

BEFORE THE
SURFACE TRANSPORTATION BOARD

239333

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TOTAL PETROCHEMICALS &
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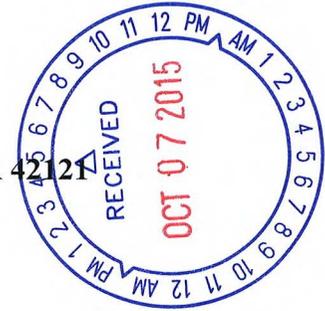
Complainant,

v.

CSX TRANSPORTATION, INC.

Defendant.

Docket No. NOR 42121



COMPLIANCE EVIDENCE AND
SUPPLEMENTAL OPENING EVIDENCE OF
TOTAL PETROCHEMICALS & REFINING USA, INC.

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October 7, 2015

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Supplemental Evidence Exhibit List

Testimony Part	Exhibit No.	Title
(1)	(2)	(3)
III-A	III-A-1	List of TPI October 7, 2015 Supplemental Evidence Section II & III Electronic Workpapers
	III-A-2	Changes Made to TPI Rebuttal Evidence to Comply with the Board's 7/24/15 Decisions
	III-A-3	Schematic of the Spreadsheet Linkages in the TPIRR Traffic and Revenue Model
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	III-C-11	TPIRR UPS and Threads Express Trains Marked for Removal
III-F	III-F-1	Summary of TPI Intermodal Facility Costs
III-H	III-H-1	TPIRR DCF Model Results – Scenario #1

Supplemental Evidence Exhibit List

Testimony Part	Exhibit No.	Title
(1)	(2)	(3)
	III-H-2	TPIRR DCF Model Results – Scenario #2
	III-H-3	TPIRR DCF Model Results – Scenario #3
	III-H-4	TPI MMM Model – Scenario #1
	III-H-5	TPI MMM Model – Scenario #2
	III-H-6	TPI MMM Model – Scenario #3

Case Glossary

<i>AEP Texas</i>	<i>AEP Tex. N. Co. v. BNSF Ry.</i> , STB Docket No. 41191 (Sub-No. 1), slip op. (served Sept. 10, 2007).
<i>AEPCO</i>	<i>Ariz. Elec. Power Coop. v. BNSF Ry.</i> , STB Docket No. NOR 2113, slip op. (served Nov. 22, 2011).
<i>Arizona Public Service</i>	<i>Arizona Public Service Co. & PacifiCorp v. The Burlington Northern and Santa Fe Railway Company</i> , 6 STB 851 (2003)
<i>APS</i>	<i>Arizona Public Service Co. v. Atchison, Topeka and Santa Fe Ry.</i> , 2 STB 367 (1997)
<i>Coal Trading</i>	<i>Coal Trading Corp. v. Baltimore & Ohio R.R.</i> , 6 I.C.C.2d 361, 413 (1990).
<i>Compliance Order</i>	STB Compliance Decision in Docket NOR 42121, <i>Total Petrochemicals & Refining USA, Inc. v. CSX Transportation, Inc.</i> , decided July 21, 2015
<i>CSXT Recon. Reply</i>	<i>CSXT's Reply to Complainant's Petition for Reconsideration and Clarification</i> , filed Aug. 12, 2015
<i>CP&L</i>	<i>Carolina Power & Light Co. v. Norfolk S. Ry.</i> , 7 S.T.B. 235 (2003).
<i>Duke/CSXT</i>	<i>Duke Energy Corp. v. CSX Transp. Inc.</i> , 7 S.T.B. 402 (2004).
<i>Duke/NS</i>	<i>Duke Energy Corp. v. Norfolk S. Ry.</i> , 7 S.T.B. 89 (2003).
<i>DuPont</i>	<i>E.I. du Pont de Nemours and Company v. Norfolk Southern Ry. Co.</i> , Docket No. NOR 42125, slip op. (served March 24, 2014).
<i>FMC</i>	<i>FMC Wyo. Corp. v. Union Pac. R.R.</i> , 4 S.T.B. 699 (2000).
<i>Major Issues</i>	<i>Major Issues in Rail Rate Cases</i> , STB Ex Parte No. 657 (Sub-No. 1), slip op. (Oct. 30, 2006).
<i>McCarty Farms</i>	<i>McCarty Farms, Inc. v. Burlington N., Inc.</i> , 2 S.T.B. 460 (1997).
<i>Nevada Power</i>	<i>Bituminous Coal – Hiawatha, Utah to Moapa, Nevada</i> , 10 I.C.C.2d 259 (1994).
<i>Otter Tail</i>	<i>Otter Tail Power Co. v. BNSF Ry.</i> , STB Docket No. 42071, slip op. (served Jan. 27, 2006).
<i>PSCo/Xcel I</i>	<i>Pub. Serv. Co. of Colo. v. Burlington N. & Santa Fe Ry.</i> , 7 S.T.B. 589 (2004).
<i>PSCo/Xcel II</i>	<i>Pub. Serv. Co. of Colo. v. Burlington N. & Santa Fe Ry.</i> , STB Docket No. 42057, slip op. (served Jan 19, 2005).

Case Glossary

<i>Reconsideration Decision</i>	STB Reconsideration Decision in Docket NOR 42121, <i>Total Petrochemicals & Refining USA, Inc. v. CSX Transportation, Inc.</i> , decided September 4, 2015
<i>SunBelt</i>	<i>SunBelt Chlor Alkali Partnership v. Norfolk Southern Ry. Co.</i> , Docket No. NOR 42130, slip op. (served June 20, 2014).
<i>Supplemental Evidence Order</i>	STB Supplemental Decision in Docket NOR 42121, <i>Total Petrochemicals & Refining USA, Inc. v. CSX Transportation, Inc.</i> , decided July 21, 2015
<i>TMPA</i>	<i>Tex. Mun. Power Agency v. Burlington N. & Santa Fe Ry.</i> , 6 S.T.B. 573 (2003).
<i>West Texas Utilities</i>	<i>W. Tex. Utils. Co. v. Burlington N. R.R.</i> , 1 S.T.B. 638 (1996).
<i>WFA/Basin</i>	<i>W. Fuels Ass'n v. BNSF Ry.</i> , STB Docket No. 42088, slip op. (served Sept. 10, 2007).
<i>Wisconsin P&L</i>	<i>Wis. Power & Light Co. v. Union Pac. R.R. Co.</i> , 5 S.T.B. 955 (2001).

Acronyms

The following acronyms are used:

ATC	Average Total Cost
BNSF	BNSF Railway Company
CAGR	Compound Annual Growth Rate
CP	Canadian Pacific Railroad
CSXT	CSX Transportation, Inc.
CTC	Central Traffic Control
DCF	Discounted Cash Flow
G&A	General and Administrative
MMM	Maximum Markup Methodology
MOW	Maintenance of Way
NS	Norfolk Southern Railway Company
PAF	Productivity Adjustment Factor
PTC	Positive Train Control
RCAF	Rail Cost Adjustment Factor
RSIA	Rail Safety Improvement Act of 2008
RTC	Rail Traffic Controller Model
SAC	Stand-Alone Cost
SARR	Stand-Alone Railroad
STB	Surface Transportation Board
T&E	Train and Engine
TPI	Total Petrochemicals & Refining USA, Inc.
TPIRR	TPI Stand-Alone Railroad
UP	Union Pacific Railroad Company

PART I

I. COUNSEL'S ARGUMENT AND SUMMARY OF EVIDENCE

Pursuant to decisions of the Surface Transportation Board (“Board” or “STB”) served in this docket on July 24¹ and September 4, 2015,² Complainant, Total Petrochemicals & Refining USA, Inc. (“TPI”), hereby submits Compliance Evidence and Supplemental Opening Evidence in support of its Complaint, as amended, against Defendant, CSX Transportation, Inc. (“CSXT”).

The Board has requested Compliance Evidence from both parties to “address deficiencies in the parties’ previous filings and [] facilitate the Board’s review of the evidence. *Compliance Order*, slip op. at 1. The requested evidence covers four general categories:

- General. The parties are to provide reference to underlying documents for all hard-coded numbers that appear in their workpapers and to link dependent spreadsheet files.
- Traffic Group. The parties are to identify how the issue traffic moves over the TPIRR by listing all the trains on which the traffic moves (including local trains). They also are to identify certain high priority traffic and provide timestamps for that traffic by milepost. Finally, the parties are to add a unique identifier to match their revenue workpapers to the MMM model.
- Operating Plan. The parties are to compile an amended train list, recalculate service units and costs, and adjust the infrastructure as necessitated by RTC modeling.
- RTC Model. The parties are to provide a list of six types of locations in the RTC model by node and ensure that all locations referenced in their narratives by name or milepost are also referenced by at least one RTC node.

The Board has requested the following supplemental evidence from TPI:

- Add historic “Y” trains and other local trains that deliver and/or pick up SARR traffic at shipper locations in the base year to its train list.

¹ The Board served two decisions on July 24th, one requesting compliance evidence and the other requesting supplemental evidence (hereafter referred to as the “*Compliance Order*” and “*Supplemental Evidence Order*,” respectively).

² The September 4 decision granted in part, and denied in part, TPI’s Petition to Reconsider the Supplemental Evidence Order (“*Reconsideration Decision*”). Although the Reconsideration Decision grants TPI the option not to submit supplemental evidence as to industrial yard trains (a/k/a “Y” trains), TPI is including “Y” trains in this Supplemental Evidence because the *Reconsideration Decision* subjects TPI to substantial litigation risk if it does not do so.

- Provide a working RTC model that supports TPI’s operating plan and configuration as specified in its narrative statements and spreadsheets, including all trains proposed as necessary in the operating plan.
- Provide two versions of recalculated growth trains: (1) with “Y” trains and high-priority UPS and Threads Express traffic, and (2) with “Y” trains but without high-priority UPS and Threads Express traffic.
- Provide documentation explaining all changes TPI has made in this Supplemental Evidence.

TPI has made all of the modifications to its evidence as specified in the *Supplemental Evidence Order*. Nevertheless, TPI also argues, as permitted by that Order, slip op. at 9, that its Rebuttal Evidence is superior to this Supplemental Evidence.

A. OVERVIEW OF COMPLIANCE EVIDENCE

TPI has presented its compliance evidence in the same format set forth in *General Procedures for Presenting Evidence in Stand-Alone Cost Rate Cases*, STB Ex Parte No. 347 (Sub-No. 3) (served March 12, 2001) (“*General Procedures*”). Parts III-A through III-H present the compliance evidence in subsections that are appropriately titled to correspond to the Board’s specific requests.

The “General” category of compliance evidence, which concerns hard-coded numbers and linking of spreadsheets, is ubiquitous across all Parts of this Supplemental/Compliance Evidence. TPI addresses those requests in Subparts 1 and 2 of Parts III-A through III-H. Those sections in turn reference Supplemental/Compliance Exhibits III-A-1 and III-A-2. Exhibit III-A-1 addresses the following matters:

- Lists and describes all workpapers included with TPI’s Supplemental/Compliance Evidence;
- Column (1) highlights in light blue all TPI Opening or CSXT Reply workpapers that TPI has added to address hard-coded numbers and linked files;
- Column (2) identifies which files have hard-coded numbers and/or linked files that need to be sourced;

- The appearance of footnote 7/ in Column (2) identifies any workpaper that TPI has modified to reflect the portion of the *Supplemental Evidence Order* granting in part, and denying in part, TPI’s Petition to Supplement the Record;
- TPI has identified all workpapers that it has added or modified to address the Board’s *Compliance* and *Supplemental Evidence Orders* by adding the extensions “_Supplemental” or “_Supplemental_v2” to the end of the filenames, depending upon the supplemental evidence scenario with which they are associated;³ and
- TPI has highlighted added workpapers in purple and described the changes in Column (3).

In addition, Exhibit III-A-2 identifies all changes that TPI has made and identified in Column (2) of Exhibit III-A-1 to address hard-coded numbers and linked files in all workpapers.

In Part III-A, TPI presents compliance evidence in the “Traffic Group” category of the *Compliance Order*. Subpart 3 describes the process by which TPI has identified all trains on which the issue traffic moves, including local trains. Subpart 4, supported by Exhibit III-A-3 and Exhibit III-A-4, identifies the high priority UPS and Threads Express traffic and associated revenues, and the trains on which the traffic moved. Subpart 5 provides timestamps for this traffic by milepost. Finally, Subpart 6 adds a unique identifier to match records from TPI’s revenue workpapers to the MMM model.

In Part III-C, TPI presents compliance evidence in the “RTC Model” category of the *Compliance Order*. Subpart 3 and Exhibit III-C-1 identify the RTC nodes for each location referenced in TPI’s Opening and Rebuttal narratives by name or milepost. As referenced in Subpart 4, TPI created Exhibits III-C-2 through III-C-7 in response to the Board’s request for lists of RTC nodes associated with rail stations, the origins and destinations of all traffic, interchanges, industry leads, random outages (beginning and ending nodes), and yards.

³ Scenario #2 adds “Y” trains and local trains as the Board requested. Scenario #3 removes high-priority UPS and Threads Express Traffic from Scenario #1 as the Board requested.

The final category of compliance evidence, the “Operating Plan,” is inextricably intertwined with the Board’s *Supplemental Evidence Order* requests. Those requests implicate three different scenarios which in turn require three different sets of responses to this category of compliance evidence. Therefore, TPI summarizes this compliance evidence in Part I-B, below.

B. SUPPLEMENTAL EVIDENCE OVERVIEW

The Board has requested that TPI submit supplemental evidence based upon three different scenarios. Scenario #1 is TPI’s Rebuttal evidence scenario adjusted to reflect the Board’s partial denial of TPI’s Petition to Supplement the Record in the *Supplemental Evidence Order*. This scenario essentially is the compliance evidence requested by the “Operating Plan” category. Scenario #2 requires TPI to add historic “Y” trains and other local trains that deliver and/or pick up SARR traffic at shipper locations in the base year. Scenario #3 requires TPI to remove high-priority UPS and Threads Express traffic from Scenario #2. Both the *Compliance Order* and *Supplemental Evidence Order* require TPI to develop amended train lists, run the RTC model, recalculate service units and costs, and make infrastructure adjustments for each scenario. Therefore, TPI is addressing all three scenarios as supplemental evidence.

1. Scenario #1

Scenario #1 does not require an amended train list or RTC simulation. Rather, Scenario #1 reflects TPI’s Rebuttal evidence, but restores TPI’s Opening intermodal costs that TPI had removed from its Rebuttal evidence. Because the Board denied TPI’s Petition to Supplement the Record as to these intermodal costs, Scenario #1 captures the effects of restoring those costs upon the SAC analysis. *See also*, Supplemental/Compliance Exhibit III-F-1. Thus, the only change in Scenario #1 occurs to road property investment, which TPI then flows through the DCF and MMM analyses. TPI makes the adjustment to intermodal costs in Part III-F-4. and demonstrates the effects on the DCF and MMM analyses in Parts III-G-3. and III-H-3. *See also*,

Supplemental/Compliance Exhibits III-H-1 and III-H-4. Under Scenario #1, TPI would not be eligible for any rate prescription in the first six months of the DCF analysis, But would be eligible for prescribed rates over the remaining 9½ years at R/VC ratios ranging from 180% to 261.6%.

2. Scenario #2

For Scenario #2, TPI has developed an amended base year train list and operating plan that: (1) includes historic “Y” trains that deliver and pick up SARR traffic at shipper locations; and (2) adds all of the remaining local trains disputed by the parties. As discussed in Part III-C-5.a.i., TPI contends that its Rebuttal evidence as reflected in Scenario #1 is superior to this supplemental evidence and should form the foundation of the Board’s decision. TPI has provided this supplemental evidence solely so that the Board will have a record upon which to reach a decision if it disagrees with TPI’s position.

In Part III-C-5.a.ii., TPI explains how it identified “historic” “Y” trains that handled TPIRR traffic within the limitations of CSXT’s traffic data. TPI has not simply added the 28,860 “Y” trains that CSXT claims TPI omitted, because those trains are not “historic” trains but merely train symbols. By reviewing CSXT’s car event data, TPI identified 25,119 historic “Y” trains, which TPI has included in its amended train list for Scenario #2. *See* Supplemental/Compliance Exhibits III-C-8 and III-C-9. This is a conservatively overstated count because TPI included the movement of all carloads over any distance to or from any location on the SARR on any “Y” train regardless of whether the traffic belonged to a TPIRR customer.

In Part III-C-a.iii., TPI has adjusted its Rebuttal yard jobs evidence to avoid double-counting the 25,119 “Y” trains that TPI has added to its amended train lists. Both parties have declared to the Board that their respective yard jobs matrices account for all yard train work,

both within and outside the yard. In Part III-C-a.iii., TPI demonstrates how “Y” trains leaving yards are included in Reply and Rebuttal evidence. The “Y” trains in this Supplemental/Compliance evidence, however, only reflect work performed outside the yard. Consequently, by definition, adding a list of Supplemental/Compliance industrial yard trains would double count operating expenses. Conversely, relying solely upon the Supplemental/Compliance evidence to the exclusion of the yard jobs matrices will omit work performed within the yard. Therefore, TPI has reduced its Rebuttal yard jobs by the number of “Y” trains included in its Supplemental/Compliance evidence train lists and RTC calculations.

In Part III-C-5.b., TPI also has added every local train that remains in dispute between the parties. *See also*, Supplemental/Compliance Exhibits III-C-8 and 9. But TPI does not concede that these in fact are “historic” trains that deliver and/or pick SARR traffic at shipper locations in the base year, because CSXT’s car and train event data contains no evidence of this activity. CSXT’s only evidence amounts to “trust me.”

In Part III-C-7., TPI recalculates growth trains for Scenario #2.

In Part III-C-8, TPI presents its RTC model for Scenario #2. Although the parties have agreed to use the most currently available version of the RTC Model, i.e., Version 69W 64-bit, TPI notes that certain RTC files can create differences in successive runs of the RTC model even when using identical versions of the program. Therefore, TPI identifies which versions of those files it has used. TPI also notes certain difficulties it had modeling “Y” train operations due to incomplete and/or senseless historic movement data that lacks sufficient detail to determine which TPIRR shippers (if any) an historic “Y” train served, where the “Y” train provided services, or for whom the “Y” train provided services. For lack of any better information, TPI conservatively has modeled all of the historic “Y” trains and included all of the stops reported in

the car event and waybill data wherever possible, even when the stops seem unreasonable and/or unrealistic. See Part III-C-8.c. The RTC simulation for Scenario #2 did not require any changes to the TPIRR's infrastructure.

In Part III-C-9, TPI has recalculated the service units based on the amended train list and RTC results for Scenario #2. The affected operating statistics include the number of locomotives, locomotive unit miles, car-miles, car-hours and crew personnel. TPI also has adjusted the locomotive peaking factor based upon the amended train lists for Scenario #2.

In Part III-D-3, TPI has recalculated the operating costs that are dependent upon the amended train list for Scenario #2. TPI modified only the affected units while continuing to use its Rebuttal evidence unit costs, consistent with the Board's instructions. These changes also had downstream effects upon insurance, trackage rights expenses, and outsourced payroll expenses.

TPI demonstrates the effects of the foregoing changes on the DCF and MMM analyses in Parts III-G-3. and III-H-3. See also, Supplemental/Compliance Exhibits III-H-2 and III-H-5. In Part III-G-4., TPI argues that the Board should use its historic DCF netting approach, which TPI used in Rebuttal evidence, rather than the approach that the Board applied *sua sponte* and without discussion in *SunBelt Chlor Alkali Partnership v. Norfolk Southern Ry. Co.*, Docket No. NOR 42130 (served June 20, 2014). Under Scenario #2, TPI would not be eligible for any rate prescription in the first six months of the DCF analysis, but would be eligible for prescribed rates over the remaining 9½ years at R/VC ratios ranging from 180% to 260.4%.

3. Scenario #3

For Scenario #3, TPI has identified and removed high-priority UPS and Threads Express traffic from Scenario #2. As discussed in Part III-C-6.a., TPI contends that CSXT has not supported its argument for removing this traffic. Furthermore, because Scenario #3 is just a scaled-down version of Scenario #2, all of TPI's evidence and argument as to Scenario #2 also

apply to Scenario #3. TPI has provided this supplemental evidence solely so that the Board will have a record upon which to reach a decision if it disagrees with TPI's position.

In Part III-C-6.b., TPI refers back to Part III.A.4. to describe how it identified specific trains carrying this high-priority intermodal traffic in the base year. Supplemental/Compliance Exhibit III-C-11 identifies the trains that TPI has removed from its Scenario #3 amended train list because they carry UPS and Threads Express traffic.

In Part III-C-7., TPI recalculates growth trains for Scenario #3.

In Part III-C-8, TPI presents its RTC model for Scenario #3. The RTC simulation for Scenario #3 did not require any changes to the TPIRR's infrastructure.

In Part III-C-9, TPI has recalculated the service units based on the amended train list and RTC results for Scenario #3. The affected operating statistics include the number of locomotives, locomotive unit miles, car-miles, car hours, and crew personnel, as well as the number of containers loaded onto rail cars. TPI also has adjusted the locomotive peaking factor based upon the amended train list for Scenario #3.

In Part III-D-3, TPI has recalculated the operating costs that are dependent upon the amended train list for Scenario #3. TPI modified only the affected units while continuing to use its Rebuttal evidence unit costs, consistent with the Board's instructions. These changes also had downstream effects upon insurance, trackage rights expenses, and outsourced payroll expenses.

TPI demonstrates the effects of the foregoing changes on the DCF and MMM analyses in Parts III-G-3. and III-H-3. *See also*, Supplemental/Compliance Exhibits III-H-3 and III-H-6. Under Scenario #3, TPI would not be eligible for any rate prescription in the first six months of the DCF analysis, but would be eligible for prescribed rates over the remaining 9½ years at R/VC ratios ranging from 180% to 260.3%.

C. TPI's REBUTTAL EVIDENCE IS SUPERIOR

TPI contends that the foregoing supplemental evidence requested by the Board is unnecessary because:

- TPI's Rebuttal Evidence provides a superior operating plan that includes all of the trains, including "Y" trains and local trains that are necessary to provide complete transportation service to the customers of the TPIRR. In contrast, the additional trains requested in the *Supplemental Evidence Order* are either duplicative, unnecessary, or both, and therefore overstate the TPIRR's stand-alone costs.
- The Board's request includes trains that even CSXT's Reply evidence demonstrated are not required to serve the TPIRR traffic group.
- The Board's request introduces evidence that CSXT acknowledges relies on deficient data.
- TPI's Rebuttal Evidence properly includes the high-priority UPS and Threads Express traffic that CSXT has excluded.

The first three items above apply to both "Y" trains and local trains addressed in Subparts 1 and 2, below. The last item applies to the high-priority trains addressed in Subpart 3.

1. No Additional "Y" Trains Are Needed.

The Board has requested supplemental "Y" train evidence from TPI to ensure that TPI has accounted for historic "Y" trains that serve customer locations. *Reconsideration Decision*, slip op. at 6. As discussed in Part III-C-5.a.i., TPI demonstrates that (a) CSXT's traffic data is inadequate for the supplemental evidence requested by the Board; and (b) TPI's Rebuttal yard jobs evidence already accounts for all "Y" trains that are needed to serve the TPIRR's traffic.

CSXT's historic train and car event data is not well-suited for capturing the historic operations of "Y" trains. Even CSXT has acknowledged this fact by developing "Y" train statistics through its yard jobs matrix, the same as TPI has done. CSXT recently confirmed this point when it stated that "CSXT did calculate the operating expenses (locomotive and crews) attributable to all of the required industrial yard trains as part of its yard operating expenses."

See CSXT's Reply to Complainant's Petition for Reconsideration and Clarification, p. 8 (filed Aug. 12, 2015) [underline in original] ("CSXT Recon. Reply"). The entire dispute over 28,860 allegedly missing "Y" trains, therefore, concerns whether TPI captured all "Y" train operations in its yard jobs matrix, not whether TPI omitted those trains from its train list used to develop operating costs, because neither party included "Y" trains in that train list.

There is a good reason why both parties did not develop "Y" train operating statistics on a train-specific basis in contrast to other train types. As CSXT itself has explained:

[P]arties to SAC cases do not develop locomotive unit miles for yard assignments on a train-specific basis. Such a level of granularity is simply not practicable because railroads do not maintain data regarding the specific number of miles traversed by all yard trains (particularly those that operate entirely within the yard). Rather, locomotive unit miles for "Y" trains are customarily based upon an assumed "average" number of miles per shift. Indeed, as TPI's Surreply acknowledges, both CSXT and TPI calculated locomotive unit miles for yard trains based upon the assumption that each TPIRR yard train would operate at an average of 6 MPH over the course of an 8-hour shift, generating 48 locomotive unit miles per shift.

CSXT Reply to Complainant's Motion for Leave to File Reply to Reply, p. 4 (filed Aug. 21, 2015) [underline in original]. The parties must rely upon an "average" number of miles because it is neither practical nor reliable to develop "Y" train operating statistics from CSXT's historic car and train event data.

As discussed in Part III-C-8.c., CSXT's traffic data does not contain sufficient operations details to capture accurate historical movement information for "Y" trains. The train event data does not contain sufficient detail to determine which TPIRR shippers (if any) were served historically by the trains, where services were provided, or for whom any services were provided. Therefore, TPI must rely entirely upon car event and waybill data to develop historical "Y" train operations to service individual shippers at specific locations on the TPIRR. But this car event data, like the train event data, also contains erroneous and spotty "Y" train information.

Consequently, TPI has been forced to model all of the historic “Y” trains and include all of the stops reported in the car event and waybill data wherever possible, even when the stops seem unreasonable and/or unrealistic.

The Board, therefore, should evaluate and choose between the parties’ yard jobs evidence instead of referring to supplemental “Y” train evidence based upon data that is not suited for that purpose. The Board can be confident that the parties’ yard jobs evidence sufficiently captures necessary “Y” trains because it is based upon CSXT’s real-world yard trains in the base year. Specifically, CSXT’s reply yard jobs evidence represents the maximum number of crews and locomotives that could possibly be needed to provide all yard train services—including so-called “Y” trains— because CSXT assigned the same total yard jobs to the TPIRR as the real-world CSXT in 2010⁴ and has acknowledged that it “did calculate the operating expenses (locomotives and crews) attributable to all of the required industrial yard trains as part of its yard operating expenses.”⁵ But because the TPIRR’s traffic is a subset of CSXT’s 2010 traffic, CSXT’s reply yard jobs evidence necessarily overstates the yard jobs that the TPIRR requires. TPI, therefore, appropriately reduced the number of “Y” trains to reflect the TPIRR’s smaller traffic group.

TPI’s yard jobs evidence is a conservatively scaled down variation upon CSXT’s evidence, which is based on historic yard jobs for a larger traffic group. *Compare* CSXT Reply at III-C-133 *with* TPI Reb. at III-C-131-32. Because the TPIRR classifies 15% fewer cars at hump yards in 2010 than the real-world CSXT, it does not require the same number of yard jobs and locomotives as the real-world CSXT. TPI Reb. at III-C-132. TPI’s evidence maintains the same level of yard productivity as the real-world CSXT, as measured by cars classified per hump job, whereas CSXT’s reply evidence would impose lower productivity upon the TPIRR. *Id.*

⁴ CSXT Reply at III-C-132-33.

⁵ CSXT Recon. Reply at 8 [underline in original].

This productivity measure necessarily includes the work performed by “Y” trains that serve customer locations beyond the yard limits in addition to performing work within the yards because it is based upon total cars classified and total yard jobs. Therefore, TPI’s yard jobs evidence more accurately accounts for the “Y” trains needed to serve the TPIRR’s smaller traffic base.

CSXT’s evidence also overstates the necessary number of “Y” trains because many of those trains are completely unnecessary according to CSXT’s MultiRail analysis which instructs “Y” trains to operate every day of the week specified in its train profile every week of the year regardless of whether there is any traffic for the TPIRR to serve. TPI Reb. at III-C-72 (n. 128).

In summary, TPI’s rebuttal yard jobs evidence has accounted for “Y” trains that operate both within and outside yard limits and thus there is no need to rely upon supplemental evidence to develop “Y” train operating costs based upon data that is unsuited for that purpose. The only issue the Board must decide as it relates to “Y” train evidence is which parties’ yard jobs matrix is superior. TPI reasonably has calculated the costs associated with “Y” trains by assigning sufficient yard crews and locomotives to the TPIRR to maintain the same level of productivity as the real-world CSXT for providing the same services to a subset of CSXT’s real-world traffic during the same time period. Therefore, it follows that TPI has included all the costs associated with “Y” train service to customer locations.

2. No Additional Local Trains Are Needed.

As demonstrated in Part III-C.5-b.i., TPI’s Rebuttal evidence conservatively includes more local trains than CSXT’s own traffic data indicates truly are “historic” trains that handled the TPIRR’s traffic. TPI Reb. at III-C-74-82. Therefore, the Board should rely upon TPI’s Rebuttal evidence rather than the supplemental evidence for Scenario #2 or Scenario #3.

In Rebuttal, TPI included 11,373 of the 15,834 local trains CSXT claimed were required, even though the need for such trains is doubtful based on the evidence. Specifically, TPI included: (1) all 5,940 local trains that serve customers at both On- and Off-SARR facilities,⁶ (2) 2,069 of the 5,302 local trains that do not appear in the car event data,⁷ (3) all 2,558 local trains that move only empty (non-revenue) carloads,⁸ (4) all 332 local trains that were manually excluded (these trains actually are part of group 1),⁹ and (5) 474 of the 1,702 local trains that were excluded for various reasons after manual review of the operations recorded in the car event data.¹⁰

The only local trains still in dispute are 4,461 trains from groups 2 and 5 above that CSXT claims are required to serve the TPIRR traffic group even though CSXT has not provided a shred of evidence from its historic traffic data that these trains handled any of the TPIRR's traffic. *Id.* at III-C-74-76 and 78-82. Of the 4,461 local trains still in dispute, 3,233 of them (72 percent) are trains that do not appear in the car event database at all. The remaining 1,228 local trains in dispute are a subgroup of the 1,702 trains that CSXT contends it could not discern why TPI omitted them even though CSXT could not offer any reason why TPI should have included them. CSXT Reply at III-C-35. As documented in Rebuttal, TPI properly excluded these trains based upon a detailed review of their operations in the CSXT traffic data to determine that they were not necessary. TPI Reb. at III-C-78-82. Absent any data from CSXT to demonstrate that these remaining disputed local trains handled TPIRR traffic, there is no basis for the Board to

⁶ TPI Reb. at III-C-43-44.

⁷ *Id.* at III-C-74-77.

⁸ *Id.* at III-C-77.

⁹ *Id.* at III-C-77-78.

¹⁰ *Id.* at III-C-78-82.

conclude that these are “historic” trains “that deliver and pick up SARR traffic at shipper locations” in the base year. *See* Supp. Ev. Order, slip op. at 7, 8 (directing TPI to include “historic” trains that pick-up or deliver SARR traffic to shipper locations). CSXT’s Reply evidence on this subject boils down to “trust me.”

3. The Board Should Retain The High-Priority UPS and Threads Express Traffic.

As TPI demonstrates in Part III-C-6.a., the Board should accept TPI’s inclusion of high-priority UPS and Threads Express traffic in the TPIRR’s traffic group for four reasons. First, both TPI’s Rebuttal evidence and Scenario #2 supplemental evidence show that the trains that handle the UPS and Threads Express traffic provide equivalent service to CSXT. TPI Reb. at III-A-6 (n. 10). Second, CSXT has not presented any evidence to support its claim that the TPIRR fails to provide service for the UPS and Threads Express traffic that is equivalent to CSXT’s existing service. *See* CSXT Reply at III-A-9-10. Third, even if the Board were to accept CSXT’s addition of 1.5 hours to the TPIRR’s transit times, CSXT merely assumes that this would cause the TPIRR to lose the UPS and Threads Express traffic without ever attempting to compare the TPIRR’s service with CSXT’s existing service. CSXT Reply at III-A-10. Indeed, CSXT never presents any evidence of a transit time service standard for this traffic, much less a standard that the TPIRR is incapable of satisfying. TPI Reb. at III-A-5. Fourth, exclusion of the UPS and Threads Express traffic would deprive the TPIRR of this revenue without any corresponding reduction in operating costs, because many trains that handle this traffic are not dedicated to just that traffic, which requires the TPIRR to still operate them at essentially the same cost but for substantially less revenue, thereby depriving the TPIRR of the same economies of scope as the real-world CSXT. TPI Reb. at III-A-6.

D. The Board Should Reject the *Otter Tail* Cross-Subsidy Test

In the *Supplemental Evidence Order*, the Board granted TPI's Petition to Supplement the Record by challenging the so-called *Otter Tail* cross-subsidy test. TPI presents argument on that issue in Part III-H-4. The Board should reject the *Otter Tail* test for two independent reasons.

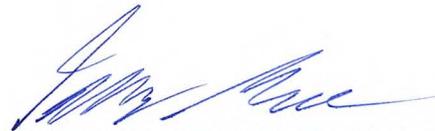
First, the test arbitrarily measures a cross-subsidy based on hypothetical rates that are not charged in the real world. This causes the Board to conclude that a rate reduction required by the SAC analysis creates a cross-subsidy, when in reality no revenue shortfall will occur at all.

Second, the test deviates without explanation from the Board's *Wisconsin P&L* decision, by creating an asymmetric risk that constitutes an impermissible barrier to entry under constrained market pricing principles. It is long established that SAC principles require the exclusion of costs and risks not faced by the real world railroad.¹¹ The Board opined in *Otter Tail* that the goal of the SAC analysis is to simulate the competitive market where no rates above the SAC level for any shipper in the selected traffic group would be sustainable without attracting new entry. Thus, the Board assumed that non-issue rates included in the cross-subsidy analysis would fall over time as new competitive railroads entered the market or through the repeated application of the SAC test to all shippers in the traffic group. But this assumption imposes a risk upon the SARR not incurred by real world railroads. CSXT, for example, will not face the repeated application of the SAC test to all of its traffic because not all the traffic can prove market dominance or will challenge its rates. The STB correctly concluded in *Wisconsin P&L* that a SARR should not face these risks because real world incumbent railroads do not face such risks, and to do so places a burden on the complaining shipper not faced by the incumbent railroad.

¹¹ See, *Coal Rate Guidelines* at 529; *West Texas Utilities* 668-73; *APS I* 385-87.

The *Otter Tail* test thus would allow CSXT to *over-recover* its total stand-alone costs by applying the second cross-subsidy test in the present, to ensure against the speculative and remote *possibility* that other captive shippers in the SARR traffic group *might* create a cross-subsidy by successfully challenging their rates in the future.¹² If those events do not occur, CSXT is assured of over-recovering its stand-alone costs, contrary to *Guidelines*. Therefore, it is neither necessary nor appropriate to deny TPI relief based on the Board's speculative and inaccurate reasoning in *Otter Tail*.

Respectfully submitted,



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October 7, 2015

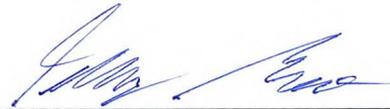
¹² The probability of that occurring in this case is even lower because, by the time the Board issues a decision in late 2016, TPI already will be 6 years into any rate prescription without a single other SAC rate prescription for any of the TPIRR's traffic.

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of October 2015, I served a copy of the "Compliance Evidence and Supplemental Opening Evidence of Total Petrochemicals & Refining USA, Inc." upon counsel for defendant CSX Transportation, Inc. via hand delivery at the address below:

G. Paul Moates
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Washington, DC 20005

Counsel for CSX Transportation, Inc.



Jeffrey O. Moreno

PART III-A

III. STAND-ALONE COST

A. STAND-ALONE TRAFFIC AND REVENUES

As discussed in detail in TPI's Opening evidence filed February 18, 2014 and Rebuttal evidence filed November 5, 2014, the TPIRR traffic group includes a broad range of commodities moving in manifest (mixed general freight), intermodal, unit and local trains. The selected traffic includes local, interline, and cross-over movements. The trains included in TPI's Rebuttal evidence provide the complete service required to serve the entire TPIRR traffic base and no additional trains are needed.

In response to the STB's Supplemental/Compliance orders, we developed TPIRR traffic, revenues, investment, operating expenses plus DCF and MMM models for the following three (3) scenarios:

1. Scenario #1 (Rebuttal¹) – Rebuttal evidence adjusted to correct clearing and grubbing and bridge abutment quantity input errors plus include intermodal facilities investment;
2. Scenario #2 (Supplemental¹) – Scenario #1 plus the addition of historic “Y” trains, other local trains and growth trains; and
3. Scenario #3 (Supplemental_v2¹) – Scenario #2 excluding high-priority UPS and Threads Express traffic.

Each of the following sections of TPI's Opening Supplemental/Compliance evidence both summarizes the information developed to quantify the above three (3) scenarios and also addresses the STB's requests for additional documentation of TPI's Opening and Rebuttal evidence.

This section of TPI's Supplemental/Compliance evidence addresses the following issues requested by the STB related to stand-alone traffic and revenues:

¹ In the electronic workpapers accompanying TPI's Opening Supplemental/Compliance evidence, Scenario #1 is referred to as “Rebuttal”, Scenario #2 is referred to as “Supplemental” and Scenario #3 is referred to as Supplemental_v2”.

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files;
2. Provide Documentation Explaining All Changes Made in Supplemental/Compliance Evidence;
3. List the Trains (Including Local Trains) on Which the Issue Traffic Moves;
4. Identify High Priority UPS and Threads Express Traffic;
5. Provide Timestamps for UPS and Threads Express Traffic by Milepost; and
6. Add Unique Identifier that Matches Records from the Revenue Workpapers to MMM Model.

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files

To address the STB's *Compliance Order* request that the parties "provide references to underlying documents for all hard-coded numbers that appear in workpapers" and "link dependent spreadsheet files",² TPI developed Supplemental/Compliance Exhibits III-A-1 and III-A-2. Supplemental/Compliance Exhibits III-A-1 and III-A-2 apply to all sections of this Opening Supplemental/Compliance filing, i.e., Section III-A through Section III-H, and include the following information:

- a. Supplemental/Compliance Exhibit III-A-1 provides a list and description of all workpapers filed in the Supplemental/Compliance evidence;
- b. Column (2) of Supplemental/Compliance Exhibit III-A-1 identifies which files have hard-coded numbers and/or linked files that need to be sourced;
- c. Supplemental/Compliance Exhibit III-A-2 identifies all changes that TPI made in the Supplemental/Compliance evidence and identified in Column (2) of Exhibit III-A-1 to address hard-coded numbers and linked files in all workpapers; and
- d. Any Opening or Reply workpaper added to Supplemental/Compliance Exhibit III-A-1 to address hard-coded numbers and linked files are highlighted in light blue in Column (1).

² See, STB Compliance Decision in Docket NOR 42121, *Total Petrochemicals & Refining USA, Inc. v. CSX Transportation, Inc.*, decided July 21, 2015, ("*Compliance Order*") at 1.

2. Provide Documentation Explaining All Changes Made in Supplemental/Compliance Evidence

To address the STB's *Supplemental Evidence Order* request that the parties "provide documentation explaining all changes it made in supplemental evidence",³ TPI developed Supplemental/ Compliance Exhibits III-A-1 and III-A-2. Supplemental/Compliance Exhibits III-A-1 and III-A-2 apply to all sections of this Opening Supplemental/Compliance filing, i.e., Section III-A through Section III-H and include the following information:

- a. TPI identified any workpaper that it changed to address the Board's Supplemental/Compliance decisions regarding Scenario #1 (Rebuttal) by adding footnote 1/ in Column (2) of Exhibit III-A-1. TPI added changes to the description in Column (3) and documented individual changes throughout the spreadsheets with purple highlight.
- b. TPI identified in Exhibit III-A-1 any workpaper that it added to address the Board's Supplemental/Compliance decisions and identified such workpapers by adding "_ Supplemental" to the end of the file name for files utilized in Scenario #2 (Supplemental), described above, and "_ Supplemental_v2" to the end of the file name for files utilized in Scenario #3 (Supplemental_v2), described above. TPI highlighted all files added to Exhibit III-A-1 to address Scenario #2 and Scenario #3 in purple in Column (1) and added descriptions to Column (3).
- c. TPI described any changes made to its Rebuttal workpapers to address the Board's Supplemental/Compliance decisions within individual spreadsheets and highlighted those changes in purple throughout.

3. List the Trains (Including Local Trains) on Which the Issue Traffic Moves

The STB's Compliance Order directed the parties to "[i]dentify how all issue traffic moves over the stand-alone railroad"...and..."[l]ist the trains (including local trains) on which the issue traffic moves."⁴ In Opening, TPI filed a workpaper⁵ ("*Issue Traffic Train List*") which

³ See, STB Supplemental Decision in Docket NOR 42121, *Total Petrochemicals & Refining USA, Inc. v. CSX Transportation, Inc.*, decided July 21, 2015, ("*Supplemental Evidence Order*") at 8.

⁴ See, *Compliance Order* at 2.

identified all trains involved in the shipment of issue traffic that traveled between July 1, 2010 and July 11, 2013. In order to connect the *Issue Traffic Train List* to the TPIRR base year train lists, TPI updated all train lists in its Supplemental/Compliance evidence to respond to the Board's directive and demonstrate the connection of the *Issue Traffic Train List*⁶ to the TPIRR base year train lists.

The following five (5) subsections describe the issue traffic identification process and the identification of issue traffic on each of the TPIRR base year train lists.

- a. Process Used to Identify Issue Traffic Trains in Opening
- b. Identification of Manifest Trains Carrying Issue Traffic
- c. Identification of Local Trains Carrying Issue Traffic
- d. Identification of Other Trains Carrying Issue Traffic
- e. Identification of Yard Trains Carrying Issue Traffic

a. Process Used to Identify Issue Traffic Trains in Opening

In Opening, TPI identified a unique list of issue traffic trains by first identifying the issue traffic lanes in the CSXT car waybill data for traffic with a waybill date between July 1, 2010 and June 28, 2013 ("36 month time period").⁷ TPI then linked the issue traffic lane identification from the car waybill data to the ShipmentKeys⁸ and CarEvent data.⁹ This process placed each

⁵ See, TPI Opening\III-C\III-C-1\Base Year Trains workpaper "Summary of TPI Traffic on CSXT Over 36Months_All_Data_Local Train Identification.xlsx". Note while the name indicates this is only for local trains, the list contains all train types.

⁶ The revised version of the *Issue Traffic Trains List* can be found in TPI Supplemental\III-C\III-C-1\Base Year Trains workpaper "Summary of TPI Traffic on CSXT Over 36Months_All_Data_Local Train Identification_Supplemental.xlsx".

⁷ See, TPI Opening\III-A\III-A-1\Issue Traffic workpaper "SUMMARY OF TPI TRAFFIC ON CSXT OVER_36MONTHS_OpeningV5.xlsx" at tab "CAR_WAYBILL_DATA" where issue traffic waybills are identified by lane in excel column CE "TPI Complaint Lane".

⁸ See TPI Opening\III-A\III-A-1\Issue Traffic workpaper "SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Tons and Miles Calculations.xlsx" tab "CAR_SHPIPMENT_DATA_KEYS", where issue traffic shipments are identified in excel column P "Lane".

issue traffic carload on a specific train. TPI then created a unique list by TrainID and TrainSuffix of all the trains that carried issue traffic shipments in the 36 month time period.¹⁰

**b. Identification of Manifest
Trains Carrying Issue Traffic**

In order to identify the trains on which issue traffic moved in the TPIRR base year manifest train list, TPI added a “lookup” to the TPIRR base year manifest train list that connects the *Issue Traffic Train List* to the TPIRR base year manifest train list. This “lookup” is used as an “Issue Traffic” flag in the TPIRR base year manifest train list in order to identify issue traffic manifest trains.¹¹

To verify that it identified all manifest trains that included issue traffic, TPI added a second “lookup” that connects the TPIRR base year manifest train list back to the *Issue Traffic Train List*. First, TPI filtered the *Issue Traffic Train List* for manifest trains and placed them in a separate list, which TPI then separated between trains within the base year and trains outside of the base year.¹² Next, TPI created the second “lookup” as an “In Base Year Train List” flag to confirm that all of the TPIRR base year manifest trains were also identified in the *Issue Traffic Train List*.¹³ This process resulted in two (2) links from the *Issue Traffic Train List* to the

⁹ See TPI Opening\III-A\III-A-1\Issue Traffic workpaper “SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Tons and Miles Calculations.xlsx” tab “CAR_EVENT_DATA_Issue Traffic”, where issue traffic car events are identified in excel column AP “Lane”. The corresponding train for the issue lane on which each car traveled can be identified in excel column E and F, “TrainID” and “TrainSuffix”.

¹⁰ See, TPI Opening\III-C\III-C-1\Base Year Trains workpaper “SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Local Train Identification.xlsx” tab “Unique_Train_ID”.

¹¹ See, Supplemental/Compliance workpaper “Manifest Train Peak Period Analysis_Opening_v3_Rebuttal_Supplemental.xlsx”, tab “Combined” excel Column A, “Issue Traffic”.

¹² See Supplemental/Compliance workpaper “SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Local Train Identification_Supplemental.xlsx” tab “Manifest Unique_Train_ID”. Base year manifest trains are identified in excel row 6 through row 2,507 and manifest trains identified prior to the base year can be found in excel row 2,509 through row 7,241. Two (2) of the 2,502 (or 0.1%) manifest trains identified in the base year from the car event data did not link to the TPIRR base year manifest train list due to CSXT car event data errors. See, Supplemental/Compliance workpaper “Issue Traffic CarEvent Data Errors.docx” for an explanation of the errors.

¹³ See, Supplemental/Compliance workpaper “SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Local Train Identification_Supplemental.xlsx”, tab “Manifest Unique_Train_ID” excel Column H “In Base Year Train List”.

TPIRR base year manifest train list and vice versa, which identified all of the manifest trains that carried issue traffic on the TPIRR.

