



July 15, 2025

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to upgrade the existing warning devices on roadways that cross the various tracks of the Norfolk Southern Railway Company at different DOT locations across multiple townships in Erie County *all in accordance with the Federal Grade Crossing Program* and the allocation of costs incident thereto.

Dear Secretary Homsher:

Enclosed for filing, please find the Application of the Department of Transportation.

A copy of this Application and Exhibits has been served upon the parties in the Certificate of Service to the Application by email.

Sincerely,

Mohammad Arghoshi Digitally signed by marghoshi
Date: 2025.07.16 07:56:07
-04'00'

Mohammad A. Arghoshi
Senior Civil Engineer | DGCE
Engineering District 1-0
Department of Transportation

Attachments

cc: Parties of Record
Mark J. Chappell, P.E., Chief, Director Bureau of Design & Delivery, Utilities & Grade Crossing Division
Karen L. Cummings, Office of Chief Counsel
William M. Sinick, P.E., Supervisor, Rail Safety Engineering Section, PUC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to upgrade the existing warning devices on roadways that cross the various tracks of the Norfolk Southern Railway Company at different DOT locations across multiple townships in Erie County *all in accordance with the Federal Grade Crossing Program* and the allocation of costs incident thereto.

Application
Docket No. _____

Electronically Filed

APPLICATION OF THE COMMONWEALTH OF PENNSYLVANIA, DEPARTMENT OF
TRANSPORTATION

Applicant, Commonwealth of Pennsylvania, Department of Transportation, files this Application pursuant to the provisions of 66 Pa.C.S § 2702 and 52 Pa. Code § 5.13 for the alteration of the public at grade crossings where State Route 215, Section 170; State Route 1006, Section 40; State Route 1013, Section 150; State Route 1017, Section 60; State Route 4007, Section 100; and State Route 4017, Section 40, crosses the track(s) of Norfolk Southern Railway Company for various crossings at DOT # 471 859A, 471 861B, 524 033L, 471 872N, 471 874C, 471 875J, in North East Township, Erie County, and DOT # 524 028P, 471 869F, in Borough of North East, DOT # 471 876R, 471 877X, 471 878E, and 471 881M in Harborcreek Twp, DOT # 471 866W, 524 002M, 524 001F, 523 998S in the City of Erie, all in Erie County, Pennsylvania, as described below:

1. The name and address of Applicant are Commonwealth of Pennsylvania, Department of Transportation, Thomas J. McClelland, P.E., Assistant District Executive, Engineering District 1-0, 255 Elm Street, Oil City, PA 16301.

2. The name and address of attorney for the Applicant are Karen L Cummings, Senior Assistant Counsel, Commonwealth of Pennsylvania, Department of Transportation, Office of Chief Counsel, PO Box 8212, Harrisburg, PA 17105-8212.

3. The Applicant is an agency of Commonwealth of Pennsylvania, organized and existing under the Administrative Code of 1929, 71 P.S. § 511, et seq. and generally 36 P.S. § 670 - 401 et seq., filing this Application on behalf of Erie County.

4. The names and addresses of the persons, parties and entities concerned in, or affected by the proposed construction, to the best of the Applicant's knowledge, are shown in the certificate of service. In addition to those served, the Applicant requests that the following also receive service of all documents in this matter:

Mark J. Chappell P.E., Chief
Utilities and Right of Way Section
Pennsylvania Department of Transportation
PO Box 3362
Harrisburg, PA 17105-3362
MARCHAPPEL@pa.gov

Karen L. Cummings
Office of Chief Counsel
Pennsylvania Department of Transportation
PO Box 8212
Harrisburg, PA 17105-8212
kcummings@pa.gov

5. The Applicant is seeking approval for Norfolk Southern Railway Company Engineering - Design & Construction to alter, as detailed below, the subject crossings by upgrading the existing circuitry and the existing warning devices on roadways that cross the various roadways that cross the track(s) of Norfolk Southern Railway Company at various DOTs in various townships, Erie County, pursuant to the Federal Grade Crossing Program.

