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AN EXELON COMPANY

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August 18, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Petition of the Borough of Royersford, Pennsylvania for Emergency Order
Docket No. P-2025-3056530**

Dear Secretary Homsher:

Enclosed please find the **Answer of PECO Energy Company to the Petition of the Borough of Royersford for Emergency Order Regarding Dangerous Railroad Crossings (the "Answer")** for filing in the above-referenced docket.

Copies of the Answer have been served in accordance with the enclosed Certificate of Service.

If you have any questions regarding this filing, please contact me directly at 267.533.1964.

Thank you.

Very truly yours,

Anthony E. Gay

c: Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF THE BOROUGH OF
ROYERSFORD, PENNSYLVANIA FOR
EMERGENCY ORDER** :
: **DOCKET NO. P-2025-3056530**
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**ANSWER OF PECO ENERGY COMPANY TO THE PETITION OF THE BOROUGH
OF ROYERSFORD FOR EMERGENCY ORDER REGARDING DANGEROUS
RAILROAD CROSSINGS**

Pursuant to 52 Pa. Code §§ 1.91 and 5.61, PECO Energy Company (“PECO” or the “Company”) hereby files this Answer responding to the Borough of Royersford’s (“Borough’s”) Petition for Emergency Order (the “Petition”).¹

I. BACKGROUND

Norfolk Southern (“NS”) owns and operates the Main Street and Arch Street railroad crossings within the Borough (collectively, the “Crossings”). The Crossings include crossing gates and warning lights to warn and stop traffic when trains are approaching and traveling through the Crossings. PECO owns and operates a “220-60” transmission line within the same right-of-way as the Crossings (the “Transmission Line”). The Transmission Line was installed in about 1984 and has been in continuous service for approximately 41 years.

¹ On August 1, 2025, Pennsylvania Public Utility Commission (“PUC” or “Commission”) Chairman DeFrank issued an Ex Parte Emergency Order (“Emergency Order”) in this proceeding granting in part, and denying in part, the Petition. Chairman DeFrank (1) directed the Bureau of Technical Utility Services (“TUS”) to meet and confer with all interested parties within 20 days of the date of the Emergency Order to consider options for immediate remediation of the dangerous conditions at the crossings, including addressing interim operational responsibility and interim allocation for any remediation costs; and (2) referred the Petition to the Office of Administrative Law Judge for adjudication as a formal complaint, on an expedited basis. As a result, the Borough’s request for an Emergency Order is moot. However, PECO is responding to the Petition as a formal complaint in accordance with the Emergency Order.

The Borough alleges that starting around 2017, the railroad crossing warning devices at the Crossings, including the crossing gates and automatic crossing signals, would occasionally malfunction and activate without any trains being present in the area. Petition ¶ 10. These issues coincided with NS' installation of a positive train control ("PTC") system. *Id.*, Exhibit D, p. 1. PECO is not aware of any similar issues occurring prior to NS' installation of the PTC. NS hired National Signal Technology, Inc. ("NST") in 2019 to investigate the malfunctions, and again in 2023. *Id.*, Exhibit A.² Following the 2023 investigation, NST provided a report recommending further interim mitigation measures and concluding that PECO and NS must work together to mitigate further impacts from the Transmission Line. *Id.*

NS provided the NST report to PECO in January 2024 to request assistance in investigating the inductance issues. *Id.*, Exhibit D, p. 3. PECO engaged POWER Engineers, Inc. ("POWER") to review the findings and recommendations of the NST report. POWER summarized its findings in a memorandum dated April 24, 2024. *See* Exhibit A. POWER found several deficiencies in the NST report and recommended further studies to evaluate proposed mitigation options. *Id.* Notably, POWER determined that "[t]he level of detail provided in the NST Report does not allow for a thorough review of the analysis approach and prevents POWER from being able to comment on whether additional simulation efforts are required or not to further investigate the performance of the proposed mitigation options and its impact on PECO systems." Exhibit A, p. 1. PECO provided POWER's findings to NS in May 2024. Petition, Exhibit D, p. 3. NS did not respond to the information provided by PECO. *Id.*

The Borough alleges that beginning in August 2024 and continuing into 2025, the railroad crossing warning devices at the Crossings malfunctioned with increasing frequency.

² The NST Report states that NST had been contacted by NS since it had experienced persistent issues since the installation of "PSOe track circuits" (i.e., the PTC). *See* Petition, Exhibit A, p. 4.

