



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 superstructure and repair the substructure of the public above-grade crossing, where SR 0309 (Sellersville Bypass Expressway) crosses above two tracks owned by Southeastern Pennsylvania Transportation Authority, and operated on by East Penn Railroad, LLC, DOT No. 592 617 N in West Rockhill Township, Bucks County. Docket No. A-2018-3005701

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-2018-3005701
Transportation of the Commonwealth of :
Pennsylvania for approval to replace the : Electronically Filed
superstructure and repair the substructure of :
the public above-grade crossing, where SR :
0309 (Sellersville Bypass Expressway) crosses :
above two tracks owned by Southeastern :
Pennsylvania Transportation Authority, and :
operated on by East Penn Railroad, LLC, DOT :
No. 592 617 N in West Rockhill Township, :
Bucks County. :**

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

3. By Secretarial Letter entered January 22, 2019, 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...”

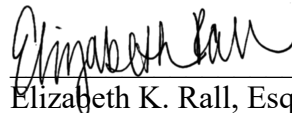
4. The December 31, 2024, completion date was not met due to the standard close out details not being completed; the physical work is complete.
5. For the reasons stated above, the Department respectfully requests an extension of time from the December 31, 2024, date contained in the January 22, 2019, Secretarial Letter to the extended date October 23, 2028, and that the Secretarial Letter dated January 22, 2019, 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~~, October 23, 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 January 22, 2019, 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

DATED: October 7, 2025

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Pennsylvania Transportation Authority, and :
operated on by East Penn Railroad, LLC, DOT :
No. 592 617 N in West Rockhill Township,
Bucks County.**

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
Michael Anderson
District Railroad Administrator

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Pennsylvania Transportation Authority, and :
operated on by East Penn Railroad, LLC, DOT :
No. 592 617 N in West Rockhill Township,
Bucks County.**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served one (1) copy of the forgoing document upon
the participants listed below via First-Class U.S. Postage Mail addressed to:

Robert L. Lund, Jr.
Southeastern Pennsylvania Trans Authority
1234 Market Street, 12th Floor
Philadelphia, PA 19107

Aaron Bibro, Manager
Hatfield Township
1950 School Road
Hatfield, PA 19440-1923

Laura Lippincott, Section Manager
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Fort Washington, PA 19034

Alfred M Sauer
East-Penn Railroad, LLC
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Kennett Square, PA 19348

Brian Hessenthaler
Bucks County Commissioners
55 East Court Street, Admin Bldg
Doylestown, PA 18901

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Lansdale, PA 19446

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Sellersville, PA 18960

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Allentown, PA 18101-1179

John Alessandrini
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King of Prussia, PA 19406

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION

Maria Bitner

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

Date: October 7, 2025