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April 8, 2016

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ENTERED

By Hand-Delivery

Cynthia T. Brown
 Chief, Section of Administration
 Office of Proceedings
 Surface Transportation Board
 395 E Street, S.W.
 Washington, D.C. 20423

Office of Proceedings
 April 8, 2016
 Part of
 Public Record

Re: Consumers Energy Company v. CSX Transportation, Inc.
STB Docket No. NOR 42142

Dear Ms. Brown:

Enclosed for filing in the above-referenced matter is an original and ten copies of Defendant CSX Transportation, Inc.'s ("CSXT's") Response to the Board's April 6, 2016 Order to Provide Additional Information. Also enclosed are three CDs containing CSXT's Workpapers and three CDs containing the Response in pdf, searchable format.

Please date-stamp the extra copy and return them to our messenger. Thank you for your assistance in this matter. If you have any questions, please contact the undersigned.

Sincerely,

Hanna M. Chouest

HMC:aat
 Enclosures
 cc: Kelvin J. Dowd

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

CONSUMERS ENERGY COMPANY

Complainant,

v.

CSX TRANSPORTATION, INC.

Defendant.

Docket No. NOR 42142

**CSX TRANSPORTATION, INC.'S RESPONSE TO THE BOARD'S APRIL 6,
2016 ORDER TO PROVIDE ADDITIONAL INFORMATION**

CSXT hereby responds to the Board's April 6, 2016 Decision¹ issued in response to Consumers Energy Company's ("Consumers") Petition for Technical Conference, filed on March 14, 2016 ("Petition"). Consumers' Petition alleged that CSXT's Reply Evidence included 164 violations of the Board's July 2015 Decision adopting 13 general procedures as well as various specific procedures for formatting the evidence.² CSXT responded to the Petition on March 21, 2016.

In its April 2016 Decision, the Board determined that the vast majority of the items enumerated by Consumers were not in fact violations of the July 2015 Decision. The Board found that CSXT had substantially complied with the July 2015 Decision and that in most cases any purported violations were remedied in CSXT's Reply to the Petition. However, in 10 instances, the Board ordered CSXT to

¹ *Consumers v. CSXT*, STB Docket No. 42142 (served April 6, 2016) ("April 2016 Decision").

² *Consumers v. CSXT*, STB Docket No. 42142 (served July 15, 2015) ("July 2015 Decision").

provide additional details about certain workpapers supporting items in Sections III-C and III-D of CSXT's Reply Evidence.

CSXT does so here. In the Attached Exhibit A, CSXT provides additional information for each of the 10 instances in which the Board determined further information regarding CSXT's Reply Evidence was warranted. In some instances, CSXT determined that a workpaper correction was necessary. Accordingly, CSXT provides those corrected workpapers along with this Response. In addition, in order to respond to Item Number 134, CSXT determined that a new workpaper was required. CSXT provides that new workpaper, "Trackage Rights Miles.xlsx," along with this Response. Each of these workpapers is identified, and a narrative response to each of the items identified by the Board is provided, in Exhibit A.

Respectfully submitted,



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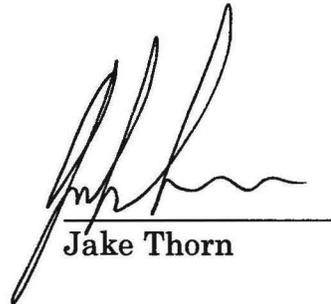
Counsel to CSX Transportation, Inc.

Dated: April 8, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of April, 2016, I caused a copy of CSX Transportation, Inc.'s foregoing Response to the STB's April 6, 2016 Order to Provide Additional Information to be served on the following parties by first class mail, postage prepaid or more expeditious method of delivery:

Kelvin J. Dowd
Daniel M. Jaffe
Christopher A. Mills
Slover & Loftus LLP
1224 Seventeenth St., N.W.
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Jake Thorn

