



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

July 1, 2025

**Via Electronic Filing**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street 2nd FL  
Harrisburg, PA 17120

**RE: P-2015-2465847**

Dear Secretary Homsher,

Enclosed for electronic filing please find the Department's *Withdrawal of Appearance* 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 black ink, appearing to read "Caroline G. Robelen".

---

Caroline G. Robelen  
Assistant Counsel

cc: Parties of Record  
Mark Chappell, P.E., Chief, Highway Delivery Division (Email)  
Mohammad Arghoshi, District Grade Crossing Engineer, District 1-0 (Email)  
Brian A. McNulty, PE, District 1-0 (Email)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Re: Petition of CSX Transportation, Inc. to** :  
**reassign maintenance responsibility for the** :  
**bridge structure where Bort Road (T-270)** : **Docket No. P-2015-2465847**  
**crosses above CSX Transportation, Inc.'s tracks** :  
**(DOT 524 035 A) in North East Township, Erie** :  
**County** : **Electronically Filed**

**Withdrawal of Appearance**

Please withdraw my appearance in the above-designated matter on behalf of the Commonwealth of Pennsylvania, Department of Transportation's Engineering District 1-0 (District 1).

Respectfully Submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



---

Caroline G. Robelen  
Assistant Counsel  
Office of Chief Counsel  
P.O. Box 8212  
Harrisburg, PA 17105-8212  
Telephone No. (717) 787-3128  
Fax Number (717) 772-2741  
Pennsylvania Attorney I.D. 328743  
[crobelen@pa.gov](mailto:crobelen@pa.gov)

DATED: 7/1/2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Re: Petition of CSX Transportation, Inc. to** :  
**reassign maintenance responsibility for the** :  
**bridge structure where Bort Road (T-270)** : **Docket No. P-2015-2465847**  
**crosses above CSX Transportation, Inc.'s tracks** :  
**(DOT 524 035 A) in North East Township, Erie** :  
**County** : **Electronically Filed**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below, in accordance with the requirements of 52 Pa. Code §1.54, by:

**Electronic Mail**

Benjamin C. Dunlap, Jr., Esquire  
Cohen Seglias Greenhall & Furman, P.C  
240 North Third Street, 7<sup>th</sup> Floor  
Harrisburg, PA 17101  
[bdunlap@cohenseglias.com](mailto:bdunlap@cohenseglias.com)

William S. Speros, Esquire  
MacDonald Illig Jones Britton, LLC  
100 State Street, Suite 700  
Erie, PA 16507  
[wsperos@mijb.com](mailto:wsperos@mijb.com)

Michael J. Musone, Esq.  
Knox McLaughlin Gornall & Sennett, PC  
120 West Tenth Street  
Erie, PA 16501  
[mmusone@kmgslaw.com](mailto:mmusone@kmgslaw.com)

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



Caroline G. Robelen  
Assistant Counsel  
Office of Chief Counsel  
P.O. Box 8212  
Harrisburg, PA 17105-8212  
Telephone No. (717) 787-3128  
Fax Number (717) 772-2741  
Pennsylvania Attorney I.D. 328743  
[crobelen@pa.gov](mailto:crobelen@pa.gov)

DATED: 7/1/2025