



April 22, 2025

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

A-2020-3020667

Re: Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to alter the crossings where State Route 3104 crosses, above grade, the tracks of CSX Transportation Inc. (DOT 584 825 U), Norfolk Southern Railway Company (DOT 507 455 K), and the Pittsburgh and Ohio Central Railroad Company (DOT Unknown) in the City of Pittsburgh, Stowe Township and McKees Rocks Borough, Allegheny County.

Dear Secretary Chiavetta:

Enclosed for filing please find the Department's *Petition for Extension of Time* in the above-captioned matter.

I certify that a copy has been sent to all parties of record by email as permitted by the Certificate of Service.

Sincerely,

A handwritten signature in black ink, appearing to read "LJB", written over a horizontal line.

Leah Jo Bobula
Assistant Counsel
Department of Transportation

Attachments

cc: Parties of Record
Mark Chappell, P.E., Utilities and Right of Way Section Chief
Tim Hann, Central Office Grade Crossing Engineer
Michele Acitelli, P.E., District 11-0
Michael Grace, P.E., District 11-0

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to alter the crossings where State Route 3104 crosses, above grade, the tracks of CSX Transportation Inc. (DOT 584 825 U), Norfolk Southern Railway Company (DOT 507 455 K), and the Pittsburgh and Ohio Central Railroad Company (DOT Unknown) in the City of Pittsburgh, Stowe Township and McKees Rocks Borough, Allegheny County.

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Electronically Filed

PETITION FOR EXTENSION OF TIME

AND NOW, comes the Commonwealth of Pennsylvania, Department of Transportation, (“Department”), by and through its counsel, Leah Jo Bobula, Assistant Counsel and offers the following in support of its Petition for Extension of Time, pursuant to 52 Pa. Code § 1.15(a)(1), in the above referenced matter and states as follows:

1. The name and address of the Petitioner is:

Douglas M. Seeley, P.E.
Assistant District Executive
Department of Transportation
Engineering District 11-0
45 Thoms Run Road
Bridgeville, PA 15017
dseeley@pa.gov

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

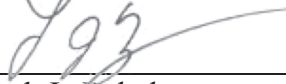
Leah Jo Bobula
Assistant Counsel
Commonwealth of Pennsylvania
Department of Transportation
Office of Chief Counsel
P.O. Box 8212
Harrisburg, Pennsylvania 17105-8212
lbobula@pa.gov

3. By Secretarial Letter entered March 10, 2021, the Pennsylvania Public Utility Commission (“Commission”) directed that “Construction of the project be completed in a manner satisfactory to this Commission on or before December 31, 2024 ...”
4. The December 31, 2024 completion date was not met because of unforeseen extra work added to the contract thereby extending it beyond its original anticipated completion date. As work progressed, it was discovered that the barrier was in such poor condition it needed to be fully replaced and not just repaired. This additional work plus a peregrine falcon restriction impacted the original contract completion date.
5. As of the date of this Petition construction is currently underway.
6. For the reasons stated above, the Department respectfully requests an extension of time from the December 31, 2024 date contained in the March 10, 2021 Secretarial Letter to the extended date of June 30, 2026, and that the Secretarial Letter dated March 10, 2021 be modified as follows, with deletions marked as strikethrough font and additions in bold font:
 14. Construction of the project be completed in a manner satisfactory to this Commission on or before ~~December 31, 2024~~ **June 30, 2026**, and that on or before said date, Pennsylvania Department of Transportation report to this Commission the date of actual completion of the work.
7. The Department reached out to CSX Transportation Inc., Norfolk Southern Railway Company, and Pittsburgh and Ohio Central Railroad Company and has not received a reply in opposition to this Petition as of the date of this Petition.

