



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

June 2, 2025

**Via Electronic Filing**

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 alter the public crossing (DOT 592 186 Y) by replacement of the existing bridge where SR 3013 (29<sup>th</sup> Street) crosses, above grade, the tracks of Norfolk Southern Railway Company, located in Paxtang Borough and Swatara Township, Dauphin County.  
A-2020-3021129**

Dear Secretary Homsher,

Enclosed for filing please find the Department's *Petition for Extension of Time* 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.

Sincerely,

A handwritten signature in black ink, appearing to read "LJB", with a long horizontal flourish extending to the right.

Leah Jo Bobula  
Assistant Counsel

Cc: Parties of Record  
Mark J. Chappell, P.E., Division Chief, ROW, Utilities, Grade Crossing  
Sarah Fenton, Central Office Grade Crossing Engineer  
Ahmed Lasloudji, Senior Grade Crossing Engineer, District 8-0  
John Bachman, Senior Project Manager, District 8-0  
Michael Deiter, Program Administrator, District 8-0

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of the Pennsylvania Department of Transportation for approval to alter the public crossing (DOT 592 186 Y) by replacement of the existing bridge where SR 3013 (29<sup>th</sup> Street) crosses, above grade, the tracks of Norfolk Southern Railway Company, located in Paxtang Borough and Swatara Township, Dauphin County.** : **Docket No. A-2020-3021129**  
: **Electronically Filed**  
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**PETITION FOR EXTENSION OF TIME**

The Commonwealth of Pennsylvania, Department of Transportation (Department), by its counsel, Leah Jo Bobula, files the following Petition for Extension of Time, pursuant to 52 Pa. Code § 1.15(a)(1), based upon the following:

1. The October 23, 2020 Secretarial Letter in the above-referenced docket ordered the Department to do all work necessary to replace the existing State Route (SR) 3013 bridge at crossing DOT 592 186 Y, by December 31, 2024.
2. On March 8, 2022, the Department filed its Drawings Authorizing Acquisition of Right-of-Way for SR 3013, Section 079 R/W, which were subsequently approved by the Public Utility Commission (Commission) on June 16, 2022.
3. On September 2, 2022, the Department submitted its Petition to Transfer Jurisdiction, which was subsequently granted by the Commission on October 27, 2022.
4. On March 30, 2023, the Department submitted its Final Construction Plans, which was subsequently approved by the Commission on May 9, 2023.

5. The start of construction was delayed approximately nine months due to longer than average time to acquire the necessary approvals as well as delays incurred while waiting for utilities to clear from the project area to begin construction.
6. Admittedly, the Department also originally underestimated the time necessary to fully complete the crossing alteration.
7. Based on the milestone date in the Department's Engineering and Construction Management System, the Department seeks an extension of the time for completion to December 31, 2025. Those milestone dates are provided below:
  - a. September 8, 2020: PUC field view meeting
  - b. October 23, 2020: Secretarial Letter issued
  - c. December 22, 2021: Construction Agreement executed
  - d. October 27, 2022: Department's Petition to Transfer Jurisdiction
  - e. November 30, 2022: Norfolk Southern approved structure plans
  - f. May 9, 2023: Commission approved Final Construction Plans
  - g. May 12, 2023: Railroad clearance
  - h. May 17, 2023: Environmental clearance
  - i. May 31, 2023: Right-of-Way clearance
  - j. August 31, 2023: Utility clearance
  - k. August 24, 2023: Project bid
8. As of the date of this Petition, construction is underway and proceeding in a timely manner.
9. Undersigned counsel reached out to Norfolk Southern Railway Company to ask for their position regarding this Petition but has not received a response.

