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February 25, 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 to Alter the Public Above-Grade Crossing by Replacing the Existing Bridge where State Route 3022 (Maclay Street) Crosses Above Grade the Tracks of Norfolk Southern Railroad (DOT 518 088 K) in the City of Harrisburg, Dauphin County, and the Allocation of Costs Incident thereto
Docket No. A-2023-3037711**

Dear Secretary Homsher:

Enclosed for filing in the above-captioned matter, please find Norfolk Southern Railway Company's Prehearing Conference Memorandum. Copies have been served upon all interested parties as indicated on the Certificate of Service.

Sincerely yours,

Benjamin C. Dunlap, Jr.

BCD:klg
Enclosures
cc: All Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Department of :
Transportation of the Commonwealth of : Docket No. A-2023-3037711
Pennsylvania to Alter the Public Above- :
Grade Crossing by Replacing the Existing : Electronically Filed
Bridge where State Route 3022 (Maclay :
Street) Crosses Above Grade the Tracks of :
Norfolk Southern Railroad (DOT 518 088 K) :
in the City of Harrisburg, Dauphin County, :
and the Allocation of Costs Incident thereto :

**NORFOLK SOUTHERN RAILWAY COMPANY’S
PREHEARING CONFERENCE MEMORANDUM**

Norfolk Southern Railway Company (“Norfolk Southern”), by and through its undersigned counsel, hereby files this Prehearing Conference Memorandum in the above proceeding, pursuant to the Prehearing Conference Order of Administrative Law Judge (“ALJ”) Chad L. Allensworth, dated December 3, 2025.

1. History of the Proceeding.

Following the filing of the Application by the Pennsylvania Department of Transportation (“PennDOT”), the parties have worked together to resolve numerous complex engineering issues connected with the project that would have impacted Norfolk Southern operations. The sole remaining issue is the proper amount of compensation for the billboard on Norfolk Southern’s property, which will need to be removed for the project to proceed. PennDOT has made an offer and Norfolk Southern recently made a counteroffer. It is hoped that this remaining matter can be resolved in the near future, to negate the need for litigation.

2. **List of Issues and Sub-Issues in the Proceeding and Norfolk Southern's Position on Each.**

1. What is the proper amount of compensation due to Norfolk Southern for the loss of the sign board on its property and the income that it generates?

3. **Statement Indicating the Last Time a Person Physically Set Forth on the Site to Inspect the Bridge.**

Not known.

4. **Statement Indicating Whether the Funds to the Project are "In-Hand" or only "Approved".**

This is a question directed to PennDOT.

5. **List of what Utilities are Connected to the Bridge and where they are Connected.**

This is a question directed to PennDOT.

6. **Proposed Plan and Schedule of Discovery.**

See below.

7. **Listing of Proposed Witnesses and Subjects of Testimony.**

Solomon Jackson
Director of Real Estate
Norfolk Southern Corporation

Mr. Jackson will testify to the fair and equitable amount of compensation that PennDOT should pay to Norfolk Southern for the loss of its sign board and the income derived therefrom, as well as how that number was derived.

8. **Possibility of Settlement**

Very good, as long as the parties continue in a spirit of cooperation.

9. **The Amount of Hearing Time Needed.**

A half day at most.

10. **Proposed Litigation Schedule Agreed to by all Parties.**

Discovery Complete by: April 7, 2026

Joint Stipulation: April 17, 2026

Written Testimony: May 1, 2026

Written Rebuttal Testimony: June 1, 2026

Provide witness schedule 3 business days before the hearing.

Hearing: week of June 15, 2026

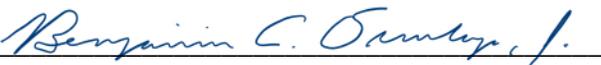
Briefing schedule to be established at the hearing.

11. Other Matters Deemed Appropriate.

None, except that Mr. Dunlap will be the lead attorney for Norfolk Southern in this matter.

Respectfully submitted,

**COHEN, SEGLIAS, PALLAS,
GREENHALL & FURMAN, PC**

By: 
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Counsel for Norfolk Southern Railway Company

Date: February 25, 2026

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in the City of Harrisburg, Dauphin County, :
and the Allocation of Costs Incident thereto :

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Prehearing Conference Memorandum in the above-captioned action this day via electronic mail and/or United States Postal Service First Class Mail to the following:

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Served via USPS First Class Mail

Date: February 25, 2026

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