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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 Pennsylvania Department of Transportation for approval to alter the public crossing (DOT 961 507 X) by construction of a new bridge on a new alignment where Ramp X Road (SR 8513) will cross, above grade, two (2) tracks of Norfolk Southern Railway Company located in Lemoyne Borough, Cumberland County  
PUC Docket No. A-2021-3023835***

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 Pennsylvania** :  
**Department of Transportation for** : **A-2021-3023835**  
**approval to alter the public crossing (DOT** :  
**961 507 X) by construction of a new bridge** :  
**on a new alignment where Ramp X Road** :  
**(SR 8513) will cross, above grade, two (2)** :  
**tracks of Norfolk Southern Railway** :  
**Company located in Lemoyne Borough,** : **Filed Electronically**  
**Cumberland County** :

**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: 

**Benjamin C. Dunlap, Jr., Esquire**

Supreme Court I.D. No. 66283

240 North 3rd Street, 7<sup>th</sup> Floor

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Telephone: (717) 480-5303

*Counsel for Norfolk Southern Railway Company*

Date: January 23, 2026

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**Cumberland County** :

**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:

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*s/Karen L. Gagne*

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Karen L. Gagne Administrative Assistant to  
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Date: January 23, 2026