Petition ¶¶ 13-15. On May 30, 2025, PECO and NS conducted a site inspection of the Crossings. PECO measured voltage in the areas around the Crossings. Petition, Exhibit D, p. 4. Most readings were negligible. *Id.* On June 17, 2025, PECO met with the Borough, NS, Commission staff, and State Senator Kate Muth to discuss the malfunctions at the Crossings. Petition ¶ 19. PECO suggested that an expert be hired to study induction effects to attempt to identify the root cause of any induction issues at the Crossings. Petition, Exhibit D, p. 8. NS agreed to participate in the study.

PECO then engaged Advanced Grounding Concepts (“AGC”), a nationally-recognized induction expert, to study its equipment and the Crossings to identify potential induction issues and recommend mitigation actions. The AGC study will, among other things, address the deficiencies in the 2023 NST report. AGC has begun its modeling process and anticipates completing its report by approximately mid-October 2025. PECO and NS are working together cooperatively to support the AGC study.

The Bureau of Technical Utility Services (“TUS”) Railroad Safety Division also conducted a field investigation and conference with the Borough, NS, and PECO at the Crossings on August 14, 2025.

II. ARGUMENT

“Immediate repair” of the Crossings, as requested by the Borough, is not feasible. The root cause of the malfunctions at the Crossings is not known. As noted in POWER’s 2024 review of the 2023 NST study, further analysis and details are required to determine recommended mitigation. PECO has engaged AGC, with NS’ cooperation, to perform a study to determine whether there is any impact to NS’ equipment at or in the vicinity of the Crossings from the Transmission Line and to provide recommended mitigation actions. PECO has also been working proactively with the Borough, NS, and TUS’ Rail Safety and Electric Safety

Divisions to identify the reasons for the malfunctions at the Crossings and to assist in reaching a resolution.

The results of the AGC study are necessary to determine if induction is a cause of malfunctions at the Crossings and, if it is, what mitigation actions PECO can implement. The AGC study may also reveal potential interim solutions to address the malfunctions. Further good faith discussions between TUS, PECO, NS, and the Borough may also result in interim solutions to address the malfunctions. Thus, “immediate repair,” as requested by the Borough (*see* Petition ¶ 42), without further understanding of any actual induction effects and other issues, is not possible and not consistent with the public interest.

III. ANSWERS TO THE AVERMENTS IN THE NUMBERED PARAGRAPHS OF THE BOROUGH’S PETITION

1. Admitted.
2. Admitted.
3. Denied as stated. The Company admits that the Petition concerns two railroad crossings within the Borough that are part of the “Harrisburg Line” owned and operated by NS. The Company lacks knowledge or information regarding the Borough’s averment that the railroad crossings are defective, and proof is demanded, if relevant, at any hearing hereon.
4. The Company does not have sufficient knowledge regarding the NS Harrisburg Line to admit or deny the averments set forth in this paragraph.
5. Admitted.
6. Denied as stated. The image presented in paragraph 6 speaks for itself.
7. Denied as stated. The image presented in paragraph 7 speaks for itself.
8. Denied as stated. The image presented in paragraph 8 speaks for itself.
9. Denied as stated. The image presented in paragraph 9 speaks for itself.

10. Denied as stated. The Company admits that the railroad crossing warning devices at the Crossings, including crossing gates and automatic crossing signals, have malfunctioned and activated without any train being present in the area. The Company does not have sufficient knowledge regarding when malfunctions began at the Crossings to admit or deny the Borough's averment that such malfunctions started around 2017 and proof is demanded, if relevant, at any hearing hereon. In further answer, it is believed that such malfunctions began when NS installed its PTC system on the rail line. The remaining averments set forth in this paragraph are denied and proof is demanded, if relevant, at any hearing hereon.

11. Admitted.

12. Denied as Stated. The NST report speaks for itself. In further answer, the NST report was deficient for several reasons, as detailed in the POWER memorandum attached hereto as Exhibit A. *See also* Sections I and II, *supra*.

13. Denied. In further answer and as explained more fully in Section II, *supra*, PECO and NS continued to investigate the cause of activations at the Crossings and, most recently, PECO hired an induction specialist to perform a study on the potential impact to the Crossings from the Transmission Line. NS agreed to participate in the study so it could create an accurate model for evaluation. The Company does not have sufficient knowledge regarding the frequency of malfunctions at the Crossings to admit or deny the remaining averments set forth in this paragraph and proof is demanded, if relevant, at any hearing hereon

14. The Company does not have sufficient knowledge regarding the frequency of malfunctions at the Crossings to admit or deny the averments set forth in this paragraph and proof is demanded, if relevant, at any hearing hereon.

