



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

July 15, 2025

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

The Honorable F. Joseph Brady  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107

**RE: A-2022-3031613, A-2024-3045709, A-2023-3043493, A-2024-3051983  
A-2024-3052077 (Consolidated)**

Dear Secretary Homsher and Judge Brady,

On May 7, 2025, a hearing was held for consolidated cases A-2022-3031613 and A-2024-3045709. At that hearing, the parties agreed dockets A-2023-2043493 and A-2024-3051983 should be consolidated as well because they both solely concern the same issue regarding the flagging language in the Secretarial Letters. Additionally, docket A-2024-3052077 is now consolidated as well due to the same flagging language issue.

Undersigned counsel is seeking permission for PennDOT to continue with construction for each of these dockets during the pending litigation.

Both Westmoreland County and the Bureau of Investigation and Enforcement are not opposed to this request. Without a temporary change in flagging language, Norfolk Southern is not in agreement with this request.

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 "LJ Bobula", with a long horizontal flourish extending to the right.

Leah Jo Bobula  
Assistant Counsel

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of Transportation : A-2022-3031613  
of the Commonwealth of Pennsylvania for :  
approval to alter the public above grade crossing :  
by the replacement of the existing bridge carrying :  
State Route 0011 (West King Street) over track :  
of Norfolk Southern Railway Company :  
(DOT 592 122 M) in Shippensburg Borough and :  
Southampton Township, Franklin County, and :  
the allocation of costs incident thereto. :

Application of Pennsylvania Department of : A-2024-3045709  
Transportation for approval to alter two (2) :  
Public crossings by the rehabilitation of the :  
existing bridge where State Route 0018 :  
(Seventh Avenue) crosses, above grade, one :  
(1) track of Norfolk Southern Railway :  
Company (DOT 503 768 L) located in New :  
Brighton Borough and two (2) tracks of CSX :  
Transportation, Inc. (DOT 584 878 T) located :  
in the City of Beaver Falls, all in Beaver County, :  
and the allocation of costs incident thereto. :

Application of the Department of Transportation : A-2023-3043493  
of the Commonwealth of Pennsylvania for :  
approval to replace the existing bridge where :  
West Lackawanna Avenue crosses above the :  
track(s) of Norfolk Southern Railway Corporation, :  
DOT Number 265 971 V I the City of Scranton, :  
Lackawanna County and the allocation of costs :  
Incident thereto. :

Application of Pennsylvania Department of : A-2024-3051983  
Transportation for approval to alter the public :  
crossings (DOT # 592 188 M) by the removal and :  
replacement of the existing bridge where :  
Seventeenth Street crosses, above grade, the tracks :  
of Norfolk Southern Railway Company in the :  
City of Harrisburg, Dauphin County, and the :  
allocation of costs incident thereto. :

Application of Westmoreland County for approval : A-2024-3052077  
to replace an above grade crossing by the : (to be consolidated)  
Installation of a single-span girder bridge where :  
West Broadway Avenue/Fourth Street crosses :  
Norfolk Southern Railroad (NSRC) BR0028787 – :  
PT-331.87; U.S. Department Federal Highway :  
Administration (FHWA) will fund the bridge :  
replacement, but Westmoreland County will own :  
and maintain the bridge located in the borough of North :  
Irwin, Westmoreland County, Pennsylvania. :

### **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**

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Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



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