**c. Identification of Local Trains
Carrying Issue Traffic**

TPI followed a similar process to the one described above for manifest trains in order to identify local trains that carried issue traffic. For local trains, TPI added a “lookup” to the TPIRR base year local train list that connects the *Issue Traffic Train List* to the TPIRR base year local train list. This “lookup” is used as an “Issue Traffic” flag in the TPIRR base year local train list and train list development files in order to identify issue traffic local trains.¹⁴

To verify that it has identified all local trains that included issue traffic, TPI added a second “lookup” that connects the TPIRR base year local train list back to the *Issue Traffic Train List*. First, TPI filtered the *Issue Traffic Train List* for local trains and placed them in a separate list, which TPI then separated between trains within the base year and trains outside of the base year.¹⁵ Next, TPI created the second “lookup” as an “In Base Year Train List” flag to identify all of the TPIRR base year local trains that appeared in the *Issue Traffic Train List*.¹⁶ In addition, TPI identified issue traffic in the local train list development file.¹⁷ This process resulted in two (2) links from the *Issue Traffic Train List* to the TPIRR base year local train list and vice versa,

¹⁴ See, Supplemental/Compliance workpaper “Train List Local V05 12162013_v4_Rebuttal_v2_supplemental”, tab “Train List ALL” excel Column D “Issue Traffic”.

¹⁵ See, Supplemental/Compliance workpaper “SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Local Train Identification_Supplemental.xlsx” tab “Local Unique_Train_ID”. Base year local trains are identified in excel row 2,935 through row 4,151 and local trains identified prior to the base year are in excel row 4 through excel row 2,933. There are three (3) local trains included in the base year group from excel row 2,935 through row 4,151 that actually traveled after the base year (after June 30, 2013) that are not included in the base year train list as it only contains trains that traveled between July 1, 2010 and June 30, 2013. These trains are flagged in Column J “Notes”.

¹⁶ See, Supplemental/Compliance workpaper “SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Local Train Identification_Supplemental.xlsx”, tab “Local Unique_Train_ID” excel Column I, “In Base Year Train List”.

¹⁷ See, Supplemental/Compliance workpaper “dbo_aSarrAllConsistLocal_ALLON_IDSuffix_ISSUEv3_Supplemental.xlsx”, tab “ALLON” excel column P, excel column AB, and excel column AH. Per the *Compliance Order*, TPI has identified all hard-coded numbers and clarified all formulas used.

which identified all of the local trains that carried issue traffic on the TPIRR. Overall, all but one issue traffic shipment, or 99.97%¹⁸ of all base year issue traffic, was carried on manifest and local trains (excluding “Y” trains).

**d. Identification of Other Trains
Carrying Issue Traffic**

The remaining one shipment, or 0.03% of issue traffic that was not carried on the manifest and local trains (excluding “Y” trains) in the base year identified above, could potentially be accounted for in two (2) remaining train type categories identified in the issue traffic car event data: (1) foreign trains and (2) unit trains. There were zero (0) foreign trains that fell within the base year that carried issue traffic.¹⁹ There was one unit train that fell within the base year that carried issue traffic.²⁰

The 2,500 manifest trains, 1,214 local trains and one unit train discussed above, account for all the trains (excluding “Y” trains) that carried issue traffic in the base year and were accounted for in TPI’s Opening evidence. The process described above and in the Supplemental/Compliance workpapers referenced and included in TPI’s Supplemental/Compliance evidence were only provided in order to clearly respond to the Board’s request to “[i]dentify how all issue traffic moves over the stand-alone railroad”...and...”[l]ist the trains (including local trains) on which the issue traffic moves.”²¹ All

¹⁸ 2,500 manifest + 1,214 local + 1 unit = 3,715 total. $3,714 \div 3,715 = 99.97\%$

¹⁹ See, Supplemental/Compliance workpaper “SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Local Train Identification_Supplemental.xlsx”, tab “Foreign Unique_Train_ID”. In 12 instances prior to the base year TPI issue traffic traveled on trains “Foreign” TrainID per CSXT CarEvent data.

²⁰ See, Supplemental/Compliance workpaper “SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Local Train Identification_Supplemental.xlsx”, tab “Unit Unique_Train_ID” excel Column H, “In Base Year Train List”. One of the two (2) unit trains identified in the base year from the car event data did not link to the TPIRR base year unit train list due to CSXT car event data errors.

²¹ See, *Compliance Order* at 2.

of TPI's issue traffic was accounted for in its base year train lists provided in Opening evidence, including issue traffic moving on "Y" trains, which is described below.

**e. Identification of Yard Trains
Carrying Issue Traffic**

In TPI's Opening and Rebuttal evidence, TPI identified all of the yard trains needed to serve not only the issue traffic, but all TPIRR traffic in its yard jobs evidence. TPI has explained this at length in Rebuttal,²² TPI's Petition for Reconsideration,²³ and throughout this Supplemental/Compliance evidence in Section I and Section III-C-5.a.iii. CSXT also has acknowledged that it calculated its Reply operating expenses for yards jobs, issue traffic, and all TPIRR traffic the same way as TPI did in its Opening evidence and did not make separate calculations for individual yard trains:

[P]arties to SAC cases do not develop locomotive unit miles for yard assignments on a train-specific basis. Such a level of granularity is simply not practicable because railroads do not maintain data regarding the specific number of miles traversed by yard trains (particularly those that operate entirely within the yard). Rather, locomotive unit miles for "Y" trains are customarily based upon an assumed "average" number of miles per shift." ... "CSXT (like TPI) calculated locomotive unit miles for "Y" trains on an "average" basis²⁴

Since both parties in this proceeding accounted for issue traffic traveling on yard trains in their yard jobs evidence on an average basis, it is not necessary, nor is it possible, to identify the yard trains on which issue traffic moved from the Opening, Reply and Rebuttal evidence previously submitted because neither party did so.

In its *Supplemental Evidence Order*, the Board instructed TPI to "add the historic "Y" trains"²⁵ in addition to listing "the trains (including local trains) on which the issue traffic

²² See, TPI Rebuttal at III-C-130-138.

²³ See, TPI Petition for Reconsideration and Clarification, filed on July 31, 2015, at pages 3-9.

²⁴ See, CSXT Reply to Complainant's Motion for Leave to File Reply to Reply, filed on August 21, 2015, at 4.

²⁵ See, *Supplemental Evidence Order* at 8.

moves.”²⁶ In order to comply with both directives, TPI has ensured that the TPIRR base year industrial yard train list accounts for all industrial “Y” trains added by this Supplemental/Compliance evidence by following the same process as previously described above for manifest and local trains to identify the trains on which issue traffic traveled. To identify issue traffic industrial yard trains, TPI added a “lookup” to the TPIRR base year industrial yard train list (added in Supplemental evidence) that connects the *Issue Traffic Train List* to the TPIRR base year industrial yard train list. TPI has used this “lookup” as an “Issue Traffic” flag in the TPIRR base year industrial train list to easily identify issue traffic industrial yard trains.²⁷

To verify that all industrial yard trains on which the issue traffic travels have been identified, TPI added a second “lookup” that connects the TPIRR base year industrial yard train list back to the *Issue Traffic Train List*. First, TPI filtered the *Issue Traffic Train List* for yard trains and placed them in a separate list, which TPI then separated between trains within the base year and trains outside of the base year.²⁸ Next, TPI accounted for yard trains that included miles in the CarEvent data, i.e. industrial yard trains, and added the home station associated with each industrial yard train.²⁹ TPI accounted for the miles associated with each yard train in order to distinguish the industrial yard trains covered by the *Supplemental Evidence Order* from all other yard trains previously accounted for in both parties’ evidence. It was necessary for TPI to identify the home station associated with each industrial yard train because many “Y” trains in

²⁶ See, *Compliance Order* at 2.

²⁷ See Supplemental/Compliance workpaper “Y trn 1 on with miles.xlsx”, tab “Train Compilation” excel Column B, “Issue Traffic”.

²⁸ See, Supplemental/Compliance workpaper “SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Local Train Identification_Supplemental.xlsx” tab “Yard Unique_Train_ID”. Base year yard trains are in excel row 6 through row 922, the base year yard trains identified prior to the base year are in excel row 923 through excel row 2,669.

²⁹ See, Supplemental workpaper “SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Local Train Identification_Supplemental.xlsx”, tab “Yard Unique_Supplemental” excel Column I “Issue Miles” and excel Columns K and L, “Home Station”.

CSXT's CarEvent data have the same TrainID and TrainSuffix and operate on the same day from different home stations. Therefore, the only way to distinguish between these types of yards trains is to assign a home station to them. Once TPI identified the yard trains with miles and associated home station, it could link the industrial yard trains that carried issue traffic to the TPIRR base year industrial yard train list.

To implement this link to the TPIRR base year industrial yard train list, TPI created a second "lookup" as an "In Base Year Train List" flag to confirm that all of the TPIRR base year industrial yard trains were also identified in the *Issue Traffic Train List*.³⁰ This process generated two (2) links from the Issue Traffic Train List to the TPIRR base year industrial yard train list and vice versa, which identified all of the industrial yard trains that carried issue traffic on the TPIRR.

The process described above enabled TPI to identify all industrial yard trains that carry issue traffic and thus to comply with the Board's *Compliance Order* to "[i]dentify how all issue traffic moves over the stand-alone railroad"...and... "[l]ist the trains (including local trains) on which the issue traffic moves."³¹

4. Identify High Priority UPS and Threads Express Traffic

In the Supplemental/Compliance decisions, the STB requested that the parties submit supplemental evidence that identifies "high priority UPS and Threads Express traffic referenced in CSXT's reply at III-A-9 to III-A-10."³² CSXT identified this "high priority" intermodal traffic in its Reply narrative as having three (3) distinct characteristics:

³⁰ See, Supplemental workpaper "SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Local Train Identification_Supplemental.xlsx", tab "Yard Unique_Supplemental" excel Column J "In Base Year Train List".

³¹ See, *Compliance Order* at 2.

³² See, *Compliance Order* at 2.

1. Intermodal traffic that moves on a premium train;
2. Intermodal traffic that CSXT claims is moved by the TPIRR on a “leapfrog” train; and
3. Intermodal traffic that is moved for two (2) specific intermodal customers (UPS traffic on the route to/from New York and Threads Express traffic on the route to/from Charlotte).³³

The STB specifically requested that each party identify this particular traffic in the traffic and revenue and train list areas of their Supplemental/Compliance evidence (Scenario #3 described above).

This section of TPI’s Opening Supplemental/Compliance evidence discusses how TPI identified this traffic under the following topical headings:

- a. Traffic and Revenue; and
- b. Train Lists.

a. Traffic and Revenue

TPI employed a series of steps to identify the volume and revenues associated with the high-priority intermodal traffic that CSXT referenced in its Reply evidence. First, TPI identified each of the twenty-six (26) unique computer files that make up the TPIRR traffic and revenue model.³⁴ TPI then identified how it linked each of the individual computer files and how those files feed into the file that summarizes the results of the TPIRR traffic and revenue calculations. Once TPI completed this process, it identified the five (5) unique Rebuttal files that must be revised to identify and remove the high-priority intermodal traffic.³⁵

TPI made the following changes to each of the five (5) files identified by orange shading on the second page of Supplemental/Compliance Exhibit III-A-3 to identify the high-priority

³³ See, CSXT Reply at III-A-9.

³⁴ See, Supplemental/Compliance Exhibit III-A-3, p. 1. The schematic shows thirty-eight (38) computer files but certain files link to multiple files, e.g., the file named “HDF & WTI Forecast Reply_REB.xlsx” is a single file that links to multiple files in the model and is listed multiple times in the schematic.

³⁵ See, Supplemental/Compliance Exhibit III-A-3, p. 2. The affected files are highlighted in orange.

intermodal traffic and revenue. TPI revised the formulae in these five (5) files so it could pull the appropriate values into the spreadsheet and utilize the correct links to other files. Also, TPI changed column headings to accurately describe the data contained in each column.

In each of the affected files, TPI also added a worksheet named “Changes” that specifically identifies the worksheet, column and row for each change summarized above. The “Changes” worksheets also include a more detailed description of each individual change.

Supplemental/Compliance Table III-A-1 below, summarizes the differences between TPI’s Rebuttal intermodal volume and revenues (Scenario #1 and Scenario #2)³⁶ and TPI’s calculations of TPIRR intermodal volume and revenues excluding the high-priority UPS and Threads Express traffic from the TPIRR traffic group (Scenario #3).

³⁶ Scenario #2 TPIRR intermodal volumes and revenues are the same as those used in Rebuttal (Scenario #1).

Supplemental/Compliance Table III-A-1
Summary of Differences in Intermodal Volume and Revenue
Between TPI Rebuttal and Scenario #3
(\$ in millions)

Period (1)	TPI Rebuttal 1/ Volume Revenue		Scenario #3 2/ Volume Revenue		Difference Volume 3/ Revenue 4/	
	(2)	(3)	(4)	(5)	(6)	(7)
1. 2010	1,134,253	\$406.3	1,117,684	\$401.2	(16,569)	(\$5.2)
2. 2011	2,276,744	\$909.4	2,241,774	\$898.0	(34,970)	(\$11.3)
3. 2012	2,460,169	\$1,035.6	2,425,562	\$1,025.3	(34,607)	(\$10.3)
4. 2013	2,528,224	\$1,102.4	2,490,658	\$1,091.6	(37,566)	(\$10.9)
5. 2014	2,666,987	\$1,211.1	2,627,360	\$1,199.3	(39,627)	(\$11.8)
6. 2015	2,857,814	\$1,324.4	2,815,352	\$1,311.1	(42,463)	(\$13.3)
7. 2016	3,099,032	\$1,496.4	3,052,985	\$1,480.3	(46,047)	(\$16.1)
8. 2017	3,248,398	\$1,637.9	3,200,131	\$1,620.5	(48,266)	(\$17.5)
9. 2018	3,458,459	\$1,807.3	3,407,071	\$1,788.1	(51,388)	(\$19.2)
10. 2019	3,682,104	\$2,003.2	3,627,393	\$1,981.9	(54,711)	(\$21.3)
11. 2020	<u>1,960,105</u>	<u>\$1,109.5</u>	<u>1,930,981</u>	<u>\$1,097.7</u>	<u>(29,124)</u>	<u>(\$11.8)</u>
12. Total	29,372,289	\$14,043.5	28,936,951	\$13,894.9	(435,338)	(\$148.6)

1/ TPI Rebuttal workpaper "Revenue Summary (Final) REPLY_REB2.xlsx".

2/ These amounts reflect Units and Revenues based on excluding certain high-priority UPS and Threads Express traffic from the TPIRR traffic group. TPI Supplemental/Compliance workpaper "Revenue Summary (Final) REPLY_REB2_Supplemental_v2.xlsx".

3/ Column (4) - Column (2).

4/ Column (5) - Column (3).

As shown in Supplemental/Compliance Table III-A-1 above, the high-priority intermodal traffic accounts for 435,338 units and \$148.6 million in TPIRR revenue over the 10-year DCF period. On average, this traffic represents 43,534 intermodal units and \$14.9 million in TPIRR revenue per year.

b. Train Lists

In its *Compliance Order*, the Board requested that the parties “[i]dentify ‘high priority’ UPS and Threads Express traffic referenced in CSXT’s reply at III-A-9 to III-A-10” in its train lists. The Board further requested that the parties “[p]rovide timestamps for UPS and Threads Express traffic by milepost.”³⁷

³⁷ See, *Compliance Order* at 2, under heading “Traffic Group” items 2.b. and 3.

TPI identified TPIRR trains carrying high-priority traffic as part of the analysis discussed in the preceding section. Specifically, TPI identified TPIRR trains moving under any of the (10) train symbols that CSXT identified as “premium trains” for the July 2012 through June 2013 base year. Next, TPI evaluated these trains to determine whether their routes included any so-called “leapfrog” segments. Finally, TPI evaluated the trains to determine whether they carried UPS or Threads Express traffic. Supplemental/Compliance Table III-A-2 below, summarizes the trains TPI identified by CSXT Train symbol.

Supplemental/Compliance Table III-A-2 Summary of TPIRR Trains Carrying High Priority UPS and Threads Express Traffic <u>Over So-Called Leapfrog Segments in the Base Year</u>		
CSXT Train Symbol	Number of Trains	
(1)	(2)	
1. Q031	148	
2. Q032	146	
3. Q033	50	
4. Q034	143	
5. Q035	7	
6. Q036	46	
7. Q037	152	
8. Q038	51	
9. Q039	8	
10. Q040	<u>51</u>	
11. Total	802	

Source: Supplemental/Compliance e-workpaper “TPIRR 2013 High Priority Intermodal Trains List V03 20151001.xlsx”, level “Table III-A-2”.

Supplemental/Compliance Exhibit III-A-4 is a list of all TPIRR trains identified as moving high priority UPS or Threads Express traffic over so-called “leapfrog” segments in the base year.

5. Provide Timestamps for UPS and Threads Express Traffic by Milepost

TPI Supplemental/Compliance workpaper “High Priority Leapfrog Intermodal TrainsAll Events V01 20151002.xlsx” includes timestamps for all trains included in Supplemental/Compliance Exhibit III-A-4 per the Board’s order. Specifically, this workpaper shows timestamps for each of the stations reported in CSXT’s train event data for each of the 802 individual trains moving high priority traffic over so-called leapfrog segments in the base year.³⁸

6. Add Unique Identifier that Matches Records from the Revenue Workpapers to MMM Model

The Board’s *Compliance Order* directed the parties to add unique identifiers that match records from the revenue worksheets to the MMM model. Pursuant to this request, TPI added a unique identifier to each of its traffic and revenue workpapers that links records to its three (3) MMM models included in its Opening Supplemental/Compliance evidence.³⁹ These identifiers consist of unique alpha-numeric characters that reference the time period and the type of traffic

³⁸ See, Supplemental Compliance e-workpaper “High Priority Leapfrog Intermodal TrainsAllEvents V01 20151002.xlsx”, at level “TrainsAllEvents”. In addition, level “Summary” of the same workpaper shows the average timestamp for stations that were reported for all of the trains of a given symbol in the base year.

³⁹ See, Rebuttal III-A e-workpapers “2010 Reply_REB2.xlsx” worksheet “2010 Reply” cells BK3 to BK55346; “2010 Containers Reply_REB2.xlsx” worksheet “2010 Reply” cells BK3 to BK55346; “2010 Containers Reply_REB2.xlsx” worksheet “2010 Containers” cells AO4 to AO19154; “2010 No Shipment Key_REB2.xlsx” worksheet “TPIRR Calculations” cells AC4 to AC4008; “2011 Reply_REB2.xlsx” worksheet “2011 Reply” cells BF3 to BF86634; “2011 Containers Reply_REB2.xlsx” worksheet “2011 Container” cells AN4 to AN28910; “2011 No Shipment Key_REB2.xlsx” worksheet “TPIRR Calculations” cells AC4 to AC7127; “2012 STCC 1 to 26 REPLY_REB2.xlsx” worksheet “STCC 1 to 26” cells AT5 to AT31586; “2012 STCC 28, 29, 37, 99 REPLY_REB2.xlsx” worksheet “STCC 28, 29, 37 and 99” cells AT4 to AT50461; “2012 STCC 28, 29, 37, 99 REPLY_REB2.xlsx” worksheet “TPI Issue Traffic” cells Y526 to Y830; “2012 STCC 30 to 90 (excluding issue) REPLY_REB2.xlsx” worksheet “STCC 30 to 90” cells AT4 to AT15404; “2012 Containers Reply_REB2.xlsx” worksheet “2012 Containers” cells AF4 to AF16905; “2012 No Shipment Key_REB2.xlsx” worksheet “TPIRR Calculations” cells AB4 to AB7824; “TPIRR Coal Revenue Forecast (Final) REPLY_REB2.xlsx” worksheet “Coal Revenue Forecast” cells GY6 to GY1732; “TPIRR General Freight Revenue Forecast STCC 1-26 2h 2012 (Final) REPLY_REB2.xlsx” worksheet “Gen Freight Revenue Forecast” cells EX6 to EX28444; “TPIRR General Freight Revenue Forecast STCC 1-26 1h 2013 (Final) REPLY_REB2.xlsx” worksheet “Gen Freight Revenue Forecast” cells EW6 to EW29084; “TPIRR General Freight Revenue Forecast STCC 28 2h 2012(Final) REPLY_REB2.xlsx” worksheet “Gen Freight Revenue Forecast” cells EM6 to E20783; “TPIRR General Freight Revenue Forecast STCC 28 1h 2013 (Final) REPLY_REB2.xlsx” worksheet “Gen Freight Revenue Forecast” cells EV6 to EV20302; “TPIRR General Freight Revenue Forecast STCC 29-UN 2h 2012(Final) REPLY_REB2.xlsx” worksheet “Gen Freight Revenue Forecast” cells EX6 to EX23838; “TPIRR General Freight Revenue Forecast STCC 29-UN 1h 2013 (Final) REPLY_REB2.xlsx” worksheet “Gen Freight

Revenue Forecast” cells FG6 to F23617; “TPIRR Intermodal Revenue Forecast (Final) REPLY_REB2.xlsx” worksheet “Container Revenue Forecast” cells ET7 to E43499; and “No Shipment Key Forecast_REB2.xlsx” worksheet “Gen Freight Revenue Forecast” cells DK6-DK13256. See also, Supplemental/Compliance e-workpapers “2010 Containers Reply_REB2_Supplemental_v2.xlsx” worksheet “2010 Reply” cells BK3 to BK55346; “2011 Containers Reply_REB2_Supplemental_v2.xlsx” worksheet “2011 Container” cells AN4 to AN28910; “2012 Containers Reply_REB2_Supplemental_v2.xlsx” worksheet “2012 Containers” cells AF4 to AF16905; and “TPIRR Intermodal Revenue Forecast (Final) REPLY_REB2_Supplemental_v2.xlsx” worksheet “Container Revenue Forecast” cells ET7 to E43499.

included in the specific workpaper. In addition, TPI included, in each of its MMM models, a worksheet that identifies the location of the unique identifiers in the traffic and revenue workpapers and the MMM models.⁴⁰

⁴⁰ See, Supplemental/Compliance e-workpapers “TPIRR MMM Rebuttal.xlsx” worksheet “Revenue Crosswalk”; “TPIRR MMM Rebuttal_Supplemental.xlsx” worksheet “Revenue Crosswalk”; and “TPIRR MMM Rebuttal_Supplemental_v2.xlsx” worksheet “Revenue Crosswalk.”

PART III-B

B. STAND-ALONE RAILROAD SYSTEM

The TPIRR is an extensive system that replicates much of the current CSXT system, extending from Chicago, IL south to New Orleans, LA, and east to Orangeburg, NY and Washington, DC; from Baltimore, MD south to Montgomery, AL; from East St. Louis, IL east to Greenwich, OH; from Memphis, TN east to Atlanta, GA; from Deshler, OH south to Nashville, TN and Atlanta, GA: and from Atlanta, GA south to Oneco, FL and Orlando, FL.

In Rebuttal, TPI presented a complete railroad system in order to accommodate the TPIRR selected traffic group.

This section of TPI's Opening Supplemental/Compliance evidence addresses the following issues requested by the STB:

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files; and
2. Provide Documentation Explaining All Changes Made in Supplemental/Compliance Evidence.

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files

TPI developed Supplemental/Compliance Exhibits III-A-1 and III-A-2 to address the STB's *Compliance Order* request that the parties "provide references to underlying documents for all hard-coded numbers that appear in workpapers" and "link dependent spreadsheet files."⁴¹ Supplemental/Compliance Exhibits III-A-1 and III-A-2 apply to all sections of this Opening Supplemental/ Compliance filing. See Section III-A-1 above for a detailed explanation.

⁴¹ See, *Compliance Order* at 1.

2. Provide Documentation Explaining All Changes Made in Supplemental/Compliance Evidence

To address the STB's *Supplemental Evidence Order* request that the parties "provide documentation explaining all changes it made in supplemental evidence,"⁴² TPI developed Supplemental/ Compliance Exhibits III-A-1 and III-A-2. Supplemental/Compliance Exhibits III-A-1 and III-A-2 apply to all sections of this Opening Supplemental/Compliance filing. See Section III-A-2 above for a detailed explanation.

In this Section III-B, the addition of historic "Y" trains, other local trains and growth trains (Scenario #2 described above) did not require any changes to the TPIRR's infrastructure. Also, eliminating the high-priority UPS and Threads Express traffic (Scenario #3 described above) did not require any changes to the TPIRR's infrastructure.

⁴² See, *Supplemental Evidence Order* at 8.

PART III-C

C. STAND-ALONE RAILROAD OPERATING PLAN

In order to implement the changes requested by the STB in the Supplemental/Compliance decisions, TPI modified the operating plan submitted with TPI's Rebuttal evidence. The modifications required TPI to change the amount of traffic handled and re-run the Rail Traffic Controller ("RTC") model for each new version of the stand-alone railroad. Specifically, TPI modified its Rebuttal operating plan twice, i.e., once to add historic "Y" trains, other local trains and growth trains (Scenario #2 described above) and then again after eliminating the high-priority UPS and Threads Express traffic (Scenario #3 described above).

This section of TPI's Opening Supplemental/Compliance evidence begins by addressing the STB's requests for additional documentation related to TPI's Opening and Rebuttal evidence and then provides the information that the STB requested in the Supplemental/Compliance decisions. Specifically, this section addresses the following issues related to the TPIRR operating plans:

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files;
2. Provide Documentation Explaining All Changes Made in Supplemental/Compliance Evidence;
3. Ensure All Locations Referenced in the Narrative by Name or Milepost are Also Referenced by at Least One RTC Node;
4. Provide a List of Rail Stations, Origins and Destinations of All Traffic, Interchanges, Industry Leads, and Yards with at least one RTC Node for each location. Provide Beginning and Ending RTC Nodes for Random Outages in the RTC Model;
5. Amend the Base Year Train List and Operating Plan to Include the Historic "Y" Trains and Other Local Trains that Deliver and Pick-up SARR Traffic at Shipper Locations;
6. Revise Amended Base Year Train List and Operating Plan by Excluding High-Priority UPS and Threads Express Traffic;

7. Provide Two Versions of the Recalculated Growth Trains;
8. Provide a Working RTC Model⁴³ that Supports the Revised Operating Plans; and
9. Recalculate Service Units Based on the Amended Train List and RTC Results.

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files

TPI developed Supplemental/Compliance Exhibits III-A-1 and III-A-2 to address the STB's *Compliance Order* request that the parties "provide references to underlying documents for all hard-coded numbers that appear in workpapers" and "link dependent spreadsheet files."⁴⁴ Supplemental/Compliance Exhibits III-A-1 and III-A-2 apply to all sections of this Opening Supplemental/ Compliance filing. See Section III-A-1 above for a detailed explanation.

2. Provide Documentation Explaining All Changes Made in Supplemental/Compliance Evidence

To address the STB's request that the parties "provide documentation explaining all changes it made in supplemental evidence,"⁴⁵ TPI developed Supplemental/Compliance Exhibits III-A-1 and III-A-2. Supplemental/Compliance Exhibits III-A-1 and III-A-2 apply to all sections of this Opening Supplemental/Compliance filing. See Section III-A-2 above for a detailed explanation.

3. Ensure All Locations Referenced in the Narrative by Name or Milepost are Also Referenced by at Least One RTC Node

Supplemental/Compliance Exhibit III-C-1 identifies the RTC nodes for each location referenced in TPI's Opening and Rebuttal filings. This Exhibit identifies the milepost (with prefix) and the RTC node for each city and state.

⁴³ TPI and CSXT agreed to use RTC Production Release 69W-64 bit to support the revised operating plans.

⁴⁴ See, *Compliance Order* at 1.

⁴⁵ See, *Supplemental Evidence Order* at 8.

4. Provide a List of Rail Stations, Origins and Destinations of All Traffic, Interchanges, Industry Leads, and Yards with at Least One RTC Node for Each location. Provide Beginning and Ending RTC Nodes for Random Outages in the RTC Model

In order to comply with the STB's requests in the Supplemental/Compliance decisions,

TPI developed the following Exhibits:

- a. Supplemental/Compliance Exhibit III-C-2 identifies the RTC nodes for each TPIRR Peak period traffic origin station;
- b. Supplemental/Compliance Exhibit III-C-3 identifies the RTC nodes for each TPIRR Peak period traffic destination station;
- c. Supplemental/Compliance Exhibit III-C-4 identifies the RTC nodes for each TPIRR Peak period traffic interchange location;
- d. Supplemental/Compliance Exhibit III-C-5 identifies the RTC nodes for each TPIRR customer lead track;
- e. Supplemental/Compliance Exhibit III-C-6 identifies the RTC nodes for each TPIRR random outage location; and
- f. Supplemental/Compliance Exhibit III-C-7 identifies the RTC nodes for each TPIRR yard location.

5. Amend the Base Year Train List and Operating Plan to Include the Historic "Y" Trains and Other Local Trains that Deliver and Pick-up SARR Traffic at Shipper Locations

The Board requested that TPI "add the historic 'Y' trains and other local trains that deliver and/or pick up SARR traffic at shipper locations in the base year to its train list."⁴⁶ As addressed in subparts a.i. and b.i. below, the Board's instruction to TPI to add the "historic 'Y' trains and other local trains that deliver and/or pick up SARR traffic at shipper locations in the base year"⁴⁷ is unnecessary because the parties' evidence already accounts for the trains that

⁴⁶ See, *Supplemental Evidence Order* at 8.

⁴⁷ *Id.*

deliver and/or pick up SARR traffic at shipper locations. Furthermore, CSXT acknowledges that the “Y” train data recorded in its traffic, car event, and train event data is spotty and unreliable, and therefore alternate models for developing yard train statistics—like those used by both parties in this case—produce more complete and reliable estimates of the SARR’s required yard train activities and associated operating expenses. Indeed, as addressed in subpart a.iii. below, because the parties already fully account for all yard train activities in their respective yard train matrices, adding tens of thousands of “Y” trains to the train lists—as the Board has instructed TPI to do—double-counts yard train operating statistics and expenses. Although TPI maintains its position that additional local and “Y” trains are not necessary in this proceeding, TPI complied with the Board’s request for supplemental evidence by adding these trains to its train list in subparts a.ii. and b.ii. below.

a. Additional “Y” Trains

In Reply, CSXT alleged that TPI omitted 28,860 “Y” trains required to serve the TPIRR traffic group. In Rebuttal, TPI rejected CSXT’s claim in its entirety. In subpart i. below, TPI contends that its Rebuttal evidence does account for all of the “Y” trains needed to serve the TPIRR’s traffic. In subpart ii., TPI responds to the Board’s *Supplemental Evidence Order* by identifying historic “Y” trains, to the best of its ability, based upon CSXT traffic data that even CSXT concedes is ill-suited to this purpose and adding those trains to its base year train list. However, because those additions to the base year train list will create a double-count of “Y” train operating statistics and expenses, TPI adjusted its Rebuttal yard jobs evidence in subpart iii. to eliminate that double-count.

i. No Additional “Y” Trains are Needed

TPI’s Rebuttal evidence contains all the industrial yard, or “Y,” trains that are needed to serve the TPIRR’s traffic group. In addition, Supplemental evidence is not needed to resolve the

difference between TPI's and CSXT's "Y" train evidence. Indeed, the requested Supplemental "Y" train evidence cannot provide much, if any, greater insight into the historic "Y" train operations that the Board has asked the parties to model in their Supplemental evidence due to both the nature of "Y" train operations and the limits of CSXT's traffic data.

**(a) CSXT's Historic "Y" Train Data is
Insufficient for the Task Assigned by
the Board**

The Board requested Supplemental "Y" train evidence from TPI to ensure that TPI accounted for historic "Y" trains that serve customer locations.⁴⁸ That request, however, requires the parties to fit a square peg into a round hole because CSXT's historic train and car event data is not well-suited for capturing the historic operations of "Y" trains. Even CSXT acknowledged this fact by developing "Y" train statistics through its yard jobs matrix, the same as TPI has done. The entire dispute over 28,860 allegedly missing "Y" trains, therefore, concerns whether TPI included sufficient "Y" train operations to handle all TPIRR traffic in its yard jobs matrix, not whether TPI omitted "Y" trains from its train list used to develop operating costs, because neither party included "Y" trains in that train list.⁴⁹

⁴⁸ See, *Reconsideration Decision*, slip op. at 6.

⁴⁹ CSXT Reply workpaper "TPIRR Reply Train Lists.xlsx" is the spreadsheet in which CSXT develops train operating statistics for all trains except yard trains. Although the 92 "Y" train symbols and corresponding 555 weekly train starts (which annualizes to 28,860 trains) that CSXT modeled in MultiRail do physically appear at range A654:L745 in level "Road_NonUnit" of this workpaper, CSXT did not include them in the calculations at level "Totals" of that same workpaper. Level "Totals" is where CSXT's Reply developed operating statistics for Coal, General Freight, Local, and Intermodal trains. In particular, statistics for "Local" trains are compiled at range A7:S7 of level "Totals." The formulae in the relevant cells reference only the trains included at level "Road_NonUnit" that Column O identifies as "Local" trains. Column O of level "Road_NonUnit" does not identify any of the "Y" trains at rows 654-745 as "Local." Therefore, none of the "Y" trains are included in CSXT's local train operating statistics, and no operating statistics are calculated for the "Y" trains for purposes of bringing them forward in the development of operating expenses. Nor are the 28,860 Y trains referenced anywhere in CSXT's "TPIRR Yard Operations_Reply.xlsx" workpaper in which CSXT develops yard train operating statistics. CSXT simply does not consider these 28,860 "Y" trains at all in its development of operating statistics and expenses. CSXT included those trains in its workpapers solely to create the inaccurate impression that TPI omitted them.

CSXT alleged in its Reply evidence that TPI omitted historical “Y” trains that serve TPIRR traffic beyond the limits of their home yard from its calculation of yard train statistics and operating expenses. In support of its allegation, CSXT offered a list of 28,860 “Y” trains that it claimed TPI ignored in its train list development procedures. Those 28,860 trains, however, are not historical trains and therefore could not have been ignored by TPI. They are hypothetical trains that CSXT developed from train profiles and that CSXT included in its MultiRail analysis to support its operating plan, but not in its RTC model. Despite these criticisms of TPI’s operating plan, CSXT also developed yard train operating expenses without regard for the hypothetical operations of the 28,860 trains in question.

Rather than develop “Y” train operating statistics based on individual yard trains using the RTC model along with all other train types, both parties developed those statistics through their yard jobs matrices.⁵⁰ Recently, CSXT conceded for the first time in this case that, like TPI, “CSXT did calculate the operating expenses (locomotive and crews) attributable to all of the required industrial yard trains as part of its yard operating expenses.”⁵¹ Both parties also calculated the locomotives needed to perform those jobs using the same methodology.⁵²

There is a good reason why both parties employed the same method to develop “Y” train operating statistics. As CSXT recently confirmed:

[P]arties to SAC cases do not develop locomotive unit miles for yard assignments on a train-specific basis. Such a level of granularity is simply not practicable because railroads do not maintain data regarding the specific number of miles traversed by all yard trains (particularly those that operate entirely within the yard). Rather, locomotive unit miles for

⁵⁰ Compare TPI Rebuttal workpaper “TPIRR Yard Operations_Rebuttal.xlsx” with CSXT Reply workpaper “TPIRR Yard Operations_Reply.xlsx.” See also, TPI Rebuttal at III-C-61-62, 70-71 and 130-37; CSXT Reply at III-C-128-34.

⁵¹ See, CSXT’s Reply to Complainant’s Petition for Reconsideration and Clarification, p. 8 (filed Aug. 12, 2015) [underline in original] (“CSXT Recon. Reply”).

⁵² The one difference in the parties’ method for calculating yard locomotives is the number of units needed to push cars over the hump. TPI Rebuttal at III-C-137. This difference of just one locomotive per hump is irrelevant to the issue of “Y” trains operating outside of the yard to serve customer locations.

“Y” trains are customarily based upon an assumed “average” number of miles per shift. Indeed, as TPI’s Surreply acknowledges, both CSXT and TPI calculated locomotive unit miles for yard trains based upon the assumption that each TPIRR yard train would operate at an average of 6 MPH over the course of an 8-hour shift, generating 48 locomotive unit miles per shift.⁵³

Both parties, therefore, appropriately relied upon the foregoing “average” number of miles because it is neither practical nor reliable to develop “Y” train operating statistics from CSXT’s historic car and train data.⁵⁴

The Board mistakenly appears to believe that CSXT’s Reply evidence should enable TPI to identify the historic “Y” trains needed to respond to the *Supplemental Evidence Order*. Specifically, the Board asserts that “CSXT has identified ‘Y’ trains that served industries beyond yard limits in real-world locations that correspond with the SARR.”⁵⁵ In the footnote supporting this statement, the Board references CSXT Reply workpaper “YardJobs_OnSARR_w_Customers.xlsx” at worksheet “FinalTrains_Include_w_Customer.” That workpaper, however, merely identifies “Y” trains that served locations on the SARR, both within and outside yard limits.

Furthermore, the referenced workpaper actually demonstrates the severe deficiencies inherent in CSXT’s car event data about which CSXT’s discovery responses cautioned TPI

⁵³ CSXT Reply to Complainant’s Motion for Leave to File Reply to Reply, p. 4 [underline in original].

⁵⁴ Despite this fact, CSXT inexplicably continues to tout its MultiRail analysis of the 28,860 allegedly missing “Y” trains as identifying “Y” train miles with “greater precision.” *Id.* That is nonsense because CSXT does not use those supposedly more precise miles to determine operating costs. Furthermore, “greater precision” does not equate to “greater accuracy;” it is possible to be very precise and still be wrong. In this case, CSXT overstates locomotive unit miles in MultiRail by assuming that every “Y” train serves every customer along its entire route every day in its train profile when the reality is that “Y” trains operate only when needed and only over the portions of their routes necessary to serve locations requiring service that day. TPI Rebuttal at III-C-72 (n. 128). In other words, MultiRail does not depict “historic” train operations as required by the Supplemental Evidence Order. Rather, as CSXT has admitted, its MultiRail trains merely “represent” trains—or more accurately train symbols—found in the Base Year train event data. CSXT Reply to Complainant’s Motion for Leave to File Reply to Reply, p. 5, quoting CSXT *Recon. Reply* at 12. Therefore, the fact that CSXT (like TPI) calculated locomotive unit miles for “Y” trains on an “average” basis renders CSXT’s MultiRail analysis of “Y” trains both superfluous and moot.

⁵⁵ See, *Reconsideration Decision*, slip op. at 6 [footnote omitted].

against placing too much reliance.⁵⁶ Specifically, CSXT's workpaper reveals that its car event data only reliably identifies 50,925 total yard trains that served TPIRR customers anywhere on the SARR.⁵⁷ These are total yard trains, not just "Y" trains that operate outside their home yard. In contrast, TPI's Rebuttal yard matrix accounts for 156,335 yard trains, which is over three (3) times greater than the total number indicated by CSXT's car event data.⁵⁸ This data deficiency is even more apparent at the individual yard level. For example, filtering CSXT's list of identified yard trains serving SARR shipments in Chicago's Barr Yard shows that CSXT identified only 2,157 TPIRR yard trains operating out of Chicago in the base year.⁵⁹ In contrast, the TPI yard matrix accounts for 10,950 Chicago yard trains in the base year.⁶⁰ Thus, if TPI had relied upon the CSXT documents cited by the Board, it would have identified far fewer "Y" trains than it has in its Rebuttal.

Given the incomplete and unreliable nature of CSXT's traffic data for identifying historical "Y" trains that serve TPIRR traffic as acknowledged by both parties, the fundamental question should be which party's yard jobs matrix best accounts for the work that all "Y" trains must perform to efficiently handle the TPIRR's traffic. The next section addresses this question.

**(b) TPI's Rebuttal "Y" Train Evidence is
Superior and More Accurate**

The parties' yard jobs evidence is the most appropriate means to measure the stand-alone costs associated with "Y" trains. The fact that both parties chose the same means to develop yard jobs is indicative of that fact. The Board, therefore, should evaluate and choose between

⁵⁶ See, TPI Opening Exhibit III-C-2.

⁵⁷ See, CSXT Reply workpaper "YardJobs_OnSARR_w_Customers.xlsx" at worksheet "Trains" at cell P46455.

⁵⁸ Sum of daily yard jobs included at rows 6-90 of Column AA of level "Sheet1" of TPI Rebuttal workpaper "TPIRR Yard Operations_Rebuttal.xlsx", times 365 days per year.

⁵⁹ Change filter at cell O5 of "Trains" level of CSXT workpaper "YardJobs_OnSARR_w_Customers.xlsx" to include only station "DD 2" (Chicago Barr Yard), and view results displayed at cell P1771.

⁶⁰ 30 daily yard jobs included at cell AA6 of level "Sheet1" of TPI Rebuttal workpaper "TPIRR Yard Operations_Rebuttal.xlsx", times 365 days per year.

the parties' yard jobs evidence instead of referring to supplemental "Y" train evidence based upon data that is not suited for that purpose. TPI's Rebuttal evidence is the best evidence of record for "Y" train operating costs, superior to both CSXT's Reply evidence and the requested Supplemental evidence.

CSXT's Reply yard jobs evidence represents the maximum number of crews and locomotives that could possibly be needed to provide all yard train services for the universe of CSXT's historical traffic—including so-called "Y" trains— because CSXT assigned the same total yard jobs to the TPIRR as the real-world CSXT in 2010⁶¹ and has acknowledged that it "did calculate the operating expenses (locomotives and crews) attributable to all of the required industrial yard trains as part of its yard operating expenses."⁶² TPI too asserts that its Rebuttal yard jobs evidence accounts for all yard train work. But because the TPIRR's traffic is a subset of CSXT's 2010 traffic, CSXT's Reply yard jobs evidence necessarily overstates the yard jobs that the TPIRR requires. TPI, therefore, appropriately reduced the number of "Y" trains to reflect the TPIRR's smaller traffic group.

TPI demonstrated that its yard jobs evidence is a conservatively scaled down variation upon CSXT's evidence, which is based on historic yard jobs for a larger traffic group.⁶³ Because the TPIRR classifies 15 percent fewer cars at hump yards in 2010 than the real-world CSXT, it does not require the same number of yard jobs and locomotives as the real-world CSXT.⁶⁴ TPI's evidence maintains the same level of yard productivity as the real-world CSXT, as measured by cars classified per hump job, whereas CSXT's Reply evidence would impose lower productivity

⁶¹ See, CSXT Reply at III-C-132-33.

⁶² See, *CSXT Recon. Reply* at 8 [underline in original].

⁶³ Compare CSXT Reply at III-C-133 with TPI Rebuttal at III-C-131-32.

⁶⁴ See, TPI Rebuttal at III-C-132.

upon the TPIRR.⁶⁵ This productivity measure necessarily includes the work performed by “Y” trains that serve customer locations beyond the yard limits in addition to performing work within the yards because it is based upon total cars classified and total yard jobs. Therefore, TPI’s yard jobs evidence includes both work performed within the yard and outside the yard contrary to CSXT’s misrepresentation.

In its newest criticism of TPI’s yard jobs analysis, however, CSXT now claims that the differential between yard jobs included in the parties’ yard matrices represents the 28,860 allegedly missing “Y” trains. Specifically, CSXT claims that:

TPI’s methodology accounted only for the crews (and locomotives) required to switch cars within the yard, and did not provide additional yard assignments to perform line-haul movements, pick ups, setoffs, and switching at customer facilities outside the yard on a daily basis.⁶⁶

CSXT attributes “[t]he lion’s share of this difference between the parties’ yard job assignments” to this alleged flaw.⁶⁷ But as demonstrated in Section III-C-5.a.iii below, this supposed flaw in TPI’s evidence does not exist because TPI included both “inside the yard” and “outside the yard” work in its yard jobs evidence, just as CSXT did.

Furthermore, CSXT’s evidence does not support its claim that the difference between the parties’ yard jobs evidence is the 28,860 allegedly missing “Y” trains. Both parties’ yard jobs matrices assume that all yard jobs operate an equivalent of 48 miles per job, but CSXT’s MultiRail analysis applies different miles across the multitude of yard trains. Thus, there is no link between the 28,860 yard trains in CSXT’s MultiRail analysis, and the yard trains in CSXT’s yard jobs matrix, despite CSXT’s allegations that the two (2) are linked.

⁶⁵ *Id.*

⁶⁶ *See, CSXT Recon. Reply* at 7 [underline in original].

⁶⁷ *Id.*

For example, in MultiRail, the Y101 TERRE HAUTE YARD JOB train operates five (5) days per week over a three (3) mile route and handles 1.19 cars per day.⁶⁸ However, in its Reply Yard Train Matrix, CSXT assumed 61 total daily yard jobs for the Terre Haute Yard⁶⁹ and included those jobs in its total count of TPIRR flat yard jobs and ultimately in its count of total daily yard jobs.⁷⁰ CSXT developed yard train locomotive unit miles by assuming an 8-hour shift at an average operating speed of six (6) miles per hour, which equates to 48 locomotive unit miles per job for all TPIRR yard jobs.⁷¹ The 61 daily Terre Haute yard jobs included in CSXT's yard operations matrix cannot "represent" the MultiRail-based operations of the Y101 TERRE HAUTE IND YARD JOB train as CSXT claims, because CSXT has assigned that train 48 miles for the purpose of developing operating statistics, but only three (3) miles in MultiRail. This renders CSXT's claim that the differential between the parties' yard jobs matrices is attributable to the 28,860 allegedly missing "Y" trains a *post hoc* fiction.⁷²

Even if there were a discernable link between the 28,860 MultiRail-based "Y" trains and CSXT's yard jobs matrix, many of those trains are completely unnecessary according to CSXT's own analysis because MultiRail instructs "Y" trains to operate every day of the week specified in its train profile every week of the year regardless of whether there is any traffic for the TPIRR to serve.⁷³ For example, CSXT assumes that Train Y150 (1) (1st SHIFT EXTRA) operates over an 89 mile route seven (7) days a week, year-round, despite the fact that MultiRail does not assign

⁶⁸ See, CSXT Reply workpaper "TPIRR Reply Train Lists.xlsx" at level "Road Non-Unit" range A654:L654 and CSXT Reply Exhibit III-C-4 at line 1.