No	Street Name	DOT No.	Municipality	Device Description
1	GULF ROAD	471859A	NORTH EAST TOWNSHIP	OBSOLETE GCP 3000, OBSOLETE RELAY CONTROLLER, 25-YEAR-OLD BATTERIES, CASE HAS SOME DAMAGE
2	BORT ROAD	471861B	NORTH EAST TOWNSHIP	OBSOLETE GCP 3000, OBSOLETE CROSSING CONTROLLER, 25-YEAR-OLD BATTERIES, NOT ENOUGH ROOM IN CASE FOR REWIRING
3	REMINGTON RD.	524033L	NORTH EAST TOWNSHIP	OBSOLETE GCP 3000, OBSOLETE RELAY CONTROLLER, 25-YEAR-OLD BATTERIES, NOT ENOUGH ROOM IN CASE FOR REWIRING
4	WASHINGTON	524028P	BOROUGH OF NORTH EAST	OBSOLETE GCP 3000, OBSOLETE CROSSING CONTROLLER, 25-YEAR-OLD BATTERIES, NOT ENOUGH ROOM IN CASE FOR REWIRING
5	SMEDLEY STREET	471869F	BOROUGH OF NORTH EAST	OBSOLETE GCP 3000, OBSOLETE RELAY CONTROLLER, 25-YEAR-OLD BATTERIES, SIDE BY SIDE CASE
6	CEMETERY ROAD	471872N	NORTH EAST TOWNSHIP	OBSOLETE GCP 3000, OBSOLETE RELAY CONTROLLER, 25-YEAR-OLD BATTERIES, NOT ENOUGH ROOM IN CASE FOR REWIRING
7	WILLIAMS ROAD	471874C	NORTH EAST TOWNSHIP	OBSOLETE GCP 3000, OBSOLETE RELAY CONTROLLER, 25-YEAR-OLD BATTERIES, SIDE BY SIDE CASE
8	S. BRICKYARD RD	471875J	NORTH EAST TOWNSHIP	OBSOLETE GCP 3000, OBSOLETE RELAY CONTROLLER, SIDE BY SIDE
9	MOREHEADVILLE ROAD	471876R	HARBORCREEK TOWNSHIP	OBSOLETE GCP 3000, OBSOLETE RELAY CONTROLLER, SIDE BY SIDE CASE
10	KING RD	471877X	HARBORCREEK TOWNSHIP	OBSOLETE GCP 3000, OBSOLETE RELAY CONTROLLER, 25-YEAR-OLD BATTERIES, CASE HAS SOME DAMAGE
11	DAVIDSON ROAD	471878E	HARBORCREEK TOWNSHIP	OBSOLETE GCP 3000, OBSOLETE RELAY CONTROLLER, 25-YEAR-OLD BATTERIES, CASE HAS SOME DAMAGE
12	WALBRIDGE ROAD	471881M	HARBORCREEK TOWNSHIP	OBSOLETE GCP 3000, OBSOLETE CROSSING CONTROLLER
13	DOWNING AVENUE	471886W	CITY OF ERIE	OBSOLETE GCP 3000, 15-YEAR-OLD BATTERIES, NOT ENOUGH ROOM IN CASE FOR REWIRING
14	CASCADE ST	524002M	CITY OF ERIE	OBSOLETE GCP 3000, OBSOLETE CROSSING CONTROLLER, 25-YEAR-OLD BATTERIES
15	RASPBERRY ST	524001F	CITY OF ERIE	OBSOLETE GCP 3000, OBSOLETE CROSSING CONTROLLER, 25-YEAR-OLD BATTERIES, DAMAGED CASE
16	GREEN GARDEN ROAD	523998S	CITY OF ERIE	OBSOLETE GCP 3000, OBSOLETE CROSSING CONTROLLER, 25-YEAR-OLD BATTERIES, NOT ENOUGH ROOM IN CASE FOR REWIRING

A Location Map is attached hereto and marked as Exhibit A.

6. The Applicant is aware of prior Public Utility Commission orders for these crossings at Docket Number(s): A-00113259 and A-00123111.

7. The average daily traffic for various DOTs in various townships, Erie County at these crossings are.

No	Street Name	DOT No.	AADT	Percent of Trucks
1	GULF ROAD	471859A	562	7
2	BORT ROAD	471861B	213	2
3	REMINGTON RD.	524033L	213	1
4	WASHINGTON	524028P	213	4
5	SMEDLEY STREET	471869F	213	3
6	CEMETERY ROAD	471872N	213	2
7	WILLIAMS ROAD	471874C	215	7
8	S. BRICKYARD RD	471875J	213	5
9	MOREHEADVILLE ROAD	471876R	162	7
10	KING RD	471877X	213	2
11	DAVIDSON ROAD	471878E	213	2
12	WALBRIDGE ROAD	471881M	450	5
13	DOWNING AVENUE	471886W	641	10
14	CASCADE ST	524002M	641	7
15	RASPBERRY ST	524001F	641	5
16	GREEN GARDEN ROAD	523998S	641	5

8. The estimated total cost of the project described above is \$ 3,834,320.88. This cost will be split 80% PennDOT and 20% Norfolk Southern. The Applicant agrees to reimburse 100% federal funds for its actual costs for this project in accordance with the Federal Grade Crossing Program.

9. This project is necessary and proper for the safety and convenience of the public.

10. A conference of all parties of interest should be held to discuss the proposed project.

Wherefore, Applicant respectfully requests that the Public Utility Commission approve this Application.

Respectfully Submitted:

Thomas J. McClelland 2025.07.15
14:31:49 -04'00'

Thomas J. McClelland, P.E.
Assistant District Executive-Design
Engineering District 1-0
Department of Transportation
255 Elm Street
Oil City, PA 16301
Phone: (814) 678-7081
Fax: (814) 678-7030
THMCCLELLA@pa.gov

Dated: _____

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to upgrade the existing warning devices on roadways that cross the various tracks of the Norfolk Southern Railway Company at different DOT locations across multiple townships in Erie County *all in accordance with the Federal Grade Crossing Program* and the allocation of costs incident thereto.

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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 email, in accordance with Emergency Order at M-2020-3019262.

Cherita R. Hunter Jones
Senior Manager Grade Crossing & Wayside Engineering
650 West Peachtree Street
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Cherita.hunter@nscorp.com

D. Shawn Starling, PE.
Senior Engineer Public Improvement
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Ellen Schauerman
Erie County Council Member
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Chad McConnell/Robert Wernicki
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Tim Sennett
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bauerb1@natfuel.com/FleekJ@natfuel.com

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(814) 320-3684
shawn.kottwitz@zitomedia.com

Dated this 16 Day of July, 2025

Digitally signed by marghoshi
Date: 2025.07.16 07:56:53
-04'00'
Mohammad Arghoshi
Mohammad A. Arghoshi
Senior Civil Engineer | DGCE
Engineering District 1-0
Department of Transportation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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VERIFICATION

I, Mohammad Arghoshi, Grade Crossing Engineer, hereby state that the facts above set forth 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).

