



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL

May 21, 2026

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

A-2018-3000172

RE: Application of the Department of Transportation of the Commonwealth of Pennsylvania for the approval to replace the existing bridge where State Route 0183, Section 05B (Schuylkill Avenue) crosses over two tracks of the Norfolk Southern Railroad (DOT# 592 216 N) in the City of Reading, Berks 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".

Elizabeth K. Rall
Assistant Counsel

Cc: Parties of Record

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of the Department of : **Docket No. A-2018-3000172**
Transportation of the Commonwealth of :
Pennsylvania for the approval to replace the :
existing bridge where State Route 0183, :
Section 05B (Schuylkill Avenue) crosses over :
two tracks of the Norfolk Southern Railroad :
(DOT # 592 216 N) in the City of Reading, :
Berks County, and the allocation of costs :
incident thereto. :

PETITION FOR EXTENSION OF TIME

The Commonwealth of Pennsylvania, Department of Transportation (Department), by its counsel, Elizabeth K. Rall, files the following Petition for Extension of Time, pursuant to 52 Pa. Code § 5.41, in the above referenced matter and states as follows: The name and address of the Petitioner is:

1. The name and address of Counsel for the Petitioner is:

Commonwealth of Pennsylvania
Department of Transportation
Bureau of Project Delivery
P.O. Box 3362
Harrisburg, Pennsylvania 17105-3362

2. The name and address of Counsel for the Petitioner is:

Elizabeth K. Rall, Assistant Counsel
Commonwealth of Pennsylvania
Department of Transportation
Office of Chief Counsel
P.O. Box 8212
Harrisburg, Pennsylvania 17105-8212
erall@pa.gov

3. By Secretarial Letter entered February 25, 2022, granting a time extension, 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 June 30, 2025.”

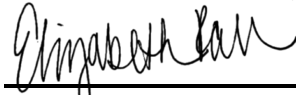
4. The June 30, 2025, completion date was not met due to the necessary manpower for the project was not available.

5. For the reasons stated above, the Department respectfully requests another extension of time from the June 30, 2025 date contained in the February 25, 2022 Secretarial Letter to the extended date of December 31, 2027, and that the Secretarial Letter dated February 25, 2022 be modified as follows:
 11. All work necessary to complete the alteration of the subject crossing be done in a manner satisfactory to this Commission on or before ~~June 30, 2025~~, December 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 February 25, 2022, be modified consistent with this Petition.

Respectfully submitted,

COMMONWEALTH OF
PENNSYLVANIA DEPARTMENT OF
TRANSPORTATION



Elizabeth K. Rall, Esq.

Assistant Counsel

Commonwealth of Pennsylvania

Department of Transportation Office of

Chief Counsel

P.O. Box 8212

Harrisburg, PA 17105-8212

Attorney I.D. Number 328725

erall@pa.gov

DATED: May 21, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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incident thereto. :

VERIFICATION

I, Rodney Rehnert, District Grade Crossing Administrator, Commonwealth of Pennsylvania, Department of Transportation, in the foregoing document, make the following statement subject to the penalties of 18 Pa.C.S.A. § 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: May 21, 2026

Rodney O. Rehnert

Rodney Rehnert
District Grade Crossing Administrator

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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(DOT # 592 216 N) in the City of Reading, :
Berks County, and the allocation of costs :
incident thereto. :

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 first class mail and/or electronic mail pursuant to 52 Pa. Code §1.54:

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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: May 21, 2026