



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

January 22, 2025

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

**RE: Application of Department of Transportation of the Commonwealth of Pennsylvania for approval to alter the public crossings (DOT 051 674 J) and (DOT 149 033 D) by removal and replacement of the existing bridge structure where SR 0068 crosses, above grade the tracks of Bessemer & Lake Erie Railroad Company, Buffalo & Pittsburgh Railroad Inc., and CSX Transportation Inc., located in Butler and Summit Townships, Butler County, and the allocation of costs incident thereto.  
Docket No.: A-2020-3022688**

Dear Secretary Chiavetta,

Enclosed for filing please find the Department's *Petition for Time of Extension* 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  
Mark J. Chappell, P.E., Utilities and Right of Way Section (*email*)  
Brian Allen, P.E., District Executive, District 10-0 (*email*)  
Jeffery Matko, P.E., Grade Crossing Engineer, (*email*)  
Anthony Pioli, P.E., Bridge Inspection Supervisor (*email*)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of Department of Transportation : Docket No. A-2020-3022688  
of the Commonwealth of Pennsylvania for :  
approval to alter the public crossings (DOT 051 : Electronically Filed  
674 J) and (DOT 149 033 D) by removal and :  
replacement of the existing bridge structure :  
where SR 0068 crosses, above grade the tracks :  
of Bessemer & Lake Erie Railroad Company, :  
Buffalo & Pittsburgh Railroad Inc., and CSX :  
Transportation Inc., located in Butler and :  
Summit Townships, Butler County, and :  
allocation of costs incident thereto. :**

**PETITION FOR EXTENSION OF TIME**

The Commonwealth of Pennsylvania, Department of Transportation (Department), by its counsel, Caroline G. Robelen, files the following Petition for Extension of Time, pursuant to 52 Pa. Code § 5.41, in the above referenced matter and states as follows:

1. The name and address of the Petitioner is:

Commonwealth of Pennsylvania  
Department of Transportation  
Bureau of Project Delivery  
P.O. Box 3362  
Harrisburg, Pennsylvania 17105-3362

2. The name and address of Counsel for the Petitioner is:

Caroline G. Robelen, Assistant Counsel  
Commonwealth of Pennsylvania  
Department of Transportation  
Office of Chief Counsel  
P.O. Box 8212

Harrisburg, Pennsylvania 17105-8212

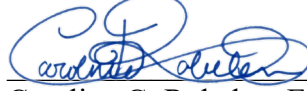
crobelen@pa.gov

3. By Secretarial Letter entered March 12, 2021, the Pennsylvania Public Utility Commission (“Commission”) directed that “All work necessary to complete the alteration of the subject crossing be done in a manner satisfactory to this Commission on or before December 31, 2024...”
4. The December 31, 2024 completion date was not met due to a delay in the start of construction on the project.
5. For the reasons stated above, the Department respectfully requests an extension of time from the December 31, 2024 date contained in the March 12, 2021 Secretarial Letter to the extended date of December 31, 2028, and that the Secretarial Letter dated March 12, 2021 be modified as follows:
  14. All work necessary to complete the alteration of the subject crossing be done in a manner satisfactory to this Commission on or before ~~December 31, 2024~~, December 31, 2028, and that on or before said date, Pennsylvania Department of Transportation report to this Commission in writing the date of actual completion of the work.

**WHEREFORE**, the Department of Transportation respectfully requests that the Public Utility Commission Secretarial Letter, entered on March 12, 2021 be modified consistent with this Petition.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



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Caroline G. Robelen, Esq.

Assistant Counsel

Commonwealth of Pennsylvania

Department of Transportation

Office of Chief Counsel

P.O. Box 8212

Harrisburg, PA 17105-8212

Pennsylvania Attorney I.D. Number 328743

[crobelen@pa.gov](mailto:crobelen@pa.gov)

DATED: January 22, 2025

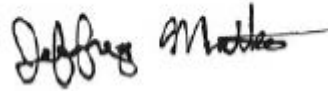
**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of Department of Transportation : Docket No. A-2020-3022688**  
**of the Commonwealth of Pennsylvania for :**   
**approval to alter the public crossings (DOT 051 : Electronically Filed**  
**674 J) and (DOT 149 033 D) by removal and :**   
**replacement of the existing bridge structure :**   
**where SR 0068 crosses, above grade the tracks :**   
**of Bessemer & Lake Erie Railroad Company, :**   
**Buffalo & Pittsburgh Railroad Inc., and CSX :**   
**Transportation Inc., located in Butler and :**   
**Summit Townships, Butler County, and :**   
**allocation of costs incident thereto.**

**VERIFICATION**

I, Jeffrey Matko, Grade Crossing Engineer, Commonwealth of Pennsylvania, Department of Transportation, in the foregoing document, 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 the Grade Crossing Administrator for the Commonwealth of Pennsylvania, Department of Transportation, I am authorized to make this statement on behalf of the Commonwealth of Pennsylvania, Department of Transportation, and that the facts set forth in the foregoing document are true and correct to the best of my information, knowledge, and belief.

DATED: 1/22/2025



Jeffrey Matko

Grade Crossing Administrator

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of Department of Transportation : Docket No. A-2020-3022688  
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approval to alter the public crossings (DOT 051 : Electronically Filed  
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Buffalo & Pittsburgh Railroad Inc., and CSX :  
Transportation Inc., located in Butler and  
Summit Townships, Butler County, and  
allocation of costs incident thereto.**

**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 first class mail, postage prepaid and by electronic mail pursuant to 52 Pa. Code §1.54:

**Service by First Class Mail, Postage Prepaid**

CT Corporation System  
600 North 2nd Street  
Suite 401  
Harrisburg, PA 17101

**Service by Electronic Mail**

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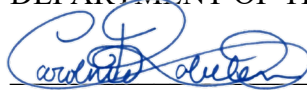
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Respectfully submitted,  
COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



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DATED: January 22, 2025