



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL

March 19, 2026

Via Electronic Filing

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

**RE: Application of the Pennsylvania Department of Transportation for approval to alter the public crossing (DOT 592 186 Y) by replacement of the existing bridge where SR 3013 (29th Street) crosses, above grade, the tracks of Norfolk Southern Railway Company, located in Paxtang Borough and Swatara Township, Dauphin County.
A-2020-3021129**

Dear Secretary Homsher,

Enclosed for filing please find the Department's *Second Petition for Extension of Time* 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.

Sincerely,

A handwritten signature in black ink, appearing to read "LJB", with a long horizontal flourish extending to the right.

Leah Jo Bobula
Assistant Counsel

Cc: Parties of Record
Mark J. Chappell
Sarah Fenton
Ahmed Lasloudji
John Bachman
Michael Deiter

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Pennsylvania Department of Transportation for approval to alter the public crossing (DOT 592 186 Y) by replacement of the existing bridge where SR 3013 (29th Street) crosses, above grade, the tracks of Norfolk Southern Railway Company, located in Paxtang Borough and Swatara Township, Dauphin County. : **Docket No. A-2020-3021129**
: **Electronically Filed**
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SECOND PETITION FOR EXTENSION OF TIME

The Commonwealth of Pennsylvania, Department of Transportation (Department), by its counsel, Leah Jo Bobula, files the following Second Petition for Extension of Time, pursuant to 52 Pa. Code § 1.15(a)(1), based upon the following:

1. The October 23, 2020 Secretarial Letter in the above-referenced docket ordered the Department to do all work necessary to replace the existing State Route (SR) 3013 bridge at crossing DOT 592 186 Y, by December 31, 2024.
2. On March 8, 2022, the Department filed its Drawings Authorizing Acquisition of Right-of-Way for SR 3013, Section 079 R/W, which were subsequently approved by the Public Utility Commission (Commission) on June 16, 2022.
3. On September 2, 2022, the Department submitted its Petition to Transfer Jurisdiction, which was subsequently granted by the Commission on October 27, 2022.
4. On March 30, 2023, the Department submitted its Final Construction Plans, which was subsequently approved by the Commission on May 9, 2023.

5. The start of construction was delayed approximately nine months due to longer than average time to acquire the necessary approvals as well as delays incurred while waiting for utilities to clear from the project area to begin construction.
6. The Department filed its first Petition for Extension of Time on June 2, 2025, seeking an extension to December 31, 2025.
7. The Commission granted the request with its September 16, 2025 Secretarial Letter.
8. Although the majority of construction was completed by December 31, 2025, additional work still needs completed, including:
 - a. Once a review from Dauphin County Conservation District determines the site has been permanently stabilized, the Department will remove its erosion and sediment control devices;
 - b. Concrete staining on abutment 2;
 - c. Americans with Disabilities Act ramp inspection;
 - d. Cleanup of debris stock piles; and
 - e. Other minor matters that may arise during the above tasks.
9. As such, the Department seeks an extension of the time for completion to December 31, 2026.
10. Because the Department is seeking an extension of time to complete the bridge replacement, the Department respectfully requests that Ordering Paragraph 13 of the October 23, 2020 Secretarial Letter be amended as follows, with deletions shown as strikethrough text and insertions as bold text:

13. 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~~ **December 31, 2026**, 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, entered on October 23, 2020, be modified consistent with this Petition.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION



Leah Jo Bobula, Esq.
Assistant Counsel
Commonwealth of Pennsylvania
Department of Transportation
Office of Chief Counsel
P.O. Box 8212
Harrisburg, PA 17105-8212
Pennsylvania Attorney I.D. Number 332184
lbobula@pa.gov

Dated: March 19, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of the Pennsylvania Department of Transportation for approval to alter the public crossing (DOT 592 186 Y) by replacement of the existing bridge where SR 3013 (29th Street) crosses, above grade, the tracks of Norfolk Southern Railway Company, located in Paxtang Borough and Swatara Township, Dauphin County. : Docket No. A-2020-3021129
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VERIFICATION

I, Ahmed Lasloudji, Grade Crossing Engineer, Commonwealth of Pennsylvania, Department of Transportation, in the foregoing document, make the following statement subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authority, and do state that as the Grade Crossing Administrator for the Commonwealth of Pennsylvania, Department of Transportation, I am authorized to make this statement on behalf of the Commonwealth of Pennsylvania, Department of Transportation, and that the facts set forth in the foregoing document are true and correct to the best of my information, knowledge, and belief.

DATED: 3/13/2026



Ahmed Lasloudji
Grade Crossing Administrator

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the Pennsylvania Department of Transportation for approval to alter the public crossing (DOT 592 186 Y) by replacement of the existing bridge where SR 3013 (29th Street) crosses, above grade, the tracks of Norfolk Southern Railway Company, located in Paxtang Borough and Swatara Township, Dauphin County. : **Docket No. A-2020-3021129**
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below by U.S. Prepaid Postage Mail pursuant to 52 Pa. Code §1.54:

Service by Electronic & US Mail

Douglas Starling, P.E. Norfolk Southern Railroad Company 650 West Peachtree Street, NW Box 45 Atlanta, GA 30308 douglas.starling@nscorp.com	Julianne Freeman, Esq. Norfolk Southern Railroad Company Three Commercial Place Norfolk, VA 23510-9241 Julianne.Freeman@nscorp.com
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<p>Rob Zimmel Verizon Pennsylvania LLC. Strawberry Square 11th Floor PA 15226 Harrisburg, PA 17101</p>	<p>Rob Januszko Commonwealth Tele. DBA Frontier 93 Old Berwick Road Drums, PA 18222 Robert.Januszko@ftr.com</p>
<p>Mike Sweigard Comcast Cable Communications, Inc. 4601 Smith Street Harrisburg, PA 17109</p> <hr/>	<p>Charlotte Krupa PPL Electric Utilities Corporation Two North Ninth Street, GENN3 Allentown, PA 18101-1179 cakrupa@pplweb.com</p>
<p>David Hayward Sunseys, LLC 11 Grandview Circle Suite 220 Canonsburg, PA 15317</p>	<p>Scott Dreiling XO/Verizon 630 Clark Avenue King of Prussia 19406</p> <hr/>
<p>Chris Ricciuti Zayo Group 170 Robbins Road Downington, PA 19335 Chris.Ricciuti@zayo.com</p>	<p>Jeff Haste, Chairman Dauphin County 6680 Linglestown Road Harrisburg, PA 17112</p>

Respectfully submitted,
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION

Maria Bitner

Maria Bitner, Legal Analyst
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DATED: March 19, 2026