Date: July 16,2025

Mohammad Arghoshi Digitally signed by marghoshi
Date: 2025.07.16 08:15:31
-04'00'

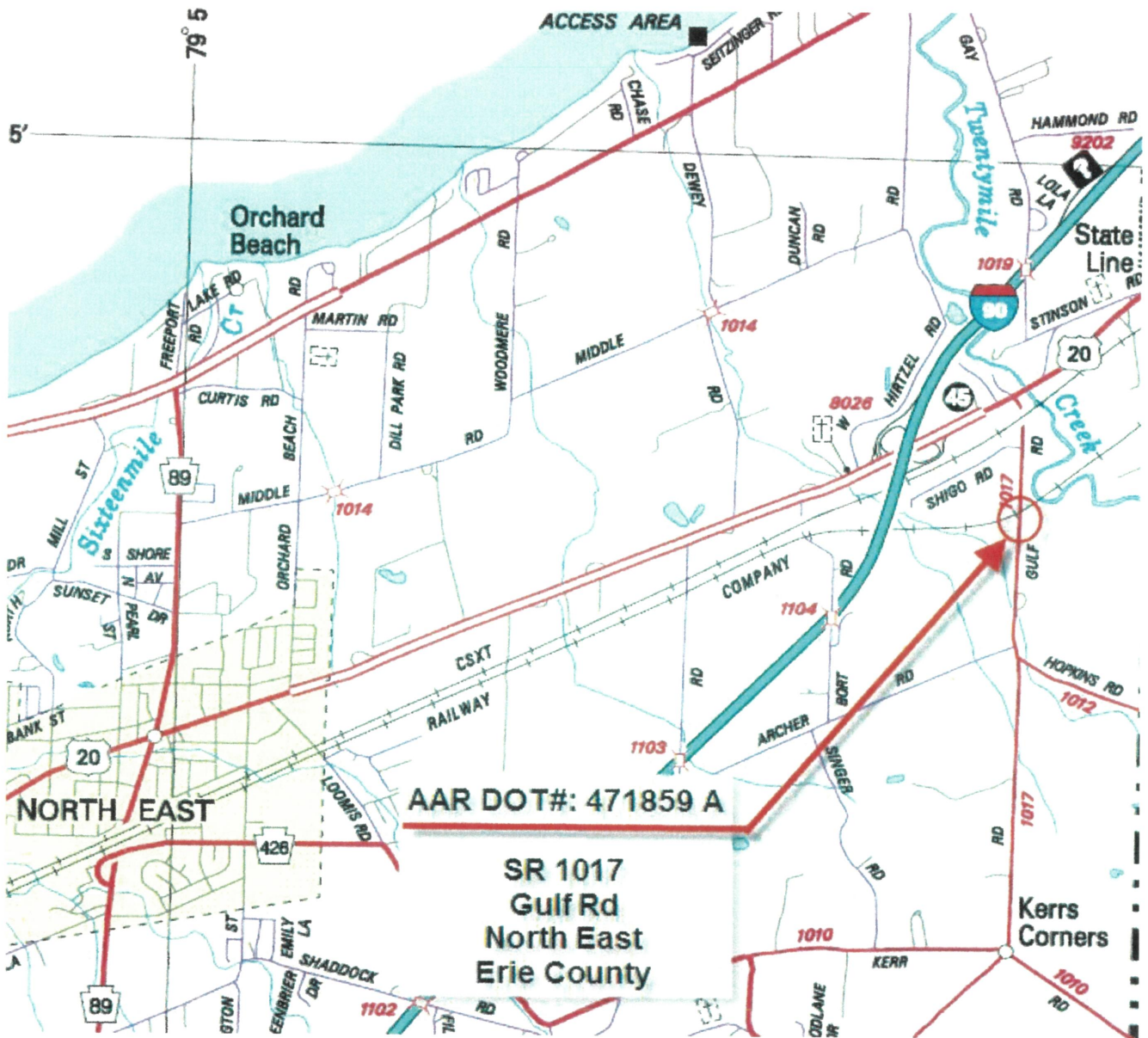
Mohammad A. Arghoshi
Senior Civil Engineer| DGCE
Engineering District 1-0
Department of Transportation

