



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL

March 6, 2026

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street 2nd FL
Harrisburg, PA 17120

A-2020-3022605

RE: Application of the Pennsylvania Department of Transportation for approval to abolish and remove the public crossings (DOT 938 230 V) and (DOT 524 153 C) where SR 4034 and State Street cross, above grade, the tracks of CSX Transportation Inc., and where Holland Street crosses at grade, the tracks of CSX Transportation Inc., located in the City of Erie, Erie County, and the allocation of costs incident thereto.

Dear Secretary Homsher,

Enclosed for filing please find the Department's *Petition for Time of Extension* in the above-captioned matter.

I hereby certify that a copy has been sent to all parties of record as indicated by the Certificate of Service.

Very truly yours,

A handwritten signature in black ink, appearing to read "Elizabeth K. Rall", written over a horizontal line.

Elizabeth K. Rall
Assistant Counsel

Cc: Parties of Record
Mark J. Chappell
Mohammad Arghoshi
Brian McNulty
Jeanette Uhl

3. By Secretarial Letter entered January 31, 2025, the Pennsylvania Public Utility Commission (“Commission”) directed that “All work necessary to complete the alteration of the subject crossing be done in a manner satisfactory to this Commission on or before December 31,2025.”

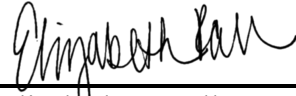
4. The December 31, 2025, completion date was not met due to material acquisition delays and the necessary manpower for the project was not available.

5. For the reasons stated above, the Department respectfully requests an extension of time from the December 31, 2025, date contained in the January 31, 2025 Secretarial Letter to the extended date of March 31, 2027, and that the Secretarial Letter dated January 31, 2025 be modified as follows:
 14. All work necessary to complete the alteration of the subject crossing be done in a manner satisfactory to this Commission on or before ~~December 31, 2025~~, March 31, 2027, and that on or before said date, Pennsylvania Department of Transportation report to this Commission in writing the date of actual completion of the work.

WHEREFORE, the Department of Transportation respectfully requests that the Public Utility Commission Secretarial Letter, dated January 31, 2025, be modified consistent with this Petition.

Respectfully submitted,

COMMONWEALTH OF
PENNSYLVANIA DEPARTMENT OF
TRANSPORTATION



Elizabeth K. Rall, Esq.
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Commonwealth of Pennsylvania
Department of Transportation Office of
Chief Counsel
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DATED: March 6, 2026

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION

Maria Bitner

Maria Bitner
Legal Analyst
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P.O. Box 8212
Harrisburg, PA 17105-8212

DATED: March 6, 2026