



Holt Logistics Corp.
101 S. King Street
Gloucester City, NJ 08030
Tel: (856) 742-3000
holtlogistics.com

April 15, 2025

VIA EFILE SUBMISSION - www.puc.pa.gov

Secretary Of the Commission
400 North Street
Harrisburg PA 17120

**Re: Petition for Reconsideration from Staff Action
A-2024-3051279**

Dear Sir/Madam:

The within Petition is being filed this day, with copies served upon all Parties of Record as outlined. I can be reached at (856) 742-3002 or at legal@holtlogistics.com for any questions.
Thank you

Sincerely,

A handwritten signature in blue ink that reads 'Lisa A. Kline'.

Lisa A. Kline
General Counsel

LAK/sma
cc: Greenwich Terminals LLC

Holt Logistics Corp. : **Case Docket: A-2024-3051279**
Petitioner : **Petition for Reconsideration from Staff Action**
v.
PAPUC :

To the Commonwealth of Pennsylvania, Pennsylvania Public Utility Commission:

This Petition for Reconsideration from Staff Action, docketed at A-2024-3051279 filed by Holt Logistics Corp., through its General Counsel, Lisa Kline, Esq. in accordance with 52 Pa. Code §§ 1.31 and 5.44, whereby petitioner avers as follows:

1. Page 2, second paragraph, second to last sentence, of the Secretary's Letter incorrectly states that Holt Logistics Corp. pays the cost and expense for maintenance by Conrail for the industrial track (easternmost) spur track with concrete panel crossing surface – referencing (DOT 541 559 F).
2. Holt Logistics Corp. does not, and has never agreed to, pay or reimburse Conrail for any maintenance costs or expenses associated with for the industrial track (easternmost) spur track with concrete panel crossing surface – referencing (DOT 541 559 F).
3. Holt Logistics is not a party to any legal agreement with Conrail for the subject for the industrial track (easternmost) spur track with concrete panel crossing surface – referencing (DOT 541 559 F).
4. Page 2, second paragraph, last sentence, of the Secretary's Letter incorrectly identifies Holt Logistics Corp. as being the owner of certain property to the east of Delaware Avenue – referencing (DOT 541 559 F).
5. Holt Logistics Corp. does not own or use, lease, license or occupy the property to the east of Delaware Avenue and North of Packer Avenue as identified in the Secretary's Letter.

6. Delaware Avenue Enterprises, Inc. is the owner of property to the east of Delaware Avenue and North of Packer Avenue (vacated).
7. At page 3 second paragraph, second to last sentence, the Secretarial Letter incorrectly identifies Holt Logistics Corp. as being the owner of certain property to the west of Columbus Boulevard – referencing (DOT 976 324 Y).
8. Holt Logistics Corp. does not own or use, lease, license or occupy the property to the west of Columbus Boulevard – referencing (DOT 976 324 Y) as identified in the Secretarial Letter.
9. The Secretarial Letter incorrectly states at page 3, second paragraph, second to last sentence, that Holt Logistics Corp. bears the expense of maintenance provided by Conrail for the industrial track across Columbus Boulevard at the crossing (DOT 976 324 Y).
10. Holt Logistics Corp. has never born the expense of, nor has it ever agreed to reimburse Conrail for any maintenance costs associated with the industrial track across Columbus Boulevard at or related to the crossing (DOT 976 324 Y).
11. Holt Logistics is not a party to any legal agreement with Conrail for the subject industrial track across Columbus Boulevard at the crossing (DOT 976 324 Y).
12. The Secretarial letter incorrectly states at page 5, third paragraph, that Holt Logistics Corp. has agreed to reimburse Conrail for certain costs of providing maintenance for the industrial track across Columbus Boulevard at the crossing (DOT 976 324 Y).
13. Holt Logistics Corp. never agreed to reimburse Conrail for certain costs of providing maintenance for the industrial track across Columbus Boulevard at the crossing (DOT 976 324 Y).
14. The Secretarial letter incorrectly states in paragraph 20, that Holt Logistics Corp. has agreed to reimburse Conrail for certain costs of providing maintenance for the industrial track across Columbus Boulevard at the crossing (DOT 976 324 Y) in accordance with the Secretarial Letter and any legal agreements between Conrail and Holt Logistics Corp.
15. Holt Logistics Corp. has never agreed to reimburse Conrail for any maintenance costs associated with the industrial track across Columbus Boulevard at or related to the crossing (DOT 976 324 Y).

