



Benjamin C. Dunlap Jr.
Partner

240 North Third Street
7th Floor
Harrisburg, PA 17101
T: 717.234.5530 | D: (717) 480-5303
bdunlap@cohenseglias.com
www.cohenseglias.com

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 alter the public crossing (DOT 591 911 H) by the replacement of the Viaduct bridge, approach structure to the John Harris Memorial Bridge, where State Route 0083 (Interstate 83) crosses, above grade, one (1) track of Norfolk Southern Railway Company, Paxton Creek and Cameron Street located in the City of Harrisburg, Dauphin County
PUC Docket No. A-2021-3028250***

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-2021-3028250**
Pennsylvania for approval to alter the :
public crossing (DOT 591 911 H) by the :
replacement of the Viaduct bridge, :
approach structure to the John Harris :
Memorial Bridge, where State Route 0083 :
(Interstate 83) crosses, above grade, one (1) : **Filed Electronically**
track of Norfolk Southern Railway :
Company, Paxton Creek and Cameron :
Street located in the City of Harrisburg, :
Dauphin 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, 7th Floor
Harrisburg, PA 17101
Telephone: (717) 480-5303
Counsel for Norfolk Southern Railway Company

Date: January 23, 2026

Robert Hoffer, P.E.
Structural Engineer, Transportation
AECOM
100 Sterling Parkway, Suite 205
Mechanicsburg, PA 17050
Robert.hoffer@aecom.com

Justin Douglas, Chairman
Dauphin County Commissioners
2 South Second Street, 4th Floor
Harrisburg, PA 17101
chairman@dauphinc.org

Charlotte Krupa
PPL Electric Utilities
Two N. Ninth Street
Allentown, PA 19101
cakrupa@pplweb.com

Joel Seiders, City Engineer
123 Walnut Street, #212
Harrisburg, PA 17101
jseiders@harrisburgpa.gov

Jesse Guarneri
Verizon Pennsylvania LLC
PO Box 16802
Newark, NJ 07101
jguarneri@pike.com

James Jacobsen
Zayo Group LLC
800 Cabin Hill Drive
Greensburg, PA 15601
James.jacobsen@zayo.com

William McMillen
Comcast Cable Communication Management
4601 Smith Street
Harrisburg, PA 17109
William_mcmillen@cable.comcast.com

Geoff Ferguson
UGI Utilities, Inc.
1301 AIP Drive
Middletown, PA 17057
Gferguson@ugi.com

Jeff Bowra
Capital Region Water
3003 North Front Street
Harrisburg, PA 17110
Jeff.bowra@capitalregionwater.com

Adam Cubbedge
Brightspeed
d/b/a United Telephone Co of PA
1765 W. Trindle Road
Carlisle, PA 17013
Adam.Cubbedge1@brightspeed.com

David Mcluckie
FirstLight Fiber, Inc.
41 State Street
Albany, NY 12207
dmcluckie@firstlight.net

Matt Souders
DQE Communications LLC
424 South 27th Street, Suite 220
Pittsburgh., PA 15203
msouders@dqe.com

s/Karen L. Gagne

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

Date: January 23, 2026