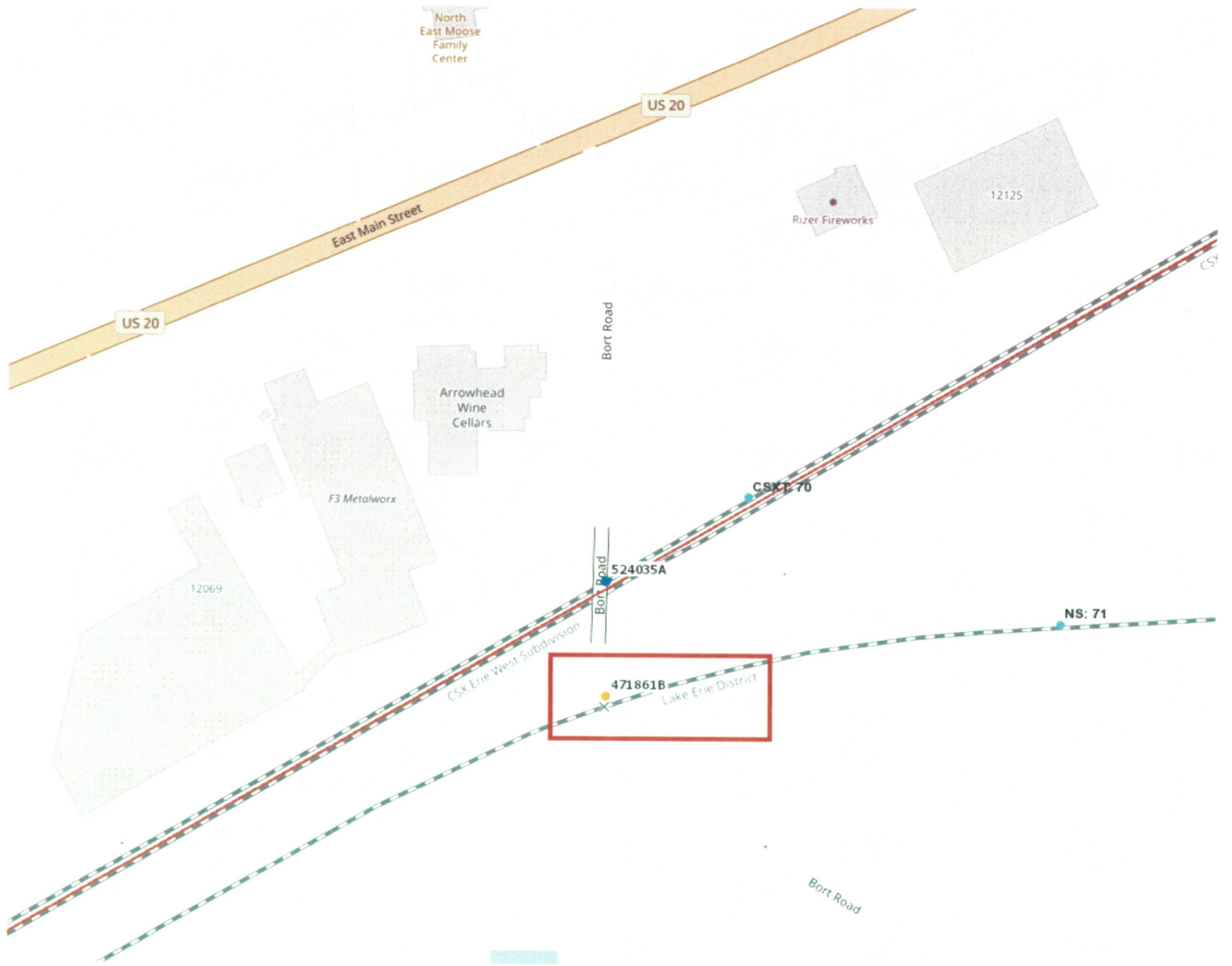
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Railroad: Norfolk's Southern Railroad Company

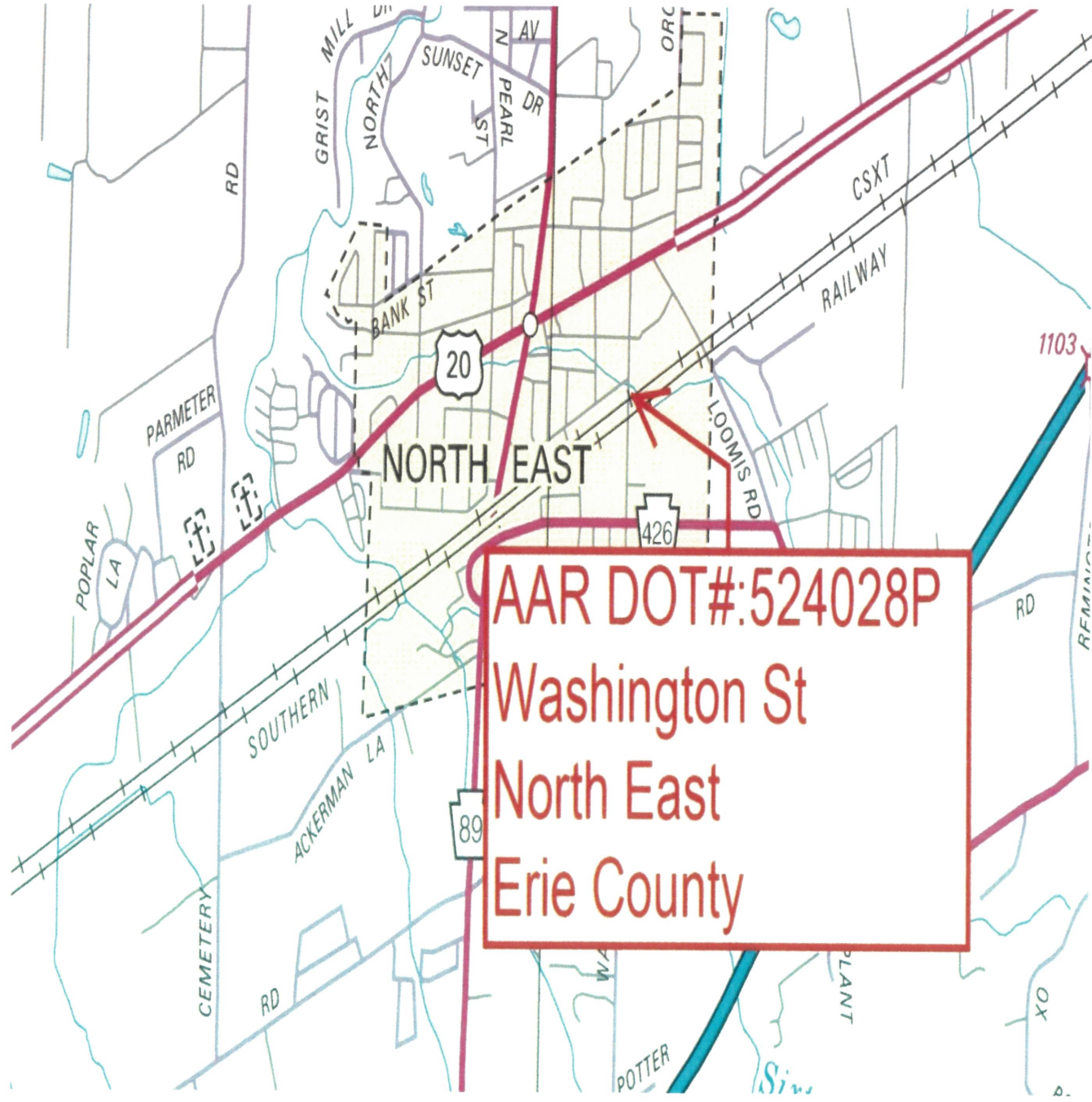
DOT #: 471 859A, 471 861B, 524 033L, 524 028P, 471 869F, 471 872N, 471 874C, 471 875J, 471 876R, 471 877X, 471 878E, 471 881M, 471 866W, 524 002M, 524 001F, 523 998S in North East, Erie County

