southern Railway Company respectfully requests that it be granted an extension of time until October 30, 2025, to complete the alteration of the subject crossings.

Respectfully Submitted,

**COHEN SEGLIAS PALLAS
GREENHALL & FURMAN PC**

By: /s/ Benjamin C. Dunlap, Jr.

Benjamin C. Dunlap, Jr., Esquire

Supreme Court I.D. #66283

240 North Third Street, 7th Floor

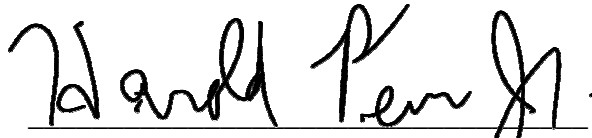
Harrisburg, PA 17101

Date: January 6, 2025

Attorneys for Norfolk Southern Railway Company

VERIFICATION

I, Harold Penn of Norfolk Southern Railway Company, in the foregoing proceeding, do make the following statement subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authority, and do state that as Manager Highway Grade Crossing Engineering, for Norfolk Southern Railway Company, I am authorized to make this statement on behalf of Norfolk Southern Railway Company, and that the facts set forth in the foregoing *Petition for Further Extension of Time* are true and correct to the best of my knowledge, information and belief. To the extent that the contents of the pleading are that of counsel, verifier has relied upon counsel in making this verification.

A handwritten signature in black ink that reads "Harold Penn" with a stylized flourish at the end.

Harold Penn
Manager Highway Grade Crossing Engineering

Date: January 2, 2025

Deborah Hoag
Director of Public Works
City of Reading
503 North Sixth Street
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Deborah.hoag@readingpa.gov

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William Murray
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Date: January 6, 2025

/s/ Ijeoma Okereke
Ijeoma N. Okereke, Paralegal to
Benjamin C. Dunlap, Jr., Esquire

EXHIBIT “A”



November 5, 2024

Berks County
City of Reading
SR 2006, SECTION 09X
DOT # 592 142Y, 592 143F & 592 144M
PUC No. A 2023 3039131
Agreement No. 05G159
ECMS # 106140
Notice to Proceed - Construction

Harold Penn Jr.
Manager Highway Crossing Engineer
Norfolk Southern Corp.
C&S Dept. Box #41
650 West Peachtree St. NW.
Atlanta, GA 30308

Dear Mr. Penn:

Your Situation and Detail Circuit Plans for the improvement at the subject crossing has been approved. Therefore, this is your official authorization to proceed with construction of the proposed improvement.

The work should be accomplished in accordance with the Plan submission the Public Utility Commission dated August 7, 2024, and approved on September 13, 2024, under Docket No. A-2023-3039131. All clearances for the installation of protective devices must comply with Part VIII, Manual on Uniform Traffic Control Devices.

Please feel free to contact me at (610) 871 - 4562 if you have any questions or concerns. Thank you in advance for your cooperation.

Sincerely,

Rodney O. Rehnert
Rodney O. Rehnert
District Grade Crossing Administrator
Engineering District 5-0
Department of Transportation

cc: M. Chappell, P.E. Chief, Utilities and Right-of-Way Section, 7th Floor, CKB
W. Sinick, P.E. Manager, Rail Safety Division, PUC, 3rd Floor, CKB
J. Ruth, Planning & Programming