EXHIBIT A

to

**CSXT RESPONSE TO THE BOARD'S APRIL 6, 2016
ORDER TO PROVIDE ADDITIONAL INFORMATION**

STB Docket No. NOR 42142

Exhibit A: CSXT Response to Board April 2016 Decision

Item #	Board Remedy	CSXT Response
<i>General Procedure 1</i>		
57	CSXT's narrative states "CSXT identified 77 foreign line crossing delays of greater than 15 minutes' duration that occurred during the peak period modeled in CSXT's RTC simulation," but in the workpaper locations cited in the reply to Consumers' petition, there are 78 foreign line crossing delays. Provide the correct number.	The number in CSXT's Reply workpaper (78) is the correct number. References to 77 crossing delays in Section III-C of CSXT's Reply narrative should be 78.
59	Provide the calculations underlying Figure III-C-9 from the workpaper cited—"Received Locomotive Consists.xlsx".	CSXT provides an amended version of Reply workpaper "Received Locomotive Consists.xlsx" that includes the underlying calculations for Figure III-C-9. See "Received Locomotive Consists.xlsx", tab "Avg_Loco_HP," Cells A8:F10.
<i>General Procedure 2</i>		
8	Provide an explanation as to how the 3% difference in transit times is calculated in the cited workpaper "5.1 TransitTimes Comparison Hist v.RTC.xlsx".	CSXT derived the 3% difference in transit times from Consumers' Opening presentation. In the cited row #12 of Consumers' Opening workpaper "5.1 TransitTimes Comparison Hist v. RTC.xlsx," Consumers claimed that its RTC simulation results were 1:53 faster than its calculation of CSXT's historical average of 59:41 for eastbound shipments from Calumet Park to Curtis. This represents a difference of 3%. In the cited row #19 of Consumers' same Opening workpaper, Consumers claimed that its RTC simulation results were 2:05 faster than its calculation of CSXT's historical average of 1:02:00 for westbound shipments from Curtis to Calumet Park. This represents a difference of 3%.
10	Provide an explanation as to how the 3% difference in transit times is calculated in the cited workpaper "5.1 TransitTimes Comparison Hist v.RTC.xlsx".	In cited row #12 of Consumers' Opening workpaper "5.1 TransitTimes Comparison Hist v. RTC.xlsx," Consumers claims that its RTC simulation results were 1:53 faster than its calculation of CSXT's historical average of 59:41 for eastbound shipments from Calumet Park to Curtis. This represents a difference of 3%.
69	Clearly identify the examples of bad-ordered carloads from the rows highlighted in CSXT's response.	The cited tab "Dataset_Access" of CSXT's Reply workpaper "Bad Ordered Carloads in NonUnit Trains.xlsx," includes the CSXT car-event records for issue-traffic shipments that were bad-ordered. Cited rows 569-590 include the referenced example of bad-ordered car CEFX 61227 that CSXT handled on the Q326-20140325 train from Chicago to Grand Rapids; cited rows 2206-2227 include the referenced example of bad-ordered car PSTX 2007 that CSXT handled on the Q326-20140325 train from Chicago to Grand Rapids; and cited rows 2995-3016 include the referenced example of bad-ordered car FSTX 5808 that CSXT handled on the Q326-20140330 train from Chicago to Grand Rapids.
72	Provide the calculation underlying this item. Neither of the two cells cited in CSXT's response corresponds to the number referenced in the narrative.	The cited cell H7 of Tab "RTC_Add_Elim" of CSXT's Reply workpaper "Peak Period Trains.xlsx," identified 321 trains that Consumers included in its Opening RTC simulation. These trains are also identified in Consumers' Opening workpaper "List of All RTC Trains with RTC IDs.xlsx," tab "RTC freight trains," rows 6-326. The cited cell H10 of tab "RTC_Add_Elim" of CSXT's Reply workpaper "Peak Period Trains.xlsx," identified 243 trains that CSXT included in its Reply RTC simulation. This same workpaper tab lists the additions and removals that CSXT made to Consumers' train list. The difference between these two totals is 78 fewer trains, the number referenced in the narrative.
126	Provide the underlying calculations for Table III-D-24 from the workpaper "Inventories for MOW Reply.xlsx". CSXT has not explained how the table is derived.	CSXT provides an amended version of Reply workpaper "Inventories for MOW_Reply.xlsx" that includes the underlying calculations for Table III-D-24. See "Inventories for MOW_Reply.xlsx," tab "Summary," Cells F50:J61.
127	Provide the underlying calculations for Table III-D-26 from the workpaper "Inventories for MOW Reply.xlsx". CSXT has not explained how the table is derived.	CSXT provides an amended version of Reply workpaper "Inventories for MOW_Reply.xlsx" that includes the underlying calculations for Table III-D-26. See "Inventories for MOW_Reply.xlsx," tab "Summary," Cells F63:N65. CSXT notes that Reply Table III-D-26 included misstated figures for average densities and miles of curved track. CSXT's amended workpaper includes a corrected version of this table.
128	Provide the underlying calculations for Table III-D-27 from the workpaper "Inventories for MOW Reply.xlsx". CSXT has not explained how the table is derived.	CSXT provides an amended version of Reply workpaper "Inventories for MOW_Reply.xlsx" that includes the underlying calculations for Table III-D-27. See "Inventories for MOW_Reply.xlsx," tab "Summary," Cells F66:N68. CSXT notes that Reply Table III-D-27 included misstated figures for the number of switches and the number of protected crossings. CSXT's amended workpaper includes a corrected version of this table.
134	Provide the workpaper(s) that include the chart and underlying calculations. The workpapers cited by CSXT do not explain how the figures used in the table are derived.	CSXT provides a new workpaper "Trackage Rights Miles.xlsx" that summarizes the mileages listed in CSXT Reply workpaper "CSXT NS Reciprocal Trackage Rights Rate (2002).pdf" and Consumers Opening workpaper "CERR Route Miles Opening.xlsx" that are presented in Table III-D-34. See "Trackage Rights Miles.xlsx," tab "Summary," Cells B12:D16.

Note: In CSXT's Amended workpapers, changes from the Reply version are color-coded blue.