



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 public above grade crossing by the installation of a new structure where State Route 0291 (Governor Printz Boulevard) crosses the tracks of Consolidated Rail Corporation (Conrail) (DOT# 589 291 W) in Tinicum Township, Delaware County and the allocation of costs incident thereto.  
Docket No. A-2017-2634994**

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", written over a horizontal line.

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, District Utility Administrator, District 6-0

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of the Department of : Docket No. A-2017-2634994  
Transportation of the Commonwealth of :  
Pennsylvania for approval to replace the public : Electronically Filed  
above grade crossing by the installation of a :  
new structure where State Route 0291 :  
(Governor Printz Boulevard) crosses the tracks :  
of Consolidated Rail Corporation (Conrail) :  
(DOT# 589 291 W) in Tinicum Township, :  
Delaware 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 January 25, 2018, 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 December 31, 2024...”

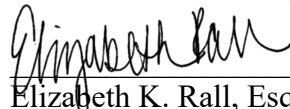
4. The December 31, 2024, completion date was not met due to design delays and it went to construction late.
5. For the reasons stated above, the Department respectfully requests an extension of time from the December 31, 2024, date contained in the January 25, 2018, Secretarial Letter to the extended date of August 03, 2032, and that the Secretarial Letter dated January 25, 2018, 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 ~~December 31, 2024~~, August 03, 2032, 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 January 25, 2018, be modified consistent with this Petition.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



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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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**(Governor Printz Boulevard) crosses the tracks :**  
**of Consolidated Rail Corporation (Conrail) :**  
**(DOT# 589 291 W) in Tinicum Township, :**  
**Delaware 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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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 First-Class Mail pursuant to 52 Pa. Code §1.54:

Southeastern Pennsylvania Trans Authority  
Brittany Clark  
1234 Market St., 12<sup>th</sup> Floor  
Philadelphia, PA 19107

John Dohalick, Regional Permit Coordinator  
Comcast Cable Communications  
2320 Trenton Road  
Levittown, PA 19056

David Schreiber, Manager  
Tincum Township  
629 N Governor Printz Blvd  
Essington, PA 19029

David Jones, ROW Specialist  
Buckeye Partners LP  
5 Tek Park  
999 Hamilton Blvd.  
Breinigsville, PA 18031

Laura Lippincott, Section Manager  
Verizon Pennsylvania LLC  
1050 Virginia Drive, FL 4  
Fort Washington, PA 19034

Marianne Grace, Executive Director  
Delaware County  
201 West Front Street  
Media, PA 19063

Ryan Hill, Director  
Conrail  
1000 Howard Blvd.  
Mt. Laurel, NJ 08054

Tracy Hoffman  
Sunoco Pipeline LP  
525 Fritztown Road  
Sinking Spring, PA 19608

William Savage  
Texas Eastern Transmission, LP  
560 Pottstown Pike  
Chester Springs, PA 19425

William Zahn  
762 W Lancaster Avenue  
Bryn Mawr, PA 19010-8699

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION

*Maria Bitner*

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

DATED: October 7, 2025