



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

January 23, 2025

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

**RE: Application of the Pennsylvania Department of Transportation for approval to abolish and remove the public crossings (DOT 938 230 V) and (DOT 524 153 C) where SR 4034 and State Street cross, above grade, the tracks of CSX Transportation Inc., and where Holland Street crosses at grade, the tracks of CSX Transportation Inc., located in the City of Erie, Erie County and the allocation of costs incident thereto.  
A-2020-3022605**

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 "Elizabeth K. Rall".

Elizabeth K. Rall  
Assistant Counsel

Cc: Parties of Record  
Mark J. Chappell, P.E., Utilities and Right of Way Section (*email*)  
Mohammad Arghoshi, District Grade Crossing Engineer, District 1-0 (*email*)  
Brian McNulty, District Executive, Highway Administration (*email*)  
Jeanette Uhl, Project Manager, Highway Administration (*email*)



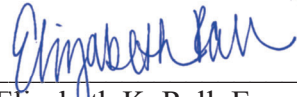
P.O. Box 8212  
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erall@pa.gov

3. By Secretarial Letter entered February 23, 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 material acquisition delays and the necessary manpower for the project was not available.
5. For the reasons stated above, the Department respectfully requests an extension of time from the December 31, 2024, date contained in the February 23, 2021 Secretarial Letter to the extended date of December 31, 2025, and that the Secretarial Letter dated February 23, 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, 2025, 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 February 23, 2021, be modified consistent with this Petition.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



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DATED: January 23, 2025





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Respectfully submitted,  
COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION

*Maria Bitner*

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DATED: January 23, 2025