⁶⁹ See, "TPIRR Yard Operations_Reply.xlsx" at level "Sheet1", range AE87:AG87.

⁷⁰ See, "TPIRR Yard Operations_Reply.xlsx" at level "Sheet1", cells AQ27, AQ20, AQ21.

⁷¹ See, "TPIRR Yard Operations_Reply.xlsx" at level "Sheet3", cell C1.

⁷² Any CSXT response that one of the 61 trains included in its matrix implicitly covers the three-mile industrial yard job route (i.e., that one of the aggregate yard jobs completed this specific job as part of its 48-mile shift) would prove precisely what TPI has stated from the start--that both parties' matrices cover all yard jobs, including "Y" trains that leave the yard to serve customer facilities located beyond yard limits.

⁷³ See, TPI Rebuttal at III-C-72 (n. 128).

any cars to it.⁷⁴ According to CSXT workpaper "SARR19F_EstimatedTrainVolumes.xls," the 1st Shift Extra departs from Erie, PA, operates 29 miles east to Westfield, NY, then returns to Erie by way of Lake City, PA, a total round trip distance of 89 miles.⁷⁵ Although CSXT Reply workpaper "YardJobs_OnSARR_w_Customers.xlsx" links three (3) individual 1st Shift Extra trains to 109 carloads of TPIRR traffic,⁷⁶ MultiRail does not assign that work to this train symbol. Specifically, CSXT assigned zero carloads of TPIRR traffic to the 1st Shift Extra in MultiRail for the base year.⁷⁷ Furthermore, just three (3) 1st Shift Extra trains handled all 109 historical shipments within the Erie Yard. Therefore, even if CSXT's MultiRail plan did assign those 109 carloads to the 1st Shift extra, that train would have operated just three (3) days in the base year, and it would have done so entirely within the Erie yard limits. Yet, CSXT's MultiRail analysis assumed that train would operate over an 89-mile route, 365 days per year.

In summary, TPI's Rebuttal yard jobs evidence accounted for "Y" trains that operate both within and outside yard limits and thus there is no need to rely upon Supplemental evidence to develop "Y" train operating costs based upon data that is unsuited for that purpose. The only issue the Board should decide as it relates to "Y" train evidence is which parties' yard jobs matrix is superior. TPI reasonably calculated the costs associated with "Y" trains by assigning sufficient yard crews and locomotives to the TPIRR to maintain the same level of productivity as the real-world CSXT for providing the same services to a subset of CSXT's real-world traffic during the same time period. Therefore, it follows that TPI included all the costs associated with

⁷⁴ See, CSXT Reply workpaper "TPIRR Reply Train Lists.xlsx" at level "Road Non-Unit" range A694:L694 and CSXT Reply Exhibit III-C-4 at line 41 (roughly middle of page 1).

⁷⁵ See, worksheet "Yard" at rows 1157-1182.

⁷⁶ See, worksheet "Trains_w_Customers" at rows 18232, 18234, 18292

⁷⁷ See, CSXT Reply workpaper "TPIRR Reply Train Lists.xlsx" at worksheet "Road Non-Unit" cell H694.

“Y” train service to customer locations. The accurate capture of those costs is all that the SAC analysis requires.⁷⁸

ii. Supplemental “Y” Train Evidence

Although TPI contends that the Board should adopt TPI’s Rebuttal “Y” train evidence for the reasons presented in the preceding section, in this section, TPI responds to the Board’s *Supplemental Evidence Order* by providing a list of historic “Y” trains that it was able to develop from CSXT’s traffic data. TPI identified 25,119⁷⁹ historical “Y” trains that met CSXT’s operational definition of so-called “industrial yard trains” by evaluating car event data from which TPI could link service at specific locations to individual “Y” trains.⁸⁰ CSXT defines “industrial yard trains” as follows:

While industrial yard trains are assigned a “Y” (yard) train symbol in CSXT’s event data, they operate in essentially the same manner as local trains in “turnaround” service, traveling to industries located beyond the yard, setting off inbound cars and picking up outbound cars, and returning to the yard with the outbound shipments.⁸¹

Therefore, in compiling TPI’s Supplemental/Compliance list of “Y” trains that “deliver and/or pick up SARR traffic at shipper locations in the base year,” TPI included all “Y” trains that met the following criteria: all “Y” trains to which the car event data associated any shipments that

⁷⁸ Although the Board claims that there also is a value to modeling the impact of “Y” train operations outside of yards upon other traffic in the RTC model, *Reconsideration Decision* at 7-8, even CSXT acknowledges that such interference is negligible at best, and certainly not worth the effort required to model them in the RTC simulation, *CSXT Recon. Reply* at 10. TPI’s Supplemental Evidence, which adds 729 “Y” trains to its RTC model bears out this fact. In light of the enormous time and cost required to develop SAC evidence, the Board only adds complexity and costs to the SAC analysis by requiring the parties to develop evidence that neither party believes would have a significant evidentiary benefit.

⁷⁹ See, Supplemental/Compliance Exhibit III-C-8, Line 5.

⁸⁰ Although some “Y” trains can be identified in the train event data, that database does not provide sufficient detail to determine which TPIRR shippers (if any) were served historically by the trains, where services were provided, or for whom any services were provided.

⁸¹ See, CSXT Reply, p. III-C-26, emphasis added.

traveled more than 0.0 miles on the train, and for which either the “from” or “to” location associated with that “Y” train movement segment was physically located on the TPIRR.⁸²

TPI’s methodology is conservative and likely overstates TPIRR “Y” train activity because it includes the movement of all carloads over any distance to or from any location on the SARR on any “Y” train regardless of whether the traffic belonged to a TPIRR customer. Therefore, the 25,119 “Y” trains in TPI’s Supplemental/Compliance train list are all “Y” trains that TPI could identify as moving traffic to/from any industry beyond yard limits during the base year.

After TPI identified all shipments moving more than 0.0 miles on all “Y” trains in the base year, TPI compiled movement data for individual carloads into movement data for cuts of cars moving together on a given train from location to location. Next, TPI assigned the various “Y” trains to a home station using the same methodology and tables that CSXT developed and used in its “YardJobs_OnSARR_w_Customers.xlsx” workpaper. Finally, TPI evaluated the individual trains to develop route of movement and sequence of pickup and setout events for the cars that moved to and from industries beyond yard limits.⁸³

⁸² TPI workpaper "TPI Yard Trains Base Year V01 20150810.mdb" is an Access database that contains all Y-Train records from TPI Opening database “SarrAllShTrn” for the base year. TPI developed “SarrAllShTrn” using the methodologies described in Opening Exhibit III-C-1. The “SarrAllShTrn” table captures the first and last nodal events associated with a given train on which an individual shipment moves based on car event data recordings. If, according to the car event data, a car moves from Point A to point B on train Y101, then from point B to point C on train Q500, then from point C to point D on train A101, there will be three output records for that individual shipment in the “SarrAllShTrn” database, one for each train on which that shipment moved between origin and destination. This analysis includes only the “SarrAllShTrn” database records associated with Y-Trains. It encompasses every instance where an individual shipment could be associated with any CSXT Y-Train in the CSXT car event data in the base year. Access Query "Y_trn_1_on_with_miles" (which is housed within TPI workpaper "TPI Yard Trains Base Year V01 20150810.mdb") compiles “SarrAllShTrn” records for individual carloads into records for cuts of carloads moving together on a given Y-Train for all instances where the CSXT car event data indicated the car moved more than 0.0 miles on the Y-Train and either the first or last location associated with that cut of cars was physically located on the SARR, regardless of whether the shipments were included in the TPIRR traffic group. It encompasses every instance where any shipment was associated with any CSXT Y-Train moving over any distance on the SARR according to the CSXT car event data in the base year.

⁸³ The step-by-step procedures used to develop this supplemental list of 25,119 “Y” trains are included in the “Read Me” level of the workpaper in which the list was developed: III-C-1/Yard Trains workpaper “Y trn 1 on with

iii. Revisions Required to Eliminate Double-Counted “Y” Trains

Due to the decision of both TPI and CSXT to develop “Y” train operating statistics in their yard jobs matrices, the Supplemental Evidence Order would double-count “Y” train operating costs if the Board uses that evidence to calculate operating statistics on top of the parties’ yard jobs evidence. Both parties have declared to the Board that their respective yard jobs matrices account for all yard train work, both within and outside the yard. The “Y” trains in the Supplemental/ Compliance evidence, however, only reflect work performed outside the yard. Furthermore, many of the same “Y” trains may perform both inside and outside the yard work. Therefore, by definition, adding a list of Supplemental/Compliance industrial yard trains would double count operating expenses. Conversely, relying solely upon the Supplemental/Compliance evidence to the exclusion of the yard jobs matrices will omit work performed within the yard. This double count further degrades the accuracy and reliability of the requested Supplemental/ Compliance evidence.

Rather than develop “Y” train operating statistics based on individual yard trains using the RTC model along with all other train types, both TPI and CSXT have developed those statistics through their yard jobs matrices.⁸⁴ **CSXT recently confirmed this point when it stated that “CSXT did calculate the operating expenses (locomotive and crews) attributable to all of the required industrial yard trains as part of its yard operating expenses.”⁸⁵** In other words, CSXT acknowledges that its yard jobs matrix accounted for the work performed by the allegedly missing 28,860 “Y” trains just as TPI claims that its yard jobs matrix also

miles.xlsx”. In addition, a more user friendly draft of the same step-by-step procedures is included in the body of III-C-1/Yard Trains workpaper “Steps Taken to Derive TPIRR Industrial Yard Jobs per Day.docx”.

⁸⁴ Compare TPI Rebuttal workpaper “TPIRR Yard Operations_Rebuttal.xlsx” with CSXT Reply workpaper “TPIRR Yard Operations_Reply.xlsx.” See also, TPI Rebuttal at III-C-61-62, 70-71 and 130-37; CSXT Reply at III-C-128-34.

⁸⁵ See CSXT’s Reply to Complainant’s Petition for Reconsideration and Clarification, p. 8 (filed Aug. 12, 2015) [underline in original] (“CSXT Recon. Reply”).

accounted for that work. Because both parties already have accounted for “Y” train operating costs in this other part of their evidence, the addition of “Y” trains to their supplemental evidence train lists will double-count “Y” train operating expenses. Therefore, it is necessary to adjust the yard jobs matrices to remove the double-counted “Y” trains. This subpart demonstrates that TPI included “Y” trains leaving yards in Rebuttal evidence and properly has remedied the impact of double-counted “Y” trains.

Both TPI and CSXT rely on the same files provided by CSXT in discovery to develop yard jobs. These files (“Yard Crew Size and Starts.xls” and “Yard Matrix.xls”) include yard jobs performed outside of yards and include CSXT data for 2Q10.⁸⁶ In fact, CSXT encouraged TPI to use these files, stating:

TPI should also incorporate the information CSXT produced on yard and local train service into TPI's operating plan analysis. "Yard Crew Size and Starts.xls," produced on DVD-063, includes data on yard operations and local train crew starts throughout the CSXT network. DVD-063 also includes yard diagrams and "Yard Matrix.xls," a spreadsheet with detailed information on each CSXT yard that includes scheduled yard jobs, local switch assignments, and average daily cars switched and handled.⁸⁷

Both TPI and CSXT source the discovery file “Yard Matrix.xls” in the development of their respective yard operations,⁸⁸ which include yard jobs performing outside of yards. The difference between TPI’s and CSXT’s yard jobs is attributable to the assumptions that each uses to determine cars handled per yard job. The scheduled yard jobs included in the “Yard Matrix.xls” file equal the crew starts included in “Yard Crew Size and Starts.xls”.⁸⁹ Because the file “Yard Crew Size and Starts.xls” includes crew starts (i.e., yard jobs) by yard and train, it is

⁸⁶ These files were produced on DVD-063.

⁸⁷ See, Opening Exhibit III-C-2 (October 11, 2013 letter from G. Paul Moates to Jeff Moreno) at p. 6.

⁸⁸ See, Reply workpaper “TPIRR Yard Operations_Reply.xlsx” and Rebuttal work paper “TPIRR Yard Operations_Rebuttal.xlsx”. 2Q10 Scheduled Yard Jobs from Column Q of “Yard Matrix.xls” are converted to CSX 2Q10 Daily Scheduled yard jobs in these work papers.

⁸⁹ A comparison of Scheduled Yard Jobs (column Q) from “Yard Matrix.xls” to Starts (column D on tab “Yard – North” and column C on tab “Yard – South”) from “Yard Crew Size and Starts.xls” shows that the scheduled yard jobs by yard equal the crew starts by yard.

straightforward to determine whether the “Y” trains that support TPI’s and CSXT’s yard operations leave yards or not. TPI made this determination by comparing the Yard/”Y” train combinations from “Yard Crew Size and Starts.xls” to the Yard/”Y” train combinations from CSXT’s train profile file “Profile2 Update.xls” provided by CSXT in discovery. CSXT encouraged TPI to use this train profile information to clarify CSXT’s own data, stating:

This train profile information can be used both to clarify any ambiguities in the traffic event data and to inform TPI’s development of its own train service plan (e.g., by identifying all the local trains that are necessary to serve CSXT’s customers today).⁹⁰

There are 1,390 unique “Y” train profiles in the “Profile2 Update.xls” file that reflect specific “Y” trains at specific yards. Of these unique train profiles, 504 leave the yards.⁹¹ When these 504 “Y” trains that leave yards are matched to the Yard/”Y” train combinations in “Yard Crew Size and Starts.xls”, 10,788 “Y” trains (crew starts) operated beyond their home yards in 2Q10. These “Y” trains represent 15 percent of the 70,097 “Y” trains included in “Yard Crew Size and Starts.xls”, which, through discovery file “Yard Matrix.xls”, the parties used to develop the TPIRR yard jobs.

Notably, not only has TPI included “Y” trains operating outside yards in its Rebuttal evidence, but the ratio of TPIRR “Y” trains leaving yards to total TPIRR “Y” trains matches the 15 percent of “Y” trains leaving CSXT yards in CSXT’s discovery file “Yard Crew Size and Starts.xls”. Supplemental/Compliance Table III-C-1 below, compares the number of CSXT “Y” trains leaving yards to the TPIRR “Y” trains leaving yards.

Supplemental/Compliance Table III-C-1 Comparison of CSXT and TPIRR <u>”Y” Trains Leaving Yards</u>

⁹⁰ See, Opening Exhibit III-C-2 (October 11, 2013 letter from G. Paul Moates to Jeff Moreno) at p. 6.

⁹¹ If a train profile accessed more than one station, it was deemed to have left the yard. See, Supplemental/Compliance workpaper “TPIRR Y-Train Support_Supplemental.xlsx” for calculation of trains that leave yards.

Railroad	"Y" Trains		Percent Leaving Yards 5/
	Total	Leaving Yards	
(1)	(2)	(3)	(4)
1. CSXT	280,388	1/ 43,152	3/ 15%
2. TPIRR	153,665	2/ 25,119	4/ 16%

1/ CSXT discovery document "Yard Crew Size and Starts.xlsx", sum of Starts (column D on tab "Yard - North" and column C on tab "Yard - South") times 4 (to annualized 2Q10 data).
2/ Rebuttal workpaper "TPIRR Yard Operations_Rebuttal.xlsx", sum of TPI Daily Yard Jobs (column AA) times 365 days.
3/ Supplemental/Compliance workpaper "TPIRR Y-Train Support_Supplemental.xlsx", tab "CSXT Yard Starts", sum of CSXT Starts Leaving Yards (column N) times 4 (to annualized 2Q10 data).
4/ Supplemental/Compliance workpaper "Y trn 1 on with miles.xlsx", tab "Train Compilation".
5/ Column (3) ÷ Column (2) x 100.

Both TPI and CSXT clearly have employed yard job and crew starts data that includes “Y” trains leaving yards to develop operating expenses for all yard trains. To avoid a double-count of these yard activities in Scenario #2 and Scenario #3, TPI appropriately reduced those yard jobs by the number of “Y” trains included in its Supplemental/Compliance evidence train lists and RTC calculations.

b. Additional Local Trains

In Reply, CSXT alleged that TPI omitted 15,834 local trains required to serve the TPIRR traffic group. In Rebuttal, TPI added 11,373 of those trains to its base year train list. The 15,834 trains fall into the following five (5) major categories:

Group 1: 5,940 local trains that serve customers at both On-SARR and Off-SARR facilities of which TPI included all 5,940 in Rebuttal;

Group 2: 5,302 local trains that do not appear in the car event data of which TPI included 2,069 in Rebuttal;

Group 3: 2,558 local trains that move only empty (non-revenue) carloads of which TPI included all 2,558 in Rebuttal;

Group 4: 332 local trains that were manually excluded of which TPI included all 332 in Rebuttal; and

Group 5: 1,702 local trains that were excluded for various reasons after manual review of the operations recorded in the car event data of which TPI included 474 in Rebuttal.

In subpart i. below, TPI contends that no additional trains are needed to serve the TPIRR's traffic. In subpart ii., TPI responds to the Supplemental Evidence Order by adding all of the remaining trains that CSXT alleges TPI improperly omitted.

i. No Additional Local Trains Are Needed

TPI's Rebuttal local train list contains all the local trains that are needed to deliver and/or pick-up the TPIRR traffic. Indeed, TPI conservatively opted to include more local trains than CSXT's own traffic data indicates truly are "historic" trains that handled the TPIRR's traffic.⁹²

In Rebuttal, TPI included 11,373 of the local trains CSXT claimed were required, even though the need for such trains is doubtful based on the evidence. Specifically, TPI included: (1) all 5,940 local trains that serve customers at both On-SARR and Off-SARR facilities,⁹³ (2) 2,069 of the 5,302 local trains that do not appear in the car event data,⁹⁴ (3) all 2,558 local trains that move only empty (non-revenue) carloads,⁹⁵ (4) all 332 local trains that were manually excluded (these trains actually are part of Group 1),⁹⁶ and (5) 474 of the 1,702 local trains that were excluded for various reasons after manual review of the operations recorded in the car event data.⁹⁷

⁹² See, TPI Rebuttal at III-C-74-82.

⁹³ See, TPI Rebuttal at III-C-43-44.

⁹⁴ *Id.* at III-C-74-77.

⁹⁵ *Id.* at III-C-77.

⁹⁶ *Id.* at III-C-77-78.

⁹⁷ *Id.* at III-C-78-82.

The only local trains still in dispute are 4,461 trains from Group 2 and Group 5 above that CSXT claims are required to serve the TPIRR traffic group even though CSXT has not provided a shred of evidence from its historic traffic data that these trains handled any of the TPIRR's traffic.⁹⁸ Absent such data, there is no basis for the Board to conclude that these are "historic" trains "that deliver and pick up SARR traffic at shipper locations" in the base year. Therefore, these trains do not qualify as historic trains requested by the *Supplemental Evidence Order*.⁹⁹

CSXT itself conceded that its traffic data does not indicate that the omitted local trains are historic trains that handled any of the TPIRR's traffic. Specifically, CSXT correctly observed that TPI omitted many local trains "because they were not associated with selected traffic in the car event data (at least on certain days)." However, to support the notion that all such trains are required to serve the traffic group, CSXT states that some of them are so-called "local switchers," and that "[i]n most cases, local switcher trains that did not appear in the car event data were documented in the train sheets and other data sources provided to TPI in discovery."¹⁰⁰ CSXT associated just two (2) examples of such trains with the TPIRR's traffic, the "Nissan Shuttle" and "Bowater Switcher," which falls far short of proving this to be true "in most cases."¹⁰¹

Of the two (2) groups of trains where TPI accepted fewer than all of the allegedly missing trains, TPI relied upon CSXT's treatment of those trains in MultiRail to identify "local switchers."¹⁰² Specifically, CSXT's MultiRail train list contained two (2) groups of local trains, those to which CSXT assigned cars and those to which it did not. The only two (2) concrete

⁹⁸ *Id.* at III-C-74-76 and 78-82.

⁹⁹ *See, Supplemental Evidence Order*, slip op. at 7, 8 (directing TPI to include "historic" trains that pick-up or deliver SARR traffic to shipper locations).

¹⁰⁰ *See, CSXT Reply* at III-C-32 [underline added].

¹⁰¹ *Id.* at III-C-32-33.

¹⁰² *See, TPI Rebuttal* at III-C-76 and 82.

examples of local switchers in CSXT's Reply evidence are the Bowater Switcher and the Nissan Shuttle, which both belong to the group of local trains to which CSXT did not assign any cars in MultiRail.¹⁰³ Despite the lack of any other specific examples of local switchers in CSXT's evidence, TPI accepted that this group of local trains, to which MultiRail did not assign any cars, constituted local switchers that handle TPIRR traffic.¹⁰⁴ This was a generous assumption on TPI's part in the absence of any evidence in CSXT's traffic data to justify adding any of these trains.

The remaining allegedly missing local trains were not local switchers and therefore cannot be justified by CSXT's logic as to why those trains may not always appear in the car event data. Nor has CSXT offered any other means by which TPI or the Board can distinguish those cases where the lack of traffic data truly does indicate that a local train is not required to serve the TPIRR's traffic. CSXT's Reply evidence on this subject boils down to "trust me."

TPI is only willing to "trust" CSXT just so far, and so should the Board. CSXT's reference to "train sheets and other data sources provided to TPI in discovery" alludes to train event data. However, CSXT warned TPI in its discovery responses against relying upon its train event data to accurately capture the activities of local and yard trains. In fact, CSXT expressly advised TPI to use its car event data—not its train event data—to develop train activities for local trains:

[H]istorical train data do not capture the full range of CSXT's operations. For example, CSXT's local train sheet data do not contain extensive information on local train movements.¹⁰⁵

* * *

¹⁰³ See, CSXT Reply at III-C-32-33.

¹⁰⁴ See, TPI Rebuttal at III-C-76-77.

¹⁰⁵ See, TPI Opening Exhibit III-C-2, p. 3.

CSXT believes that the Car Event Data are a more useful source of information for TPI's purposes, because they provide a more granular view of each individual car's movement. Car event data is particularly useful for understanding the service needs of carload traffic.¹⁰⁶

* * *

Car event data provide a granular account of each car's movement and allows one to infer where individual cars were picked up or set out.¹⁰⁷

TPI "trusted" CSXT's discovery representations and must be allowed to rely upon them in developing and presenting its evidence. Of the 4,461 local trains still in dispute, 3,233 of them (72 percent) are trains that do not appear in the car event database at all—the database CSXT identified as the "more useful" database that contains a "granular account" of carload activities. CSXT's Reply evidence repudiates the foregoing discovery representations by claiming that the mere appearance of a train in the train event data definitively proves that it was required to move specific historical traffic, despite the absence of any corresponding car event data that indicates TPIRR traffic moved on that train. To be clear, these 3,233 trains are not in the group of "local switchers" that CSXT identified for the first time in Reply. TPI added all of those local switcher trains in Rebuttal. Because these 3,233 trains are not local switchers and do not appear in the car event data, they have not been—and cannot be—linked to a single historic carload of TPIRR traffic based on the evidence.

The remaining 1,228 local trains in dispute are a subgroup of the 1,702 trains in Group 5 that CSXT contends it could not discern why TPI omitted even though CSXT could not offer any reason why TPI should have included them.¹⁰⁸ However, as documented in Rebuttal, TPI properly excluded these trains based upon a detailed review of their operations in the CSXT traffic data to determine that they were not necessary, whereas CSXT made no attempt at all to

¹⁰⁶ See, TPI Opening Exhibit III-C-2, p. 8.

¹⁰⁷ See, TPI Opening Exhibit III-C-2, p. 8.

¹⁰⁸ CSXT Reply at III-C-35.

analyze its traffic data to demonstrate why these trains were necessary.¹⁰⁹ TPI added just 474 trains from this subgroup of 1,702 trains because they fell within the definition of a “local switcher.”¹¹⁰

ii. Supplemental Local Train Evidence

TPI added all of the remaining trains that CSXT claims TPI improperly omitted to its Supplemental/Compliance base year local train list. This encompasses the following trains:

1. The remaining 3,233 local trains from Group 2 that do not appear in the car event data and are not identifiable as “local switchers;” and
2. The remaining 1,228 local trains¹¹¹ from Group 5 with car event data that demonstrates they are not required to serve the TPIRR traffic group and are not identifiable as “local switchers.”

With the addition of this final group of 4,461 disputed local trains, TPI’s Supplemental/Compliance base year local train list for the TPIRR now includes 58,042 local trains broken out as follows: (a) the 42,208¹¹² trains that TPI identified and included in Opening evidence; (b) the 5,940¹¹³ trains from Group 1 that CSXT identified and included in its Reply train list and that TPI accepted in Rebuttal; (c) the 5,433¹¹⁴ trains from Groups 2, 3, 4, and 5 that CSXT identified

¹⁰⁹ TPI Rebuttal at III-C-78-82.

¹¹⁰ *Id.* at III-C-82.

¹¹¹ 1,702 total trains are not required to serve the TPIRR traffic group based on manual review of the car event data less 474 trains TPI agreed to add because they were grouped as “local switchers” by CSXT in Reply, despite the complete lack of evidence from CSXT proving they were actually required to serve the TPIRR traffic group. *See*, Supplemental/Compliance Exhibit III-C-8, Line 2e.

¹¹² These trains have been flagged in the TPI base year local train list in the III-C-1/Peak Period Trains workpaper “Train List Local V05 12162013_v4_Rebuttal_v2_supplemental.xlsx” at tab “Train List ALL” in excel Column B “Original Evidence Inclusion” with the flag “Opening”. *See*, Supplemental/Compliance Exhibit III-C-8, Line 1.

¹¹³ These trains have been flagged in the TPI base year local train list in the III-C-1/Peak Period Trains workpaper “Train List Local V05 12162013_v4_Rebuttal_v2_supplemental.xlsx” at tab “Train List ALL” in excel Column B “Original Evidence Inclusion” with the flag “CSXT Reply”. *See*, Supplemental/Compliance Exhibit III-C-8, Line 2a.

¹¹⁴ These trains have been flagged in the TPI base year local train list in the III-C-1/Peak Period Trains workpaper “Train List Local V05 12162013_v4_Rebuttal_v2_supplemental.xlsx” at tab “Train List ALL” in excel Column B “Original Evidence Inclusion” with the flag “Rebuttal”. *See*, Supplemental/Compliance Exhibit III-C-8, Line 2b and Line 2e.

in Reply and that TPI added to its base year local train list in Rebuttal; and (d) the 4,461¹¹⁵ additional trains from Groups 2 and 4 that CSXT identified in Reply but did not offer any evidence as to why those trains are needed to handle the TPIRR's traffic.

With the addition of the outstanding 4,461 local trains and 25,119 historical "Y" trains moving traffic to and from industry beyond yard limits, TPI's combined list of local and industrial yard trains stands at 83,161 base year trains.¹¹⁶ This is 22,373 more trains¹¹⁷ than the 60,788 base year trains¹¹⁸ CSXT included in its Reply evidence.

6. Revise Amended Base Year Train List and Operating Plan by Excluding High-Priority UPS and Threads Express Traffic

The *Supplemental Evidence Order* directs the parties to amend their base year train lists and operating plans by excluding high-priority UPS and Threads Express traffic, as addressed by TPI in Parts III-A-4 and III-A-5, above. In subpart a. below, TPI further explains why its inclusion of this traffic in Rebuttal is appropriate. In subpart b., TPI nevertheless submits its revised train lists in compliance with the *Supplemental Evidence Order*.

a. The Board Should Retain The High-Priority UPS and Threads Express Traffic

The Board should accept TPI's inclusion of high-priority UPS and Threads Express traffic in the TPIRR's traffic group because the TPIRR can and does provide equivalent service to CSXT. CSXT's attempts to prove otherwise are predicated upon inflated transit times and unsupported minimum service standards. Moreover, CSXT's exclusion of this traffic is

¹¹⁵ These trains have been flagged in the TPI base year local train list in the III-C-1/Peak Period Trains workpaper "Train List Local V05 12162013_v4_Rebuttal_v2_supplemental.xlsx" at tab "Train List ALL" in excel Column B "Original Evidence Inclusion" with the flag "Supplemental". See, Supplemental/Compliance Exhibit III-C-8, Line 2b and Line 2e.

¹¹⁶ See, Supplemental Exhibit III-C-10 at Line 4, Column (7).

¹¹⁷ 83,161 – 60,788 = 22,373

¹¹⁸ See, Supplemental Exhibit III-C-10 at Line 4, Column (5).

prejudicial to TPI because it deprives TPI of revenue that CSXT itself receives to operate these trains but still requires TPI to incur the cost of operating these trains for other traffic.

First, TPI's Rebuttal evidence demonstrates that the trains that handle the UPS and Threads Express traffic provide equivalent service to CSXT.¹¹⁹ Moreover, so does TPI's Supplemental/Compliance evidence. Specifically, TPI evaluated the specific peak period trains identified by CSXT in Reply that carried the high-priority intermodal traffic that CSXT excluded. TPI found that, based on the RTC results for Scenario #2, the TPIRR actually moves these trains 21 percent faster, on average, over the TPIRR segments (including the additional time associated with interchanges) than CSXT historically moved these trains.¹²⁰ These results are even better than TPI demonstrated in its Rebuttal evidence.

Second, CSXT has not presented any evidence to support its claim that the TPIRR fails to provide service for the UPS and Threads Express traffic that is equivalent to CSXT's existing service.¹²¹ At no place has CSXT presented any evidence of transit times for this traffic either based upon CSXT's existing service or the TPIRR's service.¹²² Rather, CSXT relies solely upon trumped-up allegations that the internal cross-over (*i.e.*, "leapfrog") operations for these trains would add three (3) new interchanges that increase transit times—which CSXT never identifies—by an additional 1.5 hours.¹²³ But these are run-through interchanges in TPI's operating plan that require just enough time to change crews.¹²⁴ Moreover, stops that these trains

¹¹⁹ TPI Rebuttal at III-A-6 (n. 10).

¹²⁰ See, TPI Supplemental/Compliance workpaper "TPIRR_INTERMODAL_TRANSIT_TIME_ANALYSIS_SUPP.xlsx".

¹²¹ See, CSXT Reply at III-A-9-10.

¹²² See, TPI Rebuttal at III-A-5.

¹²³ See, CSXT Reply at III-A-9.

¹²⁴ When cross-over traffic is interchanged between the SARR and the residual incumbent in the middle of a train route, the entire train is interchanged intact (*i.e.*, without switching) the same as a typical run-through interchange of unit trains. When cross-over traffic is interchanged between the SARR and the residual incumbent at yards where the residual incumbent switches cars in and/or out of these trains, the cross-over interchange does not require any additional time. TPI Rebuttal at III-C-86-87.

currently make on CSXT for refueling, inspections, and other operating considerations could be performed at these new interchanges between the TPIRR and residual CSXT, thereby off-setting, if not completely eliminating, the need for any additional interchange time.¹²⁵

Third, even if the Board were to accept CSXT's addition of 1.5 hours to the TPIRR's transit times, CSXT never demonstrates that this would cause the TPIRR to lose the UPS and Threads Express traffic. CSXT merely assumes this to be true without ever attempting to compare the TPIRR's service with CSXT's existing service.¹²⁶ Furthermore, CSXT never presents evidence of a transit time service standard for this traffic, much less a standard that the TPIRR is incapable of satisfying.¹²⁷ This is yet another incidence of a "trust me" argument from CSXT.

CSXT also presents the foregoing argument in a vague and ambiguous manner that makes it difficult to address. Specifically, CSXT first alleges that transit times would increase by at least 1.5 hours, but then alleges that the need to change-out locomotives to and from distributed power ("DP") configurations actually would add 4-5 hours of interchange time.¹²⁸ Immediately thereafter CSXT concludes that "[t]his additional time"—without specifying whether it is referring to 1.5 hours or 4-5 hours—would mean that the TPIRR provides substantially worse service for this traffic. On Rebuttal, TPI removed the DP configuration issue from dispute by agreeing to operate all internal cross-over trains in the same head-end configuration as the residual CSXT rather than DP configuration.¹²⁹ Therefore, to the extent that CSXT's inadequate service claims for this high-priority traffic are predicated upon 4-5 hours

¹²⁵ See, TPI Rebuttal at III-A-5.

¹²⁶ See, CSXT Reply at III-A-10.

¹²⁷ See, TPI Rebuttal at III-A-5.

¹²⁸ See, CSXT Reply at III-A-9-10.

¹²⁹ See, TPI Rebuttal at III-A-6 and III-C-152.

instead of 1.5 hours (or even less according to TPI's evidence), CSXT has not presented evidence to justify excluding this traffic from the SAC analysis.

Lastly, exclusion of the UPS and Threads Express traffic would deprive the TPIRR of this revenue without any corresponding reduction in operating costs. The trains that handle this traffic are not dedicated to just that traffic. Because CSXT has removed just the UPS and Threads Express traffic from these trains, the TPIRR still must operate those trains at essentially the same cost but for substantially less revenue, thereby depriving the TPIRR of the same economies of scope as the real-world CSXT.¹³⁰ This has an adverse impact upon the SAC analysis that is greater than just the lost revenue.

b. Excluded High-Priority Traffic

In Section III-A.4 above, TPI identified the specific trains carrying high-priority intermodal traffic in the base year.¹³¹ To develop operating statistics for Scenario #3, TPI developed an alternate base year train list from which it removed these trains.¹³² TPI used this alternate train list to develop operating expenses for Scenario #3 as discussed in Section III-D-3.¹³³

7. Provide Two Versions of the Recalculated Growth Trains

The Board instructed the parties to provide two versions of its "recalculated growth trains: 1) with 'Y' trains and high-priority UPS and Threads Express Traffic, and 2) with 'Y' trains but without high-priority UPS and Threads Express Traffic."¹³⁴ TPI's Rebuttal peak period train list is the basis for the two (2) versions submitted in this Opening

¹³⁰ TPI Rebuttal at III-A-6.

¹³¹ See, Supplemental Exhibit III-A-4.

¹³² See, Supplemental/Compliance workpaper "Manifest Train Peak Period Analysis_Opening_v3_Rebuttal_Supplemental_v2.xlsx".

¹³³ See, Supplemental/Compliance workpaper "TPIRR Operating Expense_Rebuttal_supplemental.xlsx".

¹³⁴ See, Supplemental Evidence Order at 8.

Supplemental/Compliance evidence. TPI first added peak period “Y” and local trains corresponding to historic base year “Y” and local trains to the Rebuttal peak period train list. TPI then developed an alternate version from which it deleted select peak period high-priority trains corresponding to historic base year high-priority trains carrying UPS and Threads Express traffic over so-called “leapfrog” segments.

As discussed in the preceding Section, the Board instructed TPI to add historic “Y” and local trains to its base year train list. The Board also instructed the parties to include “Y” and local trains in their “recalculated growth trains.” For “Y” trains, TPI did this by isolating the 653 so-called “industrial yard trains” that it identified as having operated outside yard limits to move TPIRR traffic to/from industry during the 10-day peak period of the base year. TPI then compiled movement data for individual cars into movement data for cuts of cars moving together on a given train and assigned each “Y” train a home yard using the procedures developed by CSXT in Reply.¹³⁵ Next, TPI compiled the train cut data into train route and activity data for the various “Y” trains transporting TPIRR traffic outside yard limits according to the car event data (as described in Section III-C-4 above.) TPI then adjusted the consist data for the trains to reflect the forecasted growth over the SARR study period by taking the growth factor (1.239) from TPI’s peak volume forecast and applying it directly to the loaded and empty car counts for each “Y” train in the peak period. In order to ensure that the volumes reflected at least as much increase as dictated by the growth factor, TPI added a small cushion of three (3) percent to the growth factor when applied to the “Y” train consists to compensate for reductions that might occur when rounding the number of cars. Overall, this produced an average applied growth

¹³⁵ See, Supplemental/Compliance e-workpaper “Y trn 1 on with miles.xlsx”.

factor of 1.243,¹³⁶ which is slightly higher and more conservative for RTC modeling purposes than the 1.239 growth factor from the forecast.

For local trains included in its “recalculated growth trains,” TPI continued to follow the methodology outlined in TPI Opening Exhibit III-C-1, at pages 42-43, which TPI also used in its Rebuttal evidence.¹³⁷ TPI did this by isolating the 86 additional local trains that operated during the 10-day peak period of the base year.¹³⁸ TPI then compiled consist and movement data for each of the 86 trains, which TPI then adjusted to reflect the forecasted growth over the SARR study period.¹³⁹

After adding “Y” train and local growth trains (Scenario #2 described above), TPI developed two (2) versions of “recalculated growth trains” to comply with the Board’s request. TPI identified the peak year growth trains that correspond to the base year trains it identified and discussed in Section III-A-4 above. Based on the Board’s directive, TPI retained the corresponding peak (growth) trains in the Scenario #2 peak train list, and excluded them from the Scenario #3 peak train list.¹⁴⁰

Supplemental/Compliance Exhibit No. III-C-11 lists the specific growth trains carrying high priority UPS and Threads Express traffic that TPI removed from the Scenario #3 peak train list.

¹³⁶ See, Supplemental/Compliance e-workpaper “Peak Period Y Trains_Supplemental.xlsx” Column P, Row 2845.

¹³⁷ See, TPI Rebuttal III-C-140-143.

¹³⁸ See Supplemental/Compliance e-workpaper “Train List Local V05 12162013_v4_Rebuttal_v2_supplemental.xlsx”, tab “Train List ALL”. The 86 supplemental trains that fall in the 10-day peak period, are flagged in excel Column B with “Supplemental” and in excel Column C with “Peak Period/RTC”.

¹³⁹ See Supplemental/Compliance e-workpaper “Train List Local V05 12162013_v4_Rebuttal_v2_supplemental.xlsx”, tab “Supp_Added Peak Period Trains”. Columns A through Column AX determine the consist and movements for each train. Columns BI through GS adjust the consist to reflect the growth over the SARR study period. The growth factor used is in Column GW.

¹⁴⁰ See, Supplemental/Compliance e-workpaper “TPIRR Train Lists_All Peak Period Trains_Supplemental.xlsx”.

a. RTC Implications

TPI incorporated the two (2) versions of the recalculated growth trains, described in Section III-C-7 above, in two (2) additional RTC scenarios. TPI used the Rebuttal RTC model as the baseline and added or removed trains as necessary for each scenario.

In Scenario #2, TPI added 86 local trains and 729 industrial yard trains to TPI's Rebuttal RTC model. The 86 local trains from the revised train list correspond to the 86 additional RTC local trains. The industrial yard trains, however, do not have a 1:1 match between the historical trains in the train list and RTC trains. CSXT's industrial yard train car event data show many industrial yard trains leaving and re-entering the TPIRR, often multiple times. Although it is unlikely that CSXT's real-world historical trains would perform multiple cycles between a yard and industry during a single "job" with a single crew, TPI modeled the trains according to the data in an effort to conservatively model every possible car event.

Using the 653 industrial yard trains from the train list, TPI "split" the trains which leave the TPIRR and return into two (2) or more RTC trains resulting in 729 corresponding RTC trains. TPI also developed estimated departure times for the subsequent segments of these On-Off-On SARR yard trains.¹⁴¹ During this process TPI also adjusted departure times for 19 internal crossover trains from its Rebuttal simulation where the subsequent leg of a crossover train departed before the originating leg reached its destination.¹⁴²

In addition, TPI reviewed each of the 653 industrial yard trains to determine whether or not it was transporting TIH materials. Any of these industrial yard trains that contained TIH materials were limited to a top speed of 50 MPH.

¹⁴¹ See, e-workpaper "Peak Period Y Trains_Supplemental.xlsx".

¹⁴² See, e-workpaper "Early Departure Leap Frog Trains Analysis_Supplemental.xlsx". TPI also corrected three (3) split trains that were partially omitted from its Rebuttal RTC simulation, i.e., RTC Trains "M0711FOLJAC", "M1408EASLOU", and "M3596RICN W".

TPI also identified and removed eleven (11) yard trains that CSXT inserted into its Reply RTC simulation that TPI subsequently adopted in its Rebuttal RTC simulation which, according to CSXT, represented a “sample” of the industrial yard trains that are now contained in TPI’s Supplemental/Compliance Scenario #2 and Scenario #3. These eleven (11) trains were removed¹⁴³ because they are included in the 653 industrial yard trains and to leave them in the RTC model would result in a double-count of these yard trains.

For Scenario #3, TPI identified 24 peak period High Priority UPS and Threads Express trains that TPI excluded from the simulation. These 24 peak period trains are all internal crossover trains; therefore all of them are represented by two (2) RTC trains because internal crossover trains were “split” into two (2) trains. TPI identified 46 RTC trains¹⁴⁴ which represent the 24 CSXT historical UPS and Threads Express trains and removed them from its Scenario #2 RTC model to create the Scenario #3 RTC model.

8. Provide A Working RTC Model that Supports the Revised Operating Plans

The STB requested that TPI submit a working RTC model that supports its operating plan and configuration as specified in its narrative statements and spreadsheets along with documentation explaining all changes it made in supplemental evidence. TPI submitted two (2) Supplemental/Compliance RTC simulations, one corresponding to Scenario #2 and one corresponding to Scenario #3 discussed above. The RTC simulation supporting Scenario #1 is the RTC simulation included in TPI’s Rebuttal evidence. Each RTC simulation submitted by TPI fulfills the requirements of the Board’s Supplemental/Compliance decisions.

¹⁴³ See, e-workpaper “TPIRR Train Lists.xlsx” for a listing of all trains that were included or excluded from both Scenario #2 and Scenario #3.

¹⁴⁴ See, Supplemental/Compliance Exhibit III-C-11. The second RTC train for two (2) of the 24 trains moved outside the peak period and therefore were not removed from the model in Scenario #3.

a. A Single Release of the RTC Model

The STB asked both parties to use a single version of the RTC Model. As a result, both parties elected to use the most currently available version of the RTC Model, i.e., Version 69W 64-bit. TPI ran Scenario #2 and Scenario #3 using this version of the RTC Model. Scenario #1, however, remains unchanged from TPI's Rebuttal filing.

There are several RTC files that can create differences in successive runs of the model even when using identical versions of the program. These include, but are not limited to, the dynamic link library file (RTC.DLL) and the locomotive specification file (RTC.LOCO). TPI used the most current RTC.DLL file available for download from Berkeley Simulation's website and used the same RTC.LOCO file that it used in Rebuttal. TPI included both of these files in TPI's workpapers along with the universe of RTC input files required to produce the results shown in TPI's Opening Supplemental/Compliance filing.

b. Revised Operating Plans

TPI has not changed the RTC simulation for Scenario #1 from TPI's Rebuttal evidence. TPI maintains that Scenario #1¹⁴⁵ is superior to Scenario #2¹⁴⁶ and Scenario #3.¹⁴⁷ Scenario #1 is conservative in the development of both revenues and costs and is more realistic and more accurate than Scenario #2 and Scenario #3. Scenario #2 and Scenario #3 include historic "Y" trains based on CSXT data that is ill-suited for this task and unrealistically increases the operating costs of the TPIRR.

¹⁴⁵ See, Supplemental/Compliance e-workpaper "TPI Rebuttal2.zip".

¹⁴⁶ See, Supplemental/Compliance e-workpaper "TPI Scenario2 RTC Case_Supplemental.zip".

¹⁴⁷ See, Supplemental/Compliance e-workpaper "TPI Scenario3 RTC Case_Supplemental_v2.zip".

**c. Historic “Y” Trains and “Missing”
Local Trains**

CSXT claimed that TPI failed to model 28,860 industrial Yard trains in its RTC model and that TPI’s operating plan and operating costs do not properly account for these trains. In addition, CSXT claimed that this is a fatal deficiency in TPI’s Rebuttal evidence. However, CSXT goes on to admit that “those trains [28,860 industrial yard trains] do not consume significant track capacity or generate conflicts with road and local train movements”¹⁴⁸ and that CSXT did not include those same trains in its Reply evidence because they “would not have generated a significant evidentiary benefit.”¹⁴⁹

CSXT cannot have it both ways. TPI agrees that these industrial yard trains are of little consequence to the RTC model. Unfortunately, while they are of little consequence, the modeling of these trains does result in some consequences. The minor impact seen in the operating statistics is largely due to the overly conservative dwell times used to model these trains in combination with the multitude of data deficiencies inherent in CSXT’s car and train event data that are ill-suited to capturing the activities of yard trains. TPI described these deficiencies in great detail at all phases of this proceeding, including this Opening Supplemental/ Compliance filing.

For the other (i.e., non-“Y”) historic trains, TPI was able to improve the reliability of train statistics from a combination of information contained in CSXT’s waybill data, train event data, and car event data. The industrial “Y” trains, however do not have sufficient operational detail recorded in the CSXT databases to capture accurate historical movement information. In particular, although some “Y” trains can be identified in the train event data, that database does not contain sufficient detail to determine which TPIRR shippers (if any) were served historically

¹⁴⁸ See, “CSXT Reply to Complainant’s Petition for Reconsideration and Clarification.pdf” at 10.

¹⁴⁹ See, “CSXT Reply to Complainant’s Petition for Reconsideration and Clarification.pdf” at 10.

by the trains, where services were provided, or for whom any services were provided. As a result, to fulfill the Board's Supplemental evidence request, TPI has been forced to rely completely upon car event and waybill data to develop historical "Y" train operations to service individual shippers at specific locations on the SARR. Because the car event data, like the train event data, also contains erroneous and spotty "Y" train information, TPI has been forced to model all of the historic "Y" trains and include all of the stops reported in the car event and waybill data wherever possible, even when the stops seem unreasonable and/or unrealistic.

The data issues encountered while modeling these industrial Yard trains and TPI's responses to each issue are documented in "Yard Train Data Evaluation Summary_Supplemental.xlsx". Because of the unreliable and unrealistic nature of the historic "Y" train data, and because TPI already had accounted for all costs associated with these industrial "Y" trains in its Rebuttal, the Board should choose TPI's Rebuttal evidence and operating plan as the superior and most realistic evidence.

