



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

October 7, 2025

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 replace the existing bridge where State Route 0095 crosses above the three tracks of Consolidated Rail Corporation, DOT No. 858 110 H in the City of Philadelphia, Philadelphia County and the allocation of costs incident thereto  
Docket No. A-2017-2620038**

Dear Secretary Homsher,

Enclosed for filing please find the Department's *Petition for Time of Extension* 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 "Elizabeth K. Rall".

Elizabeth K. Rall  
Assistant Counsel

Cc: Parties of Record  
Mark J. Chappell, P.E., Utilities and Right of Way Section (*Email*)  
Mary Ann Lang, District Utility Administrator, District 6-0  
K. Michael Anderson, Utility Relocation Technician, District 6-0  
Abiy Abebe, Utility Administrator, District 6-0

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of the Department of : Docket No. A-2017-2620038  
Transportation of the Commonwealth of :  
Pennsylvania for approval to replace the : Electronically Filed  
existing bridge where State Route 0095 crosses :  
above the three tracks of Consolidated Rail :  
Corporation, DOT No. 858 110 H in the City of :  
Philadelphia, Philadelphia County and the :  
allocation of costs incident thereto :**

**PETITION FOR EXTENSION OF TIME**

The Commonwealth of Pennsylvania, Department of Transportation (Department), by its counsel, Elizabeth K. Rall, files the following Petition for Extension of Time, pursuant to 52 Pa. Code § 5.41, in the above referenced matter and states as follows:

1. The name and address of the Petitioner is:

Commonwealth of Pennsylvania  
Department of Transportation  
Bureau of Project Delivery  
P.O. Box 3362  
Harrisburg, Pennsylvania 17105-3362

2. The name and address of Counsel for the Petitioner is:

Elizabeth K. Rall, Assistant Counsel  
Commonwealth of Pennsylvania  
Department of Transportation  
Office of Chief Counsel  
P.O. Box 8212  
Harrisburg, Pennsylvania 17105-8212  
[erall@pa.gov](mailto:erall@pa.gov)

3. By Secretarial Letter entered October 4, 2017, the Pennsylvania Public Utility Commission (“Commission”) directed that “All work necessary to complete the alteration of the subject crossing be done in a manner satisfactory to this Commission on or before April 18, 2024...”

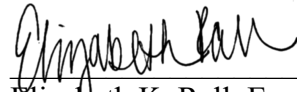
4. The April 18, 2024, completion date was not met due to extra work added to the project and Utility relocation delays.
5. For the reasons stated above, the Department respectfully requests an extension of time from the April 18, 2024, date contained in the October 4, 2017, Secretarial Letter to the extended date April 18, 2028, and that the Secretarial Letter dated October 4, 2017, be modified as follows:

9. All work necessary to complete the alteration of the subject crossing be done in a manner satisfactory to this Commission on or before ~~April 18, 2024~~, April 18, 2028, and that on or before said date, Pennsylvania Department of Transportation report to this Commission in writing the date of actual completion of the work.

**WHEREFORE**, the Department of Transportation respectfully requests that the Public Utility Commission Secretarial Letter, entered on October 4, 2017, be modified consistent with this Petition.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



Elizabeth K. Rall, Esq.

Assistant Counsel

Office of Chief Counsel

P.O. Box 8212

Harrisburg, PA 17105-8212

Pennsylvania Attorney I.D. Number 328725

[erall@pa.gov](mailto:erall@pa.gov)

DATED: October 7, 2025

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**Corporation, DOT No. 858 110 H in the City of :**  
**Philadelphia, Philadelphia County and the :**  
**allocation of costs incident thereto :**  
**:**

**VERIFICATION**

I, Michael Anderson, District Railroad Administrator, Commonwealth of Pennsylvania, Department of Transportation, in the foregoing document, make the following statement subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsifications to authority, and do state that as the District Railroad Administrator for the Commonwealth of Pennsylvania, Department of Transportation, I am authorized to make this statement on behalf of the Commonwealth of Pennsylvania, Department of Transportation, and that the facts set forth in the foregoing document are true and correct to the best of my information, knowledge, and belief.

DATED: 10/9/2025

*/s/ K. Michael Anderson*  
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Michael Anderson  
District Railroad Administrator

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allocation of costs incident thereto :**

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this day served a true copy of the foregoing document upon the participants listed below by electronic mail and/or First-Class Mail pursuant to 52 Pa.

Code §1.54:

Norfolk Southern Corp.  
Kevin Hauschildt  
1200 Peachtree Street, NE 7<sup>th</sup> Floor  
Atlanta, GA 30309

Jason N. Morris, Esquire  
Norfolk Southern Corp.  
Three Commercial Place  
Norfolk, VA 23510-9241

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City Solicitor  
1515 Arch Street, 17<sup>th</sup> Floor  
Philadelphia, PA 19102-1595

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Andrew McGinnis  
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Canonsburg, PA 15317

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Patrick O'Donnell  
1401 JFK Boulevard  
Philadelphia, PA 19102-1676

City of Philadelphia Water Department  
Vahe Hovespian  
1101 Market Street, 5<sup>th</sup> Floor  
Philadelphia, PA 19102-1595

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION

*Maria Bitner*

Maria Bitner  
Legal Analyst  
Office of Chief Counsel  
P.O. Box 8212  
Harrisburg, PA 17105-8212

DATED: October 7, 2025