16. Holt Logistics is not a party to any legal agreement with Conrail for the subject industrial track across Columbus Boulevard at the crossing (DOT 976 324 Y).

WHEREFORE, Petitioners pray for the following relief:

The Secretarial Letter dated March 21, 2025 A-2024-3051279 be revised and reissued to:

1. correct the inaccurate statements in the Secretary's Letter;
2. to delete all references to Holt Logistics owning land;
3. to delete all references to Holt Logistics paying or reimbursing Conrail for costs;
4. to delete numbered paragraph 20 from page 8 of the Secretary's Letter; and
5. such other and further relief to which petitioners may be entitled.



Lisa A. Kline, Esquire, General Counsel
Attorney for Petitioner Holt Logistics Corp.
PA 74312

VERIFICATION

I, Lisa A. Kline, Esquire, on behalf of Petitioner Holt Logistics Corp., 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).

Lisa A Kline 4/15/2025
Signature/Date

Holt Logistics Corp. : Case Docket: A-2024-3051279
Petitioner :
 : Petition for Reconsideration from Staff Action
v. :
PAPUC :

CERTIFICATE OF SERVICE

This is to certify that I have this day served a true, accurate and correct copy of Petition for Reconsideration from Staff Action by serving the Parties of Record of the above-captioned matter, via eService (attached herewith) and by depositing a copy in the United States Mail, postage prepaid, addressed to the following:

Daniel Leonard, Grade Crossing Manager
PENNDOT, 400 North Street, PO Box 3362
Harrisburg, PA, 17105-3362

John Burleson, President/LLC Manager
Greenwich Terminals LLC
3301 S. Columbus Boulevard
Philadelphia, PA 19148

Respectfully submitted,



Lisa A. Kline
Attorney for Petitioner Holt Logistics Corp.
PA 74312

A-2024-3051279 Emails for Parties of Record

Travis M. Kniffin	Philadelphia Law Department	travis.kniffin@phila.gov ;
Michele Sarkos	City Of Philadelphia	michele.sarkos@phila.gov ;
Denise Soisson Manager Of Pa Ports Program	PennDOT Multimodal Deputate	dsoisson@pa.gov ;
Paul Shultes	Penndot Dist 6-0	c-pshultes@pa.gov ;
Stephen Buckley Project Manager	Kimley-Horn	stephen.buckley@kimley-horn.com ;
Ross Buchan	Kimley-Horn	ross.buchan@kimley-horn.com ;
George Woodward Board Member	Philadelphia Belt Line	george.c.woodward@verizon.net ;
Rob Girardot Board Member	CSX Transportation	rob_girardot@csx.com ;
Michael Sliper	CSX Transportation	michael_sliper@csx.com ;
Jeremy Shoemaker	Norfolk Southern Railway Company	jeremy.shoemaker@nscorp.com ;
Greg Reiman GM of Engineering	Conrail	gregory.reiman@conrail.com ;
Nicholas Palmer	Conrail	nicholas.palmer@conrail.com ;
Larry Henshaw	Conrail	larry.henshaw@conrail.com ;
Matthew Fulmer	Philadelphia Water Department	matthew.fulmer@phila.gov ;
David Whene	Greenwich Terminals Llc/Holt Logistics	dwhene@holtlogistics.com ;
Michael Fluehr	Holt Logistics	mfluehr@holtlogistics.com ;
Edwin Esposito	Challenger Realty Group	ed@challengerrealtygroup.com ;
Patty Herrera	Challenger Realty Group	patty@challengerrealtygroup.com ;
John Zakutny	Glovis Southport	jzakutny@glovisusa.com ;
Kate Mcnamara Senior VP of the Navy Yard	Philadelphia Industrial Development Corp	kmcnamara@pidcphila.com ;
Justin Knapp	Eco Energy	justink@eco-energy.com ;
Chad Conn	Eco Energy	chadc@eco-energy.com ;
Scott Wright	Ineos Chemical	scott.wright1@ineos.com ;
Bill Golden	Dependable Distribution Services Inc	william@ddscocoa.com ;
Sara Fenton	Penndot Co	sfenton@pa.gov ;
Karen Cummings	Penndot Co	kcummings@pa.gov ;
Mary Ann Lang	Penndot Dist 6-0	malang@pa.gov ;
Abey Abebe	Penndot Dist 6-0	aabebe@pa.gov ;
Michael Anderson	Penndot Dist 6-0	kmanderson@pa.gov ;
Matthew Wurst	PUC	mwurst@pa.gov ;