**d. Adjustments to Infrastructure
Necessitated by RTC Modeling**

There were no adjustments to infrastructure necessary to handle the additional local and industrial yard trains in Scenario #2 and Scenario #3 included in this Opening Supplemental/Compliance evidence. Some of the local and yard trains delivered shipments to customers that were not previously modeled in the peak period. Although modeling these trains required TPI to add branch lines and turnouts to the RTC Model in some cases, TPI's Rebuttal investment costs already accounted for all of this infrastructure.¹⁵⁰ This fact further solidifies the case that TPI's Rebuttal evidence did account for all of these trains as well as all of the costs and infrastructure required to handle these trains.

¹⁵⁰ See, Supplemental/Compliance e-workpaper "Summary of New RTC Nodes with Stick Diagram check_Supplemental.xlsx".

9. Recalculate Service Units Based on the Amended Train List and RTC Results

Scenario #2 includes the addition of the historic “Y” trains, other local trains and growth trains to the RTC model and removes them from TPI’s yard jobs calculations to avoid a double-count. These changes impact some of the operating statistics used to calculate operating expenses. The affected operating statistics include the number of locomotives, locomotive unit miles, car-miles, car-hours and crew personnel.

The addition of local trains and historic “Y” trains impacts the peaking factor used to ensure that TPIRR locomotive and car requirements can meet the needs of TPIRR traffic. In Rebuttal, TPI used a peaking factor of 5.3 percent, which is equal to the average number of train starts per day in the peak week of the peak year divided by the average number of train starts per day in the peak year.¹⁵¹ TPI used the same method to calculate its peaking factor as that first prescribed by the Board in *PSCO/Xcel II*¹⁵² and used in every stand-alone cost proceeding since that decision. The addition of 4,461 local trains and 25,119 historic “Y” trains for Scenario #2 and Scenario #3 reduces the peaking factor because the trains per day in the peak week are less than the trains per day in the peak year. Supplemental/Compliance Table III-C-2 below shows the calculation of the peaking factor for each scenario.

Item	Peak Year Trains	Peak Week Trains	Peaking Factor
(1)	(2)	(3)	(4)
1. Rebuttal (Scenario #1)	201,762	4,076	1.053
2. Add: Local Trains	4,461	67	0.783
3. Add: Historic "Y" Trains	25,119	430	0.893

¹⁵¹ See, TPI Rebuttal at III-D-30.

¹⁵² See, *PSCO/Xcel II* at 13.

4. Remove: High-priority Intermodal Trains	(802)	(20)	1.300
5. Scenario #2	231,342	4,573	1.031
6. Scenario #3	230,540	4,553	1.030

Source: e-workpaper "Peaking Factor Supplemental.xlsx".

As shown in Supplemental/Compliance Table III-C-2 above, the Rebuttal peaking factor of 5.3 percent is restated to 3.1 percent for Scenario #2 due to the addition of local trains and historic "Y" trains. Likewise, the peaking factor for Scenario #3, with the removal of high-priority intermodal trains, is restated to 3.0 percent.

Supplemental/Compliance Table III-C-3 below, summarizes the TPIRR operating statistics impacted by Scenario #2 along with the same operating statistics used in Rebuttal. The Rebuttal operating statistics do not change with the correction of the input errors (Scenario #1).

Supplemental/Compliance Table III-C-3
Summary of TPI Rebuttal and Scenario #2
TPIRR 2010 Operating Statistics

Item	Rebuttal Scenario #1	Scenario #2		
		Total	Double Count 1/	Net
(1)	(2)	(3)	(4)	(5)
1. Number of Locomotives	1,285	1,305	23	1,282
2. Locomotive Unit Miles (millions)	130.3	131.1	1.2	129.9
3. Crew Personnel	3,303	3,412	93	3,319
4. Car-Miles (millions)	3,591	3,608	--	3,608
5. Car-Hours (millions)	250.0	255.7	--	255.1

Source: e-workpaper "TPI Supp OPEX Narrative Tables.xlsx".

1/ Double-counted "Y" Trains.

Scenario #3, which excludes high-priority UPS and Threads Express traffic from Scenario #2, also impacts the number of locomotives, locomotive unit miles, car-miles, and crew personnel in addition to impacting the number of containers loaded onto railcars.

Supplemental/Compliance Table III-C-4 below, summarizes the TPIRR operating statistics impacted by Scenario #3 compared to the same operating statistics impacted by Scenario #2.

Supplemental/Compliance Table III-C-4
Summary of Scenario #3
TPIRR 2010 Operating Statistics

Item (1)	Scenario #2 Total (2)	Scenario #3		
		Total (3)	Double Count 1/ (4)	Net
1. Number of Locomotives	1,305	1,299	23	1,276
2. Locomotive Unit Miles (millions)	131.1	130.4	1.2	129.2
3. Crew Personnel	3,412	3,401	93	3,308
4. Car-Miles (millions)	3,608	3,599	--	3,599
5. Car-Hours	255.7	255.1	--	255.1
6. Containers	1.9	1.8	--	1.8

Source: e-workpaper "TPI Supp OPEX Narrative Tables.xlsx".
1/ Double-counted "Y" Trains.

Each of the operating statistics that change under Scenario #2 and Scenario #3 are described below.

a. Number of Locomotives

The additional 4,461 local trains and 25,119 historic "Y" trains included in Scenario #2 and Scenario #3 result in the need for 41 locomotives in addition to those identified in Rebuttal *before* consideration of the revised peaking factor. The revised peaking factor increases locomotive requirements by 20 locomotives when compared to Rebuttal. When the 25,119 double-counted "Y" trains that leave yards are removed from yard jobs, however, the locomotive count for SD-40 locomotives decreases by 23. (Supplemental/Compliance Table III-C-3, Line 1, Column (4) above).

Under Scenario #3, the removal of high-priority UPS and Threads Express traffic results in a reduction of six (6) locomotives.

b. Locomotive Unit Miles

The additional 4,461 local trains and 25,119 historic "Y" trains included in Scenario #2 and Scenario #3 result in 859,703 more locomotive unit miles than calculated for Rebuttal. The

removal of the double-counted “Y” trains from yard jobs results in a reduction of 1,025,712 locomotive unit miles.¹⁵³ The re-assignment of “Y” trains leaving yards from TPI’s yard jobs evidence to its supplemental train list results in a net reduction in locomotive unit miles because the average miles assumed for yard trains in yard operations is greater than the actual miles of the historic “Y” trains in the supplemental train lists. Specifically, TPI (and CSXT) assume yard trains travel, on average, six (6) miles per hour across eight (8) hours per yard job, or the equivalent of 48 miles per yard job. The 25,119 base year “Y” trains traveling outside of yards, described in Section III-C-4 above, travel an average of 19 miles.¹⁵⁴ Since these trains are modeled in Scenario #2 and Scenario #3, their actual miles are used rather than the conservative assumption of 48 miles per yard job used in Rebuttal for all yard trains.

Under Scenario #3, the removal of high-priority UPS and Threads Express traffic reduces locomotive unit miles by 699,122.

Supplemental/Compliance Table III-C-5 below, summarizes the TPIRR locomotive unit miles for each scenario.

Supplemental/Compliance Table III-C-5			
TPI Rebuttal, Scenario #2 and Scenario #3			
<u>TPIRR Locomotive Unit Miles – 2010</u>			
(millions)			
Train Type	Rebuttal		
(1)	Scenario #1	Scenario #2	Scenario #3
	(2)	(3)	(4)
1. Local	3.3	3.9	3.9
2. Yard	8.3	7.0	7.0
3. All Other	<u>118.8</u>	<u>119.0</u>	<u>118.3</u>
4. Total	130.3	129.9	129.2

Source: e-workpapers "TPIRR Operating Statistics_Rebuttal.xlsx", "TPIRR Operating Statistics_Supplemental.xlsx" and "TPIRR Operating Statistics_Supplemental_v2.xlsx".

¹⁵³ See, Supplemental/Compliance e-workpaper “TPI Supp OPEX Narrative Tables.xlsx”.

¹⁵⁴ See, Supplemental/Compliance e-workpaper “Y trn 1 on with miles.xlsx”, worksheet “Home Station Stats”.

The locomotive unit miles shown in Table III-C-5 above reflect the removal of 1,025,712 locomotive units miles associated with double-counted “Y” trains.

c. Crew Personnel

The additional 4,461 local trains and 25,119 historic “Y” trains included in Scenario #2 and Scenario #3 result in the need for 109 crew personnel in addition to those provided in Rebuttal. As in Rebuttal, the local trains each have a crew made up of an engineer and a conductor and the yard trains each have a crew of an engineer. When the 25,119 double-counted “Y” trains that leave yards are removed from yard jobs, the crew personnel count is reduced by 93. (Supplemental/Compliance Table III-C-3, Line 3 above).

Under Scenario #3, the removal of high-priority UPS and Threads Express traffic results in a reduction of 11 crew personnel. (Supplemental/Compliance Table III-C-4, Line 3 above).

d. Car-miles

Car-miles on the TPIRR increase under Scenario #2 due to the addition of certain local trains, the modeling of “Y” trains that leave yards, and the impact that new local and reclassified “Y” trains have on the operation of all other trains. The increase in car-miles is offset somewhat by the use of the Scenario #2 peaking factor of 3.1 percent, which, as discussed above, is lower than the Rebuttal peaking factor of 5.3 percent. Local train car-miles under Scenario #2 increase over Rebuttal car-miles by 16.6 million. (Supplemental/Compliance Table III-C-3, Line 4 above). Car-miles related to yard trains costed as yard jobs were not calculated in Rebuttal.

Under Scenario #3, the exclusion of high-priority UPS and Threads Express traffic reduces car-miles. Total Scenario #3 car-miles decrease by 8,468,265 from Scenario #2. (Supplemental/ Compliance Table III-C-4, Line 4 above).

e. Car-hours

Car-hours on the TPIRR increase under Scenario #2 due to the addition of certain local trains, the modeling of “Y” trains that leave yards, and the impact that new local and reclassified “Y” trains have on the operation of all other trains. Local train car-hours, including car-hours for historic “Y” trains, under Scenario #2 increase over Rebuttal car-hours by 5.7 million. Car-hours related to yard trains costed as yard jobs were not calculated in Rebuttal.

Under Scenario #3, the exclusion of high-priority UPS and Threads Express traffic reduces car-hours by 605,570 hours from Scenario #2.

f. Containers

The number of containers carried by intermodal trains decreases in Scenario #3 with the exclusion of high-priority UPS and Threads Express traffic. Specifically, the container count in Rebuttal of 1,851,280 drops by 54,954 under Scenario #3 for a total of 1,796,326 containers.

PART III-D

D. OPERATING EXPENSES

For the three (3) scenarios evaluated in this Opening Supplemental/Compliance evidence, the operating expenses for two (2) of the scenarios change from the operating expenses presented in TPI's Rebuttal evidence. Specifically, the operating expenses associated with modeling the historic "Y" trains, other local trains and growth trains changed (Scenario #2 described above). Also, the operating expenses associated with deleting the high-priority UPS and Threads Express traffic changed (Scenario #3 described above).

This section of TPI's Supplemental/Compliance evidence begins by addressing the STB's requests for additional documentation of TPI's Opening and Rebuttal evidence and is followed by the quantification of the impact of TPIRR's operating expenses associated with implementing Scenario #2 and Scenario #3. Specifically, this section addresses the following issues requested by the STB:

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files;
2. Provide Documentation Explaining All Changes Made in Supplemental/Compliance Evidence; and
3. Recalculate All Costs that are Dependent on the Amended Train Statistics.

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files

To address the STB's Compliance Order request that the parties "provide references to underlying documents for all hard-coded numbers that appear in workpapers" and "link dependent spreadsheet files",¹⁵⁵ TPI developed Supplemental/Compliance Exhibits III-A-1 and III-A-2 which are discussed in Section III-A-1 above. Supplemental/Compliance Exhibits III-A-

¹⁵⁵ See, *Compliance Order* at 1.

1 and III-A-2 apply to all sections of this Opening Supplemental/ Compliance filing, i.e., Section III-A through Section III-H.

2. Provide Documentation Explaining All Changes Made in Supplemental/Compliance Evidence

To address the STB's *Supplemental Evidence Order* request that the parties "provide documentation explaining all changes it made in supplemental evidence",¹⁵⁶ TPI developed Supplemental/ Compliance Exhibits III-A-1 and III-A-2. Supplemental/Compliance Exhibits III-A-1 and III-A-2 apply to all sections of this Opening Supplemental/Compliance filing. See Section III-A-2 above for a detailed explanation.

3. Recalculate All Costs that are Dependent on the Amended Train Statistics

Applying the Scenario #2 operating statistics summarized in Supplemental/ Compliance Table III-C-3 above to the unit costs using the same costing methodologies that TPI used in Rebuttal results in the operating expenses shown in Supplemental/Compliance Table III-D-1 below. Table III-D-1 shows these Scenario #2 operating expenses before and after removal of the costs associated with double-counted "Y" trains.

¹⁵⁶ See, *Supplemental Evidence Order* at 8.

Supplemental/Compliance Table III-D-1
TPI Rebuttal and Scenario #2
TPIRR Operating Expenses - 2010
(\$ millions)

Item	Rebuttal (Scenario #1)	Scenario #2		
		Total	Double- Count 1/	Net 2/
(1)	(2)	(3)	(4)	(5)
1. Locomotive Lease	\$100.8	\$100.7	\$0.9	\$99.8
2. Locomotive Maintenance	140.5	142.1	2.2	139.9
3. Locomotive Servicing	878.7	883.7	9.7	874.0
4. Railcar Lease	229.1	229.8	-	229.8
5. Materials & Supply Operating	5.1	5.1	0.0	5.1
6. Train and Engine Personnel	401.8	414.5	10.8	403.7
7. Operating Managers	97.7	97.7	-	97.7
8. General & Administrative	99.6	99.6	0.0	99.6
9. Loss & Damage	8.6	8.6	-	8.6
10. Ad Valorem Tax	41.6	41.6	-	41.6
11. Maintenance-of-Way	213.0	213.0	-	213.0
12. Trackage Rights	27.7	27.7	-	27.7
13. Intermodal Lift and Ramp	65.2	65.2	-	65.2
14. Insurance	32.9	33.2	0.3	32.9
15. Startup and Training	81.9	83.7	1.6	82.2
16. Motor Vehicles	22.3	22.3	-	22.3
17. BULK Transfer	18.8	18.8	-	18.8
18. Total	\$2,465.1	\$2,487.3	\$25.6	\$2,461.7

Source: "TPIRR Operating Expense_Rebuttal.xlsx" and "TPIRR Operating Expense_Supplemental.xlsx".
1/ Double-counted "Y" trains. Values in Column (4) are from "TPI Supp OPEX Narrative Tables.xlsx".
2/ Column (3) – Column (4).

As shown in Supplemental/Compliance Table III-D-1 above, the Scenario #2 addition of historic "Y" trains, other local trains and growth trains without the removal of double-counted "Y" trains results in total operating expenses of \$2,487.3 million, or \$22.2 million more than TPI's Rebuttal operating expenses. (Supplemental/Compliance Table III-D-1, Column (3) above). After removing the \$25.6 million in operating expenses attributable to the double-counted "Y" trains, the Scenario #2 total operating expenses equal \$2,461.7 million or \$3.4 million less than the Rebuttal operating expenses. (Supplemental/Compliance Table III-D-1, Column (5) above).

Applying the Scenario #3 operating statistics summarized in Supplemental/ Compliance Table III-C-4 above to the unit costs using the same costing methodologies that TPI used in Rebuttal results in the operating expenses shown in Supplemental/Compliance Table III-D-2 below.

Supplemental/Compliance Table III-D-2 TPI Scenario #2 and Scenario #3 <u>TPIRR Operating Expenses - 2010</u> (\$ millions)				
Item	Scenario #2 Total 1/	Scenario #3		
		Total	Double- Count 2/	Net 3/
(1)	(2)	(3)	(4)	(5)
1. Locomotive Lease	\$100.7	\$100.2	\$0.9	\$99.3
2. Locomotive Maintenance	142.1	141.4	2.2	139.2
3. Locomotive Servicing	883.7	879.1	9.7	869.3
4. Railcar Lease	229.8	229.1	-	229.1
5. Materials & Supply Operating	5.1	5.1	0.0	5.1
6. Train and Engine Personnel	414.5	413.2	10.8	402.3
7. Operating Managers	97.7	97.7	-	97.7
8. General & Administrative	99.6	99.6	0.0	99.6
9. Loss & Damage	8.6	8.6	-	8.6
10. Ad Valorem Tax	41.6	41.6	-	41.6
11. Maintenance-of-Way	213.0	213.0	-	213.0
12. Trackage Rights	27.7	27.7	-	27.7
13. Intermodal Lift and Ramp	65.2	63.2	-	63.2
14. Insurance	33.2	33.1	0.3	32.7
15. Startup and Training	83.7	83.6	1.6	82.0
16. Motor Vehicles	22.3	22.3	-	22.3
17. BULK Transfer	18.8	18.8	-	18.8
18. Total	<u>\$2,487.3</u>	<u>\$2,477.1</u>	<u>\$25.6</u>	<u>\$2,451.5</u>

Source: "TPIRR Operating Expense_Supplemental.xlsx" and "TPIRR Operating Expense_Supplemental_v2.xlsx".
1/ Supplemental/Compliance Table III-D-1, Column (3).
2/ Double-counted "Y" trains. Values in Column (4) are from "TPI Supp OPEX Narrative Tables.xlsx".
3/ Column (3) – Column (4).

As shown in Supplemental/Compliance Table III-D-2 above, the removal of high-priority UPS and Threads Express traffic from Scenario #2 without removal of double-counted "Y" trains results in total operating expenses of \$2,477.1 million, or \$10.2 million less than the Scenario #2 operating expenses before the removal of double-counted "Y" trains. After

removing the \$25.6 million in operating expenses attributable to the double-counted “Y” trains, the Scenario #3 total operating expense equals \$2,451.5 million, or \$10.2 million less than the Scenario #2 operating expenses after the removal of the double-counted “Y” trains.

The remainder of this section describes the differences in operating expenses between Rebuttal (Scenario #1), Scenario #2 and Scenario #3 related to crew expenses, locomotive expenses, railcar expenses and other impacted operating expenses.

a. Crew Expenses

The additional 4,461 base year local trains and the 25,119 base year modeled “Y” trains included in Scenario #2 result in the addition of 109 crew personnel before the removal of the double-counted “Y” trains. As discussed in Section III-C-9 above, the removal of the double-counted “Y” trains reduces crew personnel by 93 people. The additional Scenario #2 crew expenses include compensation, training costs, and materials, supplies and equipment costs, including end-of-train devices. The total of these additional crew expenses equals \$14.5 million before the removal of the double-counted “Y” trains. With the removal of the double-counted “Y” trains, Scenario #2 crew expenses decrease by \$12.4 million to a total of \$2.1 million.¹⁵⁷

Scenario #3 crew expense impacts include those from Scenario #2 plus crew expenses associated with the 802 high-priority UPS and Threads Express trains. These crew expenses include compensation, training costs, materials, supplies and equipment costs, including end-of-train devices, and taxi and overnight expenses.

Supplemental/Compliance Table III-D-3 below, summarizes the TPIRR Rebuttal, Scenario #2 and Scenario #3 crew expenses.

¹⁵⁷ See, Supplemental/Compliance e-workpaper “TPI Supp OPEX Narrative Tables.xlsx”.

Supplemental/Compliance Table III-D-3
TPI Rebuttal, Scenario #2 and Scenario #3
TPIRR Crew Expenses – 2010
(\$ in millions)

<u>Expense</u>	<u>Rebuttal Scenario #1</u>	<u>Scenario #2</u>	<u>Scenario #3</u>
(1)	(2)	(3)	(4)
1. Compensation	\$401.8	\$403.7	\$402.3
2. Taxi & Overnight	17.0	17.0	17.0
3. Training	55.5	55.7	55.6
4. Mats, Supps & Equip	<u>0.9</u>	<u>0.9</u>	<u>0.9</u>
5. Total	\$475.1	\$477.3	\$475.7

Source: "TPIRR Operating Expense_Rebuttal.xlsx", "TPIRR Operating Expense_Supplemental.xlsx" and "TPIRR Operating Expense_Supplemental_v2.xlsx".

b. Locomotive Expenses

The additional 4,461 base year local trains and the 25,119 base year modeled “Y” trains included in Scenario #2 result in the need for 20 locomotives before the removal of the double-counted “Y” trains. These additional local and modeled “Y” trains also increase locomotive unit miles by 859,703 before the removal of the double-counted “Y” trains. The removal of double-counted “Y” trains reduces locomotives by 23 and locomotive unit miles by 1,025,712.

The additional Scenario #2 locomotives and locomotive unit miles impact the expenses for locomotive lease costs, locomotive maintenance costs and locomotive fuel costs. Before removing double-counted “Y” trains, these locomotive expenses reflect a decrease in locomotive lease costs of \$0.1 million, an increase in locomotive maintenance cost of \$1.7 million and an increase in locomotive fuel costs of \$5.0 million. The total of these increases equals \$6.6 million. The removal of the double-counted “Y” trains results in locomotive expense decreases of \$0.9 million in locomotive lease costs, \$2.2 million in locomotive maintenance costs and \$9.7 million in locomotive fuel costs, for a total of \$12.9 million. With these reductions in

locomotive expenses from the removal of double-counted “Y” trains, net locomotive expenses under Scenario #2 decrease by \$6.2 million when compared to Rebuttal locomotive expenses.

With the reduction in locomotives and locomotive unit miles associated with the high-priority UPS and Threads Express traffic, locomotive expenses decrease \$5.9 million from Scenario #2. This decrease includes \$0.5 million in locomotive lease costs, \$0.7 million in locomotive maintenance costs and \$4.7 million in locomotive fuel and servicing costs.

Supplemental/Compliance Table III-D-4 below summarizes the TPIRR locomotive costs for each scenario.

<u>Expense</u>	<u>Rebuttal Scenario #1</u>	<u>Scenario #2</u>	<u>Scenario #3</u>
(1)	(2)	(3)	(4)
1. Lease	\$100.8	\$99.8	\$99.3
2. Maintenance	140.5	139.9	139.2
3. Fuel	<u>878.7</u>	<u>874.0</u>	<u>869.3</u>
4. Total	\$1,119.9	\$1,113.7	\$1,107.8

Source: "TPIRR Operating Expense_Rebuttal.xlsx", "TPIRR Operating Expense Supplemental.xlsx" and "TPIRR Operating Expense Supplemental v2.xlsx".

c. Railcar Expenses

Car-miles and car-hours on the TPIRR increased under Scenario #2 due to the addition of certain local trains, the modeling of “Y” trains that leave yards and the impact that new local and reclassified “Y” trains have on the operation of all other trains. Since car-miles and car-hours were not calculated for cars in yard operations in Rebuttal, the removal of double-counted “Y” trains has no impact on Scenario #2 railcar expenses. Car-miles under Scenario #2 increase over Rebuttal car-miles by 16.6 million while car-hours increase by 5.7 million. As a result, railcar lease and maintenance expenses increase by \$0.7 million under Scenario #2.

Car-miles and car-hours decrease under Scenario #3 with the removal of priority UPS and Threads Express trains, resulting in a decrease in car lease and maintenance expenses of \$0.7 million.

Supplemental/Compliance Table III-D-5 below, summarizes the TPIRR railcar hours and maintenance expenses for each scenario.

Supplemental/Compliance Table III-D-5 TPI Rebuttal, Scenario #2 and Scenario #3 <u>TPIRR Railcar Expenses – 2010</u> (\$ and units in millions)			
Item	Rebuttal Scenario #1	Scenario #2	Scenario #3
(1)	(2)	(3)	(4)
1. Car-miles	3,591.1	3,607.7	3,599.3
2. Railcar Hours 1/	250.0	255.7	255.1
3. Maintenance and Lease Expenses	\$229.1	\$229.8	\$229.1

Source: "TPIRR Car Costs_Rebuttal.xlsx", "TPIRR Car Costs_Supplemental.xlsx" and "TPIRR Car Costs_Supplemental_v2.xlsx".
1/ Includes car dwell hours.

d. Other Expenses

Other operating expenses impacted in Scenario #2 include insurance, trackage rights expenses and outsourced payroll expenses. Additional other operating expenses impacted under Scenario #3 include loss and damage expenses, intermodal lift and ramp expenses, and outsourced audit and legal expenses. Any outsourcing expenses are included in general and administrative expenses in Supplemental/Compliance Tables III-D-1 and III-D-2 above. Of the other expenses impacted in Scenario #2, only insurance and outsourced payroll expenses are impacted by the removal of double-counted "Y" trains.

Insurance expenses changed in Scenario #2 and Scenario #3 because insurance expense is developed based on total operating expenses. Trackage rights expenses changed in both

scenarios because trackage rights expenses are developed based on a combination of car-miles, car counts and locomotive counts. Outsourced payroll expense for both scenarios changed because TPIRR headcounts changed. Loss and damage expenses changed in Scenario #3 because loss and damage is based upon the TPIRR's traffic by commodity and is applied to actual CSXT loss and damage costs by commodity. Intermodal lift and ramp expenses under Scenario #3 changed because of the elimination of high-priority UPS and Threads Express traffic. Both outsourced audit and legal expenses changed in Scenario #3 because both are developed as a percentage of TPIRR revenues.

Impacted Scenario #2 other operating expenses exceed the same Rebuttal other operating expenses by \$308,515 before the removal of double-counted yard jobs. With the removal of the double-counted "Y" trains, Scenario #2 other operating expenses decrease by \$349,304 for a difference from Rebuttal other operating expenses of -\$40,789.¹⁵⁸ Under Scenario #3, other operating expenses decrease \$2.1 million from Scenario #2, mostly driven by a \$2.0 million decrease in intermodal lift and ramp costs.

Other operating expenses impacted by the inclusion of "Y" trains (Scenario #2) and the exclusion of high-priority UPS and Threads Express traffic (Scenario #3) are summarized in Supplemental/Compliance Table III-D-6 below.

¹⁵⁸ See, Supplemental/Compliance e-workpaper "TPI Supp OPEX Narrative Tables.xlsx".

Supplemental/Compliance Table III-D-6
TPI Rebuttal, Scenario #2 and Scenario #3
TPIRR 2010 Other Operating Expenses
(\$ millions)

Item	Rebuttal Scenario #1	Scenario #2	Scenario #3
(1)	(2)	(3)	(4)
1. Loss & Damage	\$8.6	\$8.6	\$8.6
2. Trackage Rights	27.7	27.7	27.7
3. Intermodal Lift and Ramp	65.2	65.2	63.2
4. Insurance	32.9	32.9	32.7
5. Outsourced Payroll	0.3	0.3	0.3
6. Outsourced Audit	3.4	3.4	3.4
7. Outsourced Legal	<u>7.0</u>	<u>7.0</u>	<u>7.0</u>
8. Total	<u>\$145.1</u>	<u>\$145.0</u>	<u>\$142.9</u>

Source: "TPIRR Operating Expense_Rebuttal.xlsx", "TPIRR Operating Expense_Supplemental.xlsx" and "TPIRR Operating Expense_Supplemental v2.xlsx".

PART III-E

**E. NON-ROAD PROPERTY
INVESTMENT**

No changes to the TPIRR non-road property investment are required in order to comply with the STB's Supplemental/Compliance decisions.

PART III-F

F. ROAD PROPERTY INVESTMENT

The STB Supplemental/Compliance decisions requested specific changes to the road property investment included in TPI's Rebuttal evidence that impact all three (3) scenarios evaluated by TPI. For Scenario #1 (Rebuttal), the STB determined that TPI may use the corrected clearing and grubbing and bridge abutment quantities from Rebuttal but that TPI must restore the intermodal investment costs removed from its Rebuttal. For Scenario #2 (Supplemental) and Scenario #3 (Supplemental_v2), the STB requested that any changes to the infrastructure from applying the revised RTC model be incorporated.

This section of TPI's Opening Supplemental/Compliance evidence begins by addressing the STB's requests for additional documentation of TPI's Opening and Rebuttal evidence and is followed by the quantification of the impact of changes to TPIRR's road property investment associated with implementing the three (3) scenarios being evaluated. Specifically, this section addresses the following issues requested by the STB:

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files;
2. Provide Documentation Explaining All Changes Made in Supplemental/Compliance Evidence;
3. Include Rebuttal Corrections to Input Errors for Clearing and Grubbing and Bridge Abutment Quantities;
4. Include Intermodal Facilities Investment; and
5. Adjust Infrastructure as Required by RTC Modeling.

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files

To address the STB's Compliance Order request that the parties "provide references to underlying documents for all hard-coded numbers that appear in workpapers" and "link dependent spreadsheet files",¹⁵⁹ TPI developed Supplemental/Compliance Exhibits III-A-1 and III-A-2. Supplemental/Compliance Exhibits III-A-1 and III-A-2 apply to all sections of this Opening Supplemental/ Compliance filing. See Section III-A-1 above for a detailed explanation.

2. Provide Documentation Explaining all Changes Made in Supplemental/Compliance Evidence

To address the STB's *Supplemental Evidence Order* request that the parties "provide documentation explaining all changes it made in supplemental evidence",¹⁶⁰ TPI developed Supplemental/ Compliance Exhibits III-A-1 and III-A-2. Supplemental/Compliance Exhibits III-A-1 and III-A-2 apply to all sections of TPI's Opening Supplemental/Compliance filing. See Section III-A-2 above for a detailed explanation.

3. Include Rebuttal Corrections to Input Errors for Clearing and Grubbing and Bridge Abutment Quantities

In Rebuttal, TPI corrected an input error in the clearing and grubbing quantities for valuation section ACL-5-FL¹⁶¹ and also corrected a double-count of the abutments for bridges that replace oversized culverts.¹⁶² In the November 5, 2014 Petition to Supplement the Record,

¹⁵⁹ See, *Compliance Order* at 1.

¹⁶⁰ See, *Supplemental Evidence Order* at 8.

¹⁶¹ See, TPI Rebuttal, pp. III-F-28-29. These changes can be found in the "Eng Rep Input" tab of "TPIRR Rebuttal Grading.xlsx".

¹⁶² See. TPI Rebuttal, p. III-F-79. These changes can be found in "TPI Bridge Construction Costs Rebuttal.xlsx".

TPI requested that the Board accept these changes due to the fact that TPI did not discover these errors until it was preparing its Rebuttal Evidence.¹⁶³

In the *Supplemental Evidence Order*, the Board stated “[w]e will accept TPI’s clearing and grubbing and bridge abutment quantities evidence because the supplemental evidence corrects minor technical errors.”¹⁶⁴ As such, these corrections continue to be included in all three (3) scenarios of TPI’s Opening Supplemental/Compliance evidence.

4. Include Intermodal Facilities Investment

In the *Supplemental Evidence Order*, the Board denied TPI’s request to supplement its Rebuttal evidence by removing intermodal facility investment costs that were improperly included in Opening.¹⁶⁵ To address the Board’s decision, TPI revised its Rebuttal evidence (Scenario #1) to include all investment costs for intermodal facilities that were included in Opening. Table III-F-1 below provides a comparison of all the intermodal facility costs included in each round of TPI’s evidence.

¹⁶³ See, *Supplemental Evidence Order*” at 5-6.

¹⁶⁴ See, *Supplemental Evidence Order* at 5.

¹⁶⁵ *Id.*

Supplemental/Compliance Table III-F-1
TPIRR Intermodal Facility Investment Costs

Item (1)	Opening (2)	Rebuttal (3)	Opening Supplemental/ Compliance (4)	Difference 1/ (5)
1. Land	\$288,919,533	\$0	\$288,919,533	\$288,919,533
2. Total Cost of Facilities	\$2,006,285 2/	\$757,100	\$2,006,285	\$1,249,185
3. Total Cost of Pavements and Fencing	\$153,358,824	\$0	\$159,961,594 3/	\$159,961,594
4. Total Cost of Lighting	\$20,329,017	\$0	\$21,119,380 4/	\$21,119,380
5. Total Drainage Cost	\$18,031,740 2/	\$4,111,637	\$18,031,740	\$13,920,103
6. Facilities 5/	\$193,725,866	\$4,868,737	\$201,118,999	\$196,250,262
7. Engineering (10%) 6/	\$19,372,587	\$486,874	\$20,111,900	\$19,625,026
8. Mobilization (2.7%) 7/	\$5,230,598	\$131,456	\$5,430,213	\$5,298,757
9. Contingencies (10%) 8/	\$21,832,905	\$548,707	\$22,666,111	\$22,117,405
10. Grand Total 9/	\$529,081,489	\$6,035,773	\$538,246,756	\$532,210,983

Source: Supplemental/Compliance Exhibit III-F-1.

1/ Column (4) – Column (3).

2/ This Opening cost includes the Rebuttal cost shown in Column (3).

3/ This cost is greater than Opening due to an increase in Asphalt Pavement and Concrete unit costs.

4/ This cost is greater than Opening due to an increase in the Lighting 20' (poles) unit cost.

5/ Sum of Lines 2 through 5.

6/ Line 6 total x 10%.

7/ Line 6 total x 2.7%.

8/ Sum of Lines 6 through 8 x 10%.

9/ Line 1 + Line 6 + Line 7 + Line 8 + Line 9.

As shown in Supplemental/Compliance Table III-F-1 above, TPI included in its Opening Supplemental/Compliance evidence the “over \$528 million of investment costs for the 19 intermodal facilities (including land, engineering, mobilizations and contingencies)” that were removed from its Rebuttal evidence.¹⁶⁶ These intermodal facility costs are included in all three (3) scenarios of TPI’s Opening Supplemental/Compliance evidence.

¹⁶⁶ See, TPI Petition to Supplement the Record in Docket NOR 42121, *Total Petrochemicals & Refining USA, Inc. v. CSX Transportation, Inc.*, filed November 5, 2014, at pages 5-6. For a detailed explanation of the intermodal facility investment cost included see, Supplemental/Compliance workpaper “TPI Intermodal Facility Cost Comparison.xlsx”.

5. Adjust Infrastructure as Required by RTC Modeling

TPI has not changed any infrastructure as a result of the RTC modeling for Scenario #2 (Supplemental) and Scenario #3 (Supplemental_v2). Therefore, no additional changes have been made to the investment costs in these scenarios.

PART III-G

G. DISCOUNTED CASH FLOW ANALYSIS

TPI placed the results associated with each of the three (3) scenarios discussed in TPI's Opening Supplemental/Compliance evidence into TPI's Rebuttal discounted cash flow ("DCF") model to determine which scenario resulted in relief for the issue traffic. Each DCF model was identical to TPI's Rebuttal DCF model with the following exceptions:

Scenario #1 – The road property investment in TPI's Rebuttal DCF model was changed to correct clearing and grubbing and bridge abutment quantity input errors plus the inclusion of intermodal facilities investment.

Scenario #2 – The Scenario #1 DCF model was adjusted to incorporate the operating expense changes resulting from modeling historic "Y" trains, other local trains and growth trains.

Scenario #3 – The Scenario #2 DCF model was adjusted to incorporate the revenues and operating expense changes resulting from excluding high-priority UPS and Threads Express traffic.

This section of TPI's Opening Supplemental/Compliance evidence addresses the following issues requested by the STB related to the DCF models:

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files;
2. Provide Documentation Explaining All Changes Made in Supplemental/Compliance Evidence;
3. The Three (3) DCF models Used to Present Results; and
4. The Board Should Rely On Its Historic DCF Netting Approach.

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files

To address the STB's Compliance Order request that the parties "provide references to underlying documents for all hard-coded numbers that appear in workpapers" and "link

dependent spreadsheet files”,¹⁶⁷ TPI developed Supplemental/Compliance Exhibits III-A-1 and III-A-2 which are discussed in Section III-A-1 above. Supplemental/Compliance Exhibits III-A-1 and III-A-2 apply to all sections of this Opening Supplemental/ Compliance filing, i.e., Section III-A through Section III-H.

As shown in Supplemental/ Compliance Exhibit III-A-1, TPI made the following six (6) adjustments to the DCF model used in Rebuttal:

1. Added workpaper references for MACRS asset life percentages;¹⁶⁸
2. Added workpaper references for annual bonus depreciation percentages;¹⁶⁹
3. Added workpaper references for the Federal statutory corporate tax rate;¹⁷⁰
4. Added source references for state corporate tax rates;¹⁷¹
5. Added source references for the annual cost of railroad preferred equity;¹⁷² and
6. Added source references for asset salvage rates.¹⁷³

2. Provide Documentation Explaining All Changes Made in Supplemental/Compliance Evidence

To address the STB’s *Supplemental Evidence Order* request that the parties “provide documentation explaining all changes it made in supplemental evidence”,¹⁷⁴ TPI developed Supplemental/ Compliance Exhibits III-A-1 and III-A-2. Supplemental/Compliance Exhibits III-

¹⁶⁷ See, *Compliance Order* at 1.

¹⁶⁸ See, Supplemental/Compliance e-workpaper “Exhibit III-H-1_Rebuttal.xlsm,” worksheet “Inputs” at cells D325, D348, and I365.

¹⁶⁹ See, Supplemental/Compliance e-workpaper “Exhibit III-H-1_Rebuttal.xlsm,” worksheet “IDC” at cell B053.

¹⁷⁰ See, Supplemental/Compliance e-workpaper “Exhibit III-H-1_Rebuttal.xlsm,” worksheet “Inputs” at cell D297, worksheet “Replacement” at cell K22, worksheet “Net MGA” at cell K22.

¹⁷¹ See, Supplemental/Compliance e-workpaper “Exhibit III-H-1_Rebuttal.xlsm,” worksheet “Inputs” at cell E392.

¹⁷² See, Supplemental/Compliance e-workpaper “Exhibit III-H-1_Rebuttal.xlsm,” worksheet “Inputs” at cells D85 to D92.

¹⁷³ See, Supplemental/Compliance e-workpaper “Exhibit III-H-1_Rebuttal.xlsm,” worksheet “Inputs” at cells D308 and D317.

¹⁷⁴ See, *Supplemental Evidence Order* at 8.

A-1 and III-A-2 apply to all sections of this Opening Supplemental/Compliance filing. See Section III-A-2 above for a detailed explanation.

3. The Three (3) DCF Models Used to Present Results

Based on the changes described in Sections III-A through III-F above, TPI developed three (3) DCF models for the three (3) scenarios requested in the STB's Supplemental/Compliance decisions and described above. The results of Scenario #1 are included in Supplemental/Compliance Exhibit III-H-1, and are summarized in Supplemental/Compliance Table III-G-1 below.

<u>Year</u>	<u>Annual Stand-Alone Requirement</u>	<u>Stand-Alone Revenues</u>	<u>Over-Payments (Shortfall)</u>	<u>PV Difference</u>	<u>Cumulative PV Difference</u>
(1)	(2)	(3)	(4)	(5)	(6)
7/1/10-12/31/10	\$2,972.2	\$2,967.3	(\$4.9)	(\$4.9)	(\$4.9)
2011	\$6,258.3	\$6,540.5	\$282.2	\$252.9	\$248.1
2012	\$6,433.2	\$6,775.7	\$342.5	\$275.8	\$523.9
2013	\$6,575.5	\$7,075.5	\$500.0	\$364.6	\$888.5
2014	\$6,778.1	\$7,490.9	\$712.8	\$466.3	\$1,354.8
2015	\$6,982.1	\$7,956.7	\$974.6	\$573.4	\$1,928.2
2016	\$7,292.3	\$8,544.9	\$1,252.6	\$662.8	\$2,591.0
2017	\$7,556.7	\$8,976.6	\$1,419.9	\$675.7	\$3,266.7
2018	\$7,899.9	\$9,576.7	\$1,676.8	\$717.6	\$3,984.4
2019	\$8,307.1	\$10,270.8	\$1,963.6	\$755.8	\$4,740.2
1/1/20-6/30/20	\$4,322.9	\$5,514.8	\$1,191.8	\$435.1	\$5,175.3

Source: TPI Supplemental/Compliance e-workpaper "Exhibit III-H-1 Rebuttal.xls."

As shown in Supplemental/Compliance Table III-G-1 above, after making adjustments to correct clearing and grubbing and bridge abutment quantity input errors and including intermodal

facilities investment, the TPIRR stand-alone revenues continue to exceed SAC in every period, except the second half of 2010.

After making the adjustments described in Scenario #1, TPI next incorporated the operating expense changes¹⁷⁵ resulting from adding historic “Y” trains, other local trains and growth trains to the RTC model as requested by the STB. TPI evaluated the resultant changes using the STB’s DCF process shown in Supplemental/Compliance Exhibit III-H-2, and summarized them in Supplemental/Compliance Table III-G-2 below.

Supplemental/Compliance Table III-G-2 Summary of TPI Scenario #2 DCF Results for the TPIRR - July 1, 2010 to June 30, 2020 (\$ in millions)					
Year	Annual Stand-Alone Requirement	Stand- Alone Revenues	Over- Payments (Shortfall)	PV Difference	Cumulative PV Difference
(1)	(2)	(3)	(4)	(5)	(6)
7/1/10- 12/31/10	\$2,970.4	\$2,967.3	(\$3.2)	(\$3.2)	(\$3.2)
2011	\$6,254.3	\$6,540.5	\$286.2	\$256.5	\$253.4
2012	\$6,429.0	\$6,775.7	\$346.7	\$279.3	\$532.6
2013	\$6,571.1	\$7,075.5	\$504.4	\$367.8	\$900.4
2014	\$6,773.6	\$7,490.9	\$717.3	\$469.3	\$1,369.7
2015	\$6,977.5	\$7,956.7	\$979.2	\$576.2	\$1,945.8
2016	\$7,287.3	\$8,544.9	\$1,257.6	\$665.5	\$2,611.3
2017	\$7,551.4	\$8,976.6	\$1,425.2	\$678.2	\$3,289.5
2018	\$7,894.4	\$9,576.7	\$1,682.3	\$720.0	\$4,009.5
2019	\$8,301.2	\$10,270.8	\$1,969.6	\$758.1	\$4,767.7
1/1/20-6/30/20	\$4,319.8	\$5,514.8	\$1,195.0	\$436.2	\$5,203.9

Source: TPI Supplemental/Compliance e-workpaper “Exhibit III-H-1 Rebuttal Supplemental.xls.”

Supplemental/Compliance Table III-G-2 above shows that adding historic “Y” trains, other local trains and growth trains to the RTC model, and including the changes in operating expenses associated with putting these trains in the model, increased the SAC requirement and

¹⁷⁵ As explained in Section III-C above, adding historic “Y” trains, other local trains and growth trains to the RTC model had no impact on the TPIRR road property investment.

lowered the overpayments. However, even with these changes, the TPIRR stand-alone revenues continue to exceed SAC requirements in every year, except the second half of 2010.

Finally, TPI adjusted the Scenario #2 DCF model to incorporate the revenues and operating expense changes¹⁷⁶ resulting from excluding high-priority UPS and Threads Express traffic (Scenario #3 described above). The results of this analysis are contained in Supplemental/ Compliance Exhibit III-H-3, and summarized in Supplemental/ Compliance Table III-G-3 below.

Year	Annual Stand-Alone Requirement	Stand- Alone Revenues	Over- Payments (Shortfall)	PV Difference	Cumulative PV Difference
(1)	(2)	(3)	(4)	(5)	(6)
7/1/10- 12/31/10	\$2,965.2	\$2,962.1	(\$3.1)	(\$3.1)	(\$3.1)
2011	\$6,242.9	\$6,529.2	\$286.3	\$256.7	\$253.5
2012	\$6,417.6	\$6,765.4	\$347.8	\$280.1	\$533.6
2013	\$6,559.3	\$7,064.6	\$505.4	\$368.5	\$902.1
2014	\$6,761.4	\$7,479.0	\$717.6	\$469.5	\$1,371.6
2015	\$6,964.7	\$7,943.4	\$978.7	\$575.8	\$1,947.5
2016	\$7,273.6	\$8,528.9	\$1,255.3	\$664.2	\$2,611.7
2017	\$7,536.9	\$8,959.1	\$1,422.2	\$676.8	\$3,288.5
2018	\$7,878.8	\$9,557.5	\$1,678.7	\$718.5	\$4,007.0
2019	\$8,284.4	\$10,249.5	\$1,965.1	\$756.4	\$4,763.4
1/1/20-6/30/20	\$4,310.8	\$5,503.0	\$1,192.2	\$435.2	\$5,198.6

Source: TPI Supplemental/Compliance e-workpaper "Exhibit III-H-1 Rebuttal Supplemental v2.xls."

As shown in Supplemental/Compliance Table III-G-3 above, excluding high-priority UPS and Threads Express traffic decreases both the SAC requirements and the stand-alone revenues. However, even with these adjustments, stand-alone revenues still exceed SAC in each period of the DCF analysis, except the second half of 2010.

¹⁷⁶ As explained in Section III-C above, adding historic "Y" trains, other local trains and growth trains to the RTC model had no impact on the TPIRR road property investment.

4. The Board Should Rely On Its Historic DCF Netting Approach

As shown in Supplemental/Compliance Tables III-G-1, III-G-2 and III-G-3 above, the adjustments made with implementing each of the three (3) scenarios discussed in TPI's Opening Supplemental/Compliance evidence result in SARR revenues exceeding SAC in all periods, except the second half of 2010 when the SARR would experience a small shortfall. The STB's DCF approach accounts for such shortfalls by utilizing a netting approach in which any underpayments are netted against revenue overpayments. If the present value of all overpayments is greater than the present value of the aggregate losses over the 10-year analysis period, the SARR has over recovered its costs and rate reductions are due.

When overpayments are greater than losses on a present value basis, as is the case in all three (3) scenarios presented in this Opening Supplemental/Compliance filing, the Board then must determine how much to lower the SARR's revenues, and for which years, while taking into consideration the need to recover any annual losses. Historically, the STB performed this task by using a present value methodology that allocated net SARR overpayments (e.g., the difference between aggregate SARR revenues and SAC) to those years in the DCF model where annual SARR revenues exceeded annual SAC ("*Historic Approach*").¹⁷⁷ This meant that in the years where SARR revenues were greater than SAC, relief would be available, but the available relief was reduced to account for those years in which SAC exceed SARR revenues.