10. Because the Department is seeking an extension of time to complete the bridge replacement, the Department respectfully requests that Ordering Paragraph 13 of the October 23, 2020 Secretarial Letter be amended as follows, with deletions shown as strikethrough text and insertions as bold text:

13. 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 October 23, 2020, be modified consistent with this Petition.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



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Leah Jo Bobula, 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 332184  
[lbobula@pa.gov](mailto:lbobula@pa.gov)

Dated: June 2, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of the Pennsylvania Department of Transportation for approval to alter the public crossing (DOT 592 186 Y) by replacement of the existing bridge where SR 3013 (29<sup>th</sup> Street) crosses, above grade, the tracks of Norfolk Southern Railway Company, located in Paxtang Borough and Swatara Township, Dauphin County.** : **Docket No. A-2020-3021129**  
: **Electronically Filed**

**VERIFICATION**

I, Ahmed Lasloudji, 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: 5/30/2025



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Ahmed Lasloudji

Grade Crossing Administrator

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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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 U.S. Prepaid Postage Mail pursuant to 52 Pa. Code §1.54:

**Service by Electronic & US Mail**

Douglas Starling, P.E. Norfolk Southern Railroad Company 650 West Peachtree Street, NW Box 45 Atlanta, GA 30308 <a href="mailto:douglas.starling@nscorp.com">douglas.starling@nscorp.com</a>	Julianne Freeman, Esq. Norfolk Southern Railroad Company Three Commercial Place Norfolk, VA 23510-9241 <a href="mailto:Julianne.Freeman@nscorp.com">Julianne.Freeman@nscorp.com</a>
Mike Pries, Chairman Dauphin County Commissioners Dauphin County Administrative Building 2 South Second Street, 4th Floor Harrisburg, PA 17108 <a href="mailto:mpries@dauphinc.org">mpries@dauphinc.org</a>	Jim Fosselman Swatara Township 599 Eisenhower Boulevard Harrisburg, PA 17111 <a href="mailto:jfosselman@swatara.com">jfosselman@swatara.com</a>
Gerry Miller, Manager Swatara Township Authority 599 Eisenhower Boulevard PO Box 4920 Harrisburg, PA 17111 <a href="mailto:gmillers@sta4920.com">gmiller@sta4920.com</a>	Keldeen Stambaugh, Manager Paxtang Borough 3423 Derry Street Harrisburg, PA 17111 <a href="mailto:Paxtangchief-manager@comcast.net">Paxtangchief-manager@comcast.net</a>

<p>Rob Zimmel Verizon Pennsylvania LLC. Strawberry Square 11th Floor PA 15226 Harrisburg, PA 17101 <a href="mailto:Robert.zimmel@verizon.com">Robert.zimmel@verizon.com</a></p>	<p>Rob Januszko Commonwealth Tele. DBA Frontier 93 Old Berwick Road Drums, PA 18222 <a href="mailto:RobertJanuszko@frontiercorp.com">RobertJanuszko@frontiercorp.com</a></p>
<p>Mike Sweigard Comcast Cable Communications, Inc. 4601 Smith Street Harrisburg, PA 17109 <a href="mailto:mike_sweigard@cable.comcast.com">mike_sweigard@cable.comcast.com</a></p>	<p>Charlotte Krupa PPL Electric Utilities Corporation Two North Ninth Street, GENN3 Allentown, PA 18101-1179 <a href="mailto:cakrupa@pplweb.com">cakrupa@pplweb.com</a></p>
<p>David Hayward Sunseys, LLC 11 Grandview Circle Suite 220 Canonsburg, PA 15317 <a href="mailto:DHayward@sunseys.com">DHayward@sunseys.com</a></p>	<p>Scott Dreiling XO/Verizon 630 Clark Avenue King of Prussia 19406 <a href="mailto:Scott.dreiling@one.verizon.com">Scott.dreiling@one.verizon.com</a></p>
<p>Chris Ricciuti Zayo Group 170 Robbins Road Downington, PA 19335 <a href="mailto:Chris.Ricciuti@zayo.com">Chris.Ricciuti@zayo.com</a></p>	<p>Jeff Haste, Chairman Dauphin County 6680 Linglestown Road Harrisburg, PA 17112</p>

Respectfully submitted,  
COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION

*Maria Bitner*

Maria Bitner, Legal Analyst  
Office of Chief Counsel  
P.O. Box 8212  
Harrisburg, PA 17105-8212  
Telephone No. (717) 705-1275

DATED: June 2, 2025