



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 Commonwealth of Pennsylvania, Department of Transportation, for approval to replace the superstructure and substructure of the public above-grade crossing, where State Route 8017 (Ramp B) and State Route 8017 (Ramp D) cross above two tracks of Consolidated Rail Corporation (DOT 960 638 X) in the City of Philadelphia, Philadelphia County  
Docket No. A-2019-3012529**

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, District Administrator, District 6-0



of the subject crossing be done in a manner satisfactory to this Commission on or before December 31, 2024...”

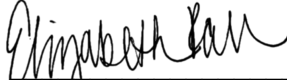
4. The December 31, 2024, completion date was not met due to extra work added to the project and Utility relocation delays.
5. For the reasons stated above, the Department respectfully requests an extension of time from the December 31, 2024, date contained in the November 4, 2019, Secretarial Letter to the extended date of July 22, 2028, and that the Secretarial Letter dated November 4, 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~~, July 22, 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 November 4, 2019, be modified consistent with this Petition.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



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Elizabeth K. Rall, Esq.

Assistant 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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of the Commonwealth of Pennsylvania, Department of Transportation, for approval to replace the superstructure and substructure of the public above-grade crossing, where State Route 8017 (Ramp B) and State Route 8017 (Ramp D) cross above two tracks of Consolidated Rail Corporation (DOT 960 638 X) in the City of Philadelphia, Philadelphia County** : **Docket No. A-2019-3012529**  
: **Electronically Filed**

**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: 10/7/2025

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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of the Commonwealth of Pennsylvania, Department of Transportation, for approval to replace the superstructure and substructure of the public above-grade crossing, where State Route 8017 (Ramp B) and State Route 8017 (Ramp D) cross above two tracks of Consolidated Rail Corporation (DOT 960 638 X) in the City of Philadelphia, Philadelphia County : Docket No. A-2019-3012529 :  
: Electronically Filed**

I hereby certify that I have this day served one (1) copy of the Petition for Extension of Time upon the participants listed below via First-Class U.S. Postage Mail and/or electronic mail addressed to:

Raymond Maleski  
New Jersey Transit  
One Penn Plaza  
Newark, NJ 07105-2246

Jessica Posner  
National Railroad Passenger Corp.  
Engineering I&C  
2955 Market Street – 4S  
Philadelphia PA 19104

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

Ryan Hill, Director  
Conrail  
1000 Howard Blvd. 4<sup>th</sup> Floor  
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[Ryan.hill@conrail.com](mailto:Ryan.hill@conrail.com)

Philadelphia Department of Streets  
Patrick O'Donnell  
1401 JFK Boulevard – Rm 940 MSB  
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Marcel Pratt  
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City Solicitor  
1515 Arch Street, 17<sup>th</sup> Floor  
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City of Philadelphia Water Department  
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Monica Lyv  
Philadelphia Gas Works  
800 West Montgomery Avenue  
Planning Section, 2<sup>nd</sup> Floor  
Philadelphia, PA 19122-2898

William Hensil  
PECO Energy Company  
1050 W Swedesford Road  
Berwyn, PA 19312

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