The *Historic Approach* was the preferred method for allocating the net available relief for over 24 years. For some unexplained reason, however, the STB deviated from the *Historic Approach* in the *SunBelt* decision, and used a new approach to offset gains and losses. The Board's new method carries annual losses forward to future years without consideration of

¹⁷⁷ See, for example, *Coal Trading 1990* at page 436, and *AEP Texas 2009* at 16-17.

whether SARR revenues exceeded SAC in those years (“*SunBelt Approach*”).¹⁷⁸ Unlike the *Historic Approach*, which would allocate relief to those years where SARR revenues were greater than SAC, the *SunBelt Approach* creates situations where annual SARR revenues exceeded SAC, but no relief would be provided to the shippers.

There are at four (4) issues and flaws with the STB’s *SunBelt Approach* that make its use inappropriate. First, there is no reason to use a new approach since the *Historic Approach* was perfectly capable of addressing the allocation of underpayments. This was most accurately demonstrated in the *AEP Texas* case where the SARR incurred losses in seven (7) of the model’s 21 years, but the Board still was able to develop MMM R/VC ratios.

Second, the *SunBelt Approach* allocates excess revenues without consideration for whether the SARR revenues exceed costs in certain years. As the STB explained in *AEP Texas 2009*, it is those years in which revenues exceed cost that revenue adjustments are required to determine relief. As explained by the Board:

As Table I shows, the cumulative over-recovery at the end of 20 years already reflects the appropriate reduction in revenues for each of the negative (under-recovery) years in the DCF model (2005-2011). Thus, it is only the years in which revenues exceed cost that need a revenue-limiting adjustment.¹⁷⁹

The *SunBelt Approach* ignores whether SARR revenues exceed SAC in specific years.

Third, the *SunBelt Approach* can produce more than one correct answer. In *SunBelt*, all the SARR losses occurred at the beginning of the DCF model period, so all of the losses were pushed to later years.¹⁸⁰ This may not always be the case, though. It is possible for losses to occur at the end of the model period as in *TMPA*, which, if using the *SunBelt Approach*, would

¹⁷⁸ The STB’s new approach utilized loss carry forwards in the *SunBelt* case because SAC exceeded revenues in the early years but not the later years of the model. If SARR revenues exceeded SAC in the later years of the model but not the early years, the STB’s approach would have to utilize loss carrybacks to carry future losses back to the early model years.

¹⁷⁹ See, *AEP Texas 2009* at 17.

¹⁸⁰ See, *SunBelt* at p. 203.

require carrying the losses back to earlier years. The real problem comes, though, if the losses occur in the middle of the DCF period as was the case in *AEP Texas*. In such a situation, losses either could be pushed forward to later years or carried back to earlier years. The results would be the same on a present value basis, but would produce different levels of relief in different years. Simply stated, the amount of relief available in certain years would be different based upon whether losses are pushed forward or carried back.

Fourth, the *SunBelt Approach* could produce absurd results depending upon the level and timing of overpayments and underpayments over the DCF model period. Assume, for example, the SARR incurred a significant loss in the last year of the DCF model, but SARR revenues exceed SAC in the prior nine (9) model years such that, on a present value basis, total revenues exceeded total SAC. If the last year loss was large enough, the *SunBelt Approach* could result in only the first year receiving relief even though the SARR revenues exceeded SAC in all years but one.

PART III-H

H. RESULTS OF SAC ANALYSIS

The changes TPI made to the three (3) DCF models described in the previous section of TPI's Opening Supplemental/Compliance evidence demonstrates that relief is available to the SARR traffic group under each of the three (3) scenarios evaluated. This section of TPI's Opening Supplemental/Compliance evidence first addresses the STB's requests for additional documentation of TPI's Opening and Rebuttal evidence followed by a quantification of the impact of applying the Maximum Mark-up Methodology ("MMM") model to the results of each stand-alone scenario requested by the STB. Finally, this section presents TPI's challenge to the so-called *Otter Tail* internal cross-subsidy test.

These issues are addressed below under the following topical headings:

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files;
2. Provide Documentation Explaining All Changes Made in Supplemental/Compliance Evidence;
3. Present Results for the Three (3) MMM Models; and
4. The Board Should Not Apply the *Otter Tail* Cross-Subsidy Test.

1. Reference Underlying Documents for All Hard Coded Numbers That Appear in Workpapers and Link Dependent Spreadsheet Files

To address the STB's Compliance Order request that the parties "provide references to underlying documents for all hard-coded numbers that appear in workpapers" and "link dependent spreadsheet files,"¹⁸¹ TPI developed Supplemental/Compliance Exhibits III-A-1 and III-A-2 which are discussed in Section III-A-1 above. Supplemental/Compliance Exhibits III-A-

¹⁸¹ See, *Compliance Order* at 1.

1 and III-A-2 apply to all sections of this Opening Supplemental/ Compliance filing, i.e., Section III-A through Section III-H.

As shown in Supplemental/ Compliance Exhibit III-A-1, TPI made the following three (3) adjustments to the MMM model used in Rebuttal, to the models that directly or indirectly feed into the Rebuttal MMM model, and to TPI's cross-subsidy analysis workpapers:

- a. As discussed in Section III-A above, TPI added unique identifiers that match records from TPI's Rebuttal revenue files to the Rebuttal MMM model;¹⁸²
- b. Added a workpaper reference for the Global Insight RCAF Forecast included in the URCS index forecast;¹⁸³ and
- c. Removed passwords from its cross-subsidy analysis revenue workpapers.¹⁸⁴

2. Provide Documentation Explaining All Changes Made in Supplemental/Compliance Evidence

To address the STB's *Supplemental Evidence Order* request that the parties "provide documentation explaining all changes it made in supplemental evidence",¹⁸⁵ TPI developed Supplemental/ Compliance Exhibits III-A-1 and III-A-2. Supplemental/Compliance Exhibits III-

¹⁸² See, Supplemental/Compliance e-workpapers "TPIRR MMM Rebuttal.xlsm," worksheet "MMM" at cell ranges A8 to A78509, G8 to G122672 and M8 to M122481, and worksheet "2013 to 2020 Input" at cell range C3 to C204519; "TPIRR MMM Rebuttal_Supplemental.xlsm", worksheet "MMM" at cell ranges A8 to A78509, G8 to G122672 and M8 to M122481, and worksheet "2013 to 2020 input" at cell range C3 to C204519; and "RPIRR MMM Rebuttal_Supplemental_v2.xlsm", worksheet "MMM" at cell ranges A8 to A78509, G8 to G122672 and M8 to M122481, and worksheet "2013 to 2020 Input". TPI also included a new worksheet "Revenue Crosswalk" in each Supplemental/Compliance MMM model that identifies that identifies the links between the MMM file and TPI's Rebuttal revenue files.

¹⁸³ See, Supplemental/Compliance e-workpaper "MMM CSXT URCS Index Rebuttal.xlsx," worksheet "Global Insight" at cell B15.

¹⁸⁴ See, Supplemental/Compliance e-workpapers "Cross Subsidy Revenue Summary rebut nvernon.xlsx," 2012 Revenue rebut nvernon.xlsx," "2011 Revenue rebut nvernon.xlsx," 2010 Revenue rebut nvernon.xlsx," "TPIRR Intermodal Revenue Forecast (Final) xsub rebut nvernon.xlsx," "TPIRR General Freight Revenue Forecast STCC 29-UN 2h 2012(Final) xsub rebut nvernon.xlsx," "TPIRR General Freight Revenue Forecast STCC 29-UN 1h 2013 (Final) xsub rebut nvernon.xlsx," "TPIRR General Freight Revenue Forecast STCC 28 2h 2012(Final) xsub rebutnvernon.xlsx," "TPIRR General Freight Revenue Forecast STCC 28 1h 2013 (Final) xsub rebut nvernon.xlsx," "TPIRR General Freight Revenue Forecast STCC 1-26 2h 2012 (Final) xsub rebut nvernon.xlsx," "TPIRR General Freight Revenue Forecast STCC 1-26 1h 2013 (Final) xsub rebut nvernon.xlsx," and "TPIRR Coal Revenue Forecast (Final) xsub rebut nvernon.xlsx."

¹⁸⁵ See, *Supplemental Evidence Order* at 8.

A-1 and III-A-2 apply to all sections of this Opening Supplemental/Compliance filing. See Section III-A-2 above for a detailed explanation.

3. Present Results for the Three MMM Models

Based on the changes described in Sections III-A through III-G above, TPI developed three (3) MMM models for the three (3) scenarios requested in the STB’s Supplemental/Compliance decisions and described above. The MMM results for Scenario #1, Scenario #2 and Scenario #3 are included in Supplemental/Compliance Exhibits III-H-4, III-H-5, and III-H-6, respectively, and are summarized along with TPI’s Rebuttal MMM results in Supplemental/Compliance Table III-H-1 below.

Application of the MMM model yields the following maximum R/VC ratios for each year of the DCF analysis.

Supplemental/Compliance Table III-H-1				
<u>Rebuttal and Supplemental/Compliance MMM Results</u>				
Year	TPI Rebuttal Maximum R/VC	Scenario #1 Maximum R/VC	Scenario #2 Maximum R/VC	Scenario #3 Maximum R/VC
(1)	(2)	(3)	(4)	(5)
7/1/10-12/31/10	393.0%	NO REDUCTION	NO REDUCTION	NO REDUCTION
2011	241.6%	261.6%	260.4%	260.3%
2012	236.3%	255.5%	254.3%	254.0%
2013	207.4%	222.3%	221.4%	221.2%
2014	185.0%	195.8%	195.2%	195.1%
2015	167.8%	175.8%	175.3%	175.4%
2016	155.6%	161.9%	161.5%	161.6%
2017	151.4%	156.9%	156.6%	156.7%
2018	144.6%	149.3%	149.0%	149.1%
2019	139.6%	143.7%	143.4%	143.5%
1/1/20-6/30/20	132.4%	135.7%	135.5%	135.6%

Sources: Rebuttal Exhibit III-H-2, Supplemental/Compliance Exhibit III-H-4, Supplemental/Compliance Exhibit III-H-5, and Supplemental/Compliance Exhibit III-H-6.

As shown in Supplemental/Compliance Table III-H-1 above, the maximum R/VC ratios ranged from 132.4 percent to 393.0 percent in TPI's Rebuttal evidence. With the changes made to TPI's Rebuttal evidence under Scenario #1, the maximum R/VC ratios increased from TPI's Rebuttal results, and now range from 135.7 percent to 261.6 percent with no reduction in the second half of 2010 (Supplemental/Compliance Table III-H-1, Column (3) above). The addition of the historic "Y" train and other local traffic to the Scenario #1 analyses leads to a slight decrease in the SAC requirements in Scenario #2, and subsequently to a decrease in the MMM results (Supplemental/Compliance Table III-H-1, Column (4) above). The subsequent removal of certain high-priority intermodal traffic in Scenario #3 results in a decrease in SAC requirements and SAC revenues. The results of these Scenario #3 changes leads to slight changes from the Scenario #2 results¹⁸⁶ (Supplemental/Compliance Table III-H-1, Column (5) above).

4. The Board Should Not Apply the Otter Tail Cross-Subsidy Test

As stated in TPI's Rebuttal Evidence, TPI identified a potential *Otter Tail* cross-subsidy on the line segment from Seymour to North Vernon, IN.¹⁸⁷ TPI, however, believes that the *Otter Tail* cross-subsidy test is inappropriate and is not justified as explained below.

In *Otter Tail*, the Board announced, for the first time, that it would extend the cross-subsidy test beyond the so-called "threshold" inquiry conducted in *PPL*, to limit any rate relief to which a complainant would otherwise be entitled under the SAC analysis. In other words, the cross-subsidy test would not just be a "pass-fail" test, but also would affect the *level* of the rate

¹⁸⁶ The adjustments we made to the operating expenses off-set the loss in revenues from the removal of the high-priority traffic. As a result, the MMM model produced slightly lower results in the early years when compared to Scenario #2 results. In the outer years, the change in the gross-ton-miles from losing the high-priority traffic led to a slight increase in operating expenses and a slight increase in R/VC ratios later in the model.

¹⁸⁷ See, TPI Rebuttal workpaper "Exhibit III-H-1 XSub - Rebuttal.xlsm."

that the Board would prescribe as reasonable *after* passing the “threshold” test. This announcement was unnecessary in that case, because the Board’s application of the *PPL* cross-subsidy test deprived Otter Tail of any rate relief under the SAC analysis, so there was no cause to *limit* the extent of such relief. Nor has the Board ever applied the *Otter Tail* test since then. Therefore, the *Otter Tail* cross-subsidy test, at present, is only *dicta*, not “settled law” as claimed by CSXT.¹⁸⁸

TPI contends that the *Otter Tail* test should be rejected for two independent reasons. First, it arbitrarily measures a cross-subsidy based on hypothetical rates that are not charged in the real world. Second, it deviates without explanation from the Board’s *Wisconsin P&L* decision, which held that the very same logic the Board used to justify the *Otter Tail* test violates contestable market theory.

a. The *Otter Tail* Cross-Subsidy Test Arbitrarily Measures a Cross-Subsidy Based on Rates that Will Not Be Charged in the Real World

The Board announced the *Otter Tail* test with the purpose of limiting any rate relief to which a complainant may otherwise be entitled by applying the cross-subsidy test a second time at the rate-setting phase of a SAC case. This second application of the cross-subsidy test *assumes* that any rate reductions applied to the complainant would apply to *all other traffic carried by the SARR*, even though any reductions imposed by the Board would in fact apply *only* to the complainant’s shipments.¹⁸⁹ According to the Board’s expansion of the cross-subsidy test, if the lower revenues resulting from *universally-applied* rate reductions on the lighter-volume segment of the SARR would not cover the costs associated with carrying that traffic, then the

¹⁸⁸ See, *CSXT’s Reply in Opposition to Complainant’s Petition to Supplement the Record*, filed November 25, 2014, p. 25.

¹⁸⁹ See, *Otter Tail* at 11.

rate reductions would *create* a cross-subsidy. In that case, the Board would increase the “maximum reasonable rate” determined by the SAC analysis to a level that eliminates the supposed cross-subsidy.

Unlike the threshold *PPL* cross-subsidy test, which is based upon real world rates for the SARR’s traffic, the second *Otter Tail* cross-subsidy test uses rates that will *not* be charged in the real world. This causes the Board to conclude that a rate reduction required by the SAC analysis creates a cross-subsidy, when in reality no revenue shortfall will occur at all. The second application of the cross-subsidy test severs all connection between the SARR’s revenues and the real world, leading to arbitrary determinations of a cross-subsidy.¹⁹⁰

In addition, CSXT’s attempt to support the *Otter Tail* decision by claiming that “the Board has previously found that to prescribe rates without considering non-issue SARR traffic would ‘inappropriate[ly]...circumvent Congress’ intent by shifting any unregulated revenues from the railroad to a particular captive shipper”¹⁹¹ is bootstrapping because it is a quote from the *Otter Tail* decision itself.¹⁹² CSXT’s inability to support its arguments with other than *Otter Tail* references is indicative of the isolated nature of the *Otter Tail* decision. TPI continues to believe that measuring a cross-subsidy based upon hypothetical rates that will never be charged is senseless.

¹⁹⁰ Although the SARR itself is hypothetical, its revenues are based on real world rates, *Guidelines* at 544 (“the revenue contribution of other...shippers will be at the level of their current rates”), and its costs must be feasible in the real world, *Id.* at 542 (“we will be guided...by the least cost (theoretically) feasible SAC model”), 543 (“the proponent of a SAC model must show that the alternative is feasible...[and] its data on construction and operating costs must be verifiable”).

¹⁹¹ See, *CSXT’s Reply in Opposition to Complainant’s Petition to Supplement the Record*, filed November 25, 2014, pp. 26-27.

¹⁹² See, *Otter Tail* at 11.

**b. The Otter Tail Cross-Subsidy Test
Deviates from the Board's Precedent
in Wisconsin P&L**

The Board's rationale for applying the cross-subsidy test a second time at the rate prescription stage also directly contradicts its own precedent. At page 11 of the *Otter Tail* decision, the Board contends that the second cross-subsidy test is compelled by contestable market theory because:

[T]he goal of the SAC analysis is to simulate the competitive market rate that would prevail in a contestable marketplace, where no rates above the SAC level for *any* shipper in the selected traffic group would be sustainable *without attracting new entry*. Thus, our analysis must assume the repeated application of the SAC test to all shippers in the traffic group. (emphasis added)

The Board, however, *rejected* this very same logic as a violation of contestable market theory in *Wisconsin P&L*.¹⁹³ In that case, the Union Pacific Railroad Company ("UP") argued that an adjustment to the SAC analysis was "required by contestable market theory because the [SARR] would in theory be subject to competition from yet another stand-alone railroad, resulting in an 'asymmetric risk.'"¹⁹⁴ This argument is comparable to the Board's claim in this case that the SAC analysis must assume "repeated application of the SAC test to all shippers."

But in *Wisconsin P&L*, the Board rejected that argument because it would create a barrier to entry, which is *inconsistent* with a contestable market:

[A]s we have often explained, *SAC principles require the exclusion of costs and risks not faced by the incumbent railroad*, so as to remove any advantages which the existing railroad has over a hypothetical stand-alone railroad. Here, UP has acknowledged, as it must, that UP does not operate in a contestable market, which means *the risk UP's proposed adjustment is designed to take into account—that a rise in projected returns above a certain level will result in the carrier being replaced immediately and entirely by a new entrant—is not faced by UP itself*. As we stated in *FMC* (at 846), we do not allow an existing railroad to charge captive shippers a

¹⁹³ See, *Wisconsin P&L* at 982-984.

¹⁹⁴ *Id.* at 983.

rate designed to compensate for risks that the incumbent carrier's investors do not face.¹⁹⁵

Because the *Otter Tail* cross-subsidy test assumes risks that CSXT does not face (*i.e.*, reduction of all rates to the SAC level), it too violates contestable market theory. The Board asserts that other captive shippers in the SARR's traffic group *could* challenge their own rates in the future, thereby implying that those rates might in fact be reduced to a point that creates a cross-subsidy.¹⁹⁶ But this is pure speculation based on the same type of asymmetric risk that the Board rejected in *Wisconsin P&L*.

In addition, CSXT's attempt to claim that the issue in *WP&L* is only broadly related to the issue of cross-subsidy in that it relates to Contestable Markets theory¹⁹⁷ is capricious. The issue in *WP&L* of the impact of potential repeated entry by competing railroads into a simulated competitive market is in fact a key component of the Board's *Otter Tail* cross-subsidy rationale. The shipper in the *Otter Tail* case demonstrated that a cross-subsidy could not occur through repeated application of the SAC test because the Board's remedial authority in a particular rate proceeding is limited to the movements subject to the complaint. The Board rejected the shipper's demonstration based on the specific premise that rates above the SAC level for any shipper in the selected traffic group would not be sustainable because the presumably high rates would attract new entry from competing railroads.¹⁹⁸ In other words, the Board reasoned that, even if it reduced just the issue traffic rate and kept other rates at supra-competitive levels, the non-issue rates would eventually be reduced through the entry of other competing SARRs into the market.

¹⁹⁵ *Id.* at 983-984 (citations and footnotes omitted; emphasis added).

¹⁹⁶ *See, Otter Tail* at 11.

¹⁹⁷ *See, CSXT's Reply in Opposition to Complainant's Petition to Supplement the Record*, filed November 25, 2014, p. 27.

¹⁹⁸ *See, Otter Tail* at p. 11.

However, it was just such repeated entry by other competing railroads, and the resultant impact on non-issue rail rates, that the Board rejected in its *Wisconsin P&L* decision. UP, the defendant in *Wisconsin P&L*, claimed that better than expected returns stemming in part from high non-issue traffic rates, would attract competitive entry into the SARR's market and prevent the SARR from realizing its full revenue potential. Specifically, UP stated that:

[I]n a contestable market, better than expected outcomes are likely to attract competitive entry, preventing the firm from capturing the full measure of the possible revenues.¹⁹⁹

The Board summarily rejected this argument in *Wisconsin P&L* because UP's position violated basic SAC principles. It is long established that SAC principles require the exclusion of costs and risks not faced by the real world railroad.²⁰⁰

The STB's concern expressed in its *Wisconsin P&L* decision that the issue-traffic SARR not face risks also faced by the incumbent carrier is germane to the application of the *Otter Tail* cross-subsidy analysis. The Board opined in *Otter Tail* that the goal of the SAC analysis is to simulate the competitive market where no rates above the SAC level for any shipper in the selected traffic group would be sustainable without attracting new entry. Thus, the Board assumed in its *Otter Tail* secondary cross-subsidy analysis that non-issue rates included in the cross-subsidy analysis would fall over time as new competitive railroads entered the market or through the repeated application of the SAC test to all shippers in the traffic group.

However, it is a bedrock principle that the real world railroad industry is not contestable, and real world railroads do not face the competitive risks faced by a hypothetical SARR,

¹⁹⁹ See, *Wisconsin P&L* at 983, n. 79.

²⁰⁰ See, *Coal Rate Guidelines* at p. 529; *West Texas Utilities* at pp. 668 to 673; *APS I* at pp 385 to 387.

including the threat of repeated entry by other hyper competitive stand-alone entities.²⁰¹ The Boards' application of the *Otter Tail* secondary cross-subsidy analysis places costs upon the shipper not incurred by the real world railroads through the presumed repeated entry of new railroads. The STB correctly concluded in *Wisconsin P&L* that shippers should not face these costs because real world incumbent railroads do not face such costs, and to do so places a burden on the complaining shipper not faced by the incumbent railroad.

Moreover, Congress has restricted the Board's jurisdiction over rates to a small subset of total rail traffic over which a railroad possesses "market dominance".²⁰² This means the SAC test can *never* be applied to *all* the SARR's traffic, contrary to the Board's incorrect assumption that the SAC test will be repeatedly applied to *all* shippers on the SARR.²⁰³

Finally, in *Wisconsin P&L* the Board declared that it is neither necessary nor appropriate to adjust the SAC rate to anticipate speculative future occurrences:

In any event..., as we have said in prior SAC cases, [a railroad] may petition to *reopen* and adjust the rate prescription should these trends shift. Thus, to compensate UP in advance for the *possibility* that the projections may not be realized is neither necessary nor appropriate and, in our view, would provide for an *over-recovery* of the total stand-alone costs.²⁰⁴

Contrary to this precedent, the *Otter Tail* test would allow CSXT to *over-recover* its total stand-alone costs by applying the second cross-subsidy test in the present, to ensure against the *possibility* that other captive shippers in the SARR traffic group *might* create a cross-subsidy by successfully challenging their rates in the future.²⁰⁵ If those events do not occur, CSXT is

²⁰¹ See, *Coal Rate Guidelines* at p. 529 "[t]he railroad industry is recognized to have barriers to entry and exit and thus is not considered contestable for captive traffic...Common sense *** indicates that the railroad industry is not contestable;" (internal quotes omitted.)

²⁰² See, 49 U.S.C. §10707.

²⁰³ See, *Otter Tail* at 11.

²⁰⁴ See, *Wisconsin P&L* at 984 (emphasis added).

²⁰⁵ The probability of that occurring in this case is even lower because, by the time the Board issues a decision in late 2015, TPI already will be 5 years into any rate prescription without a single other SAC rate prescription for any of the TPIRR's traffic.

assured of over-recovering its stand-alone costs, contrary to *Guidelines*. Indeed, the risk of over-recovery is particularly high in this case, since repeated application of the SAC test to *all* shippers on the SARR is *impossible* due to statutory restrictions on the rate regulation of non-market-dominant traffic.²⁰⁶ Therefore, it is neither necessary nor appropriate to deny TPI relief based on the Board's speculative and inaccurate reasoning in *Otter Tail*.

If and when other captive shippers in the SARR's traffic group do challenge their own rates in the future, *and if* their rate reductions combined with TPI's would create a cross-subsidy, the Board is fully empowered to re-open TPI's case to consider this changed circumstance. Indeed, the Board has demonstrated its willingness to reopen a prior rate case in order to vacate a prescribed rate due to changed circumstances.²⁰⁷ Unless and until such changes occur, however, it would be arbitrary and capricious for the Board to deny TPI relief from an unreasonably high rate based on pure speculation.

Contrary to CSXT's assertions it would not be costly, impractical or inefficient to reconsider the changed circumstances for four (4) reasons.²⁰⁸ First, the number of actual cases that potentially could be re-opened would be very limited. The STB includes on its website a summary of the disposition of all of the large rate cases it has ruled on since 1996.²⁰⁹ Over this nearly 20-year period, the Board has found the railroads' rates unreasonable in only eight (8) cases that involved a full SAC analysis.²¹⁰ This equates to approximately one (1) case every 2.5 years. Moreover, the Board has never found more than two (2) rates unreasonable in a full SAC case in any one year period, and has not found a rate unreasonable in a SAC case in the last four

²⁰⁶ See, 49 U.S.C. §10707.

²⁰⁷ *Ariz. Pub. Serv. Co. v. The Burlington Northern and Santa Fe Ry. Co.*, 6 S.T.B. 851 (2003) (*Arizona Public Service*).

²⁰⁸ See, CSXT's Reply in Opposition to Complainant's Petition to Supplement the Record, filed November 25, 2014, p. 28.

²⁰⁹ See, http://www.stb.dot.gov/stb/industry/Rate_Cases.htm

²¹⁰ These include *West Texas Utilities*, *APS 1998*, *FMC*, *Wisconsin PL*, *TMPA*, *PSCo/Xcel*, *WFA/Basin*, and *AEPCO*.

(4) years. Should this nearly twenty-year trend continue, such a limited workload would not present any great burden on the Board, nor would it create any administrative inefficiencies if the Board re-opened a case to make limited adjustments.

Second, in almost all cases, shippers include only a limited number of rates in a rate challenge. So, even if the Board were to find another captive shipper's rate or rates unreasonable in a future rate case, it would be a relatively straightforward task to replace the estimated rates used in the initial rate case with the newly prescribed rates from an updated case.²¹¹ As TPI's workpapers show, each movement in the SAC rate case evidence is identified by unique characteristics that would easily allow the Board to update the rates in a new case. These characteristics include, but are not limited to, railroad origin and destination, standard transportation commodity code and pricing authority number. Using these unique identifying characteristics would allow the Board to update the few rates impacted by a new rate reasonableness decision in a practical and efficient manner.

Third, no other adjustments to the Board's models would be required beyond updating the newly prescribed rail rate. The Board routinely asks parties, including parties to this case, to update or add limited information in their respective evidentiary filings.²¹² Such limited updates are standard practice, and could be easily accommodated by the Board.

Fourth, either the shipper or the incumbent railroad could benefit from updating the record in a case. Although CSXT asserts that updating a prior rate case would provide no benefits to shippers, railroads or the public, either the shipper or the railroad could benefit if the

²¹¹ The Board would also not be required to reopen the original case every year to adjust the prescribed rates from the new rate case. The Board's MMM methodology prescribes annual R/VC ratios for each year of the SAC period. The Board would simply need to apply the prescribed R/VC ratios to the forecasted variable cost included in the initial rate case (these variable costs are used to calculate ATC division percentages and MMM rates so are already in the record) to develop the forecasted rates from the more recent case.

²¹² The STB did so in the *Otter Tail* case. See, *Otter Tail* December 12, 2004 decision at p. 3, "The parties' supplemental submissions must be confined to the two issues discussed here... The parties may not use the supplemental submissions as an opportunity to address other issues in this case."

newly prescribed rate is lower or higher, respectively, than the originally forecasted rate used in the Board's initial decision.²¹³ Simply stated, both parties could benefit from the updating of the Board's evidence based on the new rate information.

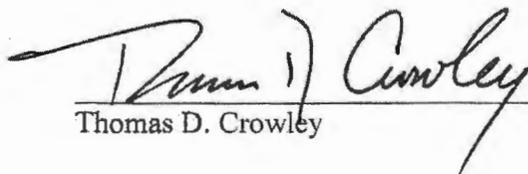
²¹³ It is customary in SAC cases to forecast future non-issue rates based on historic pricing data for the movement. It is also possible that at the end of a non-issue movement's contract term, the railroad significantly increases the rate such that the newly prescribed rate is still higher than the prior contract rate.

Part IV

IV. WITNESS QUALIFICATIONS AND VERIFICATIONS

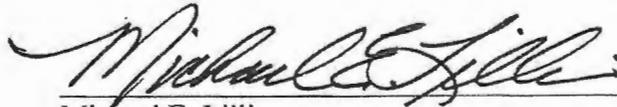
This Part contains the Verifications of the seven (7) witnesses who are sponsoring the Total Petrochemicals & Refining USA, Inc.'s ("TPI") Opening Supplemental/Compliance evidence. Statements of Qualification for all TPI Supplemental/Compliance witnesses appear in Part IV of TPI's Opening evidence filed on February 18, 2014.

I, Thomas D. Crowley, verify under penalty of perjury that I am the same Thomas D. Crowley whose Statement of Qualifications appears in Part IV of the Narrative portion of TPI's Opening Evidence in this proceeding; that I am co-sponsoring the portions of TPI's Supplemental/Compliance evidence that relate to the SARR traffic group, including volumes and revenues (Part III-A); the development of the discounted cash flow model (Part III-G); and the calculation of SAC results (Part III-H); that I know the contents thereof, and that the same are true and correct. Further, I certify that I am qualified and authorized to file this statement.


Thomas D. Crowley

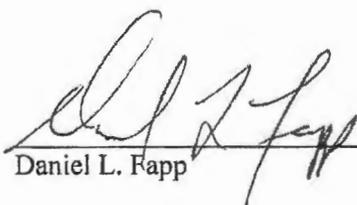
Executed on October 6, 2015

I, Michael E. Lillis, verify under penalty of perjury that I am the same Michael E. Lillis whose Statement of Qualifications appears in Part IV of the Narrative portion of TPI's Opening Evidence in this proceeding; that I am co-sponsoring the portions of TPI's Supplemental/Compliance evidence that relate to the SARR traffic group, including volumes, revenues and forecasting (Part III-A); that I know the contents thereof, and that the same are true and correct. Further, I certify that I am qualified and authorized to file this statement.


Michael E. Lillis

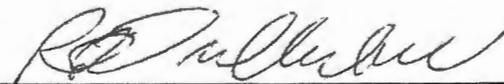
Executed on October 6, 2015

I, Daniel L. Fapp, verify under penalty of perjury that I am the same Daniel L. Fapp whose Statement of Qualifications appears in Part IV of the Narrative portion of TPI's Opening Evidence in this proceeding; that I am co-sponsoring the portions of TPI's Supplemental/ Compliance evidence that relates to the RTC modeling component (Part III-C); the development of the discounted cash flow model (Part III-G); and the calculation of SAC results (Part III-H); that I know the contents thereof, and that the same are true and correct. Further, I certify that I am qualified and authorized to file this statement.


Daniel L. Fapp

Executed on October 6, 2015

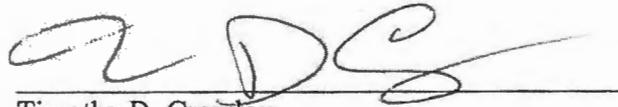
I, Robert D. Mulholland, verify under penalty of perjury that I am the same Robert D. Mulholland whose Statement of Qualifications appears in Part IV of the Narrative portion of TPI's Opening Evidence in this proceeding; that I am co-sponsoring the portions of TPI's Supplemental/Compliance evidence that relate to the SARR base period and peak period train lists (Part III-C); that I know the contents thereof, and that the same are true and correct. Further, I certify that I am qualified and authorized to file this statement.



Robert D. Mulholland

Executed on October 6, 2015

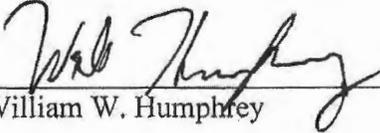
I, Timothy D. Crowley, verify under penalty of perjury that I am the same Timothy D. Crowley whose Statement of Qualifications appears in Part IV of the Narrative portion of TPI's Opening Evidence in this proceeding; that I am sponsoring the portions of TPI's Supplemental/Compliance evidence that relate to the calculation of SARR route miles (Part III-B), TPIRR's non-road property investment (Part III-E) and the road property investment cost of the SARR (Part III-F); that I am co-sponsoring the portions of TPI's Supplemental/Compliance evidence that relates to development of the peak train lists (Part III-C); that I know the contents thereof, and that the same are true and correct. Further, I certify that I am qualified and authorized to file this statement.



Timothy D. Crowley

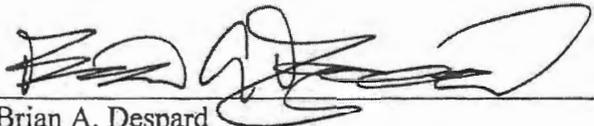
Executed on October 6, 2015

I, William W. Humphrey, verify under penalty of perjury that I am the same William W. Humphrey whose Statement of Qualifications appears in Part IV of the Narrative portion of TPI's Opening Evidence in this proceeding; that I am co-sponsoring the portions of TPI's Supplemental/Compliance evidence that relate to the simulation of the SARR's operations using the Rail Traffic Controller Model (Part III-C); that I know the contents thereof, and that the same are true and correct. Further, I certify that I am qualified and authorized to file this statement.


William W. Humphrey

Executed on October 6, 2015

I, Brian A. Despard, verify under penalty of perjury that I am the same Brian A. Despard whose Statement of Qualifications appears in Part IV of the Narrative portion of TPI's Opening Evidence in this proceeding; that I am sponsoring the portions of TPI's Supplemental/ Compliance evidence that relate to joint facilities costs (Part III-C), the development of operating statistics, crew requirements, locomotive and freight car requirements, fuel costs, personnel compensation, equipment lease/maintenance costs, operating units cost, training and recruiting costs, ad valorem taxes, loss and damage expenses, insurance costs, intermodal lift costs, automotive handling costs and application of unit costs to operating statistics (Part III-D) and the land to be acquired through easements and the associated costs of that land (Part III-F-1); that I know the contents thereof, and that the same are true and correct. Further, I certify that I am qualified and authorized to file this statement.


Brian A. Despard

Executed on October 6, 2015

EXHIBITS

PART III-A

TAB 1

List of TPI October 7, 2015 Supplemental Evidence Section III Electronic Workpapers

File (1)	Supplemental/Compliance Order (2)	Description (3)
1. TPI_October 7 2015_Supplemental Electronic Workpaper Index.xls		Spreadsheet Listing Files Supporting Section III of TPI Supplemental Evidence
2. SENSITIVE SECURITY INFORMATION.docx	5/	Notification of evidence containing Sensitive Security Information
3. STB Linking Procedures TPI Supplemental.docx	5/	Linking Procedures for TPI Supplemental Electronic Spreadsheets Linked Together
III-A. Stand-Alone Cost - Traffic Group		
4. Contract_Summary_Renewed_Full_CSXT_Fuel_Surcharge.xlsx	5/	CSXT contracts produced in discovery reopened with new fuel surcharge/terminated discounts
5. CSX Quarterly Financial Report Q1 2013.pdf	5/	CSX Quarterly Financial Report Q1 2013
6. CSX Quarterly Financial Report Q2 2013.pdf	5/	CSX Quarterly Financial Report Q2 2013
7. CSX Quarterly Financial Report Q3 2013.pdf	5/	CSX Quarterly Financial Report Q3 2013
8. CSX Quarterly Financial Report Q4 2013.pdf	5/	CSX Quarterly Financial Report Q4 2013
9. CSXT_Letter to TPI_121010.pdf	5/	December 2010 letter from CSXT to TPI re: electronic traffic data production
10. RCAF 201410.pdf	5/	HIS October 2014 Rail Cost Adjustment Factor Forecast
11. SA Transcripts_CSXT 2Q1014 Investor Call.doc	5/	Public Transcript of CSXT 2Q 2014 Investor Call
12. table2_M_201001-201512.xlsx	5/	October 2014 EIA STEO Table 2
13. TPI_Letter to CSXT_111910.pdf	5/	November 2010 letter from TPI to CSXT re: electronic traffic data production
14. TPIRR_INTERMODAL_TRANSIT_TIME_ANALYSIS.xlsx	6/	Analysis of TPIRR high priority intermodal train speeds v. CSXT historical
15. TPIRR_INTERMODAL_TRANSIT_TIME_ANALYSIS_SUPP.xlsx		Analysis of TPIRR high priority intermodal train speeds v. CSXT historical for Scenario 2.
16. TPIRR_TRAFFIC_HISTORICAL_CONTAINER_ALL Reb.xlsx	6/	Percentage of 2012 TPIRR Container Traffic without CSXT contract reference
17. TRAIN DESIGNATION SCHEME (CSX-TPI-C-28892 to	5/	CSXT train designation scheme decoder provided in discovery
18. UPS Lightens CSX's Load - Florida Times Union.pdf	5/	Article on the magnitude of CSXT's historically poor service to UPS
III-A-1. Stand-Alone Cost - Traffic Group - SARR Traffic		
Subdirectory: Issue Traffic		
19. CSXT Containers Data for TPI Traffic 1Q09 to 2Q10 (Historical)	7/	Market Dominance Rebuttal CarEvent data for the 1Q09 to 2Q10 time period utilized for lanes that did not have shipments in the update time period.
20. CSXT CarWaybills and CarShipments Data for TPI Traffic 1Q09 to 2Q10 Rebuttal.xlsx	4/ 7/	Market Dominance Rebuttal Carload Waybill data for the 1Q09 to 2Q10 time period utilized for lanes that did not have shipments in the update time period.
21. Selected 1Q2009 to 2Q2010 Waybill and CarEvent Data.xlsx	4/	Waybill and CarEvent data for the 7 lanes that did not have CSXT traffic data in the July 2010 to June 2013 time period. Used to calculate miles and tons for variable costs.
22. SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Tons and Miles Calculations_Supplemental.xlsx	7/	Calculation of miles by unique CSXT shipment key for use in miles calculations for variable costs.
23. SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Tons and Miles Calculations_Supplemental.xlsx		Supplemental file takes opening workpaper and determines home station for yard trains that appear in issue traffic.
24. SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_Opening_Tons and Miles Calculationsv2.xlsx	4/	Calculation of weighted average miles and tons for TPI complaint lanes for use in variable cost calculations.
25. SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_OpeningV5.xlsx	4/	Determination of TPI complaint traffic from CSXT Waybill data.
Subdirectory: CSXT Tariffs		
26. csxt5_stationlisting1-REF2420_Lookup.xlsx	5/	Geographical Price Group linking file to determine applicable rate for TPI Complaint Lanes.
27. Opening Tariff Calculations by Quarter.xlsx	6/	Rate information for TPI complaint lanes.
28. 27 CSXTPublic Price Authority Excel Files	5/	CSXT for Public Tariff Rates 28003, 28211 and 29111 price authorities
III-A-2. Stand-Alone Cost - Traffic Group - Volumes (historical and projected)		
29. Development Coal Volume forecast indices	7/	Development Coal Volume forecast indices
30. Exhibit III-A-4.pdf		List of TPIRR Trains Carrying High Priority UPS and Threads Express Traffic Over So-Called Leapfrog Segments in the Base Year, developed in III-C-1/Base Year Trains file "TPIRR 2013 High Priority Intermodal Trains List V03 20151001.xlsx"
31. Development Non-Coal Volume forecast indices	7/	Development Non-Coal Volume forecast indices
32. Table III-A-2.pdf		Summary of TPIRR Trains Carrying High Priority UPS and Threads Express Traffic Over So-Called Leapfrog Segments in the Base Year, developed in III-C-1/Base Year Trains file "TPIRR 2013 High Priority Intermodal Trains List V03 20151001.xlsx"
33. Summary of Volume forecast indices used to develop the Peak Week Traffic	7/	Summary of Volume forecast indices used to develop the Peak Week Traffic
34. Train List Volume Forecast_REBUTTAL.xlsx	4/	Summary of Volume forecast indices used to develop the Peak Week Traffic
Subdirectory: CSXT Provided Internal Forecasts		
35. 2013-2017STRATPLAN.xlsx	5/	CSXT Internal Forecast of shipments and revenues for all commodity groups, 2013-2017
Subdirectory: Database		
36. Data Processing Notes.docx	5/	Notes on Rebuttal Data Processing.docx
37. TpiRebuttal-20141031-Compressed.bak	5/	Backup of The Working Database
38. TrainListByCase0-20141027-Compressed.bak	5/	Backup of The Database Containing Opening Processing Data For The Base Year Train List.
39. TrainListByCase6-20141027-Compressed.bak	5/	Backup of The Database Containing Rebuttal Processing Data For The Base Year Train List.
III-A-3. Stand-Alone Cost - Traffic Group - Revenues (historical and projected)		
40. Revenue Summary (Final) REPLY_REB2.xlsx	4/	Summary of TPIRR traffic volumes and revenues for ten year DCF time period
41. Revenue Summary (Final) REPLY_REB2_Supplemental_v2.xlsx		Summary of TPIRR traffic volumes and revenues for ten year DCF time period (excluding HP)
42. Summary of Change In TPIRR Intermodal Units and Revenues_Supplemental_v2.xlsx		Summary of changes in TPIRR intermodal revenues Rebuttal v. Supplemental
Subdirectory: 2010		
43. 2010 Containers Reply_REB2.xlsx	3/ 4/	2010 TPIRR rebuttal intermodal traffic and revenues
44. 2010 Containers Reply_REB2_Supplemental_v2.xlsx	3/ 4/	2010 TPIRR rebuttal intermodal traffic and revenues (excluding HP IM)
45. 2010 No Shipment Key_REB2.xlsx	3/ 4/	2010 TPIRR rebuttal revenues from shipments without shipment keys
46. 2010 Reply_REB2.xlsx	3/ 4/	2010 TPIRR rebuttal revenues and traffic (excluding intermodal)

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File (1)	Supplemental/Compliance Order (2)	Description (3)
Subdirectory: 2011		
47. 2011 Containers Reply_REB2.xlsx	3/ 4/	2011 TPIRR rebuttal intermodal traffic and revenues
48. 2011 Containers Reply_REB2_Supplemental_v2.xlsx	3/ 4/	2011 TPIRR rebuttal intermodal traffic and revenues (excluding HP IM)
49. 2011 No Shipment Key_REB2.xlsx	3/ 4/	2011 TPIRR rebuttal revenues from shipments without shipment keys
50. 2011 Reply_REB2.xlsx	3/ 4/	2011 TPIRR rebuttal revenues and traffic (excluding intermodal)
Subdirectory: 2012		
51. 2012 Containers Reply_REB2.xlsx	3/ 4/	2012 TPIRR rebuttal intermodal traffic and revenues
52. 2012 Containers Reply_REB2_Supplemental_v2.xlsx	3/ 4/	2012 TPIRR rebuttal intermodal traffic and revenues (excluding HP IM)
53. 2012 No Shipment Key_REB2.xlsx	3/ 4/	2012 TPIRR rebuttal revenues from shipments without shipment keys
54. 2012 STCC 1 to 26 REPLY_REB2.xlsx	3/ 4/	2012 TPIRR rebuttal revenues and traffic - STCC 1 to 26
55. 2012 STCC 28, 29, 37, 99 REPLY_REB2.xlsx	3/ 4/	2012 TPIRR rebuttal revenues and traffic - STCC 28, 29, 37, 99
56. 2012 STCC 30 to 90 (excluding issue) REPLY_REB2.xlsx	3/ 4/	2012 TPIRR rebuttal revenues and traffic - STCC 30 to 90 (excluding issue)intermodal)
Subdirectory: 2013-2020		
57. Coal Volume Forecast Matrix_REB.xlsx	4/	Development Coal Volume forecast indices
58. Contract Summary Reply_REB.xlsx	4/	Summary of CSXT contracts for adjustments to revenues
59. HDF & WTI Forecast Reply_REB.xlsx	5/	Forecast of CSXT's HDF & WTI fuel Surcharge programs
60. No Shipment Key Forecast_REB2.xlsx	4/	Forecasted 2 half 2012-2020 revenues for TPIRR revenues with No Shipment Keys
61. Non-Coal Volume Forecast Matrix_REB.xlsx	4/	Development Non-Coal Volume forecast indices
62. Rate Forecast Matrix.xlsx	4/	Matrix of forecasted Revenue Per Unit indices
63. RCAF 201410.pdf	5/	HIS October 2014 Rail Cost Adjustment Factor Forecast
64. TPIRR Coal Revenue Forecast (Final) REPLY_REB2.xlsx	4/	Forecasted 2013-2020 carloads, tons and revenues for TPIRR selected Coal traffic
65. TPIRR General Freight Revenue Forecast STCC 1-26 1h 2013 (Final) REPLY_REB2.xlsx	4/	Forecasted 1 half 2013-2020 carloads and revenues for TPIRR selected General Freight traffic (STCC's 1-26)
66. TPIRR General Freight Revenue Forecast STCC 1-26 2h 2012 (Final) REPLY_REB2.xlsx	4/	Forecasted 2 half 2012-2020 carloads and revenues for TPIRR selected General Freight traffic (STCC's 1-26)
67. TPIRR General Freight Revenue Forecast STCC 28 1h 2013 (Final) REPLY_REB2.xlsx	4/	Forecasted 1 half 2013-2020 carloads and revenues for TPIRR selected General Freight traffic (STCC 28)
68. TPIRR General Freight Revenue Forecast STCC 28 2h 2012(Final) REPLY_REB2.xlsx	4/	Forecasted 2 half 2012-2020 carloads and revenues for TPIRR selected General Freight traffic (STCC 28)
69. TPIRR General Freight Revenue Forecast STCC 29-UN 1h 2013 (Final) REPLY_REB2.xlsx	4/	Forecasted 1 half 2013-2020 carloads and revenues for TPIRR selected General Freight traffic (STCC's 29-"UNKNOWN")
70. TPIRR General Freight Revenue Forecast STCC 29-UN 2h 2012(Final) REPLY_REB2.xlsx	4/	Forecasted 2 half 2012-2020 carloads and revenues for TPIRR selected General Freight traffic (STCC's 29-"UNKNOWN")
71. TPIRR Intermodal Revenue Forecast (Final) REPLY_REB2.xlsx	4/	Forecasted 2013-2020 carloads and revenues for TPIRR selected Intermodal traffic
72. TPIRR Intermodal Revenue Forecast (Final) REPLY_REB2_Supplemental_v2.xlsx	4/	Forecasted 2013-2020 carloads and revenues for TPIRR selected Intermodal traffic (excluding HP IM)
Subdirectory: ATC		
73. 2012 Fixed Cost Per Mile By Segment Rebuttal.xlsx	6/	Rebuttal fixed cost per CSXT line segment.
74. [REDACTED]	7/	Calculation of 2012 Tonnage by mileage segment
75. ATC Divisions Rebuttal.xlsx	4/	Calculation of TPIRR rebuttal car and container divisions
76. ATC Divisions Rebuttal_Supplemental_V2.xlsx		ATC divisions adjusted to show average SARR and CSXT miles for high priority intermodal
77. ATC SARR and Residual Incumbent Variable Costs v45 Rebuttal - Cars.xlsx	5/	Calculation of adjusted SARR and residual CSXT variable costs and miles for cars
78. ATC SARR and Residual Incumbent Variable Costs v45 Rebuttal - Containers.xlsx	5/	Calculation of adjusted SARR and residual CSXT variable costs and miles for containers
79. ATC URCS Input Cars V45 - Rebuttal.xlsx	4/	Development of carload URCS inputs for ATC variable costs
80. ATC URCS Input Cars V45 - Rebuttal_Cars_CSXT Outputs.xlsx	4/	Phase III URCS output for carload movements on the CSXT
81. ATC URCS Input Cars V45 - Rebuttal_Cars_SARR Outputs.xlsx	4/	Phase III URCS output for carload movements on the SARR
82. ATC URCS Input Containers V45 -Rebuttal.xlsx	4/	Development of container URCS inputs for ATC variable costs
83. ATC URCS Input Containers V45 -Rebuttal_CSXT Outputs.xlsx	4/	Phase III URCS output for container movements on the CSXT
84. ATC URCS Input Containers V45 -Rebuttal_SARR Outputs.xlsx	4/	Phase III URCS output for container movements on the SARR
85. CARS V45_URCS CSXT INPUTS.prn	5/	URCS Inputs file for CSXT Car variable costs.
86. CARS V45_URCS CSXT INPUTS.xlsx	6/	URCS Inputs file for CSXT Car variable costs.
87. CARS V45_URCS CSXT OUTPUTS.csv	6/	URCS Outputs file for CSXT Car variable costs.
88. CARS V45_URCS SARR INPUTS.prn	5/	URCS Inputs file for SARR Car variable costs.
89. CARS V45_URCS SARR INPUTS.xlsx	6/	URCS Inputs file for SARR Car variable costs.
90. CARS V45_URCS SARR OUTPUTS.csv	6/	URCS Outputs file for SARR Car variable costs.
91. CONTAINERS V45_URCS CSXT INPUTS.prn	5/	URCS Inputs file for CSXT Container variable costs.
92. CONTAINERS V45_URCS CSXT INPUTS.xlsx	6/	URCS Inputs file for CSXT Container variable costs.
93. CONTAINERS V45_URCS CSXT OUTPUTS.csv	6/	URCS Outputs file for CSXT Container variable costs.
94. CONTAINERS V45_URCS SARR INPUTS.prn	5/	URCS Inputs file for SARR Container variable costs.
95. CONTAINERS V45_URCS SARR INPUTS.xlsx	6/	URCS Inputs file for SARR Container variable costs.
96. CONTAINERS V45_URCS SARR OUTPUTS.csv	6/	URCS Outputs file for SARR Container variable costs.
97. CSXT Selected Gross Tons Density Segments.xlsx	4/	Adjustments to CSXT gross tons by segment calculations
98. Rebuttal ATC Cars Lookup.xlsx	4/	Develops TPIRR ATC divisions for carload traffic
99. Rebuttal ATC Container Lookup.xlsx	4/	Develops TPIRR ATC divisions for container traffic
100. TPI_Final_Network-Rebut V6 (ATC).xlsx	4/	TPI Final Network Rebuttal modified to reflect rerouted segments from CSXT Reply
Subdirectory: Database		
101. Rebuttal - ATC Step 1 - Create URCS Costing Input V45.sql	5/	Script For Step 1 of the Process to Create Input Data For URCS Costing.
102. Rebuttal - ATC Step 2 - Create URCS Costing Input V45.sql	5/	Script For Step 2 of the Process to Create Input Data For URCS Costing.
103. Rebuttal - ATC Step 3 - Create URCS Costing Input V45.sql	5/	Script For Step 3 of the Process to Create Input Data For URCS Costing.
104. Rebuttal - ATC Step 4 - Create URCS Costing Input V45.sql	5/	Script For Step 4 of the Process to Create Input Data For URCS Costing.
105. Rebuttal - ATC Step 5 - Create URCS Costing Input V45.sql	5/	Script For Step 5 of the Process to Create Input Data For URCS Costing.