15. The Company does not have sufficient knowledge regarding the frequency of malfunctions at the Crossings to admit or deny the averments set forth in this paragraph and proof is demanded, if relevant, at any hearing hereon.

16. The Company does not have sufficient knowledge regarding the duration of malfunctions at the Crossings or the normal crossing equipment activation sequence at the Crossings to admit or deny the averments set forth in this paragraph and proof is demanded, if relevant, at any hearing hereon.

17. The Company does not have sufficient knowledge regarding the actions of drivers at the Crossings to admit or deny the averments set forth in this paragraph and proof is demanded, if relevant, at any hearing hereon.

18. The Company does not have sufficient knowledge regarding the referenced April 23, 2025 meeting to admit or deny the averments set forth in this paragraph and proof is demanded, if relevant, at any hearing hereon.

19. Admitted.

20. Admitted in part, denied as stated in part. The document attached to the Petition as Exhibit D is not an exact copy of the presentation given by PECO at the June 17, 2025 meeting as it contains handwritten notes that were not a part of that presentation. The remaining averments in this Paragraph 20 are admitted.

21. The Company does not have sufficient knowledge regarding the referenced July 3, 2025 meeting to admit or deny the averments set forth in this paragraph and proof is demanded, if relevant, at any hearing hereon.

22. Denied as stated. The Petition speaks for itself.

23. Denied as stated. 52 Pa. Code § 3.3 speaks for itself. In further answer, the Borough's request for issuance of an *ex parte* emergency order is moot.

24. It is not necessary to specifically admit or deny averments of law. In further answer, the Borough's request for issuance of an *ex parte* emergency order is moot.

25. It is not necessary to specifically admit or deny averments of law. In further answer, the Borough's request for issuance of an *ex parte* emergency order is moot.

26. Denied as stated. 66 Pa.C.S. § 2702(f) speaks for itself. In further answer, the Borough's request for issuance of an *ex parte* emergency order is moot.

27. It is not necessary to specifically admit or deny averments of law. In further answer, 52 Pa. Code § 3.361(a) speaks for itself.

28. It is not necessary to specifically admit or deny averments of law.

29. Denied. In further answer, the Borough's request for issuance of an *ex parte* emergency order is moot.

30. Denied. In further answer, the Borough's request for issuance of an *ex parte* emergency order is moot.

31. Denied. *See* the Company's Answer to Paragraph Nos. 29-30.

32. Denied. In further answer and as explained more fully in Sections I and II, *supra*, the Borough has not established that PECO is responsible and/or accountable for any alleged defective railroad crossing or that PECO's Transmission Line is the likely source. PECO has actively participated in discussions and activities to determine the source of issues at the Crossings and is willing to continue working with the Borough, NS, and Commission to identify and mitigate any issues, but it has not been determined that PECO's Transmission Line is the source of malfunctions or that PECO should otherwise be responsible for any issues. As

described in Sections I and II, *supra*, PECO has engaged AGC, an induction specialist, to identify potential induction issues and recommend mitigation actions.

33. It is not necessary to specifically admit or deny averments of law. In further answer, the Company does not have sufficient knowledge regarding NS' crossing equipment to admit or deny the averments set forth in this paragraph and proof is demanded, if relevant, at any hearing hereon.

34. It is not necessary to specifically admit or deny averments of law. In further answer, the Borough's request for issuance of an *ex parte* emergency order is moot.

35. Denied. In further answer and as explained more fully in Sections I and II, *supra*, PECO has been responsive to the Borough and NS and has actively worked with those parties and the Commission to identify and mitigate any issues. In addition, the Borough's request for issuance of an *ex parte* emergency order is moot.

36. It is denied that the circumstances described by the Borough constitute an emergency. The remaining averments in this paragraph constitute a conclusion of law to which no response is required. In further answer, the Borough's request for issuance of an *ex parte* emergency order is moot.

37. Paragraph 37 constitutes a prayer for relief and, as such, an answer is not required. In further answer, the Borough's request for issuance of an *ex parte* emergency order is moot.

38. The Company does not have sufficient knowledge to admit or deny the averments set forth in this paragraph and proof is demanded, if relevant, at any hearing hereon.