Location: North East Erie, County PA





471861B

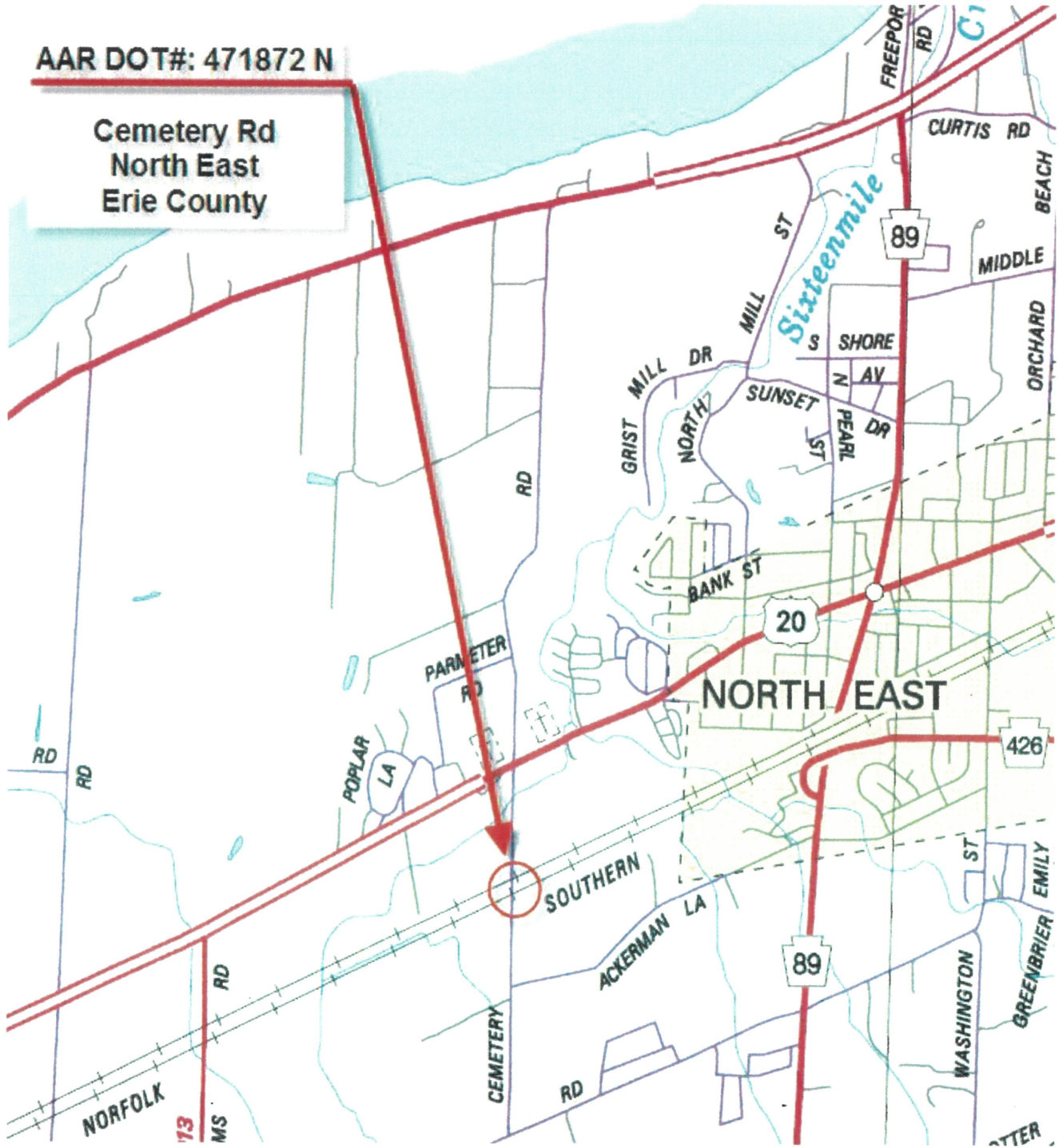


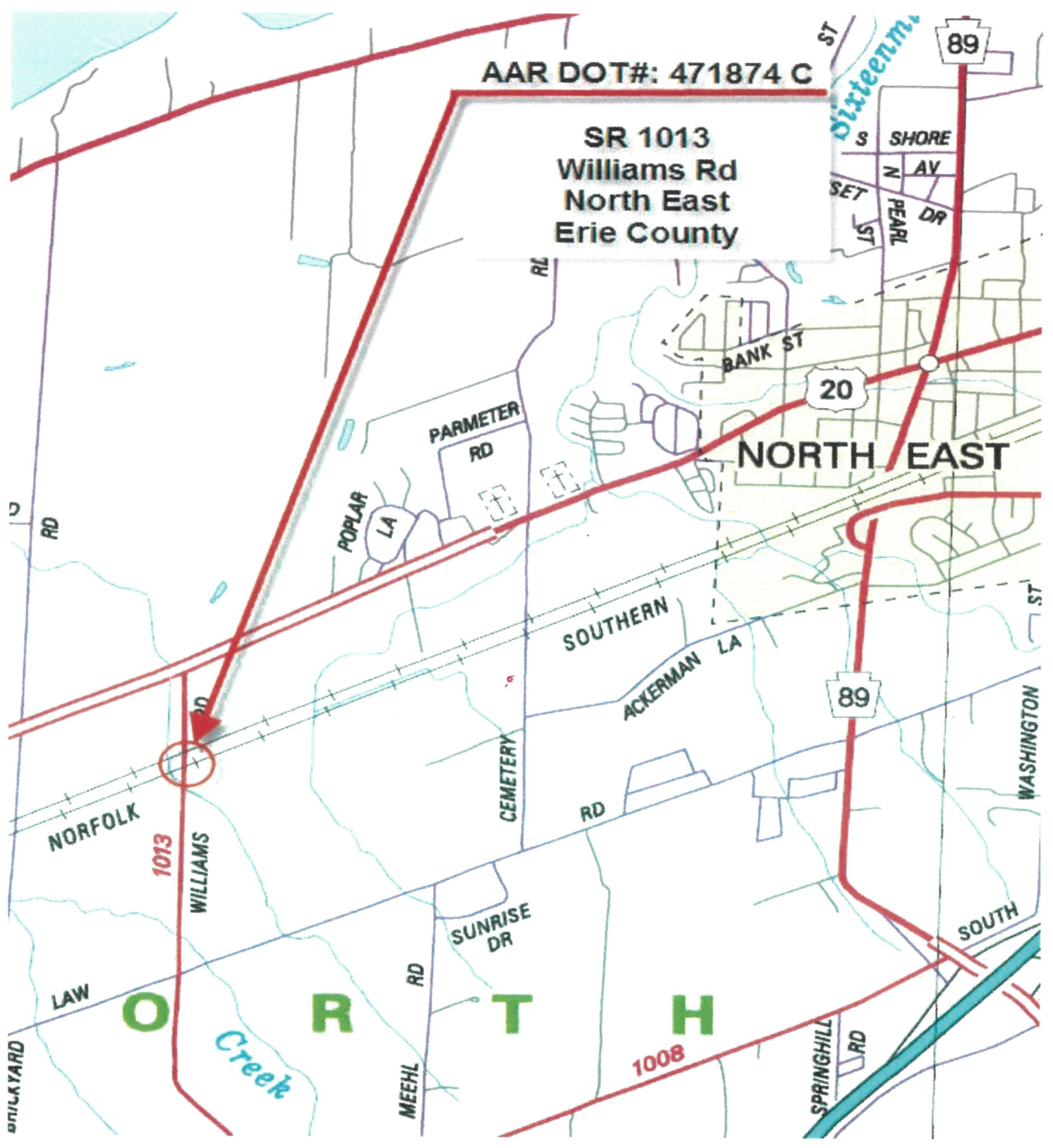
AAR DOT#:524028P
Washington St
North East
Erie County



