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March 31, 2026

VIA ELECTRONIC-FILING

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

RE: Bridge structure (BRKEY 3298) and roadway closure at the public crossing (DOT 869 358 A) where Clinton Road (T-881) crosses, above grade, a single track of Buffalo & Pittsburgh Railroad, Incorporated, located in South Buffalo Township, Armstrong County
Docket No. A-2025-3056642
File No. 2393.274368

Dear Secretary Homsher:

Enclosed for filing please find a Joint Motion for Extension of Time in the above-referenced matter. Copies have been served on the parties of record in accordance with the Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

/s/ Aaron M. Ponzo

Aaron M. Ponzo

AMP/eie

Enclosure

Cc: As per Certificate of Service

35612617.1

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Bridge structure (BRKEY 3298) and roadway closure at the public crossing (DOT 869 358 A) where Clinton Road (T-881) crosses, above grade, a single track of Buffalo & Pittsburgh Railroad, Incorporated, located in South Buffalo Township, Armstrong County

Docket No. A-2025-3056642

NOTICE TO PLEAD

TAKE NOTICE that pursuant to 52 Pa. Code §1.15 and §5.103, South Buffalo Township and Buffalo & Pittsburgh Railroad, Inc. ("BPRR") have filed a Joint Motion for Extension of Time in the above-captioned matter. Pursuant to 52 Pa. Code § 5103(c), you are hereby notified to file with the Commission and serve upon the undersigned and all parties a written response within twenty (20) days from the date of service of the Motion.

LAW OFFICE OF James A. Favero

DICKIE, McCAMEY & CHILCOTE, P.C.

By: /s/James A. Favero
James A. Favero, Esquire
PA. I.D. #35932

By: /s/Aaron M. Ponzo
Aaron M. Ponzo, Esquire
PA I.D. #203584

Attorney for South Buffalo Township

Attorney for Buffalo & Pittsburgh Railroad, Inc.

Dated: March 31, 2026

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Bridge structure (BRKEY 3298) and roadway closure at the public crossing (DOT 869 358 A) where Clinton Road (T-881) crosses, above grade, a single track of Buffalo & Pittsburgh Railroad, Incorporated, located in South Buffalo Township, Armstrong County

Docket No. A-2025-3056642

JOINT MOTION FOR EXTENSION OF TIME

AND NOW, comes South Buffalo Township and Buffalo & Pittsburgh Railroad, Inc. (“BPRR”), by their undersigned counsel and files this Joint Motion for Extension of Time, stating as follows:

1. This matter involves the temporary closure of the public crossing (DOT 869 358 A) where Clinton Road (T-881) crosses, above grade, a single track of BPRR located in South Buffalo Township.

2. By Secretarial Letter dated August 4, 2025, the Commission affirmed the action taken by South Buffalo Township to close the bridge after the bridge was determined to be in critical structural condition following a safety inspection.

3. The Commission directed South Buffalo Township, at its initial cost and expense, to “furnish all material and perform all work necessary to establish and maintain any detours or traffic controls that may be required to properly and safely accommodate highway and pedestrian traffic during the time the bridge is closed.” See Secretarial Letter, August 4, 2025 ¶2.

4. The Commission further directed South Buffalo Township, at its initial cost and expense, to “maintain any barricades, fencing and signage installed to prevent

vehicular and pedestrian access to the subject public crossing until such time that the bridge structure can be repaired or replaced...” *Id.* ¶3.

5. BPRR was directed, at its sole cost and expense, to “prepare and submit complete detailed structural repair plans and/or details to address the Critical Priority (Priority 0) Maintenance items at the subject public crossing to all parties for review and to the Commission for approval and/or affirmation.” *Id.* ¶4

6. By Secretarial Letter of January 30, 2026, the Commission noted that an inspection on October 17, 2025, found repairs performed by BPRR were adequate and effectively mitigated the Critical Priority (Priority 0) maintenance items. *See* Secretarial Letter, January 30, 2026, at 1.

7. The Commission affirmed the action taken by South Buffalo Township to reopen the bridge following the completion of the repairs. *Id.*, at ¶ 1.

8. On November 21, 2025, the Township transmitted to BPRR a request for reimbursement of \$118,818.59. *Id.*, at 1.

9. The Commission encouraged South Buffalo Township and BPRR to continue working toward the resolution of the final costs and advised that if the final costs were not resolved within sixty (60) days of the January 30, 2026, Secretarial Letter, the matter will be reassigned to the Commission’s Office of Administrative Law Judge for adjudication.

10. The Township and BPRR are continuing to work toward resolution final costs but need additional time within which to do so, and request an extension of time until April 15, 2026, before this matter is reassigned to the Commission’s Office of Administrative Law Judge for adjudication.

11. Allowing the parties additional time to resolve the final costs would be consistent with the Commission's policy of encouraging settlements. 52 Pa. Code § 5.231(a).

12. No party will be prejudiced by the requested extension.

WHEREFORE, South Buffalo Township and Buffalo & Pittsburgh Railroad, Inc. respectfully request that the Commission grant their Motion and extend the time within which to resolve final costs to April 15, 2026.

LAW OFFICE OF JAMES A. FAVERO

DICKIE, McCAMEY & CHILCOTE, P.C.

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*Attorney for Buffalo & Pittsburgh Railroad,
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing Joint Motion for Extension of Time have been served this 31st day of March 2026, upon the parties listed below in accordance with 52 Pa. Code § 1.54 (relating to service by a party):

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