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106. Rebuttal - ATC Step 6 - Create URCS Costing Input V45.sql	5/	Script For Step 6 of the Process to Create Input Data For URCS Costing.
107. Rebuttal - ATC Step 7 - Create URCS Costing Input V45.sql	5/	Script For Step 7 of the Process to Create Input Data For URCS Costing.
108. Rebuttal - ATC Step 8 - Create URCS Costing Input V45.sql	5/	Script For Step 8 of the Process to Create Input Data For URCS Costing.
109. Rebuttal - ATC Step 9 - Create Summary V45.sql	5/	Script To Create The ATC Summary
Subdirectory: Public Indices and Information		
110. [REDACTED]	7/	CSX Corporation 10K 2012 Annual, Volumes and Revenue per Unit used in 2012 to 2013
111. [REDACTED]	7/	CSX Corporation 10K 2013 Annual, Volumes and Revenue per Unit used in 2012 to 2013
III-B. Stand-Alone Cost - Stand-Alone Railroad System - Route and Mileage		
112. TPIRR Rebuttal Stick Diagrams.pdf	5/	PDF of stick diagrams depicting TPIRR Rebuttal route and mileage
113. TPIRR Yard and Interchange Track Comparison.xlsx	6/	Detail behind Rebuttal Table III-B-3 with sources
III-C. Stand-Alone Cost - Operating Plan		
114. 11 - OnSARR & Applicable Delays - TPI Rebuttal.xlsx	6/	Revised CSXT RTC Outages for TPI Rebuttal RTC Simulation"
115. Bakken Oil Business Journal_NovDec 2012.pdf	5/	Bakken Oil Business Journal Article from Nov/Dec 2012, Jan 2013 issue.
116. CSXT Reply YD INV.zip	5/	Adjusted CSXT Reply RTC simulation with corrected Yard investment
117. CSXT RTC Dwell Frequency by Yard Type and Stop Type.xlsx	4/	Analysis and Summary of CSXT's changes to TPI's Opening RTC Simulation Trains
118. Dirnberger AREMA Presentation.pdf	5/	Improving Railroad Classification Yard Performance Through Bottleneck Management
119. [REDACTED]	7/	CSXT Reply workpaper; included for reference
120. [REDACTED]	7/	CSXT Reply workpaper; included for reference
121. Insufficient CSX Yard Capacity Screen Shots.zip	5/	Screenshots showing multiple occasions where CSXT's RTC simulation exceeded the investment yard capacity at particular yards
122. [REDACTED]	7/	CSXT Reply workpaper - Percent used for rebalancing locomotives
123. MIT Study.pdf	5/	Rate that trains were inspected at CSXT's Radnor Yard.
124. MJWarren Aug 26 Letter.pdf	5/	Response to request for workpapers
125. Nearest Yard for Local Trains_Reply_Revised.xlsx	6/	Rebuttal Local locomotive requirements
126. NS Locomotive Shops.pdf	5/	List of NS locomotive shops
127. Rebuttal Exhibit III-C-1.pdf	5/	Receiving and Departure Track Miles Used in CSXT's Reply RTC vs Receiving and Departure Track Miles Included in CSXT Reply Investment
128. Rebuttal Exhibit III-C-2.pdf	5/	Examples of Outages Included in CSXT's Reply RTC Simulation that are Off-SARR
129. Track and Train changes to CSXT Reply RTC.xlsx	5/	List of detailed adjustments and corrections made to CSXT's Reply RTC model inputs
130. Yard Screen Shots.zip	5/	Screenshots showing maximum achieved yard capacity for yards throughout CSXT's Reply RTC simulation
Subfolder: MultiRail		
131. MultiRail Car Counts.pdf	5/	Email from Oliver Wyman regarding MultiRail estimated car counts values.
132. MultiRail Laptop.pdf	5/	Emails from Oliver Wyman regarding TPI access to MultiRail.
133. MultiRail Reports.pdf	5/	Emails from Oliver Wyman regarding MultiRail output reports.
134. MultiRail Review.docx	5/	MultiRail screenshots for trains addressed in III-C text.
Subfolder: RTC		
135. [REDACTED]	7/	CSXT Reply file that lists Locals CSXT added to RTC
136. [REDACTED]	7/	CSXT Reply file that lists industrial yard trains CSXT added to RTC
137. RTC Rebuttal Departure Times_Supplemental.xlsx		TPI Rebuttal RTC Departure times imported into Excel format.
138. RTC System Files_Supplemental.zip		RTC.LOCO and RTC.DLL files required for duplicating simulation results.
139. Scenario 2 and 3 Recrews_Supplemental.xlsx		TPI Scenarios #2 and #3 RTC relief crew analysis.
140. Summary of New RTC Nodes with Stick Diagram check_Supplemental.xlsx		Analysis of newly modeled track from RTC Scenarios #2 and #3 to determine impact on investment.
141. TPI Rebuttal2.zip	5/	TPI Rebuttal RTC Simulation
142. TPI Rebuttal2 REPORT.xlsx	6/	Summary of peak week statistics output from TPI's Rebuttal Scenario #1 RTC simulation
143. TPI Scenario 2 REPORT_Supplemental.xlsx		Summary of peak week statistics output from TPI's Supplemental Scenario #2 RTC simulation
144. TPI Scenario 3 REPORT_Supplemental_v2.xlsx		Summary of peak week statistics output from TPI's Supplemental Scenario #3 RTC simulation
145. TPI Scenario2 RTC Case_Supplement.zip		TPI Scenario #2 RTC Simulation
146. TPI Scenario2 v2B Train Inputs_Supplemental.xlsx		TPI Supplemental Scenario #2 RTC Simulation Train inputs imported into Excel Format.
147. TPI Scenario3 RTC Case_Supplement.zip		TPI Scenario #3 RTC Simulation
148. TPI Scenario3 v11 Train Inputs_Supplemental_v2.xlsx		TPI Supplemental Scenario #3 RTC Simulation Train inputs imported into Excel Format.
149. [REDACTED]	7/	CSXT Reply file that lists local trains CSXT added to RTC due to overtime.
150. TPI Locals_with Overtime_in RTC_Model_Rebuttal.xlsx	6/	Rebuttal to CSXT's additional locals due to overtime.
151. Yard Crew Size and Starts Update_Lookupadded.xls	4/	CSXT Reply workpaper with added lookup; used in comparison; included to facilitate linking
152. Yard Crew Size and Starts_Lookupadded.xls	4/	CSXT Reply workpaper with added lookup; used in comparison; included to facilitate linking
153. YARD Train Data Evaluation Summary_Supplemental.xlsx		Summary of "Y" train car event data issues encounter during RTC modeling and the solution applied to each problem.
III-C-1. Stand-Alone Cost - Operating Plan - Train List Development		
154. Exh III-C-8_9_10_Summary of Local and Y Train Counts in Evidence.xlsx		Development file for Supplemental exhibit III-C-8, III-C-9 and III-C-10, which compare TPI Opening, CSXT Reply, TPI Rebuttal, STB requested Supplemental, and TPI Supplemental train list counts for local and Y trains.
155. TPI_Final_Network-Rebut V4.xlsx	4/	Reply file updated with OnSARR links and locations identified and reasons for differences
Subdirectory: Base Year RTC Results		
156. Base Year Local Transit Time_Mileage Analysis_Rebuttal.xlsx	6/	Calculations of base year statistics for miles, average speed and locomotives for local trains
157. Base Year Local Transit Time_Mileage Analysis_Rebuttal_Supplemental_v2.xlsx		Supplemental calculations of base year statistics for miles, average speed and locomotives for local trains
158. Base Year Local Transit Time_Mileage Analysis_Supplemental.xlsx		Supplemental calculations of base year statistics for miles, average speed and locomotives for local trains

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159. Base Year Manifest Train Transit Time_Mileage Analysis_Rebuttal.xlsx	4/	Calculations of base year statistics for miles, average speed and locomotives for manifest trains
160. Base Year Manifest Train Transit Time_Mileage Analysis_Rebuttal_Supplemental v2.xlsx		Supplemental Calculations of base year statistics for miles, average speed and locomotives for manifest trains
161. Base Year Manifest Train Transit Time_Mileage Analysis_Rebuttal_Supplemental.xlsx		Supplemental Calculations of base year statistics for miles, average speed and locomotives for manifest trains
162. Base Year Unit Train Transit Time_Mileage Analysis_Rebuttal.xlsx	4/	Calculations of base year statistics for miles, average speed and locomotives for unit trains
163. Base Year Unit Train Transit Time_Mileage Analysis_Rebuttal_Supplemental v2.xlsx		Supplemental Calculations of base year statistics for miles, average speed and locomotives for unit trains
164. Base Year Unit Train Transit Time_Mileage Analysis_Rebuttal_Supplemental.xlsx		Supplemental Calculations of base year statistics for miles, average speed and locomotives for unit trains
165. Manifest TrainsS Routing V02.xlsx	4/	Event data for manifest trains used to determine which trains to include in rebuttal transit time analysis.
166. Normalized City List.xlsx	5/	List of SARR cities normalized for metropolitan areas.
167. Peak Period Local Trains v5 wDwell v3_Transit Time_Mileage Analysis_Rebuttal.xlsx	4/	Linking of RTC outputs to local peak period trains
168. Peak Period Manifest Train RTC List Master_Transit Time_Mileage Analysis Rebuttal.xlsx	4/	Linking of RTC outputs to manifest peak period trains
169. Peak Period Manifest Train RTC List Master_Transit Time_Mileage Analysis Rebuttal_Supplemental v2.xlsx		Linking of RTC outputs to manifest peak period trains
170. Peak Period Manifest Train RTC List Master_Transit Time_Mileage Analysis Rebuttal_Supplemental.xlsx		Linking of RTC outputs to manifest peak period trains
171. Peak Period Unit Train RTC List_v3_Transit Time_Mileage Analysis_Rebuttal.xlsx	4/	Linking of RTC outputs to unit peak period trains
172. Peak Period Unit Train RTC List_v3_Transit Time_Mileage Analysis_Rebuttal_Supplemental v2.xlsx		Linking of RTC outputs to unit peak period trains
173. Peak Period Unit Train RTC List_v3_Transit Time_Mileage Analysis_Rebuttal_Supplemental.xlsx		Linking of RTC outputs to unit peak period trains
174. Peak Period Unit Trains v1_Opening.xlsx	6/	TPI Opening workpaper; used in comparison; included to facilitate linking
175. RTC Train ID to CSXT Train ID Crosswalk.xlsx	5/	Crosswalk to link RTC train ID's to CSXT historical train ID's/
176. SarrBaseLhUnitTrainsTri.xlsx	4/	Event data for unit trains used to determine which trains to include in rebuttal transit time analysis.
177. TPI Rebuttal2 REPORT_Opr Stats.xlsx	6/	RTC Outputs report for all trains
178. TPI Rebuttal2 REPORT_Opr Stats_Local.xlsx	6/	RTC Outputs report for locals trains only
179. TPI Rebuttal2 REPORT_Opr Stats_Manifest.xlsx	6/	RTC Outputs report for manifest trains only
180. TPI Rebuttal2 REPORT_Opr Stats_Unit.xlsx	6/	RTC Outputs report for unit trains only
181. TPI Scenario 2 REPORT_Supplemental_Op Stats.xlsx		RTC Outputs for Scenario 2
182. TPI Scenario 3 REPORT_Supplemental_v2_Op Stats.xlsx		RTC Outputs for Scenario 3
183. TPIRR Peak Week Transit Time Comparison_Rebuttal.xlsx	4/	Comparison of RTC transit times and CSXT transit times
Subdirectory: Base Year Trains		
184. Base and Peak Period Removed Train Summary.xlsx	6/	Summary of various CSXT Reply workpapers containing data on trains CSXT removed from
185. Base Year Train List Remove Unit Merch Rebut 20140922.xlsx	4/	Identifies Line-haul merchandise and Unit trains from Opening that were removed in Rebuttal for failure to meet TPI's 10 miles OnSARR requirement.
186. CarEvent Data for OffSARR Issue Movements.xlsx	7/	Development of issue traffic re-routes for OffSARR movements.
187. Compare Train Lists TPI Rebut v4.xlsx	6/	Comparison of Opening, CSXT's "Corrected Opening", Reply, and Rebuttal Train Lists
188. dbp_aSarrAllConsistLocal.xlsx	7/	CSXT base year local trains identified in "SarrAll Local V02 12162013.acedb"
189. dbp_aSarrAllConsistLocal_ALLOFF.xlsx	4/ 7/	CSXT base year local trains identified as moving Off-SARR.
190. dbp_aSarrAllConsistLocal_ALLON_IDSuffix_ISSUEv3.xlsx	4/ 7/	Identification of TPIRR base year local trains.
191. dbp_aSarrAllConsistLocal_ALLON_IDSuffix_ISSUEv3_Supplemental.xlsx		CSXT base year local trains identified as moving both ON and Off-SARR, with issue traffic flagged.
192. dbp_aSarrAllConsistLocal_ON_OFF.xlsx	4/ 7/	CSXT base year local trains identified as moving both ON and Off-SARR.
193. High Priority Leapfrog Intermodal TrainsAllEvents V01 20151002.xlsx		Sequenced Train Event Data for Every Train Moving High Priority UPS and Threads Express Traffic over Leapfrog Segments in the Base Year
194. iNetworkLinks_ONSARR_v8.xlsx	7/	CSXT NetworkLinks file expanded to include flags for OnSARR segments
195. iNetworkLocations_ONSARR_v13.xlsx	7/	CSXT NetworkLinks file expanded to include additional station mileposts identified from the train sheets and train events data and flags for OnSARR stations
196. Issue Shipments with more than one yard train of the same ID.xlsx		CarEvent data for Issue shipment that traveled on more than one Y train with the same ID and home station but train suffixes of two consecutive days.
197. Issue Traffic CarEvent Data Errors.docx		Explanation of the issue traffic shipment data for 3 issue shipment that contain data errors.
198. Issue B62 and B113 Train Operation Selection.xlsx	7/	Determination of the trains issue traffic will be rerouted on for lanes B62 and B113 was made.
199. Local Grid - Exh III-C-3 Development.xlsx	6/	Houses Rebuttal Exhibit III-C-3, Comparison of Opening, CSXT's "Corrected Opening", Reply, and Rebuttal LOCAL train lists
200. Rebuttal Exhibit III-C-3.pdf	5/	Evaluation of TPIRR Local Trains
201. SarrAllLocalV02 12162013.acedb	7/	Database of CSXT local trains in the TPIRR base year.
202. SarrAllLocalV02 12162013.acedb_ISSUEv3	7/	Identification of local trains that contain issue traffic carloads. As well as all other train types.
203. SUMMARY OF TPI TRAFFIC ON CSXT OVER 36MONTHS_ALL_DATA_Local Train		Identification of local trains that contain issue traffic carloads edited to address the Board's Supplemental/Compliance decision.
204. TPI Base Year Manifest stats sub.xlsx	4/	TPI Opening Line-haul Merchandise Train List; used in comparison; included to facilitate
205. TPIRR Base Year Local Train Lists V2 statistics sub.xlsx	7/	Opening workpaper - TPIRR crews for Coal trains
206. TPIRR 2013 High Priority Intermodal Trains List V03 20151001.xlsx		List of TPIRR Trains Carrying High Priority UPS and Threads Express Traffic Over So-Called Leapfrog Segments in the Base Year
207. TPIRR Base Year Local Train Lists V2 statistics sub.xlsx	6/	TPI Opening Local Train List; used in comparison; included to facilitate linking
208. TPIRR Base Year Local Train Lists V2 statistics sub.xlsx	7/	Base year local train list for the TPIRR
209. TPIRR Base Year Local Train List v2_Rebuttal Statistics.xlsx	4/	Rebuttal development of Base Year Operating Statistics - Local Trains

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File (1)	Supplemental/Compliance Order (2)	Description (3)
210. TPIRR Base Year Local Train List v2_Rebuttal Statistics_Supplemental v2.xlsx		Supplemental excluding High Priority development of Base Year Operating Statistics - Local Trains
211. TPIRR Base Year Local Train List v2_Rebuttal Statistics_Supplemental.xlsx		Supplemental development of Base Year Operating Statistics - Local Trains
212. TPIRR Base Year Local Train List v2_Statistics.xlsx	7/	Opening development of Base Year Operating Statistics - Local Trains; included to source train counts in "CarEvent Data For OffSARR Issue Movements v5.xlsx"
213. TPIRR Base Year Manifest Train List_Rebuttal Statistics.xlsx	4/	Rebuttal development of Base Year Operating Statistics - Manifest Trains
214. TPIRR Base Year Manifest Train List_Rebuttal Statistics_Supplemental v2.xlsx		Supplemental excluding High Priority development of Base Year Operating Statistics - Manifest Trains
215. TPIRR Base Year Manifest Train List_Rebuttal Statistics_Supplemental.xlsx		Supplemental development of Base Year Operating Statistics - Manifest Trains
216. TPIRR Base Year Manifest Train List_Statistics.xlsx	7/	Opening development of Base Year Operating Statistics - Manifest Trains; included to source train counts in "CarEvent Data For OffSARR Issue Movements v5.xlsx"
217. TPIRR Base Year Unit Train List v2_Rebuttal Statistics.xlsx	4/	Rebuttal development of Base Year Operating Statistics - Unit Trains
218. TPIRR Base Year Unit Train List v2_Rebuttal Statistics_Supplemental v2.xlsx		Supplemental excluding High Priority development of Base Year Operating Statistics - Unit Trains
219. TPIRR Base Year Unit Train List v2_Rebuttal Statistics_Supplemental.xlsx		Supplemental development of Base Year Operating Statistics - Unit Trains
220. TPIRR Base Year unit Train Lists V2 statistics sub.xlsx	6/	TPI Opening Unit Train List; used in comparison; included to facilitate linking
221. TPIRR Crews Manifest Train Lists	7/	Opening workpaper - TPIRR crews for Manifest trains
222. TPIRR Crews Unit Non-Coal Trains.xlsx	7/	Opening workpaper - TPIRR crews for Non-coal Unit trains
223. TPIRR Open Train Lists Corrected.xlsx	4/	CSXT Reply workpaper; used in comparison; included to facilitate linking
224. TPIRR Reply Train Lists	7/	CSXT Reply workpaper used to source hard-coded values in "Review of CSXT Reply Yard Train Analysis.xlsx"
225. TPIRR Reply Train Lists-V2REBUT.xlsx	4/	CSXT Reply workpaper; used in comparison; included to facilitate linking
226. Train List Local V09 12152013 v4.xlsx	7/	Development of base year local trains from Base Year SarrAllConsist and Train Data
227. Train List Manifest V18 12152013.acodb	7/	Base year Linehaul merchandise train list developed from SQL program environment; Develops daily train counts used to determine peak period train requirements at files "LH Merch TeNotCe Daily Count.xlsx" and "LH Merch TriSum Daily Count.xlsx"
228. Train List Unit V09 12162013.xlsx	7/	Opening Peak Period evidence included to source train counts in "CarEvent Data For OffSARR Issue Movements v5.xlsx"
Subdirectory: Removed Trains Files		
229. Add1 SARR Freight for Reply RTC.xlsx	4/	CSXT Reply workpaper; used in comparison; included to facilitate linking
230. BaseYearTrainComparison_rebuttal.xlsx	4/	CSXT Reply workpaper with added lookup; used in comparison; included to facilitate linking
231. Coal Train Removal Plant Closings_Rebuttal.xlsx	4/	CSXT Reply workpaper with added lookup; used in comparison; included to facilitate linking
232. TPIRR RTC Removed Trains for Train Sheet Mileage	4/	CSXT Reply workpaper with added lookup; used in comparison; included to facilitate linking
233. TrainsRemoved_BaseYear_Operations_rebuttal.xlsx	4/	CSXT Reply workpaper with added lookup; used in comparison; included to facilitate linking
234. TrainsRemoved_rebuttal.xlsx	4/	CSXT Reply workpaper with added lookup; used in comparison; included to facilitate linking
Subdirectory: CSXT Reply Files		
235. TPIRR Reply Train Lists.xlsx	7/	CSXT Reply file -- Calculation of Reply train operating statistics
236. TPIRR Reply Train Lists_Supplemental.xlsx		Calculation of Reply train operating statistics, with added summary tab for train counts.
Subdirectory: TPI Open Corrected		
237. TPIRR Open Train Lists_Correction.xlsx	4/ 7/	CSXT Reply file -- TPI Opening train operating statistics with corrections to list of trains and associated operating statistics.
Subdirectory: TPI TrainListReview		
238. TPIRR TrainListReview.xlsx	7/	CSXT Reply File - Examination of gap between TPI train list and trains included in MultiRail simulation - examining points in TPI processing where trains removed from plan
Subdirectory: Database		
239. Case0 - TrainListDevelopment Step I - CEWB.sql	5/	Script For Step 1 of the Opening Base Train List Build Process.
240. Case0 - TrainListDevelopment Step II - Comp.sql	5/	Script For Step 2 of the Opening Base Train List Build Process.
241. Case0 - TrainListDevelopment Step III - TS Local.sql	5/	Script For Step 3 of the Opening Base Train List Build Process.
242. Case0 - TrainListDevelopment Step III - TS Merch.sql	5/	Script For Step 3 of the Opening Base Train List Build Process.
243. Case0 - TrainListDevelopment Step III - TS Unit.sql	5/	Script For Step 3 of the Opening Base Train List Build Process.
244. Case6 - TrainListDevelopment Step I - CEWB.sql	5/	Script For Step 1 of the Rebuttal Base Train List Build Process.
245. Case6 - TrainListDevelopment Step II - Comp.sql	5/	Script For Step 2 of the Rebuttal Base Train List Build Process.
246. Case6 - TrainListDevelopment Step III - TS Local.sql	5/	Script For Step 3 of the Rebuttal Base Train List Build Process.
247. Case6 - TrainListDevelopment Step III - TS Merch.sql	5/	Script For Step 3 of the Rebuttal Base Train List Build Process.
248. Case6 - TrainListDevelopment Step III - TS Unit.sql	5/	Script For Step 3 of the Rebuttal Base Train List Build Process.
249. TPI Yard Trains Base Year and Peak Period.sql		Script For TPI Yard Trains Base Year V01 20150810.mdb
250. TPISupplemental-20151005-Compressed.bak		Backup of Database For Supplemental
Subdirectory: iNetwork Rebuttal		
251. Subdirectory: Chicago	5/	pdf maps showing reason for discrepancy between Reply and Rebuttal in iNetworks Links and Locations mileposts in the Chicago area as noted in TPI_Final_Network-Rebut V4.xlsx
252. Subdirectory: ESL	5/	pdf maps showing reason for discrepancy between Reply and Rebuttal in iNetworks Links and Locations mileposts in the East St. Louis area, as noted in TPI_Final_Network-Rebut V4.xlsx
253. Subdirectory: Hamlet	5/	pdf maps showing reason for discrepancy between Reply and Rebuttal in iNetworks Links and Locations mileposts in the Hamlet NC area, as noted in TPI_Final_Network-Rebut V4.xlsx
254. Subdirectory: Links	5/	pdf maps showing reason for discrepancy between Reply and Rebuttal in iNetworks Links, as noted in TPI_Final_Network-Rebut V4.xlsx
255. Subdirectory: Locations	5/	pdf maps showing reason for discrepancy between Reply and Rebuttal in iNetworks Locations mileposts, as noted in TPI_Final_Network-Rebut V4.xlsx

List of TPI October 7, 2015 Supplemental Evidence Section III Electronic Workpapers

File (1)	Supplemental/Compliance Order (2)	Description (3)
Subdirectory: Peak Period Trains		
256. [REDACTED]	7/	CSXT Reply workpaper; included to facilitate linking
257. Base Year Train List Remove Unit Merch Rebut 20140922 peak sort.xlsx	4/	Analysis and final list to determine Merchandise Line-haul and Unit trains removed from Rebuttal Train list for failure to meet TPI's 10-mile ON-SARR Requirement; sorted to facilitate peak period train identification
258. CSA Report_Dwell Time_V6 Dwell and loading Analysis.xlsx	5/	TPI Opening workpaper; included to facilitate linking
259. [REDACTED]	7/	CSXT Reply workpaper; included to facilitate linking
260. dbo_aSarrAllConsistLocal.xlsx	5/	TPI Opening workpaper; included to facilitate linking
261. [REDACTED]	7/	Identification of TPIRR peak period local trains.
262. Early Departure Leap Frog Trains Analysis_Supplemental.xlsx		Analysis of internal crossover train overlaps in departure times and development of revised departure times for trains which overlap.
263. Exhibit III-C-11_Supplemental_v2.xlsx		List of High Priority UPS and Threads Express trains removed from Supplemental RTC Simulation of Scenario #3
264. [REDACTED]	7/	Flagging Of Network Locations Used In Traffic (Car and Container Waybills)
265. LH Merch TeNotCe Daily Count.xlsx	5/	TPI Opening workpaper; included to facilitate linking
266. LH Merch TriSum Daily Count.xlsx	5/	TPI Opening workpaper; included to facilitate linking
267. Manifest Train Peak Period Analysis_Opening_Average Train Size.xlsx	4/	Development of peak period linehaul merchandise growth train and consist requirements from base year trains
268. [REDACTED]	7/	Development of peak period linehaul merchandise growth train and consist requirements from base year trains
269. Manifest Train Peak Period Analysis_Opening_v3_Rebuttal.xlsx	4/	Consist and routing data for peak period used to develop Peak Period "Manifest Train Routing for RTC_v4.xlsx". Base year manifest train list from Rebuttal with issue traffic identified.
270. Manifest Train Peak Period Analysis_Opening_v3_Rebuttal_Supplemental.xlsx		
271. Manifest Train Peak Period Analysis_Opening_v3_Rebuttal_Supplemental_v2.xlsx		Base year manifest train list with High Priority trains removed.
272. Manifest Train Peak Period Analysis_Peak Week_v5_Rebuttal.xlsx	6/	Development of RTC routing and growth trains for manifest trains.
273. Peak Period Additional RTC Local Trains Rebuttal_v4.xlsx	5/	Development of additional local trains added to RTC in Rebuttal.
274. Peak Period Additional RTC Local Trains_Supplemental.xlsx		Additional Local Train list for TPI Supplemental RTC Simulations of Scenario #2 and Scenario
275. [REDACTED]	7/	TPI Opening workpaper; included to facilitate linking
276. Peak Period Unit Train RTC List Rebuttal.xlsx	5/	Unit train input for RTC modeling exercise
277. Peak Period Unit Train RTC List Rebuttal_Supplemental.xlsx		Unit train input for RTC modeling exercise, with added count of peak period trains removed in rebuttal.
278. Peak Period Unit Trains v1.xlsx	6/	TPI Opening workpaper; included to facilitate linking
279. Peak Period Y Trains_Supplemental.xlsx		TPI Supplemental RTC Scenarios #2 and #3 Peak Period additional "Y" trains.
280. Profiles1 Update.xlsx	4/	TPI Opening workpaper; included to facilitate linking
281. [REDACTED]	7/	TPI Opening workpaper; included to facilitate linking
282. TPI Peak Period Yard Train Nodal Car Events		TIH Data for identification of TIH materials in the Peak Period additional "Y" train list
283. TPI RTC Peak Train List_Manifest_Rebuttal.xlsx	6/	Peak Period Linehaul merchandise train list
284. TPI RTC Peak Train List_Manifest_Rebuttal_Supplemental_v2.xlsx		Peak Period Linehaul supplemental merchandise train list
285. TPIRR RTC Removed Trains for Train Sheet Mileage Fix Comp Reply Rebuttal.xlsx	6/	Comparison of Reply and Rebuttal Peak Period Trains removed from Open Peak train list for failure to meet TPI's 10-mile on-SARR requirement
286. TPIRR Train Lists_All Peak Period Trains_Supplemental.xlsx		Combined Supplemental Peak Period Train List
287. [REDACTED]	7/	Development of peak period local trains from Base Year SarrAllConsist and Train Data
288. Train List Local V05 12162013_v4_Rebuttal_v2.xlsx	4/	Development of peak period local trains from Base Year SarrAllConsist and Train Data
289. Train List Local V05 12162013_v4_Rebuttal_v2_supplemental.xlsx		Development of peak period local trains from Base Year SarrAllConsist and Train Data for Supplemental
290. Train List Unit V09 12162013 With Peak Calc v2 Rebut.xlsx	4/	Identification of peak period and development of peak year and peak period TPIRR train requirements.
291. Train List Unit V09 12162013 With Peak Calc v2 Rebut_Supplemental.xlsx		Identification of peak period and development of peak year and peak period TPIRR train requirements with issue traffic flagged.
292. [REDACTED]	7/	Identification of peak period and development of peak year and peak period TPIRR train requirements.
293. [REDACTED]	7/	Volume forecast configured for use in developing peak year train requirements
294. Train List Volume Forecast TRAIN DRAFT Rebuttal.xlsx	4/	Volume forecast configured for use in developing peak year train requirements
295. Train Power Base Year V02 12202013.xlsx	6/	TPI Opening workpaper; used in comparison; included to facilitate linking
Subdirectory: YTrains		
296. CarEvent Data For OffSARR Issue Movements v5.xlsx	4/	Development of OnSARR and OffSARR Yard Job miles
297. CSXT MUL/TRAIL Industrial Yard Jobs vs. TPI Historic Industrial Yard Jobs.xlsx		Indicates 91 yard jobs that TPI covered in its base year train list (based on historic traffic levels) out of the 92 yard jobs CSXT derived from MultiRail train profiles
298. Peak Y trn 1 on with miles PEAK GROWTH.xlsx		Compiles yard trains and movement characteristics for the peak period using database outputs from "TPI Yard Trains Base Year V01 20150810.mdb" and then uses forecast data in "Train List Volume Forecast TRAIN DRAFT Rebuttal.xlsx" to determine future consist sizes
299. Peak Y trn 1 on with miles.xlsx		Compiles yard trains and movement characteristics for the peak period using database outputs from "TPI Yard Trains Base Year V01 20150810.mdb"
300. Profiles1 Update_Yard Trains Only with Lookup.xlsx	4/	CSXT Discovery Data - Train Profile for yard trains only with added lookups.
301. RegionStats-byCategory-byTrain.xlsx		CSXT Reply Workpaper, linked to derive the table in CSXT Reply Exhibit III-C-4 which lists CSXT MultiRail profiles for yard jobs 28.860 trains CSXT claimed TPI did not include in its
302. Review of CSXT Reply Yard Train Analysis.xlsx	6/	Analysis of CSXT Reply Yard train files.
303. sarr_locals_and_yardjobs_base.xls		CSXT Reply Workpaper, linked to derive the table in CSXT Reply Exhibit III-C-4 which lists CSXT MultiRail profiles for yard jobs 28.860 trains CSXT claimed TPI did not include in its train list (includes CSXT "As Req'd" jobs field which were not included in the Reply Exhibit)
304. SARR19B_TripPlan_IssueTraffic_Loads.pdf	5/	CSXT Reply workpaper
305. SARR19B_TripPlan_IssueTraffic_Loadsv3.xlsx	5/	Development of comparison of reply trip plans with TPIRR lanes and actual traffic

List of TPI October 7, 2015 Supplemental Evidence Section III Electronic Workpapers

File (1)	Supplemental/Compliance Order (2)	Description (3)
306. SARR19F_EstimatedTrainVolumes	6/	CSXT Reply workpaper; used in comparison; included to facilitate linking
307. Steps Taken to Derive TPIRR Industrial Yard Jobs per Day.pdf		PDF document describing the formulas, data, and analysis performed in "Y trn 1 on with
308. TPI Yard Trains Base Year V01 20150810.mdb		Traffic data outputs for On-SARR CSXT Y-Trains in the base period with query for import
309. TPIRR Y-Train Support.xlsx		Identification of Y-trains used in Rebuttal that leave yards
310. Train List Volume Forecast TRAIN DRAFT Rebuttal.xlsx	4/	Volume forecast configured for use in developing peak year train requirements
311. Trip Plans (CSXT-TPI-C-28781 to 28891).pdf	5/	CSXT Discovery document
312. Trip Plans (CSXT-TPI-C-28781 to 28891).xlsx	5/	Conversion of CSXT Discovery Document from .pdf
313. Y trn 1 on with miles.xlsx		Derives number of yard jobs per day at various terminals based on historic CSXT traffic data queried from "TPI Yard Trains Base Year V01 20150810.xlsx" and unique job locations based on CSXT Reply Workpaper "YardJobs_OnSARR_w_Customers.xlsx"
314. Y trn 1 on with miles Statistics v2.xlsx		Development of operating statistics for Y trains operating as locals incorporating RTC results excluding High Priority
315. Y trn 1 on with miles_Statistics.xlsx		Development of operating statistics for Y trains operating as locals
316. Y101 from SARRAllShTrnYard.xlsx	4/	Summary of CSXT Event data for Yard Trains with the CSXT ID Y101.
317. Y110 from SARRAllShTrnYard.xlsx	4/	Summary of CSXT Event data for Yard Trains with the CSXT ID Y110.
318. Yard Train Peak Period V01 20150728.mdb		Contains data table representing all peak period Yard Trains and a query that generates the tables used in the peak yard train analysis files
319. Yard Trains In Opening V01 20140812.acbdb	5/	CSXT Event data for Yard Trains in Opening database.
320. YardJobs_OnSARR_Serving_Issue Traffic v2.xlsx	6/	Development of percentages of Yard trains moving TPIRR traffic
321. YardJobs_OnSARR_w_Customers.xlsx	7/	CSXT Reply Workpaper unchanged. Used to facilitate Home Station development for Y trains in order to differentiate between geographically disparate Y trains operating under the same TRAIN_PROFILE_ID on the same day.
322. YardJobs_OnSARR_w_Customers_Rebuttal.xlsx	6/	CSXT Reply workpaper for Yard Job in event data with added lookups for rebuttal.
III-D. Stand-Alone Cost - Operating Expenses		
323. ATC URCS Input Cars V45 - Rebuttal.xlsx	4/	2012 ATC Traffic with statistic tables - Non-Intermodal
324. ATC URCS Input Containers V45 -Rebuttal Supplemental v2.xlsx		2012 ATC Traffic with statistic tables - Intermodal
325. ATC URCS Input Containers V45 -Rebuttal.xlsx	4/	2012 ATC Traffic with statistic tables - Intermodal
326. COMPARE_OD_HP_IM_2012_REB_SUPP_v2.xlsx		2012 Intermodal high priority containers to be removed
327. Peaking Factor_Supplemental.xlsx		Development of Peaking Factor for Supplemental Scenario 2 and Scenario 3.
328. TPI Supp OPEX Narrative Tables.xlsx		Support for numbers included in Supplemental/Compliance/section III-C-9 and III-D
329. TPIRR Operating Expense_Rebuttal.xlsx	6/	Development of TPIRR Rebuttal Operating Expense
330. TPIRR Operating Expense_Rebuttal_Supplemental.xlsx		Development of TPIRR Rebuttal Supplemental Operating Expense
331. TPIRR Operating Expense_Rebuttal_Supplemental v2.xlsx		Development of TPIRR Rebuttal Supplemental v2 Operating Expense
332. TPIRR Operating Expense_Rebuttal.xlsx	7/	CSXT Reply workpaper - Operating Expense
333. TPIRR Operating Statistics_Rebuttal.xlsx	5/	Rebuttal TPIRR Base Year and First Year Statistics
334. TPIRR Operating Statistics_Rebuttal_Supplemental.xlsx		Supplemental TPIRR Base Year and First Year Statistics
335. TPIRR Operating Statistics_Rebuttal_Supplemental v2.xlsx		Supplemental_v2 TPIRR Base Year and First Year Statistics
336. Traffic Index_REB.xlsx	4/	Indices from base year and 2012 to first year
337. Traffic Index_REB_Supplemental_v2.xlsx		Supplemental_v2 Indices from base year and 2012 to first year
III-D-1. Stand-Alone Cost - Operating Expenses - Locomotives		
338. CFR Emission Standards.pdf	5/	CFR showing emission standards by locomotive tier
339. CSX fuel price.xlsx	6/	TPI Opening workpaper - 3/Q/10 Fuel Price
340. TPI Opening workpaper - Fuel Consumption.xlsx	7/	TPI Opening workpaper - CSXT discovery document with fuel consumption for ES44
341. TPI Opening workpaper - Calculation of annual lease cost for ES44AC locomotives	7/	TPI Opening workpaper - Calculation of annual lease cost for ES44AC locomotives
342. TPI Opening workpaper - Support for loco lease, loco maintenance, servicing and fuel price	7/	TPI Opening workpaper - Support for loco lease, loco maintenance, servicing and fuel price
343. Loco stats Update_Spare Margin_Rebuttal.xlsx	6/	Development of locomotive spare margin and system dwell
344. Locomotive Lease_Revised.xlsx	4/	Comparison of CSX and UP cost for new locomotives.
345. TPI Opening workpaper - Support for SD40 lease cost	7/	TPI Opening workpaper - CSXT discovery document support for SD40 lease cost
346. Locomotive Maintenance Agreement.pdf	5/	Excerpt from Maintenance Agreement showing what monthly charge covers
347. CSXT Reply workpaper showing additional maintenance costs	7/	CSXT Reply workpaper showing additional maintenance costs
348. Progressive Railroading mechanical update.pdf	5/	Article showing CSX locomotive DP power capability
349. TPIRR Reply Train Lists with dwell calc.xlsx	6/	CSXT Reply workpaper showing dwell hour calculation
III-D-2. Stand-Alone Cost - Operating Expenses - Rail Cars		
350. CAR REPAIR USER_2010.xlsx	6/	TPI Opening workpaper - Unit cost for private car repairs
351. Cars Originated Comparison.xlsx	6/	Comparison of Class I and TPI Opening Cars Originated
352. CSX Hoppers.pdf	5/	CSX Hoppers from The Official Railway Equipment Register
353. CSX Trailers and Containers Update_Revised.xlsx	4/	TPI Opening workpaper - CSXT discovery document with average cost for container lease cost
354. Foreign Car Per Diem.pdf	5/	Support for net per diem calculations
355. SARR Carloads By Shipment Type V45 20141031_Rebuttal.xlsx	6/	Rebuttal Development of Car Dwell for System and Foreign cars
356. STB Deck Network Velocity Service 07-02-2014.pdf	6/	BNSF Velocity & Service Status Update to STB
357. TPIRR 2012 Rev	6/	Support for Peaking Factor
358. TPIRR Car Costs_CSXT Reply_Formula Correction.xlsx	6/	CSXT Reply car cost spreadsheet with foreign time correction
359. TPIRR Car Costs_Rebuttal.xlsx	6/	Rebuttal costs associated with system, private, foreign cars
360. TPIRR Car Costs_Supplemental.xlsx		Supplemental costs associated with system, private, foreign cars
361. TPIRR Car Costs_Supplemental_v2.xlsx		Supplemental costs associated with system, private, foreign cars
III-D-3. Stand-Alone Cost - Operating Expenses - Personnel		
362. BNSF.employee.avg.tenure.pdf	5/	BNSF webpage referring to employee average tenure
363. TPI Opening workpaper - calculating fringe benefit ratio	7/	TPI Opening workpaper - calculating fringe benefit ratio
364. Communications Generally Accepted Practices Study.pdf	5/	Overview of GAP accounting
365. TPI Opening workpaper - Development of TPIRR Crew Rebalancing	7/	TPI Opening workpaper - Development of TPIRR Crew Rebalancing
366. Crew Taxi Costs.xlsx	6/	TPI Open workpaper - Taxi costs for crew rebalance
367. CSX.presentation.Shortline.Workshop.Feb.2008.pdf	5/	CSXT presentation on short lines
368. CSX.shortline.workshop.Publicly.Available.pdf	5/	CSXT website with link to 2008 Shortline Workshop presentation

List of TPI October 7, 2015 Supplemental Evidence Section III Electronic Workpapers

