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January 23, 2026

**VIA ELECTRONIC FILING**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
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 bridge where State Route 83 crosses over the tracks of Norfolk Southern, DOT Number (517 939 B) in Lemoyne Borough, Cumberland County and the allocation of costs incident thereto PUC Docket No. A-2020-3023411***

Dear Secretary Homsher:

Enclosed please find Norfolk Southern Railway Company's Objection to Plans for filing in the above-referenced matter. Copies have been served upon all interested parties of record. Thank you.

Sincerely yours,



Benjamin C. Dunlap, Jr.

BCD:klg  
Enclosure  
cc: All Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of the Department of** :  
**Transportation of the Commonwealth of** : **A-2020-3023411**  
**Pennsylvania for approval to replace the** :  
**public above grade crossing by the** :  
**installation of a new bridge where State** :  
**Route 83 crosses over the tracks of Norfolk** :  
**Southern, DOT Number (517 939 B) in** :  
**Lemoyne Borough, Cumberland County** : **Filed Electronically**  
**and the allocation of costs incident thereto** :

**OBJECTION TO PLANS**

Norfolk Southern Railway Company (“Norfolk Southern”) by and through its undersigned counsel, submits this formal Objection to the Plans filed by the Pennsylvania Department of Transportation (“PennDOT”) in this proceeding on October 30, 2025. PennDOT has extended the deadline for Norfolk Southern to file formal objections on three prior occasions to provide the parties time to discuss and resolve Norfolk Southern’s concerns. While the parties have made significant progress in addressing those issues, there remain important clearance and signalization issues, which are interrelated with the three other proceedings in which Norfolk Southern is contemporaneously filing formal objections. The current extended deadline expires on January 23, 2026, which PennDOT is not willing to further extend, hence the reason for these formal objections. Norfolk Southern will continue to work with PennDOT with a goal of resolving the outstanding issues prior to the initiation of litigation.

Respectfully submitted,

**COHEN SEGLIAS PALLAS  
GREENHALL & FURMAN PC**

By: 

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Telephone: (717) 480-5303  
*Counsel for Norfolk Southern Railway Company*

Date: January 23, 2026

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing documents upon the participants listed below, in accordance with the requirements of 52 Pa. Code § 1.54, by:

**Electronic Mail**

Leah Jo Boula  
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Mr. Justin Douglas, Chairman  
Dauphin County Commissioners  
2 Second Street, 4<sup>th</sup> Floor  
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[chairman@dauphinc.org](mailto:chairman@dauphinc.org)

*s/Karen L. Gagne*  
Karen L. Gagne Administrative Assistant to  
Benjamin C. Dunlap, Jr., Esquire

Date: January 23, 2026