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September 29, 2025

VIA ELECTRONIC FILING

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

***Re: Application of Halifax Township for approval to make safety improvements and establish the existing private crossing (DOT 518 116 L) as a public crossing where the existing private drive to Fort Halifax Park crosses, at grade, a single track of Norfolk Southern Railway Company located in Halifax Township, Dauphin County
PUC Docket No. A-2025-3054710***

Dear Secretary Homsher:

Enclosed please find a Petition for Reconsideration from Staff Action on behalf of Norfolk Southern Railway Company for filing in the above-referenced matter. Copies have been served upon all interested parties of record. Thank you.

Sincerely yours,

Benjamin C. Dunlap, Jr.

BCD:klg
Enclosure
cc: All Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Halifax Township for approval :
to make safety improvements and establish : Docket No. A-2025-3054710
the existing private crossing (DOT 518 116 L) :
as a public crossing where the existing private :
drive to Fort Halifax Park crosses, at grade, a : Filed Electronically
single track of Norfolk Southern Railway :
Company located in Halifax Township, :
Dauphin County :

PETITION FOR RECONSIDERATION FROM STAFF ACTION

Norfolk Southern Railway Company (“Norfolk Southern”), by and through its undersigned counsel, hereby submits this Petition for Reconsideration from Staff Action, pursuant to 52 Pa. Code § 5.44, concerning the Secretarial Letter issued in the above-referenced matter on September 9, 2025, averring as follows:

1. In ordering paragraph 9 on page 4 of the Secretarial Letter, Norfolk Southern is required to furnish flagging at the sole cost and expense of Halifax Township (“Township”). The language of this ordering paragraph, and parties’ responsibilities regarding flagging at rail-highway crossing projects initiated by state and municipal entities, is the subject of current litigation at Docket No. A-2022-3031613, et al. As such, Norfolk Southern requests that the Secretarial Letter be held in abeyance until the parallel litigation regarding flagging language and responsibilities is resolved.

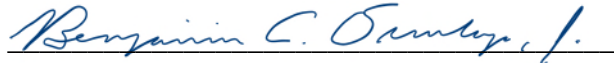
2. Alternatively, the Pennsylvania Department of Transportation (PennDOT) filed a Motion for Approval of Temporary Settlement on the flagging language issue in Docket No. A-2022-3031613, et al., on September 22, 2025. If PennDOT’s Motion is granted, Norfolk Southern would have no objection to the temporary language in that Motion being substituted for ordering paragraph 9 in this Secretarial Letter.

3. Norfolk Southern further objects to ordering paragraph 16 on page 5 of the Secretarial Letter, which orders Norfolk Southern to be jointly responsible to pay all compensation for damages, if any, due to the owners of property taken, injured, or destroyed by reason of work completed as part of this project. This is the Township's Application, and in accord with past practice, the initiator of an application is liable for such damages, if any, that may occur. It is Norfolk Southern's further understanding that the Township does not object to Norfolk Southern being deleted as a responsible party from this ordering paragraph.

WHEREFORE, Norfolk Southern Railway Company respectfully requests that the above-referenced relief in this Petition for Reconsideration be granted.

Respectfully submitted,

**COHEN, SEGLIAS, PALLAS,
GREENHALL & FURMAN, PC**

By: 
Benjamin C. Dunlap, Jr., Esquire
Supreme Court I.D. #66283

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Counsel for Norfolk Southern Railway Company

Date: September 29, 2025

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Halifax Township for approval :
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Company located in Halifax Township, :
Dauphin County :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing documents upon the parties listed below, via electronic mail, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

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/s/ Karen L. Gagne

Karen L. Gagne, Administrative Assistant
to Benjamin C. Dunlap, Jr., Esquire

Date: September 29, 2025