File (1)	Supplemental/Compliance Order (2)	Description (3)
369. CSXT.4049.dated.July.1.2014.pdf	5/	CSXT 7/1/2014 publication on hazmat rules for transportation
370. CSXT.inspects.trains.for.hazmat.compliance.pdf	5/	CSXT webpage describing inspection of hazmat cargo
371. CSXT.network.rationalization.department.10.15.14.pdf	5/	CSXT webpage on short line leases and sales
372. [REDACTED]	7/	Support for IT costs
373. [REDACTED]	7/	CSXT percent of revenues used for external audit outsourcing costs
374. Fringe Benefit Double Count.xlsx	4/	Example showing overstatement of indexing fringe benefit percent
375. Martland.RR.productivity.article.Fall.2012.pdf	5/	Productivity Improvements in the U.S. Rail Freight Industry, 1980-2010
376. T&E Salary Roster Update_Revised.xlsx	5/	TPI Open workpaper - CSXT discovery document with calculation of Engineer and Conductor
377. Tolliver.RR.operational.performance.Fall.2010.pdf	5/	Railroad Operational Performance in the United States
378. [REDACTED]	7/	Sources percent of revenues used for internal audit outsourcing costs
379. TPIRR - Capital Budget-Rebuttal.xls	4/	Rebuttal IT capital budget
380. [REDACTED]	7/	TPI Open workpaper - Summary of Trains by Crew Segment
381. TPIRR - Operating Budget-Rebuttal.xls	4/	Rebuttal IT operating budget
382. TPIRR -Cell Phones & Pagers-Rebuttal.xls	4/	Development of Cell Phones & Pagers count
383. TPIRR -Desktop Computer-Rebuttal.xls	4/	Development of Desktop Computer count
384. TPIRR -Desktop Printers-Rebuttal.xls	4/	Development of Desktop Printers count
385. TPIRR G&A Outsourcing_Rebuttal.xlsx	4/	Rebuttal calculation of Outsourcing costs
386. TPIRR G&A Outsourcing_Supplemental.xlsx		Supplemental calculation of Outsourcing costs
387. TPIRR G&A Outsourcing_Supplemental v2.xlsx		Supplemental_v2 calculation of Outsourcing costs
388. TPIRR Hotels Taxis_Open.xlsx	4/	TPI Open workpaper - Calculation of hotel and taxi costs for TPIRR crews
389. TPIRR Hotels Taxis_Open_Supplemental v2.xlsx		TPI Open workpaper - Calculation of hotel and taxi costs for TPIRR crews excluding High Priority trains
390. TPIRR -Lap Top Computer- Rebuttal.xls	4/	Development of Lap Top Computer count
391. TPIRR -Lap Top Printers- Rebuttal.xls	4/	Development of Lap Top Printers count
392. [REDACTED]	7/	Sources percent of revenues used for legal outsourcing costs
393. TPIRR Materials and Supplies.xls	6/	TPI Open workpaper - Development of TPIRR operating supplies
394. TPIRR Rebuttal 2013 Org Chart.xlsx	6/	Summary data and comparisons made from CSXT Reply workpaper "2013 Org Chart.xls"
395. TPIRR Rebuttal Bad Debt.xlsx	6/	Calculation of debt percentage
396. TPIRR Rebuttal Car-mile Comparison.xlsx	6/	Comparison of TPI Opening car-miles to CSXT 2010
397. TPIRR Rebuttal CNW Phone Directory.xlsx	6/	Restatement of CSXT Reply workpaper "CNW Phone Directory Count.xls"
398. TPIRR Rebuttal Comp G&A.xlsx	6/	Comparison of Opening, Reply, and Rebuttal G&A Personnel
399. TPIRR Rebuttal Comp NTO.xls	4/	Comparison of Opening, Reply, and Rebuttal Non-train Operating Personnel
400. TPIRR Rebuttal CSXT Benchmarking - GA (corrected and	4/	Restatement of CSXT's reply workpaper "Benchmarking - GA.xls"
401. TPIRR Rebuttal IT Capital Budget.xls	5/	Summary of IT capital costs
402. TPIRR Rebuttal IT Operating Budget.xls	5/	Summary of IT operating costs
403. TPIRR Rebuttal Load Engineering and Design Service - CSX Website.pdf	5/	CSXT website page describing LEADS services
404. TPIRR Rebuttal Select Class I RR Data - 2010 to 2013.xlsx	6/	Support for Rebuttal benchmarks to Class I railroads
405. [REDACTED]	7/	CSXT Reply workpaper calculating average CSXT and NS fringe benefits
406. TPIRR Salaries-2010.xlsx	6/	TPI Open workpaper - Development of TPIRR salaries
407. TPIRR Salaries-2010_Revised.xlsx	4/	Rebuttal salary for executives and directors
408. [REDACTED]	7/	Opening Yard Locomotives and Locomotive Unit miles
409. TPIRR Yard Operations_Rebuttal.xlsx	6/	Rebuttal Yard Locomotives and Locomotive Unit miles
410. TPIRR Yard Operations_Rebuttal_Supplemental v2.xlsx		Supplemental excluding High Priority Yard Locomotives and Locomotive Unit miles
411. TPIRR Yard Operations_Rebuttal_Supplemental.xlsx		Supplemental Yard Locomotives and Locomotive Unit miles
412. [REDACTED]	7/	Reply Yard Locomotives and Locomotive Unit miles
413. Train Imbalance_Rebuttal.xlsx	4/	Rebuttal calculation of crews and locomotive hours for train imbalance
414. Train Imbalance_Rebuttal_Supplemental v2.xlsx		Rebuttal calculation of crews and locomotive hours for train imbalance excluding High Priority
415. Training Expenses Update_Revised.xlsx	5/	TPI Open workpaper - CSXT discovery document with training cost per student
416. Yard & Support Job Comparison.xlsx	6/	Rebuttal calculation of Yard personnel
417. Yard & Support Job Comparison_Supplemental.xlsx		Supplemental calculation of Yard personnel
418. Yard & Support Job Comparison_Supplemental v2.xlsx		Supplemental_v2 calculation of Outsourcing costs
III-D-4. Stand-Alone Cost - Operating Expenses - Maintenance of Way		
419. intro to CSXT MOW Field Manual.pdf	5/	Beginning of Engineering Department Maintenance of Way Field Manual
420. Rebuttal - Note on Management workforce - Analysis of Class 1 Railroads 2010.xlsx	6/	CSXT Reply workpaper of same name with Rebuttal comments
421. Rebuttal 2007 Engineering Dept Employees sorted.xls	5/	Spreadsheet of CSX Employees from 2007
422. Rebuttal CSXT Employee Data from 2010 Sorted Local Crews.xls	5/	Spreadsheet with data taken from CSXT in Discovery
423. Rebuttal Exhibit III-D-2 TPIRR MOW.xls	4/	Rebuttal calculation of TPIRR Maintenance of Way expense
424. Rebuttal Note on CSXT Workforce Data Produced.docx	5/	CSXT Reply workpaper of same name with Rebuttal comments
425. Rebuttal Notes on Correction of TPI Estimates of CSXT MOW Workforce per MainTrack Mile.docx	5/	CSXT Reply workpaper of same name with Rebuttal comments
426. Rebuttal TPI MOW Employee Positions and Descriptions.xlsx	4/	Spreadsheet of Employee positions and Descriptions for TPI
427. Rebuttal TPIRR Miles.xlsx	6/	Breakout of route miles and track miles maintained
428. Rebuttal TPIRR System MOW Workload.xlsx	4/	CSXT Reply workpaper of same name with Rebuttal comments
429. TPIRR Capitalized MOW_Rebuttal.xlsx	5/	Discounted annual capitalized MOW costs
430. TPIRR Rebuttal Comp MOW.xlsx	4/	Comparison of Opening, Reply, and Rebuttal MOW Personnel
431. TPIRR Rebuttal CSXT Employee Data from 2010 Sorted.xls	5/	Spreadsheet with data taken from CSXT in Discovery
III-D-6. Stand-Alone Cost - Operating Expenses - Loss & Damage		
432. TPIRR FCD1 by STCC - 2010_Rebuttal.xls	6/	Rebuttal calculation of TPIRR loss and damage
433. TPIRR FCD1 by STCC - 2010_Supplemental v2.xlsx		Supplemental_v2 calculation of TPIRR loss and damage
III-D-7. Stand-Alone Cost - Operating Expenses - Insurance		
434. TPI Insurance_Open.xls	6/	TPI Open workpaper - Calculation of TPIRR Insurance Rate

List of TPI October 7, 2015 Supplemental Evidence Section III Electronic Workpapers

File (1)	Supplemental/Compliance Order (2)	Description (3)
III-D-8. Stand-Alone Cost - Operating Expenses - Ad Valorem Tax		
435. TPIRR Ad Valorem 2010_Rebuttal.xls	4/	TPIRR Ad Valorem Tax
III-D-9. Stand-Alone Cost - Operating Expenses - Other		
436. Aug 09 to Jul 10 BRC201 invoices.pdf	5/	August 2009 to July 2010 BRC puller service invoices to CSXT; provided in discovery
437. Aug 09 to May 10 IHB201 invoices.pdf	5/	August 2009 to May 2010 IHB Dolton interlocker invoices to CSXT; provided in discovery
438. Aug 09 to May 10 IHB203 invoices.pdf	5/	August 2009 to May 2010 IHB dispatching invoices to CSXT; provided in discovery
439. B0-107-H1003.pdf	5/	July 2010 TASD Invoice to CSXT; provided in discovery
440. SARR CarType12 OrigTerm Locations V45	6/	Rebuttal calculation of TPIRR Auto Handling costs
441. SARRContainers OrigTerm Locations V45 20141031_Rebuttal Supplemental v2.xlsx		Supplemental excluding High Priority calculation of TPIRR Lift cost
442. SARRContainers OrigTerm Locations V45 20141031_Rebuttal.xlsx	6/	Rebuttal calculation of TPIRR Lift cost
443. TPI Joint facility charges 2010 REBUTTAL.xlsx	6/	Rebuttal calculation of TPIRR Joint Facilities costs
444. TPI Joint facility charges 2010 REBUTTAL_Supplemental.xlsx		Supplemental calculation of TPIRR Joint Facilities costs
445. TPIRR Base Year Local Train List III D 9_Supplemental.xlsx		TPI Opening workpaper revised to include Supplemental Local Base Year Trains
446. TPIRR Base Year Local Train List III D 9_Supplemental.xlsx	7/	TPI Opening workpaper - car counts used for trackage rights
III-F. Stand-Alone Cost - Road Property Investment		
446. Exh III-F-1_TPI Intermodal Facility Cost Comparison.xlsx	4/	Spreadsheet showing the land and facility costs for IM terminals. The Opening numbers are linked to the "TPIRR Facilities.xlsx" spreadsheet submitted on Opening. The Rebuttal numbers are keyed in due to the fact that the file they are from has changed and is used for Supplemental Scenario 1. The Supplemental Rebuttal numbers are linked to the "TPIRR Facilities
447. III-F Total Rebuttal.xls	I/ 4/	Spreadsheet linking III-F spreadsheets and total construction costs
448. Rebuttal Exhibit III-F-1.xlsx	I/ 4/	Rebuttal Exhibit III-F-1 - TPIRR road property investment
III-F-1. Stand-Alone Cost - Road Property Investment - Land		
449. Interchange Yard Roadbed Width.xlsx	6/	Details TPIRR roadbed width for up to 5 tracks
450. TPIRR Easement Fees_Rebuttal.xlsx	4/ 7/	Appraisal Report - Land Valuation for TPI SAR
451. TPIRR Easement Fees_Rebuttal.xlsx	4/	Support for Easement Fees
452. TPIRR Easement Fees_Rebuttal.xlsx	4/ 7/	Land acquired via easement and total easement fee
Subdirectory: Atlanta GA		
453. Subdirectory: Atlanta Geocoded Sales	5/	Google Earth files for CSXT sales in Atlanta GA, geocoded
454. Atlanta Analysis.xlsx	4/	Spreadsheets for analysis of CSXT land valuation in Atlanta GA
Subdirectory: Baltimore MD		
455. Subdirectory: Baltimore Geocoded Sales	5/	Google Earth files for CSXT sales in Baltimore MD, geocoded
456. Baltimore Analysis.xlsx	4/	Spreadsheets for analysis of CSXT land valuation in Baltimore MD
Subdirectory: Chicago IL		
457. Subdirectory: Chicago Geocoded Sales	5/	Google Earth files for CSXT sales in Chicago IL, geocoded
458. Chicago Analysis.xlsx	4/	Spreadsheets for analysis of CSXT land valuation in Chicago IL
Subdirectory: Jacksonville FL		
459. Jacksonville Analysis.xlsx	4/	Spreadsheets for analysis of CSXT land valuation in Jacksonville FL
460. Our Jacksonville Routes Valued by CSX.kmz	4/	Google Earth file for Jacksonville FL SARR routes where land was valued by CSXT
Subdirectory: Land Rebuttal Report		
461. TPI-Land Valuation Rebuttal Report Nov 5 2014.docx	5/	Rebuttal Report and Appraisal Review of Retrospective Appraisal of Land for TPI SARR
462. TPI-Land Valuation Rebuttal Report Nov 5 2014.pdf	5/	Rebuttal Report and Appraisal Review of Retrospective Appraisal of Land for TPI SARR
Subdirectory: Nashville & Chattanooga		
463. Chattanooga Analysis.xlsx	4/	Spreadsheets for analysis of CSXT land valuation in Chattanooga TN
464. Chattanooga-Our Routes Valued by CSX.kmz	5/	Google Earth file for Chattanooga TN SARR routes where land was valued by CSXT
465. Nashville Analysis.xlsx	4/	Spreadsheets for analysis of CSXT land valuation in Nashville TN
466. Our Nashville Routes Valued by CSX.kmz	5/	Google Earth file for Nashville TN SARR routes where land was valued by CSXT
Subdirectory: Pittsburgh PA		
467. Subdirectory: Pittsburgh Geocoded Sales	5/	Google Earth files for CSXT sales in Pittsburgh PA, geocoded
468. Pittsburgh Analysis.xlsx	4/	Spreadsheets for analysis of CSXT land valuation in Pittsburgh PA
Subdirectory: TPI Routes Added		
469. Subdirectory: Curtis Bay Branch	4/	Land Valuation spreadsheet and Google Earth KML file for 5.27-mile extension in Baltimore,
470. Subdirectory: IL - BRC Forest Hill-Clearing Yd	4/	Land Valuation spreadsheet and Google Earth KML file for 4.8-mile extension on BRC in
471. Subdirectory: IL - IHB Blue Island Yd-Bedford Pk	4/	Land Valuation spreadsheet and Google Earth KML file for 11.29-mile extension on IHB in Chicago IL
472. Subdirectory: IL-Rose Lake Yard to TRRA	4/	Land Valuation spreadsheet and Google Earth KML file for 0.30-mile extension in East St
473. Subdirectory: IL-TRRA to Madison Yard ESTL	4/	Land Valuation spreadsheet and Google Earth KML file for 2.0-mile extension on TRRA in East St Louis IL
Subdirectory: TPI Yards		
474. TPI Rebuttal Yard Acres.xlsx	4/	Support for Yard Acres
475. TPI REBUTTAL Yards and Land Values-FINAL.xlsx	I/ 4/	Land Valuation for TPI SARR Yards. TPI has calculated the IM facility land values based on the numbers used in Opening. TPI has done this for the 19 IM terminals included in Opening, as well as the three IM terminals added in Rebuttal.
476. TPI Yards and Land Values - ALL YARDS.xlsx	4/	TPI Opening workpaper; included to facilitate linking
477. Yards Added in Rebuttal.xlsx	4/	Land Valuation spreadsheet for Clearing Yard (Chicago) and Madison Yard (East St Louis IL)

List of TPI October 7, 2015 Supplemental Evidence Section III Electronic Workpapers

File (1)	Supplemental/Compliance Order (2)	Description (3)
478. Yards Added in Rebuttal.kmz	5/	Google Earth file for Clearing Yard (Chicago) and Madison Yard (East St Louis IL)
Subdirectory: Washington DC		
479. Our Wash DC Routes Valued by CSX.kmz	5/	Google Earth file for Washington DC Area SARR routes where land was valued by CSXT
480. Washington Analysis.xlsx	4/	Spreadsheets for analysis of CSXT land valuation in Washington DC Area
III-F-2. Stand-Alone Cost - Road Property Investment - Roadbed Preparation		
481. [redacted].pdf	4/ 7/	PDF of CMP specifications
482. [redacted].pdf	4/ 7/	PDF listing prices for various pipe types and sizes
483. Cost of Water per CY for TPIRR.xlsx	5/	Calculation showing alternative cost to that used by CSXT
484. [redacted].pdf	4/ 7/	Yard information provided in discovery
485. [redacted].pdf	4/ 7/	Discovery file with detail report for CSXT culverts from DVD-041
486. Dry rubble definition.pdf	5/	Definition of dry rubble (and similar categories) shown on ICC Engineering Reports
487. [redacted].pdf	7/	Means indexes by quarter
488. [redacted].pdf	4/ 7/	Identification of highway crossings on track charts of new segments
489. [redacted].pdf	4/ 7/	ICC Engineering Reports and system valuation section maps
490. [redacted].pdf	4/ 7/	Yard information provided in discovery
491. [redacted].pdf	4/ 7/	Calculation of mark-up ratio for land for waste quantities
492. [redacted].pdf	4/ 7/	Orin Line Construction documents
493. [redacted].pdf	4/ 7/	Means handbook pages for unit costs and location factors
494. Means Handbook project size.pdf	5/	Means Handbook section on size of project
495. Pennsylvania.iron.smelting.history.pdf	5/	History of iron smelting in Pennsylvania
496. Rural land cost.pdf	5/	Copies of land for waste excavation sections from public versions of text in several STB proceedings supporting use of rural land cost
497. [redacted].pdf	4/ 7/	Calculation of sign removal cost used in grading spreadsheet
498. [redacted].pdf	4/ 7/	Yard information provided in discovery
499. [redacted].pdf	4/ 7/	Yard information provided in discovery
500. TPIRR Culvert Construction Rebuttal.xlsx	4/	Spreadsheet calculating Rebuttal cost for culverts on TPIRR
501. [redacted].pdf	4/ 7/	Identification of and information on intermodal, automotive and bulk transfer facilities
502. [redacted].pdf	4/ 7/	Means Handbook historical cost indexes
503. [redacted].pdf	4/ 7/	Grading / roadbed preparation spreadsheet
504. TPIRR Rebuttal Grading.xlsx	4/	Rebuttal grading / roadbed preparation spreadsheet
505. [redacted].pdf	4/ 7/	Average monthly and annual rainfall amounts for various locations on the TPIRR and in
506. [redacted].pdf	4/ 7/	Average monthly and annual rainfall amounts for various locations on the TPIRR and in
507. [redacted].pdf	4/ 7/	Route miles spreadsheet plus modifications for grading and roadbed preparation calculations
508. TPIRR Route Miles Rebuttal Grading.xlsx	4/	Rebuttal route miles spreadsheet plus modifications for grading and roadbed preparation
509. [redacted].pdf	4/ 7/	Yard matrix spreadsheet plus modifications for grading and roadbed preparation calculations
510. TPIRR Yard Matrix Rebuttal Grading.xlsx	6/	Rebuttal yard matrix spreadsheet plus modifications for grading and roadbed preparation
511. [redacted].pdf	4/ 7/	Yard information provided in discovery
512. [redacted].pdf	4/ 7/	Yard information provided in discovery
513. Trestle Hollow Location Information.pdf	5/	Information on South Central Tennessee Railroad and location of Trestle Hollow Project in relation to the TPIRR
514. [redacted].pdf	4/ 7/	Cost sheet for the Trestle Hollow Project
515. [redacted].pdf	4/ 7/	State DOT files re: water for compaction
Subdirectory: Soil Critique		
516. C2-Sheshukov.pdf	5/	Slides from presentation at the SWAT International Conference on SSURGO.
517. Citation for Soil_Information_for_Hydro_Models_poster slide 4.pdf	5/	Citation for slide handout from American Geophysical Union Fall Meeting.
518. CSXT Soil Analysis Critique.pdf	5/	Critique of CSXT soil analysis used for Subgrade preparation
519. Description of SSURGO Database _ NRCS.pdf	5/	USA website description of SSURGO database.
520. Description of STATSGO2 Database _ NRCS.pdf	5/	USA website description of STATSGO2 database.
521. Dylan E Beaudette_California Soil Resource Lab.pdf	5/	Profile and Resume for Dylan Beaudette of the California Soil Resource Lab
522. s2241.kmz	5/	google earth file containing mapunit s2241 locations and corresponding TPIRR ROW.
523. s2241_map.pdf	5/	PDF printout of .kmz map for s2241 chorizon map units.
524. Scaling Soil Survey _ California Soil Resource Lab.pdf	5/	Article from California Soil Resource Lab on scaling soil survey information.
525. Soil_Information_for_Hydro_Models_poster.pdf	5/	Article from USGS on soil information for hydrologic modeling.
526. STATSGO2_Soils_TPIRR_Rebuttal.xlsx	4/	TPI's review and attempt to recreate CSXT's Reply workpaper soil calculations.
527. TPIRR Soil Moisture Content Analysis Mapunits in Multiple	5/	workpaper showing that when a map unit is in multiple states the data for each state is the
528. Unified Soil Classification System.pdf	5/	Military Soils Engineering Unified Soil Classification System
529. Web Soil Survey - Frequently Asked Questions.pdf	5/	USDA websoil survey frequently asked questions
Subdirectory: CSXT Reply Files		
530. TPIRR Soil Moisture Content - IL.xlsx	5/	CSXT Reply workpaper
531. TPIRR Soil Moisture Content - IN.xlsx	5/	CSXT Reply workpaper
532. TPIRR Soil Moisture Content - NY.xlsx	5/	CSXT Reply workpaper
533. TPIRR Soil Moisture Content - OH.xlsx	5/	CSXT Reply workpaper
534. TPIRR Soil Moisture Content - PA.xlsx	5/	CSXT Reply workpaper
Subdirectory: Web Soil Survey SSURGO Database		
535. Subdirectory: IL049	5/	SSURGO Database for Effingham County, Illinois
536. Subdirectory: IN097	5/	SSURGO Database for Marion County, Indiana
537. Subdirectory: NY055	5/	SSURGO Database for Monroe County, New York
538. Subdirectory: OH147	5/	SSURGO Database for Seneca County, Ohio
539. Subdirectory: PA003	5/	SSURGO Database for Allegheny County, Pennsylvania
Subdirectory: Web Soil Survey STATSGO2 Database		
540. Subdirectory: Illinois	5/	STATSGO2 Database for Illinois

List of TPI October 7, 2015 Supplemental Evidence Section III Electronic Workpapers

File (1)	Supplemental/Compliance Order (2)	Description (3)
541. Subdirectory: Indiana	5/	STATSGO2 Database for Indiana
542. Subdirectory: New York	5/	STATSGO2 Database for New York
543. Subdirectory: Ohio	5/	STATSGO2 Database for Ohio
544. Subdirectory: Pennsylvania	5/	STATSGO2 Database for Pennsylvania
III-F-3. Stand-Alone Cost - Road Property Investment - Track Construction		
545. Index of material transportation cost.xlsx	4/	Indexing of TPIRR material transportation cost from 1994 to 2010 using RCAFA
546. Rail Shipping Cost Rebuttal.xlsx	5/	Spreadsheet of TPIRR's Rebuttal Rail Shipping cost - adjustment to CSXT's Reply
547. TPI Turnouts & Multi-Track Rebuttal.xlsx	4/	Spreadsheet of TPIRR turnouts and multi-track for Rebuttal
548. Track Construction Rebuttal.xlsx	4/	Spreadsheet calculating Rebuttal cost for track on TPIRR
Subdirectory: Ballast		
549. Ballast gradation recommendations from AREMA	4/ 7/	PDF of ballast gradation recommendations from AREMA
550. Ballast and sub-ballast densities	4/ 7/	PDF of ballast and sub-ballast densities
551. Ballast and sub-ballast standards	4/ 7/	PDF of ballast and sub-ballast standards
552. Ballast cost contracts	4/ 7/	PDF of ballast cost contracts
553. Ballast Prices by Supplier and Location CSXT Reply TPI	4/	Spreadsheet detailing correction to errors in CSXT's Reply Ballast Prices and Suppliers
554. Ballast shipping distances	4/ 7/	Spreadsheet of ballast shipping distances
555. DuPont ballast cost.pdf	5/	Excerpts from DuPont Rebuttal (public version) and STB's March 24, 2014 decision in
Subdirectory: Curves		
556. TPIRR Curves & Lubricator Spacing.xlsx	4/ 7/	Spreadsheet of curve location and lubricator spacing
Subdirectory: Details		
Subdirectory: Double Switch Point		
557. Double Switch Point Cost Quote	4/ 7/	PDF of double switch point cost quote
558. Double Switch Point Detail	4/ 7/	PDF of double switch point detail
Subdirectory: Sliding Derail		
559. Sliding Derail Shipping Distance	4/ 7/	Spreadsheet of shipping distance for sliding derail
560. Sliding Derail Cost Quote	4/ 7/	PDF of sliding derail cost quote
561. Sliding Derail Shipping Cost	4/ 7/	PDF of sliding derail shipping cost
Subdirectory: Diamond Crossings		
562. Diamond Crossing Costs	4/ 7/	PDF of diamond crossing costs
563. TPIRR at-grade crossings	4/ 7/	Spreadsheet of TPIRR at-grade crossings
Subdirectory: Lubricators & Mats		
564. Rail Lubricator Cost	4/ 7/	PDF of rail lubricator cost
565. Rail Lubricator Cost Quote	4/ 7/	PDF of rail lubricator cost quote
566. Rail Lubricator Spacing Spec	4/ 7/	PDF of rail lubricator spacing spec
567. Average Matting Shipping Distance	4/ 7/	Spreadsheet of average matting shipping distance
568. Track Absorbent Matting Cost Quote	4/ 7/	PDF of track absorbent matting cost quote
569. Mat Shipping Quote	4/ 7/	PDF of mat shipping quote
Subdirectory: OTM		
570. A&K Plate Quote.pdf	4/ 7/	PDF of tie plate cost quote
571. LB Anchor Quote.pdf	4/ 7/	PDF of anchor cost quote
572. LB Plate Quote.pdf	4/ 7/	PDF of plate cost quote
573. LB Spike Quote.pdf	4/ 7/	PDF of spike cost quote
574. Progress Anchor Quote.pdf	4/ 7/	PDF of anchor cost quote
575. Progress Plate Quote.pdf	4/ 7/	PDF of plate cost quote
576. Progress Spike Quote.pdf	4/ 7/	PDF of spike cost quote
577. RJ Plate Bid.pdf	4/ 7/	PDF of plate cost quote
578. TPI Rail Anchor Pattern Details.pdf	4/ 7/	PDF of rail anchor detail
579. TPIRR Spiking Patterns.pdf	4/ 7/	PDF of spiking pattern detail
580. TPIRR Typical Tie Plate Details.pdf	4/ 7/	PDF of tie plate detail
581. TPIRR Typical Track Spike Detail.pdf	4/ 7/	PDF of track spike detail
582. Unifrac Anchor Quote.pdf	4/ 7/	PDF of anchor cost quote
583. Unifrac Plate Quote II.pdf	4/ 7/	PDF of plate cost quote
584. Unifrac Plate Quote.pdf	4/ 7/	PDF of plate cost quote
585. Unifrac Spike Quote.pdf	4/ 7/	PDF of spike cost quote
Subdirectory: Rail		
586. Rail Cost used from CSX R-1 Report	4/ 7/	PDF of Rail Cost used from CSX R-1 Report
587. Labor Cost Email	4/ 7/	PDF of labor cost email
588. Labor Cost Quote	4/ 7/	PDF of labor cost quote
Subdirectory: Rail Weld		
589. Rail Weld Bid.pdf	4/ 7/	PDF of rail welding bid
Subdirectory: Roadway Grade Crossing		
590. Crossing Repair Bid Sheet	4/ 7/	PDF of crossing repair bid sheet
591. Crossing Bid Pricing	4/ 7/	PDF of crossing bid pricing
592. Crossing Scope of Work	4/ 7/	PDF of crossing scope of work

List of TPI October 7, 2015 Supplemental Evidence Section III Electronic Workpapers

File (1)	Supplemental/Compliance Order (2)	Description (3)
593. TPI Crossings.xlsx	4/ 7/	Spreadsheet of TPIRR crossings
Subdirectory: Signs		
Subdirectory: Cross-buck		
594. SENX12079930 OH Crossbucks AFE.xlsx	4/ 7/	Document of signage costs at crossings
Subdirectory: ENS		
595. Email to PennDOT for ENS (000001).pdf	4/ 7/	PDF of email for crossing signs
596. Email to PennDOT for ENS (000001).pdf	4/ 7/	PDF of email for crossing signs and cost
597. PennDOT ENS quote.pdf	4/ 7/	PDF of crossing sign costs
598. PennDOT ENS quote.pdf	4/ 7/	PDF of sign installation costs
Subdirectory: Mile Marker & Whistle Post		
599. Mile Marker Sign Price.pdf	4/ 7/	PDF of mile marker sign costs
Subdirectory: Sub-Ballast		
600. AREMA Sub-Ballast Standards.pdf	4/ 7/	PDF of sub-ballast standards from AREMA
601. Base Course for Sub-Ballast.pdf	4/ 7/	PDF of base course cost
602. Typical Sub-ballast Costs.pdf	4/ 7/	PDF of sub-ballast costs
Subdirectory: Switch Heaters		
603. Lubricator Shipping Costs.xlsx	4/ 7/	PDF of lubricator shipping costs
604. Price List for Switch Heaters.pdf	4/ 7/	PDF of No. 20 switch heater costs quote
605. Switch Heater Average Distances.xlsx	4/ 7/	Spreadsheet of switch heater shipping distances
Subdirectory: Ties		
606. 29323.pdf	5/	CSXT document provided in discovery
607. 32414.pdf	5/	CSXT document provided in discovery
608. A37401_RB.pdf	5/	CSXT document provided in discovery
609. Turnout Turnout and Tie Turnout Costs.xlsx	4/ 7/	PDF of tie costs
610. New Rock Subdivision AFE turnout.xlsx	5/	CSXT document provided in discovery
611. Turnout Tie 2004 Quote.xlsx	4/ 7/	Spreadsheet of tie costs
612. Tie Cost - Base RT from CSXT (10/11/15).xlsx	4/ 7/	PDF of tie costs
613. Tie Discovery AFE Summary.xlsx	5/	Summary of main line tie prices from CSXT discovery documents
Subdirectory: Turnouts		
614. AWP Turnout Quote Email.pdf	4/ 7/	PDF of email for turnout and switches
615. AWP Turnout Quote.pdf	4/ 7/	PDF of turnout and switch costs quote
616. AWP Turnout Bid.pdf	4/ 7/	PDF of turnout costs bid
617. AWP Turnout Quote Email.pdf	4/ 7/	PDF of email for turnout costs
618. AWP Turnout Quote.pdf	4/ 7/	PDF of turnout costs quote
619. Proposal for Turnout Quotes.pdf	4/ 7/	PDF of No. 10 turnout costs quote
620. Proposal for Turnout Quotes.pdf	4/ 7/	PDF of No. 20 turnout costs quote
621. Proposal Plant Location Email.pdf	4/ 7/	PDF of plant location email
622. Proposal Turnout Quote.pdf	4/ 7/	PDF of email turnout costs
623. AWP Turnout Quote.pdf	4/ 7/	PDF of turnout costs quote
624. Turnout.pdf	4/ 7/	PDF of turnout detail
625. Turnout Plant Location Email.pdf	4/ 7/	PDF of plant location email
626. Turnout Turnout Quote.pdf	4/ 7/	PDF of turnout cost quote email
Subdirectory: Typical Sections		
627. TPIRR Typical Sections.pdf	4/ 7/	PDF of sub-ballast, ballast, and track section details
Subdirectory: Wheel Stop		
628. TPIRR Wheel Stop Detail.pdf	4/ 7/	PDF of wheel stop detail
629. Wheel Stop Quote Wheel Stop.pdf	4/ 7/	PDF of costs for wheel stop shipping
630. Wheel Stop System (000001).xlsx	4/ 7/	Spreadsheet of shipping distance
631. Wheel Stop Detail.pdf	4/ 7/	PDF of costs for wheel stop
III-F-4. Stand-Alone Cost - Road Property Investment - Tunnels		
632. TPIRR Tunneling.xlsx	4/ 7/	Tunnel listing provided by CSXT in discovery
633. TPI Tunnel Construction Rebuttal.xlsx	4/	Spreadsheet calculating Rebuttal cost for tunnels on TPIRR
III-F-5. Stand-Alone Cost - Road Property Investment - Bridges		
634. Bridge abutment spill slopes.pdf	5/	BNSF / UP bridge specifications showing 1.5:1 slope for abutment spill slopes
635. Bridge.xlsx	4/ 7/	Spreadsheet of FHWA overpass bridge locations by state and county
636. Crossings.xlsx	4/ 7/	Discovery file with detail report for CSXT crossings from DVD-033
637. CSXT Response to RFP No. 133.pdf	5/	Excerpts from discovery documents related to bridge height special study
638. FHWA highway bridges by state and county TPIRR.xlsx	4/ 7/	Spreadsheet of FHWA overpass bridge locations by state and county on the TPIRR
639. TPI Bridge Construction Costs Rebuttal.xlsx	4/	Rebuttal Bridge Construction Costs
640. TPIRR Highway Overpass Construction TPI Rebuttal.xlsx	4/	Rebuttal Highway Overpass Construction Costs
Subdirectory: References & Exhibits		
641. Type II.pdf	4/ 7/	PDF of Type II superstructure detail
642. Type II.pdf	4/ 7/	PDF of Type II superstructure detail
643. Type II.pdf	4/ 7/	PDF of Type II superstructure girder detail
644. Type II.pdf	4/ 7/	PDF of Type II superstructure base plate & bearing pad detail

List of TPI October 7, 2015 Supplemental Evidence Section III Electronic Workpapers

	File (1)	Supplementa I/Compliance		Description (3)
		Order (2)		
645	BR04-Type II-5.pdf	4/	7/	PDF of Type II substructure detail
646	BR04-Type II-6.pdf	4/	7/	PDF of Type II substructure detail
647	BR04-Type II-7.pdf	4/	7/	PDF of Type II superstructure detail
648	BR05-Type III-1.pdf	4/	7/	PDF of Type III cross-section detail
649	BR05-Type III-2.pdf	4/	7/	PDF of Type III superstructure detail
650	BR05-Type III-3.pdf	4/	7/	PDF of Type III superstructure girder detail
651	BR05-Type III-4.pdf	4/	7/	PDF of Type III superstructure girder detail
652	BR05-Type III-5.pdf	4/	7/	PDF of Type III superstructure girder detail
653	BR05-Type III-6.pdf	4/	7/	PDF of Type III superstructure girder detail
654	BR05-Type III-7.pdf	4/	7/	PDF of Type III superstructure reinforcing detail
655	BR06-Type IV-1.pdf	4/	7/	PDF of Type IV superstructure detail
656	BR06-Type IV-2.pdf	4/	7/	PDF of Type IV superstructure detail
657	BR08-Bridge Handrail-1.pdf	4/	7/	PDF of photos depicting bridge handrails
658	BR08-Bridge Handrail-2.pdf	4/	7/	PDF of photos depicting bridge handrails
659	BR09-Footing.pdf	4/	7/	PDF of Type I - Type IV footing detail
660	BR09-Type I & II Pier-1.pdf	4/	7/	PDF of Type I & Type II pier detail
661	BR09-Type I & II Pier-2.pdf	4/	7/	PDF of Type I & Type II pier detail
662	BR09-Type III Pier-1.pdf	4/	7/	PDF of Type III pier detail
663	BR09-Type III Pier-2.pdf	4/	7/	PDF of Type III pier detail
664	BR09-Type IV Pier-1.pdf	4/	7/	PDF of Type IV pier detail
665	BR09-Type IV Pier-2.pdf	4/	7/	PDF of Type IV pier detail
666	C&XT Standard Stub Abutment.pdf	4/	7/	PDF of Type I & Type II abutment detail
667	Greene Contractors - Abutment Concrete - No Piling #2.pdf	4/	7/	PDF of bridge project description and cost schedule
668	Greene Contractors - Abutment Concrete - No Piling.pdf	4/	7/	PDF of bridge project description and cost schedule
669	Greene Contractors - Abutment Concrete - Piling #2.pdf	4/	7/	PDF of bridge project description and cost schedule
670	Greene Contractors - Abutment Concrete - Piling.pdf	4/	7/	PDF of bridge project description and cost schedule
671	Greene Contractors - Abutment Piles.pdf	4/	7/	PDF of bridge project description and cost schedule
672	Greene Contractors - Pier Piles.pdf	4/	7/	PDF of bridge project description and cost schedule
673	Greene Contractors - PVC Deck Drain.pdf	4/	7/	PDF of bridge project description and cost schedule
674	Greene Contractors - Superstructure Type II.pdf	4/	7/	PDF of bridge project description and cost schedule
675	Greene Contractors - Superstructure Type III.pdf	4/	7/	PDF of bridge project description and cost schedule
676	Greene Contractors - Type II Elastomeric Pad.pdf	4/	7/	PDF of bridge project description and cost schedule
677	Greene Contractors - Type II Steel Base PL.pdf	4/	7/	PDF of bridge project description and cost schedule
678	Greene Contractors - Type III Elastomeric Pad.pdf	4/	7/	PDF of bridge project description and cost schedule
679	Greene Contractors - Type III Steel Base PL.pdf	4/	7/	PDF of bridge project description and cost schedule
680	Greene Contractors - Type IV Elastomeric Pad.pdf	4/	7/	PDF of bridge project description and cost schedule
681	Greene Contractors - Type IV Steel Base PL.pdf	4/	7/	PDF of bridge project description and cost schedule
682	Innovative Redesign for Cost Savings on a Vertical Lift Bridge.pdf	4/	7/	PDF of vertical lift bridge cost schedule
683	Innovative Vertical Lift Webpage.jpg	4/	7/	JPG of vertical lift bridge website
684	Kay & Kay - Abutment Piles.pdf	4/	7/	PDF of bid form for unit prices
685	Kay & Kay - Pier Piles.pdf	4/	7/	PDF of bid form for unit prices
686	Miller - Abutment Pile Tips.pdf	4/	7/	PDF of bid sheet
687	Miller - Abutment Piles.pdf	4/	7/	PDF of bid sheet
688	Miller - Pier Pile Tips.pdf	4/	7/	PDF of bid sheet
689	Miller - Pier Piles.pdf	4/	7/	PDF of bid sheet
690	Miller - Superstructure Type I.pdf	4/	7/	PDF of bid sheet
691	Miller - Type I Elastomeric Pad.pdf	4/	7/	PDF of bid sheet
692	NERA - Superstructure Type IV.pdf	4/	7/	PDF of Type IV cost
693	Pittman Creek Bridge MP 163.4.pdf	4/	7/	PDF of bridge plans and photos
694	Pittman Creek Bridge Viaduct #2 Steel Weight.pdf	4/	7/	PDF of steel tower weight calculations
695	Pittman Creek Bridge Viaduct Bearing on Concrete Pedestal.pdf	4/	7/	PDF of steel tower bearing on concrete pedestal calculations
696	SCTRA Bell Construction Duck River Bid Sheet.pdf	4/	7/	PDF of Bell Construction scope of services
697	Spoon River 1.pdf	4/	7/	PDF of Spoon River truss picture
698	Spoon River 2.pdf	4/	7/	PDF of Spoon River truss picture
699	Spoon River Truss Field Notes.pdf	4/	7/	PDF of Spoon River truss inspection notes
700	Steel Truss Weight - Crossing Spoon River Seville, IL.pdf	4/	7/	PDF of truss weight calculations
701	Steel Truss Weight - Crossing Tennessee-Tombigbee Waterway Holcut, MS.pdf	4/	7/	PDF of truss weight calculations
702	Sunbelt Contractors - Handrail.pdf	4/	7/	PDF of bridge bid sheet
703	Tennessee - Tombigbee Truss Field Notes.pdf	4/	7/	PDF of TN-Tombigbee River truss inspection notes
704	TN - Tombigbee 1.pdf	4/	7/	PDF of TN-Tombigbee River truss picture
705	TN - Tombigbee 2.pdf	4/	7/	PDF of TN-Tombigbee River truss picture
706	TN - Tombigbee 3.pdf	4/	7/	PDF of TN-Tombigbee River truss picture
707	TPI Bridge Drawings.dwg	4/	7/	AutoCAD drawing used to create Bridge Details
708	TPI Pier & Pile Design.pdf	4/	7/	PDF of Type I - Type IV pier & pile design and calculations
709	TPI Pier & Pile Design.xlsx	4/	7/	Type I - Type IV pier & pile design and calculations
710	TPI Type III Abutment.pdf	4/	7/	PDF of Type III abutment design & calculations
711	TPI Type IV Abutment.pdf	4/	7/	PDF of Type IV abutment design & calculations
712	Trans SVC's of TN - Abutment Concrete - No Piling.pdf	4/	7/	PDF of TDOT's scope of services
713	Trans SVC's of TN - Abutment Concrete - Piling.pdf	4/	7/	PDF of TDOT's scope of services
714	Type I_Photos and Plans.pdf	4/	7/	PDF of Type I bridge plans and photos
715	Type II Bridge Calcs 45 ft Span.pdf	4/	7/	PDF of Type II Bridge Calculations
716	Type II Bridge Calcs 60 ft Span.pdf	4/	7/	PDF of Type II Bridge Calculations
717	Type II_Photos and Plans.pdf	4/	7/	PDF of Type II bridge plans and photos
718	Type III 63 FT Calcs.pdf	4/	7/	PDF of Type III Bridge Calculations
719	Type III 73 Ft Calcs.pdf	4/	7/	PDF of Type III Bridge Calculations
720	Type III 92 Ft Calcs.pdf	4/	7/	PDF of Type III Bridge Calculations

List of TPI October 7, 2015 Supplemental Evidence Section III Electronic Workpapers

File (1)	Supplementa I/Compliance		Description (3)
	Order (2)		
721. Type III Plans and Photos	4/	7/	PDF of Type III bridge plans and photos
722. Type IV Bridge Calculations	4/	7/	PDF of Type IV Bridge Calculations
723. Type IV Plans and Photos	4/	7/	PDF of Type IV bridge plans and photos
724. Type IV After Action Flood Report	4/	7/	PDF of After Action Flood Report
III-F-6. Stand-Alone Cost - Road Property Investment - Signals & Communications			
725. AEI Quote.doc		7/	AEI reader quote
726. CSXT PTC Unit Costing Detail.xls		7/	PTC cost data provided by CSXT in discovery
727. Derail.pdf		7/	Derail costs
728. Insulated Joint Quote.pdf		7/	Insulated joint price quote
729. Microwave Tower Spacing.pdf		5/	Support for maximum microwave tower spacing distance
730. PTC Costs with Details Update version 2.xlsx		4/	PTC locomotive equipment cost - provided by CSXT in discovery
731. PTC Wikipedia Article.pdf		5/	Support for TPI PTC system
732. S & C Workpapers.pdf		7/	Signals & communications workpapers
733. TPI LMR Cost Development Rebuttal.xls		5/	Spreadsheet detailing Rebuttal microwave cost development
734. TPI Signals & Communications Rebuttal.xls		4/	Spreadsheet listing signal and communication price summaries
735. TPI Track Connector.pdf		5/	Support for TPI track connector unit cost
736. TPIRA Hump Yard Equipment.doc		7/	Development of hump yard equipment cost
737. TPIRR PTC Locomotive Cost Rebuttal.xlsx		4/	Spreadsheet showing calculation of PTC-related costs for locomotives
III-F-7. Stand-Alone Cost - Road Property Investment - Buildings & Facilities			
738. 2010 ADA Standards for accessible design.pdf		5/	2010 ADA Standards for accessible design
739. Tank Quote	4/	7/	Tank Quote
740. Crane Quote	4/	7/	Crane Quote
741. Word File from CSX Discovery used for wheel truing machine cost	4/	7/	Word File from CSX Discovery used for wheel truing machine cost
742. Word File from CSX Discovery used for turntable cost	4/	7/	Word File from CSX Discovery used for turntable cost
743. Word File from CSX Discovery used for drop pit system cost	4/	7/	Word File from CSX Discovery used for drop pit system cost
744. Workpaper for Unit Costs of Crew Change, Yard, & MOW Buildings	4/	7/	Workpaper for Unit Costs of Crew Change, Yard, & MOW Buildings
745. CSXT in and out gates support.pdf		5/	Pages related to in and out gates from CSXT Reply workpaper "CSX Cost Estimate
746. CSXT(Hemmersbaugh) to TPI November 5, 2010 letter INTERMODAL.pdf		5/	November 5, 2010 letter from CSXT counsel to TPI counsel regarding intermodal terminals and CSX restructuring
747. Curtis Bay Coal Pier TPI Rebuttal.xlsx		4/	Rebuttal development of investment for Curtis bay Coal Terminal
748. Facility Assets Update.xlsx	4/	7/	CSX Discovery Spreadsheet from DVD 103 - Contains pricing for various Facility Assets
749. Fixed Fueling Station.pdf	4/	7/	Fixed Fueling Station Cost from CSX Discovery
750. Guard Booth Unit Costs.pdf	4/	7/	Workpaper for Unit Costs for Guard Booths
751. Headquarters Building Unit Costs.pdf	4/	7/	Workpaper for Unit Costs for HQ Building
752. In and Out Gates TPI Rebuttal.xlsx		4/	Spreadsheet detailing CSXT overstatement in costs for in and out gates
753. Lighting Unit Costs.pdf	4/	7/	Workpaper for Unit Costs for Lighting
754. Oil Water Separator.doc	4/	7/	Quote used for Oil Water Separator Cost
755. DW's Foundation.pdf	4/	7/	Foundation Costs for Oil Water Separator
756. Parking Pump House Quote.pdf	4/	7/	Quote for Pump House
757. Polystar Fuel Pan Quote.pdf	4/	7/	Fuel Pan Quote
758. TPIRR Automotive Terminals Workpapers.pdf	4/	7/	Workpaper for Automotive Yards
759. TPIRR Bulk Transfer Terminals Workpapers.pdf	4/	7/	Workpaper for Bulk Transfer Yards
760. TPIRR Facilities Rebuttal.xlsx	1/	4/	Spreadsheet detailing Rebuttal costs for TPIRR facilities. TPI has included guard booths at all of the IM facilities and turntables at the Mobile facility. TPI has also added pavement and fencing costs, drainage costs, and lighting costs to all of the IM facilities using the same approach that was used in Opening.
761. TPIRR Facilities.xlsx	4/	7/	Spreadsheet listing total cost for TPIRR facilities
762. TPIRR Intermodal Terminals Workpapers.pdf	4/	7/	Workpaper for Intermodal Yards
763. TPIRR Major Yards Workpapers.pdf	4/	7/	Workpaper for Major Yards
764. TPIRR Other Yards Workpapers.pdf	4/	7/	Workpaper for Other Yards
765. Truck Spillage Containment Quote.pdf	4/	7/	Truck Containment Quote
766. Used Oil Tanks.pdf	4/	7/	Tank Quote
767. Yard Pavements, Fencing & Pavement Markings Unit Costs.pdf	4/	7/	Workpaper for Unit Costs for Pavement, fencing, and pavement marking
768. Yardmaster Tower Unit Costs.pdf	4/	7/	Workpaper for Unit Costs for Yardmaster Towers
III-F-12. Stand-Alone Cost - Road Property Investment - Other			
769. TPIRR Complete Construction Schedule.xlsx		5/	Spreadsheet of Construction Schedule for TPIRR (Opening file)
III-G. Stand-Alone Cost - Discounted Cash Flow Analysis			
770. TPIRR Land Appreciation Rebuttal.xlsx		5/	Rebuttal land inflation forecast
III-H. Stand-Alone Cost - Results of SAC Analysis			
771. Exhibit III-H-1 (Netting Summary).xlsx			Netting summary from adjusted rebuttal DCF model
772. Exhibit III-H-1_Rebuttal.xlsm	4/		Adjusted Rebuttal DCF Model
773. Exhibit III-H-1_Rebuttal_Supplemental.xlsm			Adjusted Rebuttal DCF model with added "Y" trains
774. Exhibit III-H-1_Rebuttal_Supplemental_v2.xlsm			Adjusted Rebuttal DCF model with added "Y" trains and high priority intermodal removed
775. Exhibit III-H-2_Rebuttal.xlsx	5/		MMM R/VC ratios
776. Exhibit III-H-2 (Netting Summary).xlsx			Netting summary from supplemental DCF model
777. Exhibit III-H-3 (Netting Summary).xlsx			Netting summary from supplemental_v2 DCF model
778. Exhibit III-H-3 through III-H-16_Rebuttal.xlsx	5/		Maximum Rate Calculations for TPIRR Issue Traffic.
779. Exhibit III-H-4.xlsx			MMM results from adjusted rebuttal MMM model
780. Exhibit III-H-5.xlsx			MMM results from adjusted supplemental MMM model
781. Exhibit III-H-6.xlsx			MMM results from adjusted supplemental_v2 MMM model
782. MMM CSXT URCS Index Rebuttal.xlsx	4/		Rebuttal CSXT URCS index forecast used to index MMM variable costs
783. TPIRR MMM Rebuttal.xlsm	4/		Rebuttal TPIRR MMM model

