



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL

August 22, 2025

Via Electronic Filing

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

RE: Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to alter the public crossing (DOT 518 047 F) by the replacement of the Viaduct bridge, approach structure to the John Harris Memorial Bridge, where State Route 0083 (Interstate 83) crosses, above grade, Front Street, Ramp C, Ramp B, the tracks of National Railroad Passenger Corporation (AMTRAK) and Norfolk Southern Railway Company located in the City of Harrisburg, Dauphin County PUC Docket No. A-2021-3028010

Dear Secretary Homsher,

Enclosed for electronic filing please find the Department's *Answer to Norfolk Southern's Petition for Reconsideration* 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 'LJB', written over a horizontal line.

Leah J. Bobula
Assistant Counsel

cc: Parties of Record
Mark Chappell, P.E., Chief, Highway Delivery Division
Sarah Fenton, Highway Design Manager
Heidi Mertz, Engineering District 8-0
Eric Gogola, Engineering District 8-0

**BEFORE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of the Department of Transportation :
of the Commonwealth of Pennsylvania for :
approval to alter the public crossing (DOT 518 047 : Docket No. A-2021-3028010
F) by the replacement of the Viaduct bridge, :
approach structure to the John Harris Memorial :
Bridge, where State Route 0083 (Interstate 83) : Electronically Filed
crosses, above grade, Front Street, Ramp C, Ramp :
B, the tracks of National Railroad Passenger :
Corporation (AMTRAK) and Norfolk Southern :
Railway Company located in the City of :
Harrisburg, Dauphin County :**

Answer to Norfolk Southern’s Petition for Reconsideration

The Commonwealth of Pennsylvania, Department of Transportation (the Department or PennDOT), by its counsel, Leah Jo Bobula, files this Answer to Norfolk Southern’s Petition for Reconsideration filed before the Public Utility Commission (Commission) by Norfolk Southern Railway Company (Norfolk Southern) and respectfully represents:

1. Admitted in part, denied in part. By way of further explanation, the Department admits the Commission approved the final, signed and sealed electric traction/catenary structure plans in their July 17, 2025 Secretarial Letter. The Department denies that the location of the catenary towers will interfere with Norfolk Southern’s future operations as the Department lacks sufficient information regarding the future operations of Norfolk Southern.
2. Denied. The Department avers there is enough space for Norfolk Southern to install a future second track.
3. Admitted in part, denied in part. The Department admits the proposed catenary towers provide less horizontal clearance but deny that the proposed horizontal clearances prohibit Norfolk Southern from constructing a future second track.

4. Denied. Petitioner's Paragraph 4 is a conclusion of law to which no response is required.
5. Denied. Petitioner's Paragraph 5 is a conclusion of law to which no response is required.
6. Denied. Petitioner's Paragraph 6 is a conclusion of law to which no response is required.
7. Denied. The Department denies the proposed taking is extreme and it lacks sufficient information regarding the future operations of Norfolk Southern so the Department denies that the proposed regulations would deprive Norfolk Southern of full future use of its railroad property.
8. Denied. Petitioner's Paragraph 8 is a request for relief to which no response is required.

Wherefore, the Department respectfully requests that Norfolk Southern's Petition for Reconsideration be denied.

Respectfully Submitted,

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION



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DATED: August 22, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of the Department of Transportation of :
the Commonwealth of Pennsylvania for approval to :
alter the public crossing (DOT 518 047 F) by the : Docket No. A-2021-3028010
replacement of the Viaduct bridge, approach :
structure to the John Harris Memorial Bridge, :
where State Route 0083 (Interstate 83) crosses, : Electronically Filed
above grade, Front Street, Ramp C, Ramp B, the :
tracks of National Railroad Passenger Corporation :
(AMTRAK) and Norfolk Southern Railway :
Company located in the City of Harrisburg, :
Dauphin County :**

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:

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Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION

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DATED: August 22, 2025