39. The Company does not have sufficient knowledge regarding the occurrence of vehicle versus train accidents to admit or deny the averments set forth in this paragraph and proof is demanded, if relevant, at any hearing hereon.

40. The Company does not have sufficient knowledge to admit or deny the averments set forth in this paragraph and proof is demanded, if relevant, at any hearing hereon.

41. It is not necessary to specifically admit or deny averments of law.

42. Denied. In further answer, the Borough's request for issuance of an *ex parte* emergency order is moot. In addition and as explained more fully in Section II, *supra*, it would not be in the public interest for the Commission to issue an order requiring the immediate repair of the Crossings as PECO and NS are already studying the potential causes of malfunctions at the Crossings and mitigation options. Commencing repair without further understanding of such causes and mitigation options would be injurious to the public interest.

WHEREFORE, for the foregoing reasons, the Borough's Petition should be denied.

Respectfully submitted,



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Dated: August 18, 2025

Counsel for PECO Energy Company

EXHIBIT A



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MEMORANDUM

DATE: April 24, 2024

TO: Steve Dasovich PECO

c: Brian Bailey (POWER-HAM); Majid Siahrang (POWER-SAN)

FROM: Kurt Bell
Senior Project Engineer

SUBJECT: 0250361 PECO: 220-60 (Limerick – Cromby) Electrical Interference Report Review

MESSAGE

Steve,

POWER conducted a review of the report “Norfolk Southern CP Cromby, Electrical Interference Continued Investigated Report 2023” from National Signal Technology (NST), dated July 14, 2023. The work was done in cooperation with Norfolk Southern (NS) C&S (Communication & Signals) Department and Siemens.

Based on the language of the report, it appears that impedance bonds were initially suggested and installed to alleviate touch voltage within the track system in previous instances. This method establishes connections between rails and ground, thereby diminishing voltage levels on the rails. In the current report, NST recommends the removal of impedance bonds and, instead, proposes reducing AC interference impact levels on the tracks through the installation of aerial and/or buried counterpoise systems.

The purpose of this memorandum is to conduct a review of the NST report and offer comments on its measurement methodology, analysis approach, and proposed mitigation suggestions. The level of detail provided in the NST Report does not allow for a thorough review of the analysis approach and prevents POWER from being able to comment on whether additional simulation efforts are required or not to further investigate the performance of the proposed mitigation options and its impact on PECO systems.

Area of Investigation

The investigation by NST was in the area of CP Cromby on the NS Harrisburg track system which is located in close proximity to PECO’s Limerick to Cromby 230 kV transmission line for a seven-mile length of the 230 kV corridor.

Comments for Work Performed by NST

NST and their team provided the following services for the most recent work starting in 2019 and resumed in 2023:

1. Testing of the track system under normal transmission line operating conditions to measure rail-to-ground voltages, rail-to-rail voltages, across the insulated joint voltages, and currents through the track filters. This testing was performed with impedance bonds connected and disconnected. GPS coordinates of the test locations were provided.
2. Simulations were performed for the PECO transmission line under steady state and fault conditions. The report does not explicitly mention the simulation software and simulation method. However, from the screenshot of the study domain included in the report, it appears that a 2-D (two dimensional) finite element method (FEM) has been used to perform the simulations.
3. Mitigation schemes were recommended, and effectiveness of mitigation counterpoise (aerial and buried) were investigated through computer simulations.
4. NST was contacted by NS in 2023 to investigate new failure with track circuits and recommend new mitigation.

It was mentioned in the report prior work done in support of this investigation as follows:

1. In the Section 1.1, it is stated, this work was a follow-up of the investigation that started in 2019. It is not clear what are the results of that investigation and a possible report developed to show baseline analysis, non-compliance results, and the analysis or testing of the track system for recommended mitigation schemes.
2. A previous study was referenced in Section 1.4, "A phase-selective signal solution for inductive interference on non-electrified railroads" March 1991. There are no details from this study report other than inductive interference mitigation was provided. It is not clear from this report what was done in that investigation and how it relates to work done in 2019 and 2023.

Comments on Measurements Performed

1. The report effectively explains the measurement methodology, and the corresponding results are presented in Table 1. However, the rail-to-rail or rail-to-ground impedance, typically expressed in ohms per one thousand feet, is not included. This parameter serves as a crucial input for simulation models.
2. It is advisable to conduct soil resistivity measurements along the shared corridor. The data gathered from these measurements can help delineate soil structures within the study models. Incorporating soil structure information is crucial for accurate simulation modeling. Specifically, the soil model will influence the performance of the proposed counterpoise systems and will have an impact on conductive interference between transmission line structures and tracks under fault conditions.