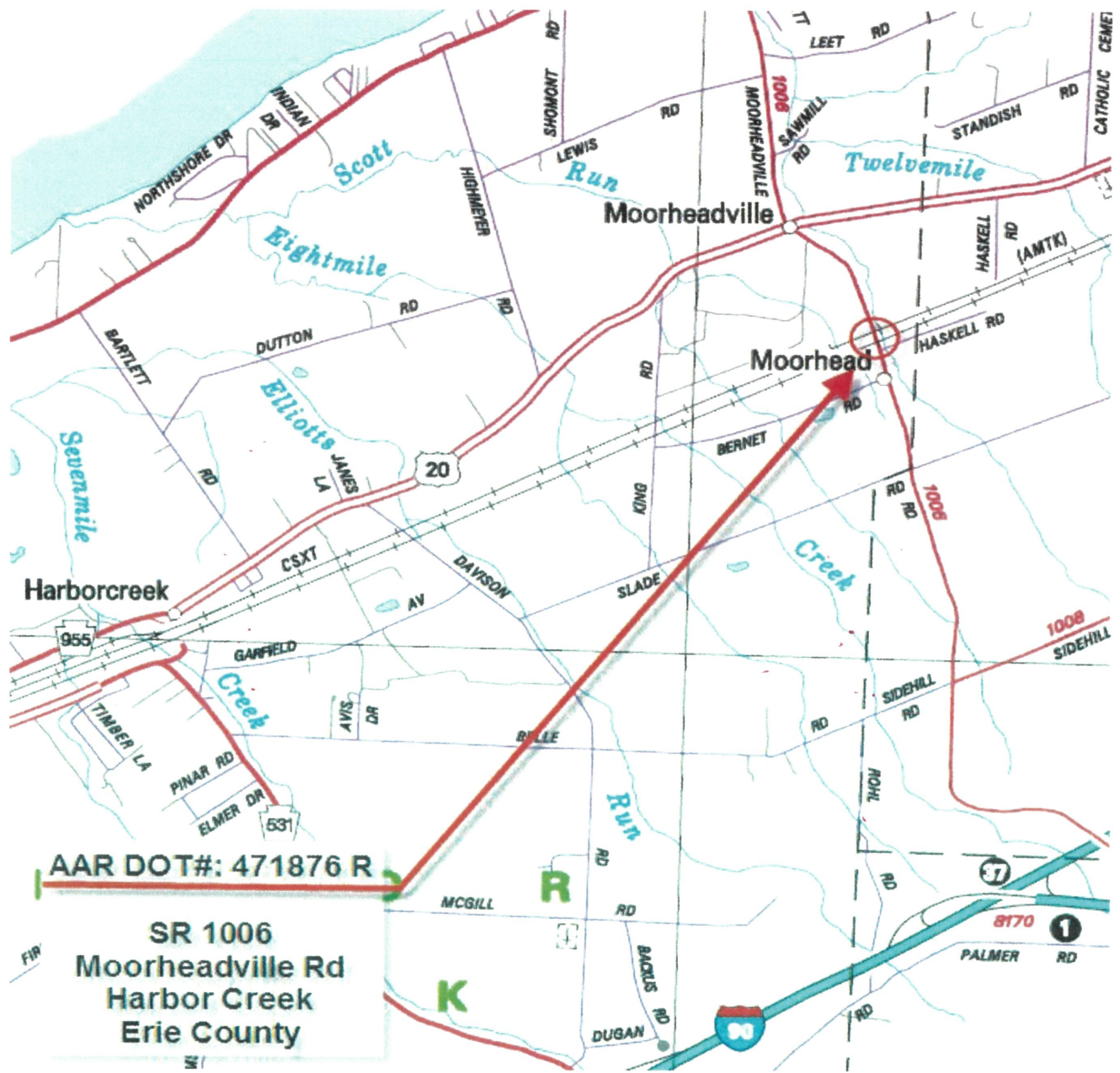
AAR DOT#: 471872 N

Cemetery Rd
North East
Erie County





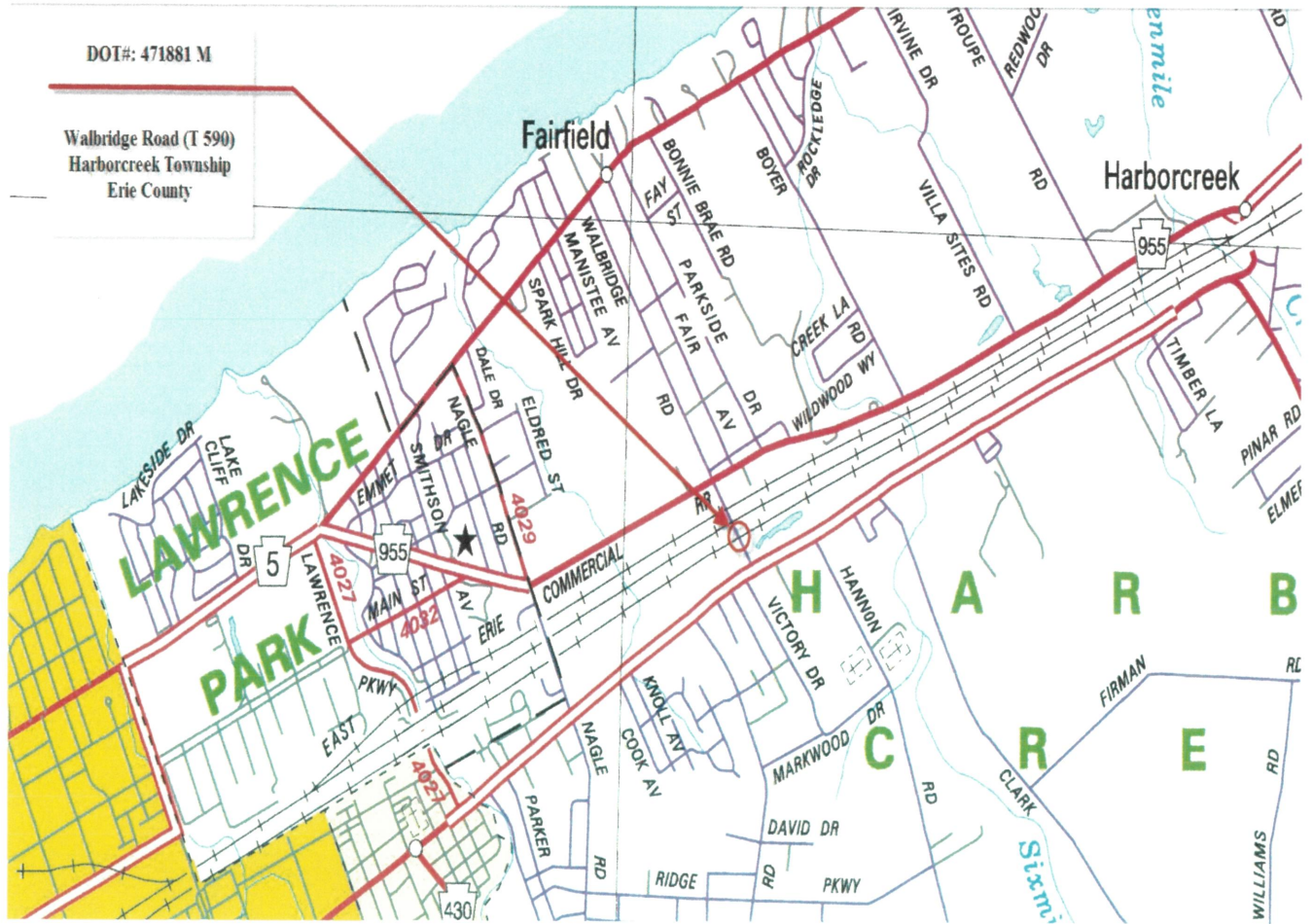






DOT#: 471881 M

Walbridge Road (T 590)
Harborcreek Township
Erie County



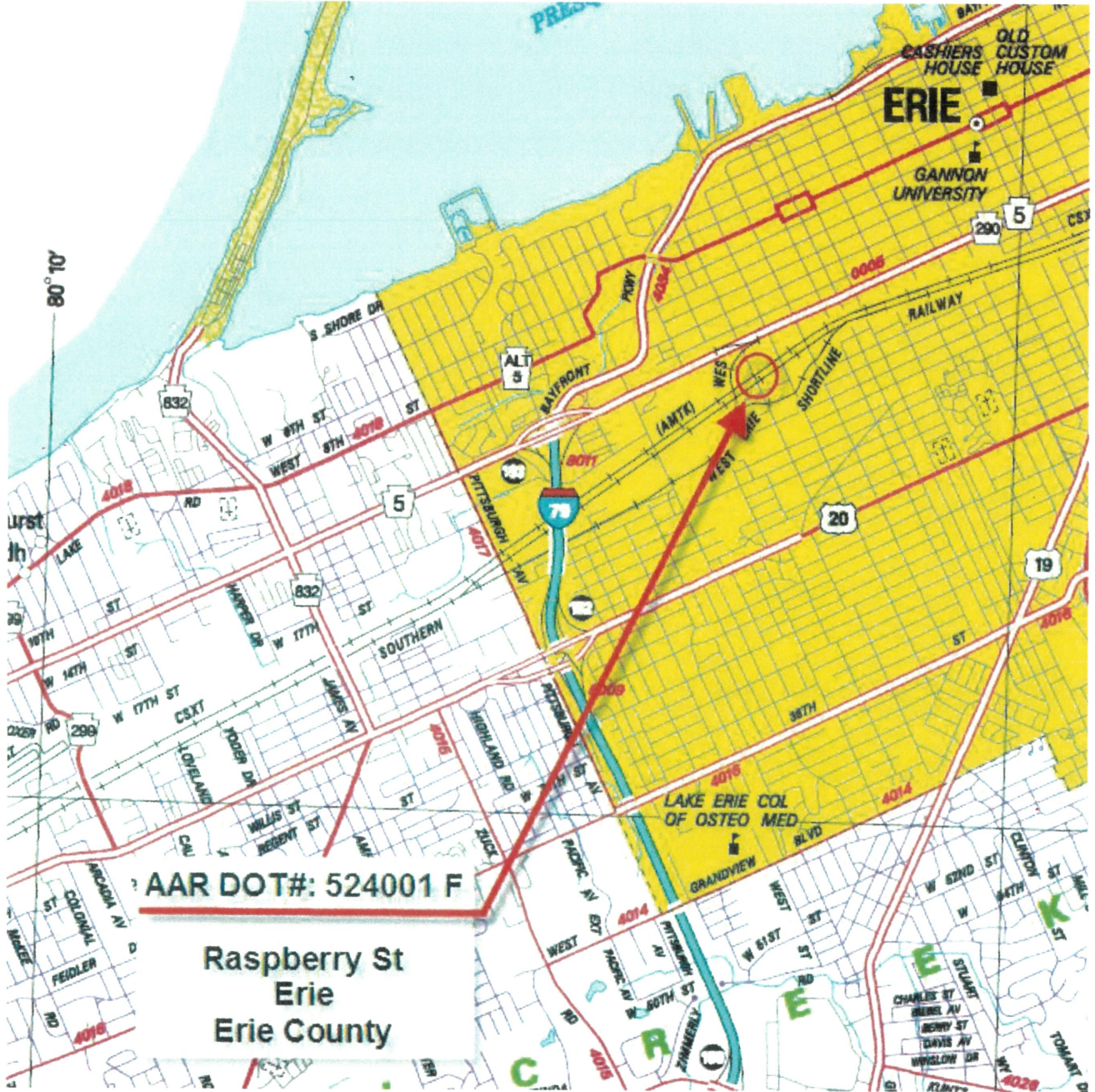


Location Map
AAR#: 471886W
Erie Co.
City of Erie
Downing Avenue



AAR DOT#: 524002 M

Cascade St
Erie
Erie County



80° 10'

ERIE

GANNON UNIVERSITY

LAKE ERIE COL OF OSTEOPATHIC MED

AAR DOT#: 524001 F

Raspberry St
Erie
Erie County



Location Map
AAR#: 523998S
Erie Co.
City of Erie
Green Garden Blvd