WHEREFORE, the Department of Transportation respectfully requests that the Public Utility Commission Secretarial Letter, entered on March 10, 2021, be modified consistent with this Petition.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION



Leah Jo Bobula
Assistant Counsel
Commonwealth of Pennsylvania
Department of Transportation
Office of Chief Counsel
P.O. Box 8212
Harrisburg, Pennsylvania 17105-8212
Telephone No. (717) 787-3128
lbobula@pa.gov

DATED: April 22, 2025

**BEFORE THE
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VERIFICATION

I, Michele Acitelli, P.E., District Utility and Grade Crossing Manager, 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 District Grade Crossing Engineer 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: 4/21/25

Michele Acitelli
Michele Acitelli, P.E.
Utility and Grade Crossing Manager

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to alter the crossings where State Route 3104 crosses, above grade, the tracks of CSX Transportation Inc. (DOT 584 825 U), Norfolk Southern Railway Company (DOT 507 455 K), and the Pittsburgh and Ohio Central Railroad Company (DOT Unknown) in the City of Pittsburgh, Stowe Township and McKees Rocks Borough, Allegheny County.

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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 mail pursuant to Application Docket Number A-2020-3020667:

<p>D. Shawn Starling, P.E. Norfolk Southern Railway Company 1200 Peachtree Street N.E. Atlanta, GA 30309 Douglas.Starling@nscorp.com</p>	<p>Chris Hornstein City of Pittsburgh 414 Grant Street, 3rd Fl. Pittsburgh, PA 15219 chris.hornstein@pittsburghpa.gov</p>
<p>Michael Sliper CSX Transportation 1 Bell Crossing Selkirk, NY 12158 Michael_Sliper@csx.com</p>	<p>Jennifer Bailey Stowe Township 555 Broadway Avenue McKees Rocks, PA 15136 secretary@stowetwp.net</p>
<p>Jared Rishel G&W Northeast West Roads 201 N Penn St Punxsutawney, PA 15767 jrishel@gwrr.com</p>	<p>Leann Wozniak McKees Rocks Borough 340 Bell Avenue McKees Rocks, PA 15136 manager@mckeesrockspa.us</p>
<p>Sara Innamorato Allegheny County Executive 101 County Courthouse 436 Grant Street Pittsburgh, PA 15219 executive@alleghenycounty.us</p>	<p>Michael Denny Peoples Natural Gas Company 375 North Shore Drive Pittsburgh, PA 15212 Michael.denny@peoples-gas.com</p>

<p>Arin Biondi Verizon Pennsylvania LLC 2713 W. State Street New Castle, PA 16101 Arin.p.biondi@verizon.com</p> <p>Jim Runatz Duquesne Light Company 1901 Edison Street Pittsburgh, PA 15116 jrunatz@duqlight.com</p> <p>James Schrenk AT&T Local Network Services 2500 Allegheny Center Pittsburgh, PA 15212 Js9723@att.com</p> <p>Michael Lichte Allegheny County Sanitary Authority (ALCOSAN) 3300 Preble Avenue Pittsburgh, PA 15233-1092 lmichael.lichte@alcosan.org</p> <p>Stephanie Lewis Columbia Gas of PA, Inc. 4000 Energy Drive Bridgeville PA 15017 sklewis@nisource.com</p> <p>Anthony Francioni Comcast Central Office 1530 Chartiers Ave. Pittsburgh, PA. 15204 anthony_francioni@cable.comcast.com</p>	<p>Robert Hutton West View Water Authority 2428 Rochester Road Pittsburgh, PA 15143 rhutton@westviewwater.org</p> <p>John Moran Windstream 4792 Old William Penn Hwy Export, PA 15632 John.R.Moran@windstream.com</p> <p>Richard Williams Level 3 Communications (Lumen) 200 Technology Drive Pittsburgh, PA 15219 richard.l.Williams@lumen.com</p> <p>Thomas Vento Dan Kirk Shell Appalachia / Shell Oil Co. (Shell Legacy Holdings) 150 N. Dairy Ashford Road Houston, TX 77079 tvento@langan.com tvento@langan.com</p> <p>Benjamin Grunauer, P.E. Pittsburgh Water & Sewer Authority (PWSA) Penn Liberty Plaza 1 1200 Penn Avenue BGrunauer@pgh2o.com</p>
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Date: April 22, 2025

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