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October 7, 2025

**VIA ELECTRONIC FILING**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor North  
Harrisburg, PA 17105-3265

**RE: In re: Application of PPL Electric Utilities Corporation for approval of the alteration of the crossing where State Route 1005 (Mount Sidney Road) crosses, above grade, tracks of the National Railroad Passenger Service (AMTRAK) (DOT 518 160 Y) for the purpose of replacing an existing utility pole and relocating an aerial utility line in East Lampeter Township, Lancaster County  
File No. A-2025-3054947**

Dear Secretary Homsher:

Enclosed for filing is PPL Electric Utilities Corporation's Answer to Amtrak's Motion to Supplement the Record.

Copies of the aforesaid Answer are being provided as indicated on the Certificate of Service.

Respectfully submitted,

GRAIG M. SCHULTZ

Enclosure

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of PPL Electric Utilities Corporation for approval of the alteration of the crossing where State Route 1005 (Mount Sidney Road) crosses, above grade, tracks of the National Railroad Passenger Service (AMTRAK) (DOT 518 160 Y) for the purpose of replacing an existing utility pole and relocating an aerial utility line in East Lampeter Township, Lancaster County

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**PPL ELECTRIC UTILITIES CORPORATION'S ANSWER TO  
AMTRAK'S MOTION TO SUPPLEMENT THE RECORD**

PPL Electric Utilities Corporation ("PPL Electric"), by and through its counsel, Fitzpatrick Lentz & Bubba, P.C., answers Amtrak's Motion to Supplement the Record pursuant to 52 Pa. Code § 5.103(c) as follows:

1. Admitted.
2. PPL Electric denies Amtrak's characterizations and/or mischaracterizations of the information contained within PPL Electric's Reply to Amtrak's New Matter. Said Reply is a writing which speaks for itself. By way of further answer, it is admitted that DQE Communications filed an Application in 2023 at Docket Number A-2023-3044381. All other allegations are denied.
3. PPL Electric denies Amtrak's characterizations and/or mischaracterizations of the information contained within PPL Electric's Reply to Amtrak's New Matter. Said Reply is a writing which speaks for itself. By way of further answer, it is admitted that DQE Communications filed an Application in 2023 at Docket Number A-2023-3044381. All other allegations are denied.
4. PPL Electric does not object to Amtrak's request to supplement the record in this proceeding with the License Agreement that was entered into by DQE Communications and Amtrak on May 1, 2024. To the extent that Amtrak seeks to supplement the record in this

proceeding with said License Agreement to somehow suggest that PPL Electric is also obligated to execute a similar license agreement, this argument is entirely without merit. As PPL Electric's previously filings clearly demonstrate, the relevant wooden and steel pools at issue in this proceeding are each located within the public right-of-way (State Route 1005). Accordingly, PPL Electric's application falls squarely within the Public Utility Commission's jurisdiction. Although, Amtrak may have hoped that PPL Electric would execute a license agreement, the simple fact remains that PPL Electric is not required to do so.

5. Denied. However, PPL Electric does not object to Amtrak's request to supplement the record in this proceeding with the License Agreement that was entered into by DQE Communications and Amtrak on May 1, 2024. To the extent that Amtrak seeks to supplement the record in this proceeding with said License Agreement to somehow suggest that PPL Electric is also obligated to execute a similar license agreement, this argument is entirely without merit. As PPL Electric's previously filings clearly demonstrate, the relevant wooden and steel pools at issue in this proceeding are each located within the public right-of-way (State Route 1005). Accordingly, PPL Electric's application falls squarely within the Public Utility Commission's jurisdiction. Although, Amtrak may have hoped that PPL Electric would execute a license agreement, the simple fact remains that PPL Electric is not required to do so.

6. Denied. However, PPL Electric does not object to Amtrak's request to supplement the record in this proceeding with the License Agreement that was entered into by DQE Communications and Amtrak on May 1, 2024. To the extent that Amtrak seeks to supplement the record in this proceeding with said License Agreement to somehow suggest that PPL Electric is also obligated to execute a similar license agreement, this argument is entirely without merit. As PPL Electric's previously filings clearly demonstrate, the relevant wooden and steel pools at issue

in this proceeding are each located within the public right-of-way (State Route 1005). Accordingly, PPL Electric's application falls squarely within the Public Utility Commission's jurisdiction. Although, Amtrak may have hoped that PPL Electric would execute a license agreement, the simple fact remains that PPL Electric is not required to do so.

**WHEREFORE**, PPL Electric Utilities Corporation does not oppose Amtrak's request to supplement the record.

Dated: October 7, 2025

Respectfully submitted,

By:   
Ronald J. Reybitz (PA I.D. No. 78863)  
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*On behalf of PPL Electric Utilities Corp.*

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of PPL Electric Utilities Corporation for approval of the alteration of the crossing where State Route 1005 (Mount Sidney Road) crosses, above grade, tracks of the National Railroad Passenger Service (AMTRAK) (DOT 518 160 Y) for the purpose of replacing an existing utility pole and relocating an aerial utility line in East Lampeter Township, Lancaster County

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of PPL Electric Utilities Corporation's Answer to Amtrak's Motion to Supplement the Record has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 relating to service by a party.

**VIA ELECTRONIC MAIL**

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**VIA ELECTRONIC MAIL**

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**VIA ELECTRONIC MAIL**

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Dated: October 7, 2025

By:   
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Graig M. Schultz