Comments on Simulation Analysis

The comments of the simulation analysis are as follows:

1. There is no detailed data included in the report to support the considered electrical and physical characteristics of the PECO transmission line and NS track system or description of the modeling. This would be useful for a simple assessment of the how the baseline and mitigation analysis was done.
2. According to the aerial imagery, for approximately two miles near the north end of the studied corridor, the track system runs parallel to another existing transmission line. For this section of the shared corridor, the effect of both transmission lines should be considered in the simulation models.
3. Typically, track blocks on either side of insulated joints are safeguarded by track arresters, which ground the rails when the rail voltage exceeds the threshold of the arresters. For typical track arresters, this threshold usually ranges from 500 to 1,000 volts. If track arresters transition into conduction mode, and as long as the dissipated currents through them do not exceed the energy dissipation withstand levels of the units, they will provide a path to ground. It is not clear that this situation has been considered in the simulation models under fault conditions.
4. Due to the inherent limitation of the two-dimensional model used for the simulations, it appears that the conductive transfer voltage from the transmission line structures to the track system was not accounted for under fault conditions on the transmission line structures. Depending on the proximity of the line structure to the rails and soil resistivity conditions, this conductive transfer voltage can substantially increase the touch voltage along the rails in the vicinity of the line structures.

Comments on Proposed Mitigations

The items for observations and comments of the proposed mitigations are as follows:

1. The techniques and advantages along with disadvantages of the proposed mitigation option are viable.
2. The performance of the aerial counterpoise is strongly influenced by the termination ground impedance at either ends of the counterpoise. It is not mentioned in the report what value had been considered for the ground impedance at the ends of the aerial counterpoise.
3. It is not indicated if buried counterpoise is isolated from the track system or bonded to the track system. This would need to be specified and can significantly impacts the results.
4. The aerial counterpoise may not be adequate in mitigating touch voltage on the tracks in the vicinity of the transmission line structures under fault conditions. Mitigation of touch voltage in these areas may require a buried counterpoise system to be bonded to the rails. As the track system under study is signalized and cannot be directly grounded, the connection between the rails and the mitigation counterpoise can be achieved through impedance bonds or using a High Energy Fault Protective Device (HEFPD) as described in AREMA C&S Manual Part 11.3.7. However, the track system operator may not allow the use of HEFPD devices.

Summary

1. The report provides useful information how the track systems measurements were performed and what can be the result of disconnecting impedance bonds.
2. Soil resistivity measurement data and equivalent rail-to-rail or rail-to-ground impedance were not provided in the report. This data is important input parameters for simulation of the AC interference between transmission line and track systems.
3. The report does not include details of initial study performed (Reference 3 in Section 1.4) based on data and assumptions and to determine results and recommended mitigation.
4. Mitigation schemes shown in Section 4.2 are reasonable for a signaled track system. However, the performance of the proposed mitigation counterpoises should be further evaluated using three-dimensional modeling.
5. Mitigation of touch voltage along track sections in the vicinity of transmission line structures may require a buried counterpoise system to be bonded to the rails. As the track system under study is signalized the connection between the rails and the mitigation counterpoise can be achieved through impedance bonds or using HEFPD.

Sincerely,



Kurt Bell

VERIFICATION

I, Drew T. Davis, hereby declare that I am the Vice President – Transmission and Substation of PECO Energy Company; that I am authorized to make this verification on behalf of PECO Energy Company; that the facts set forth in the foregoing Answer are true and correct to the best of my knowledge, information and belief; and that I make this verification subject to the penalties of 18 Pa.C.S. § 4904 pertaining to false statements to authorities.

Date: August 18, 2025



Drew T. Davis

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF THE BOROUGH OF ROYERSFORD, PENNSYLVANIA FOR EMERGENCY ORDER : **Docket No P-2025-3056530**
:

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a true copy of the **Answer of PECO Energy Company to the Petition of the Borough of Royersford for Emergency Order Regarding Dangerous Railroad Crossings** on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL or FIRST CLASS MAIL

The Honorable Christopher P. Pell
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Counsel for Norfolk Southern Corporation

Dated: August 18, 2025

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