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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 592 197 L) by the removal and replacement of the existing bridge where SR 2035 (South Third Street) crosses, above grade, the tracks of Norfolk Southern Railway Company located in Lemoyne Borough, Cumberland County, and the allocation of costs incident thereto
PUC Docket No. A-2021-3023845***

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-2021-3023845**
approval to alter the public crossing (DOT :
592 197 L) by the removal and replacement :
of the existing bridge where SR 2035 :
(South Third Street) crosses, above grade, :
the tracks of Norfolk Southern Railway :
Company located in Lemoyne Borough, : **Filed Electronically**
Cumberland County, 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: *Benjamin C. Dunlap, Jr.*

Benjamin C. Dunlap, Jr., Esquire

Supreme Court I.D. No. 66283

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Harrisburg, PA 17101

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:

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

Date: January 23, 2026