List of TPI October 7, 2015 Supplemental Evidence Section III Electronic Workpapers

File (1)	Supplementa I/Compliance Order (2)	Description (3)
784. TPIRR MMM Rebuttal_Supplemental.xlsm		Scenario 2 MMM model
785. TPIRR MMM Rebuttal_Supplemental_v2.xlsm		Scenario 3 MMM model
Subdirectory: Bonus Depreciation		
786. 2002 Accelerated Depreciation.pdf	5/	Job Creation And Worker Assistance Act Of 2002
787. 2003 Jobs and Growth Act.pdf	5/	Jobs And Growth Tax Relief Reconciliation Act Of 2003
788. BonusDepreciationCRS.pdf	5/	Congressional Research Service paper on bonus depreciation
789. CSXT 2013 Supp PTC Revised.xlsx	5/	CSXT PTC related investments as reported to the STB in its 2013 Annual Report R-1
790. Florida's Tax breaks.pdf	5/	Orlando Sentinel article on CSXT's use of 2012 tax benefit
791. History of Investment Tax Credits.pdf	5/	History of investment tax credits from 1962 to 1991
792. History of Tax Depreciation Policy.pdf	5/	History of depreciation tax breaks given to corporations
793. Incentive effects of the investment tax credit.pdf	5/	List incentive tax credits available to companies and railroads
794. Tax Reform Act of 1969.pdf	5/	Tax Reform Act of 1969, including special provisions for railroads
Subdirectory: Cross Subsidy		
795. 2010 Revenue rebut nvernon.xlsx	5/	Calculation of cross subsidy revenue on North Vernon segment for 2010
796. 2011 Revenue rebut nvernon.xlsx	5/	Calculation of cross subsidy revenue on North Vernon segment for 2011
797. 2012 Revenue rebut nvernon.xlsx	5/	Calculation of cross subsidy revenue on North Vernon segment for 2012
798. Cross Subsidy Revenue Summary rebut nvernon.xlsx	5/	Summary of corrected North Vernon cross subsidy revenues and traffic statistics
799. Exhibit III-H-1 XSub - Rebuttal.xlsm	5/	Rebuttal cross-subsidy DCF model
800. Exhibit III-H-1 XSub - Corrected CSXT Reply.xlsm	5/	Corrected version of CSXT Reply cross subsidy DCF model
801. TPIRR Coal Revenue Forecast (Final) xsub rebut nvernon.xlsx	5/	Calculation of cross subsidy revenue on North Vernon segment for forecasted coal traffic
802. TPIRR General Freight Revenue Forecast STCC 1-26 1h 2013 (Final) xsub rebut nvernon.xlsx	5/	Calculation of cross subsidy revenue on North Vernon segment for forecasted general freight traffic
803. TPIRR General Freight Revenue Forecast STCC 1-26 2h 2012 (Final) xsub rebut nvernon.xlsx	5/	Calculation of cross subsidy revenue on North Vernon segment for forecasted general freight traffic
804. TPIRR General Freight Revenue Forecast STCC 28 1h 2013 (Final) xsub rebut nvernon.xlsx	5/	Calculation of cross subsidy revenue on North Vernon segment for forecasted general freight traffic
805. TPIRR General Freight Revenue Forecast STCC 28 2h 2012(Final) xsub rebut nvernon.xlsx	5/	Calculation of cross subsidy revenue on North Vernon segment for forecasted general freight traffic
806. TPIRR General Freight Revenue Forecast STCC 29-UN 1h 2013 (Final) xsub rebut nvernon.xlsx	5/	Calculation of cross subsidy revenue on North Vernon segment for forecasted general freight traffic
807. TPIRR General Freight Revenue Forecast STCC 29-UN 2h 2012(Final) xsub rebut nvernon.xlsx	5/	Calculation of cross subsidy revenue on North Vernon segment for forecasted general freight traffic
808. TPIRR Intermodal Revenue Forecast (Final) xsub rebut	5/	Calculation of cross subsidy revenue on North Vernon segment for forecasted intermodal
809. Xsub Operating Expense.xlsx	5/	Summary of cross subsidy operating expenses for the North Vernon segment
810. XSub Operating Expense Rebuttal.xlsx	5/	Updated cross-subsidy expenses with Rebuttal unit costs
811. Xsub Operating Statistics.xlsx	5/	Summary of cross subsidy operating statistics for the North Vernon segment
Subdirectory: North Vernon Construction		
812. III-F Total rebut nvernon.xlsx	5/	Summary of corrected cross subsidy construction costs for the North Vernon segment
813. TPI Bridge Construction Costs nvernon.xlsx	5/	Calculation of cross subsidy bridge construction costs for the North Vernon segment
814. TPI Bridge Construction Costs.xlsx	5/	Calculation of cross subsidy bridge construction costs for the North Vernon segment
815. TPI Signals & Communications.xlsx	5/	Calculation of cross subsidy C&S construction costs for the North Vernon segment
816. TPI Tunnel Construction.xlsx	5/	Calculation of cross subsidy tunnel construction costs for the North Vernon segment
817. TPIRR Culvert Construction.xlsx	5/	Calculation of cross subsidy culvert construction costs for the North Vernon segment
818. TPIRR Facilities.xlsx	4/	Calculation of cross subsidy facilities construction costs for the North Vernon segment
819. TPIRR Highway Overpass Construction.xlsx	5/	Calculation of cross subsidy highway overpass construction costs for the North Vernon
820. TPIRR Open Grading.xlsx	4/	Calculation of cross subsidy grading construction costs for the North Vernon segment
821. TPIRR Route Miles Opening Grading.xlsx	4/	Calculation of cross subsidy construction costs for the North Vernon segment - opening route
822. TPIRR Yard Matrix Opening Grading.xlsx	4/	Calculation of cross subsidy construction costs for the North Vernon segment - opening yard
823. Track Construction rebut nvernon.xlsx	5/	Calculation of cross subsidy track construction costs for the North Vernon segment
Subdirectory: Equity Flotation		
824. Bajaj, Chen and Mazumdar - Competition in IPO Underwriting.pdf	5/	Bajaj, Chen and Mazumdar paper on competition and risk in the IPO market
825. BN Equity Flotation.pdf	5/	1991 SEC News Digest discussing BN common equity issue
826. Fernando, Gatchev, May and Megginson 2012.pdf	5/	Underwriter Compensation and Returns to Reputation
827. Hao - Securities litigation withdrawal risk and initial public	5/	Ho article on risk
828. Liaw - The Business of Investment Banking.pdf	5/	Excerpts from Liaw's book in investment banking
829. Logue and Lindvall - Behavior of Investment Bankers.pdf	5/	Logue and Lindvall article on risk
830. Williamson - The Investment Banking Handbook.pdf	5/	Excerpts from Williamson's book in investment banking
Subdirectory: RCAF Index		
831. AAR September 2014.pdf	5/	AAR Railroad Cost Recovery Indies for September 2014
832. Global Insight October 2014.pdf	5/	Global Insight October 2014 RCAF Forecast
Subdirectory: Variable Costs		
833. CSXT10_URCS_Phase III_Index_to_4Q13_PPI_Rounded.xls	5/	URCS variable cost index for CSXT base year 2010
834. CSXT11_URCS_Phase III_Index_to_4Q13_PPI_Rounded.xls	5/	URCS variable cost index for CSXT base year 2011
835. CSXT12_URCS_Phase III_Index_to_4Q13_PPI_Rounded.xls	5/	URCS variable cost index for CSXT base year 2012
836. CSXT13_URCS_Phase III_Index_to_4Q13_PPI_Rounded.xls	5/	URCS variable cost index for CSXT base year 2013
837. TPI Rebuttal II-A 1-16 Exhibits.xlsx	5/	Calculation of CSXT Variable Costs and RVC Ratios
838. URCS Inputs_TO.prn	5/	URCS Inputs
839. URCS Outputs_TO_2010_v2.csv	5/	2010 Issue Traffic URCS outputs
840. URCS Outputs_TO_2011_v2.csv	5/	2011 Issue Traffic URCS outputs
841. URCS Outputs_TO_2012_STB.csv	5/	2012 Issue Traffic URCS outputs
842. URCS Outputs_TO_2013_STB.csv	5/	2013 Issue Traffic URCS outputs

List of TPI October 7, 2015 Supplemental Evidence Section III Electronic Workpapers

<u>File</u> (1)	<u>Supplementa l/Compliance Order</u> (2)	<u>Description</u> (3)
1/ This file has been updated to include IM facilities, per the STB's 7/24/15 Supplemental/Compliance decision.		
2/ "Links" listed in BLUE TEXT have been hard-coded to allow for smaller file sizes. These links are shown with a noted titled "SOURCE" within applicable tabs. (Applicable in Supplemental/Compliance workpaper: "TPI_October 7 2015_Supplemental Electronic Workpaper Index.xls")		
3/ Files marked with a footnote 3/ in column (1) contain a tab with data from "ATC Divisions Rebuttal.xlsx".		
4/ This file has been updated to source or link all hard-coded values, per the STB's 7/24/15 Supplemental/Compliance decision. See : Exhibit III-A- 2 ("Exhibit III-A-2_Changes" tab).		
5/ No changes needed.		
6/ Hard-coded references/data source or link already provided in Rebuttal.		
7/ File added to source or link all hard-coded values, per the STB's 7/24/15 Supplemental/Compliance decision. Source will be noted within the applicable file.		
1 = Supplemental/Compliance workpaper added to Rebuttal workpaper directory. Addresses Supplemental/Compliance evidence.		
2 = Opening or Reply workpaper added to Rebuttal workpaper directory to address hard-coded/linked files.		

TAB 2

Changes Made to TPI Rebuttal Evidence to Comply with the Board's 7/24/15 Decisions

Exhibit III-A-1 <u>Line No.</u> (1)	<u>File</u> (2)	<u>Level</u> (3)	<u>Issue Addressed</u> (4)
III-A-1. Stand-Alone Cost - Traffic Group - SARR Traffic			
Subdirectory: Issue Traffic			
1.	20. CSXT CarWaybills and CarShipments Data for TPI Traffic 1Q09 to 2Q10 Rebuttal.xlsx	STCC Groupings	Sourcing has been added in the purple box that begins in excel cell E1.
2.	21. Selected 1Q2009 to 2Q2010 Waybill and CarEvent Data.xlsx	WAvg Miles Calcs	Sourcing has been added in the purple box that begin in excel cell K1.
3.	21. Selected 1Q2009 to 2Q2010 Waybill and CarEvent Data.xlsx	Wavg Tons Calcs	Sourcing has been added in the purple box that begin in excel cell K1.
4.	25. SUMMARY OF TPI TRAFFIC ON CSXT OVER_36MONTHS_OpeningV5.xlsx	Groups	Sourcing has been added in the purple box that begin in excel cell J1.
III-A-2. Stand-Alone Cost - Traffic Group - Volumes (historical and projected)			
5.	34. Train List Volume Forecast_REBUTTAL.xlsx	Train List Forecast	Sourcing has been updated in excel row 40 and row 41 in column A, both are highlighted in
III-A-3. Stand-Alone Cost - Traffic Group - Revenues (historical and projected)			
6.	40. Revenue Summary (Final) REPLY_REB2.xlsx	2010 to 2012	Identified source of hardcoded numbers - See CSXT Rely workpaper "Revenue Summary (Final) Reply.xlsx", sheet "2010 to 2012" where CSXT hard-coded the values contained in TPI Opening evidence from file "Revenue Summary (Final).xlsx"; sheet "2010 to 2012". These hard-coded values were not used to develop TPI
7.	40. Revenue Summary (Final) REPLY_REB2.xlsx	2013 to 2020	Identified source for hardcoded numbers - See CSXT Rely workpaper "Revenue Summary (Final) Reply.xlsx", sheet "2013 to 2020" where CSXT hard-coded the values contained in TPI Opening evidence from file "Revenue Summary (Final).xlsx"; sheet "2013 to 2020". These hard-coded values were not used to develop TPI
8.	40. Revenue Summary (Final) REPLY_REB2.xlsx	2012 ATC by Shipment	Identified source for hardcoded numbers - See CSXT Rely workpaper "Revenue Summary (Final) Reply.xlsx", sheet "2012 ATC By Shipment Type" where CSXT hard-coded the values contained in TPI Opening evidence from file "Revenue Summary (Final).xlsx"; sheet "2012 ATC By Shipment Type".
9.	40. Revenue Summary (Final) REPLY_REB2.xlsx	Reply Units	Identified source for hardcoded numbers - See CSXT Rely workpaper "Revenue Summary (Final) Reply.xlsx", sheet "Reply Units" where CSXT included hard-coded values as support for their analysis.
Subdirectory: 2010			
10.	43. 2010 Containers Reply_REB2.xlsx	2010 Containers	Identified source of hardcoded numbers - See TPI Opening workpaper "All Containers Final.xlsx", sheet "2h 2010 Final"
11.	45. 2010 No Shipment Key_REB2.xlsx	TPIRR Calculations	Identified source of hardcoded numbers - Pivot table of the data shown on sheet "2010" of this same file.

Changes Made to TPI Rebuttal Evidence to Comply with the Board's 7/24/15 Decisions

Exhibit III-A-1 <u>Line No.</u> (1)	<u>File</u> (2)	<u>Level</u> (3)	<u>Issue Addressed</u> (4)
12.	46. 2010 Reply_REB2.xlsx	2010 Reply	Identified source of hardcoded numbers - See CSXT Rely workpaper "TPIRR_TRAFFIC_HISTORICAL_CARLOAD_2010_ADJ Reply.xlsx", sheet "Pivot Filter" and CSXT hard-coded the values contained in TPI Opening evidence. These hard-coded values were not used to develop TPI Rebuttal evidence
13.	46. 2010 Reply_REB2.xlsx	Issue	Source of hardcoded numbers - See CSXT Rely workpaper "TPIRR_TRAFFIC_HISTORICAL_CARLOAD_2010_ADJ Reply.xlsx", sheet "Pivot Filter" and CSXT hard-coded the values contained in TPI Opening evidence. These hard-coded values were not used to develop TPI Rebuttal evidence
Subdirectory: 2011			
14.	47. 2011 Containers Reply_REB2.xlsx	2011 Container	Identified source of hardcoded numbers - See TPI Opening workpaper "All Containers Pivot TPIRR_TRAFFIC_HISTORICAL_CONTAINE R_ALL.xlsx", sheet "2011 Final"
15.	49. 2011 No Shipment Key_REB2.xlsx	TPIRR Calculations	Identified source of hardcoded numbers - Pivot table of the data shown on sheet "2011" of this same file.
16.	50. 2011 Reply_REB2.xlsx	2011 Reply	Identified source of hardcoded numbers - See CSXT Rely workpaper "TPIRR_TRAFFIC_HISTORICAL_CARLOAD_2011_ADJ Reply.xlsx", sheet "Pivot Output" and CSXT hard-coded the values contained in TPI Opening evidence. These hard-coded values were not used to develop TPI Rebuttal evidence
Subdirectory: 2012			
17.	51. 2012 Containers Reply_REB2.xlsx	2012 Containers	Identified source of hardcoded numbers - See TPI Opening workpaper "All Containers Pivot TPIRR_TRAFFIC_HISTORICAL_CONTAINE R_ALL.xlsx", Pivot summary of sheet "TPIRR_CONT_2012_ALL"
18.	53. 2012 No Shipment Key_REB2.xlsx	TPIRR Calculations	Identified source of hardcoded numbers - Pivot table of the data shown on sheet "2012" of this same file.
19.	54. 2012 STCC 1 to 26 REPLY_REB2.xlsx	STCC 1 to 26	Identified source of hardcoded numbers - See TPI Opening workpaper "TPIRR_TRAFFIC_HISTORICAL_CARLOAD_2012.xlsx", Pivot of STCC 1 to 26 data found on sheet "TPIRR_CAR_2012_ALL" copied directly to this file.
20.	55. 2012 STCC 28, 29, 37, 99 REPLY_REB2.xlsx	STCC 28, 29, 37 and 99	Identified source of hardcoded numbers - See TPI Opening workpaper "TPIRR_TRAFFIC_HISTORICAL_CARLOAD_2012.xlsx", Pivot of STCC 28, 29, 37, 99 data found on sheet "TPIRR_CAR_2012_ALL" copied directly to this file.
21.	55. 2012 STCC 28, 29, 37, 99 REPLY_REB2.xlsx	TPI Issue Traffic	Identified source of hardcoded numbers as the prior sheet "ATCC 28, 29, 37, and 99" in this

Changes Made to TPI Rebuttal Evidence to Comply with the Board's 7/24/15 Decisions

Exhibit III-A-1 <u>Line No.</u> (1)	<u>File</u> (2)	<u>Level</u> (3)	<u>Issue Addressed</u> (4)
22.	56.	2012 STCC 30 to 90 (excluding issue) REPLY_REB2.xlsx	STCC 30 to 90 Identified source of hardcoded numbers - See TPI Opening workpaper "TPIRR_TRAFFIC_HISTORICAL_CARLOAD_2012.xlsx", Pivot of STCC 30 to 90 data found on sheet "TPIRR_CAR_2012_ALL" copied directly to this file.
Subdirectory: 2013-2020			
23.	57.	Coal Volume Forecast Matrix_REB.xlsx	2012 SARR Coal for Cap Identified SQL code and specific data sources for hard-coded numbers
24.	58.	Contract Summary Reply_REB.xlsx	UPS Identified source of hard-coded data is the FSC from AGRT 02020
25.	60.	No Shipment Key Forecast_REB2.xlsx	Gen Freight Revenue Forecast Identified sources of hardcoded numbers - See TPI Opening workpaper "FINAL_ADD_TPIRR_TRAFFIC_CARLOAD_2012_NOSHIPMENTKEY.xlsx", sheet "Sheet3" and "FINAL_ADD_TPIRR_TRAFFIC_CARLOAD_2013_NOSHIPMENTKEY.xlsx", sheet "No Ship Key Final 1h 2013"
26.	60.	No Shipment Key Forecast_REB2.xlsx	Contracts & Indices Updated source reference to "Contract Summary_Reply_REB.xlsx"
27.	60.	No Shipment Key Forecast_REB2.xlsx	Volume Matrix Updated source reference to "Non-Coal Volume Forecast Matrix_REB.xlsx".
28.	60.	No Shipment Key Forecast_REB2.xlsx	FSC Updated source reference to "HDF & WTI Forecast Reply_REB.xlsx"
29.	60.	No Shipment Key Forecast_REB2.xlsx	TPI Issue Traffic Identified source file as "SUMMARY OF TPI TRAFFIC ON CSXT OVER_36 MONTHS_OpeningV5.xlsx"; sheet "CAR_WAYBILL_DATA".
30.	61.	Non-Coal Volume Forecast Matrix_REB.xlsx	Traffic Pivot Identified source as pivot table summary of CSXT data contained in sheet "Non-IN 2013-2017" of this same file.
31.	61.	Non-Coal Volume Forecast Matrix_REB.xlsx	Intermodal Pivot Identified source as pivot table summary of CSXT data contained in sheet "INTERMODAL 2013-2017" of this same file.
32.	61.	Non-Coal Volume Forecast Matrix_REB.xlsx	INTERMODAL 2013-2017 Identified source as data shown in sheet "2013-2017STRATPLAN" of this same file
33.	61.	Non-Coal Volume Forecast Matrix_REB.xlsx	Non-IN 2013-2017 identified source as data shown in sheet "2013-2017STRATPLAN" of this same file
34.	62.	Rate Forecast Matrix.xlsx	IN 2013-2017 Identified source as data shown in sheet "2013-2017STRATPLAN" of this same file
35.	62.	Rate Forecast Matrix.xlsx	Non-IN 2013-2017 Identified source as data shown in sheet "2013-2017STRATPLAN" of this same file
36.	62.	Rate Forecast Matrix.xlsx	2013-2017STRATPLAN Identified source as CSXT's "2013-2017STRATPLAN.xlsx" produced in discovery
37.	64.	TPIRR Coal Revenue Forecast (Final) REPLY_REB2.xlsx	Coal Revenue Forecast Identified source: Files "1h 2013 Final.xlsx", sheet "Coal" and "2h 2012 Final.xlsx"; sheet
38.	64.	TPIRR Coal Revenue Forecast (Final) REPLY_REB2.xlsx	Plant Closure Identified source - CSXT Reply workpaper "TPIRR Coal Revenue Forecast (Final) REPLY.xlsx"
39.	64.	TPIRR Coal Revenue Forecast (Final) REPLY_REB2.xlsx	2012 SARR Volumes Identified source - CSXT Reply workpaper "TPIRR Coal Revenue Forecast (Final) REPLY.xlsx"
40.	64.	TPIRR Coal Revenue Forecast (Final) REPLY_REB2.xlsx	Volume Matrix Identified sources as "Coal Volume Forecast Matrix_REB"

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Exhibit III-A-1 <u>Line No.</u> (1)	<u>File</u> (2)	<u>Level</u> (3)	<u>Issue Addressed</u> (4)
41.	64. TPIRR Coal Revenue Forecast (Final) REPLY_REB2.xlsx	FSC	Identified source as "HDF & WTI Forecast Reply_REB.xlsx"
42.	64. TPIRR Coal Revenue Forecast (Final) REPLY_REB2.xlsx	Capped Plants	Identified source as file "Coal Volume Forecast Matrix_REB.xlsx; sheet "Cap".
43.	64. TPIRR Coal Revenue Forecast (Final) REPLY_REB2.xlsx	Miles for new lanes	Identified source - CSXT Reply workpaper "TPIRR Coal Revenue Forecast (Final) REPLY.xlsx"
44.	65. TPIRR General Freight Revenue Forecast STCC 1-26 1h 2013 (Final) REPLY_REB2.xlsx	Gen Freight Revenue Forecast	Identified source as file "1h 2013 Final.xlsx"; sheet "Gen Freight 1-26".
45.	65. TPIRR General Freight Revenue Forecast STCC 1-26 1h 2013 (Final) REPLY_REB2.xlsx	FSC	Identified source as "HDF & WTI Forecast Reply_REB.xlsx"
46.	65. TPIRR General Freight Revenue Forecast STCC 1-26 1h 2013 (Final) REPLY_REB2.xlsx	TPI Issue Traffic	Identified source file as "SUMMARY OF TPI TRAFFIC ON CSXT OVER_36 MONTHS_OpeningV5.xlsx"; sheet "CAR_WAYBILL_DATA".
47.	66. TPIRR General Freight Revenue Forecast STCC 1-26 2h 2012 (Final) REPLY_REB2.xlsx	Gen Freight Revenue Forecast	Identified source as file "2h 2012 Final.xlsx"; sheet "Gen Freight 1-26".
48.	66. TPIRR General Freight Revenue Forecast STCC 1-26 2h 2012 (Final) REPLY_REB2.xlsx	FSC	Identified source as "HDF & WTI Forecast Reply_REB.xlsx"
49.	66. TPIRR General Freight Revenue Forecast STCC 1-26 2h 2012 (Final) REPLY_REB2.xlsx	TPI Issue Traffic	Identified source file as "SUMMARY OF TPI TRAFFIC ON CSXT OVER_36 MONTHS_OpeningV5.xlsx"; sheet "CAR_WAYBILL_DATA".
50.	67. TPIRR General Freight Revenue Forecast STCC 28 1h 2013 (Final) REPLY_REB2.xlsx	Gen Freight Revenue Forecast	Identified source as file "1h 2013 Final.xlsx"; sheet "Gen Freight 28-UN".
51.	67. TPIRR General Freight Revenue Forecast STCC 28 1h 2013 (Final) REPLY_REB2.xlsx	FSC	Identified source as "HDF & WTI Forecast Reply_REB.xlsx"
52.	67. TPIRR General Freight Revenue Forecast STCC 28 1h 2013 (Final) REPLY_REB2.xlsx	TPI Issue Traffic	Identified source file as "SUMMARY OF TPI TRAFFIC ON CSXT OVER_36 MONTHS_OpeningV5.xlsx"; sheet "CAR_WAYBILL_DATA".
53.	68. TPIRR General Freight Revenue Forecast STCC 28 2h 2012(Final) REPLY_REB2.xlsx	Gen Freight Revenue Forecast	Identified source as file "2h 2012 Final.xlsx"; sheet "Gen Freight 28-UN".
54.	68. TPIRR General Freight Revenue Forecast STCC 28 2h 2012(Final) REPLY_REB2.xlsx	FSC	Identified source as "HDF & WTI Forecast Reply_REB.xlsx"
55.	68. TPIRR General Freight Revenue Forecast STCC 28 2h 2012(Final) REPLY_REB2.xlsx	TPI Issue Traffic	Identified source file as "SUMMARY OF TPI TRAFFIC ON CSXT OVER_36 MONTHS_OpeningV5.xlsx"; sheet "CAR_WAYBILL_DATA".
56.	69. TPIRR General Freight Revenue Forecast STCC 29-UN 1h 2013 (Final) REPLY_REB2.xlsx	Gen Freight Revenue Forecast	Identified source as file "1h 2013 Final.xlsx"; sheet "Gen Freight 28-UN".
57.	69. TPIRR General Freight Revenue Forecast STCC 29-UN 1h 2013 (Final) REPLY_REB2.xlsx	FSC	Identified source as "HDF & WTI Forecast Reply_REB.xlsx"

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Exhibit III-A-1	Line No. (1)	File (2)	Level (3)	Issue Addressed (4)
	58.	69. TPIRR General Freight Revenue Forecast STCC 29-UN 1h 2013 (Final) REPLY_REB2.xlsx	TPI Issue Traffic	Identified source file as "SUMMARY OF TPI TRAFFIC ON CSXT OVER_36 MONTHS_OpeningV5.xlsx"; sheet "CAR_WAYBILL_DATA".
	59.	70. TPIRR General Freight Revenue Forecast STCC 29-UN 2h 2012(Final) REPLY_REB2.xlsx	Gen Freight Revenue Forecast	Identified source as file "2h 2012 Final.xlsx"; sheet "Gen Freight 28-UN".
	60.	70. TPIRR General Freight Revenue Forecast STCC 29-UN 2h 2012(Final) REPLY_REB2.xlsx	FSC	Identified source as "HDF & WTI Forecast Reply_REB.xlsx"
	61.	70. TPIRR General Freight Revenue Forecast STCC 29-UN 2h 2012(Final) REPLY_REB2.xlsx	TPI Issue Traffic	Identified source file as "SUMMARY OF TPI TRAFFIC ON CSXT OVER_36 MONTHS_OpeningV5.xlsx"; sheet "CAR_WAYBILL_DATA".
	62.	71. TPIRR Intermodal Revenue Forecast (Final) REPLY_REB2.xlsx	Gen Freight Revenue Forecast	Identified source as file "All Containers Final"; sheets "2h 2012 Final" and "1h 2013 Final".
	63.	71. TPIRR Intermodal Revenue Forecast (Final) REPLY_REB2.xlsx	FSC	Identified source as "HDF & WTI Forecast Reply_REB.xlsx"
Subdirectory: ATC				
	64.	75. ATC Divisions Rebuttal.xlsx	SQL	Add worksheet showing the SQL script used to develop data in "Cars", "Issue Traffic" and Source provided for hard coded numbers in file
	65.	79. ATC URCS Input Cars V45 - Rebuttal.xlsx	Statistics	Source provided for hard coded numbers in file
	66.	79. ATC URCS Input Cars V45 - Rebuttal.xlsx	Cars	Source provided for hard coded numbers in file
	67.	79. ATC URCS Input Cars V45 - Rebuttal.xlsx	SQL	Add worksheet showing the SQL script used to develop data in "Cars" worksheet.
	68.	80. ATC URCS Input Cars V45 - Rebuttal_Cars_CSXT Outputs.xlsx	Cars	Source provided for hard coded numbers in file
	69.	81. ATC URCS Input Cars V45 - Rebuttal_Cars_SARR Outputs.xlsx	Cars	Source provided for hard coded numbers in file
	70.	82. ATC URCS Input Containers V45 - Rebuttal.xlsx	Containers	Source provided for hard coded numbers in file
	71.	82. ATC URCS Input Containers V45 - Rebuttal.xlsx	SQL	Add worksheet showing the SQL script used to develop data in "Containers" worksheet.
	72.	83. ATC URCS Input Containers V45 - Rebuttal_CSXT Outputs.xlsx	Containers	Source provided for hard coded numbers in file
	73.	84. ATC URCS Input Containers V45 - Rebuttal_SARR Outputs.xlsx	Containers	Source provided for hard coded numbers in file
	74.	97. CSXT Selected Gross Tons Density Segments.xlsx	All	Linked spreadsheet to its base model "2012 Gross Tonnage.xlsx."
	75.	98. Rebutal ATC Cars Lookup.xlsx	ATC Car Lookup	Source provided for hard coded numbers in file
	76.	99. Rebuttal ATC Container	ATC Container Lookup	Source provided for hard coded numbers in file
	77.	100. TPI_Final_Network-Rebut V6 (ATC).xlsx	wNetworkLocations_Rebut	Source provided for hard coded numbers in file
	78.	100. TPI_Final_Network-Rebut V6 (ATC).xlsx	WNetworkLinks_Rebut	Source provided for hard coded numbers in file
III-C. Stand-Alone Cost - Operating Plan				
	79.	117. CSXT RTC Dwell Frequency by Yard Type and Stop Type.xlsx	CSXT Reply RTC Train Inputs	Source for hard coded numbers was clarified
	80.	117. CSXT RTC Dwell Frequency by Yard Type and Stop Type.xlsx	TPI Open RTC Train Inputs	Source for hard coded numbers was clarified
Subfolder: RTC				
	81.	151. Yard Crew Size and Starts Update_Lookupadded.xls	Yard - North	Source provided for hard coded numbers in file and in description on workpaper index

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Exhibit III-A-1 Line No. (1)	File (2)	Level (3)	Issue Addressed (4)
82.	151. Yard Crew Size and Starts Update_Lookupadded.xls	Yard - South	Source provided for hard coded numbers in file and in description on workpaper index
83.	151. Yard Crew Size and Starts Update_Lookupadded.xls	Locals - South	Source provided for hard coded numbers in file and in description on workpaper index
84.	151. Yard Crew Size and Starts Update_Lookupadded.xls	Locals - North	Source provided for hard coded numbers in file and in description on workpaper index
85.	151. Yard Crew Size and Starts Update_Lookupadded.xls	Mandays	Source provided for hard coded numbers in file and in description on workpaper index
86.	152. Yard Crew Size and Starts_Lookupadded.xls	Yard - North	Source provided for hard coded numbers in file and in description on workpaper index
87.	152. Yard Crew Size and Starts_Lookupadded.xls	Yard - South	Source provided for hard coded numbers in file and in description on workpaper index
88.	152. Yard Crew Size and Starts_Lookupadded.xls	Locals - South	Source provided for hard coded numbers in file and in description on workpaper index
89.	152. Yard Crew Size and Starts_Lookupadded.xls	Locals - North	Source provided for hard coded numbers in file and in description on workpaper index
90.	152. Yard Crew Size and Starts_Lookupadded.xls	Man days	Source provided for hard coded numbers in file and in description on workpaper index
III-C-1. Stand-Alone Cost - Operating Plan - Train List Development			
91.	155. TPI_Final_Network-Rebut V4.xlsx	wNetworkLinks_Rebut	Sourcing has been added in the purple box that begins in excel cell S1.
Subdirectory: Base Year RTC Results			
92.	159. Base Year Manifest Train Transit Time_Mileage	Combined Manifest Train List	sourced in purple box that starts in Row 1 Column A
93.	159. Base Year Manifest Train Transit Time_Mileage	Group	Source provided for hard coded numbers in file
94.	162. Base Year Unit Train Transit Time_Mileage	Combined Unit Trains	sourcing in purple box that starts in Row 1 column A
95.	165. Manifest TrainsS Routing V02.xlsx	Manifest TrainsS Routing V02	sourcing in purple box that starts in Row 1 column A
96.	167. Peak Period Local Trains v5 wDwell v3_Transit Time_Mileage Analysis_Rebuttal.xlsx	Peak Train List	Source provided for hard coded numbers in file
97.	168. Peak Period Manifest Train RTC List Master_Transit Time_Mileage Analysis Rebuttal.xlsx	Manifest Train List	sourcing in purple box that starts in Row 1 column A
98.	168. Peak Period Manifest Train RTC List Master_Transit Time_Mileage Analysis Rebuttal.xlsx	Trains Removed	sourcing in purple box that starts in Row 1 column A
99.	171. Peak Period Unit Train RTC List_v3_Transit Time_Mileage Analysis_Rebuttal.xlsx	RTC Outputs	sourcing in purple box that starts in Row 1 column A
100.	176. SarrBaseLhUnitTrainsTri.xlsx	SarrBaseLhUnitTrainsTri	Source provided for hard coded numbers in file and in description on workpaper index
101.	183. TPIRR Peak Week Transit Time Comparison_Rebuttal.xlsx	Merch Times	Source provided for hard coded numbers in file
102.	183. TPIRR Peak Week Transit Time Comparison_Rebuttal.xlsx	Unit Times	Source provided for hard coded numbers in file
Subdirectory: Base Year Trains			
103.	185. Base Year Train List Remove Unit Merch Rebut 20140922.xlsx	Reb LH Merch Remove	Source provided for hard coded numbers in cell A1
104.	185. Base Year Train List Remove Unit Merch Rebut 20140922.xlsx	Reb Unit Remove	Source provided for hard coded numbers in cell A1
105.	185. Base Year Train List Remove Unit Merch Rebut 20140922.xlsx	Reb Unit-Merch Trains to Remove	Source provided for hard coded numbers in cell A2

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Exhibit III-A-1	Line No. (1)	File (2)	Level (3)	Issue Addressed (4)
106.	185.	Base Year Train List Remove Unit Merch Rebut 20140922.xlsx	CSXT Reply Only Removed	Source provided for hard coded numbers in cell A2
107.	189.	dbo_aSarrAllConsistLocal_ALLOF F.xlsx	Unique_Train_ID	Sourcing has been added in the purple box that begins in excel cell A1.
108.	190.	dbo_aSarrAllConsistLocal_ALLON_IDSuffix_ISSUEv3.xlsx	Issue_Unique_Train_ID	Sourcing has been added in the purple box that begins in excel cell A1.
109.	190.	dbo_aSarrAllConsistLocal_ALLON_IDSuffix_ISSUEv3.xlsx	Issue_Shipment Key_Train ID	Sourcing has been added in the purple box that begins in excel cell L1.
110.	192.	dbo_aSarrAllConsistLocal_ON_OF F.xlsx	Unique_Train_ID	Sourcing has been added in the purple box that begins in excel cell A1.
111.	204.	TPI Base Year Manifest stats sub.xlsx	Combined Manifest Train List	Source provided for hard coded numbers in cell E1
112.	209.	TPIRR Base Year Local Train List v2_Rebuttal Statistics.xlsx	Additional Trains group	Source provided for hard coded numbers in cell A1
113.	213.	TPIRR Base Year Manifest Train List_Rebuttal Statistics.xlsx	Combined Manifest Train List	Source provided for hard coded numbers in cell A1
114.	213.	TPIRR Base Year Manifest Train List_Rebuttal Statistics.xlsx	dbo_aSarrBaseLhManTrains TriSum	Source provided for hard coded numbers in file
115.	213.	TPIRR Base Year Manifest Train List_Rebuttal Statistics.xlsx	dbo_aSarrTeManTrainsNotIn CeSum	Source provided for hard coded numbers in file
116.	213.	TPIRR Base Year Manifest Train List_Rebuttal Statistics.xlsx	Trains Removed	Source provided for hard coded numbers in cell A1
117.	217.	TPIRR Base Year Unit Train List v2_Rebuttal Statistics.xlsx	Coal Unit Trains	Source provided for hard coded numbers in cell A1
118.	217.	TPIRR Base Year Unit Train List v2_Rebuttal Statistics.xlsx	Other Unit Trains	Source provided for hard coded numbers in cell A1
119.	217.	TPIRR Base Year Unit Train List v2_Rebuttal Statistics.xlsx	Combined Unit Trains	Source provided for hard coded numbers in cell A1
120.	217.	TPIRR Base Year Unit Train List v2_Rebuttal Statistics.xlsx	Average Cars	Source provided for hard coded numbers in cell A1
121.	217.	TPIRR Base Year Unit Train List v2_Rebuttal Statistics.xlsx	SarrBaseLhUnitTrainsTri	Source for hard coded numbers is the name of the tab
122.	217.	TPIRR Base Year Unit Train List v2_Rebuttal Statistics.xlsx	SarrTeUnitTrainsNotInCeSum	Source for hard coded numbers is the name of the tab
123.	223.	TPIRR Open Train Lists Corrected.xlsx	All	CSXT Reply workpaper; used in comparison; included to facilitate linking, noted on Index but not on file
124.	225.	TPIRR Reply Train Lists-V2REBUT.xlsx	All	CSXT Reply workpaper; used in comparison; included to facilitate linking, noted on Index but not on file
125.	229.	Addl SARR Freight for Reply RTC.xlsx	All	CSXT Reply workpaper; used in comparison; included to facilitate linking, noted on Index but not on file
126.	230.	BaseYearTrainComparison_rebuttal.xlsx	All	CSXT Reply workpaper; used in comparison; included to facilitate linking, noted on Index but not on file
127.	231.	Coal Train Removal Plant Closings_Rebuttal.xlsx	All	CSXT Reply workpaper; used in comparison; included to facilitate linking, noted on Index but not on file
128.	232.	TPIRR RTC Removed Trains for Train Sheet Mileage Fix_Rebuttal.xlsx	All	CSXT Reply workpaper; used in comparison; included to facilitate linking, noted on Index but not on file
129.	233.	TrainsRemoved_BaseYear_Operations_rebuttal.xlsx	All	CSXT Reply workpaper; used in comparison; included to facilitate linking, noted on Index but not on file

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Exhibit III-A-1 <u>Line No.</u> (1)	<u>File</u> (2)	<u>Level</u> (3)	<u>Issue Addressed</u> (4)
130.	234. TrainsRemoved_rebuttal.xlsx	All	CSXT Reply workpaper; used in comparison; included to facilitate linking, noted on Index but not on file
Subd			
131.	257. Base Year Train List Remove Unit Merch Rebut 20140922 peak sort.xlsx	Reb LH Merch Remove	Source for hard coded numbers provided in A1
132.	257. Base Year Train List Remove Unit Merch Rebut 20140922 peak sort.xlsx	Reb Unit Remove	Source for hard coded numbers provided in A1
133.	257. Base Year Train List Remove Unit Merch Rebut 20140922 peak sort.xlsx	Reb Unit-Merch Trains to Remove	Source for hard coded numbers provided in A2
134.	257. Base Year Train List Remove Unit Merch Rebut 20140922 peak sort.xlsx	CSXT Reply Only Removed	Source for hard coded numbers provided in A2
135.	257. Base Year Train List Remove Unit Merch Rebut 20140922 peak sort.xlsx	Sensitivity	Source for hard coded numbers provided in A35
136.	267. Manifest Train Peak Period Analysis_Opening_Average Train Size.xlsx	Carload and Length Summary	Source for hard coded numbers provided in file
137.	269. Manifest Train Peak Period Analysis_Opening_v3_Rebuttal.xlsx	Combined	Source for hard coded numbers provided in file
138.	269. Manifest Train Peak Period Analysis_Opening_v3_Rebuttal.xlsx	Train Maximums	Source for hard coded numbers provided in file
139.	280. Profiles1 Update.xlsx	Sheet 1	Source for hard coded numbers provided in file
140.	288. Train List Local V05 12162013_v4_Rebuttal_v2.xlsx	Added Peak Week Trains	Source for hard coded numbers provided in file
141.	288. Train List Local V05 12162013_v4_Rebuttal_v2.xlsx	J717 Trains	Source for hard coded numbers provided in file
142.	288. Train List Local V05 12162013_v4_Rebuttal_v2.xlsx	Added Trains Avg Size	Source for hard coded numbers provided in file
143.	288. Train List Local V05 12162013_v4_Rebuttal_v2.xlsx	D779	Source for hard coded numbers provided in file
144.	288. Train List Local V05 12162013_v4_Rebuttal_v2.xlsx	Opening Train Size	Source for hard coded numbers provided in file
145.	290. Train List Unit V09 12162013 With Peak Calc v2 Rebut.xlsx	MaxSort	Source for hard coded numbers provided in cell D1
146.	294. Train List Volume Forecast TRAIN DRAFT Rebuttal.xlsx	SARR Origins & Coal Regions	Source for hard coded numbers provided in cell A1
Subdirectory: YTrains			
147.	296. CarEvent Data For OffSARR Issue Movements v5.xlsx	CAR_EVENT_DATA_Issue	Source for hard coded numbers provided in cell A1
148.	296. CarEvent Data For OffSARR Issue Movements v5.xlsx	Yard Summary	Source for hard coded numbers provided in cell J1
149.	296. CarEvent Data For OffSARR Issue Movements v5.xlsx	Yard Summary No Duplicates	Source for hard coded numbers provided in cell L1
150.	296. CarEvent Data For OffSARR Issue Movements v5.xlsx	Yard-No Miles	Source for hard coded numbers provided in cell K1
151.	296. CarEvent Data For OffSARR Issue Movements v5.xlsx	Yard-Miles	Source for hard coded numbers provided in cell K1
152.	296. CarEvent Data For OffSARR Issue Movements v5.xlsx	CAR_SHIPMENT_DATA_KEYS	Source for hard coded numbers provided in cell K2
153.	296. CarEvent Data For OffSARR Issue Movements v5.xlsx	Summary	Source for hard coded numbers provided in cell A1

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Exhibit III-A-1	Line No.	File	Level	Issue Addressed
	(1)	(2)	(3)	(4)
	154.	296. CarEvent Data For OffSARR Issue Movements v5.xlsx	OffSARR Summary	Source for hard coded numbers provided in cell B1
	155.	296. CarEvent Data For OffSARR Issue Movements v5.xlsx	Additional Carloads Summary 1	Source for hard coded numbers provided in cell L1
	156.	296. CarEvent Data For OffSARR Issue Movements v5.xlsx	Additional Carloads Summary 2	Source for hard coded numbers provided in cell L1
	157.	296. CarEvent Data For OffSARR Issue Movements v5.xlsx	Local Trains	Source for hard coded numbers provided in cell E1
	158.	296. CarEvent Data For OffSARR Issue Movements v5.xlsx	Manifest Trains	Source for hard coded numbers provided in cell E1
	159.	296. CarEvent Data For OffSARR Issue Movements v5.xlsx	Unit Trains	Source for hard coded numbers provided in cell E1
	160.	300. Profiles1 Update_Yard Trains Only with Lookup.xlsx	Sheet1	Source for hard coded numbers provided in cell BZ1
	161.	316. Y101 from SARRAllShTrnYard.xlsx	Y101	Source for hard coded numbers provided in cell A1
	162.	316. Y101 from SARRAllShTrnYard.xlsx	Train Summary	Source for hard coded numbers provided in cell A137750
	163.	317. Y110 from SARRAllShTrnYard.xlsx	Y110	Source for hard coded numbers provided in cell A1
	164.	317. Y110 from SARRAllShTrnYard.xlsx	Train Summary	Source for hard coded numbers provided in cell A27975
III-D.	Stand-Alone Cost - Operating Expenses			
	165.	323. ATC URCS Input Cars V45 - Rebuttal.xlsx	Cars	Source provided for hard coded numbers in file and in description on workpaper index/file name
	166.	325. ATC URCS Input Containers V45 - Rebuttal.xlsx	Containers	Source provided for hard coded numbers in file and in description on workpaper index/file name
	167.	336. Traffic Index_REB.xlsx	Sheet1	Source provided for hard coded numbers = "Rebuttal TPIRR Traffic Data"
III-D-1.	Stand-Alone Cost - Operating Expenses - Locomotives			
	168.	344. Locomotive Lease_Revised.xlsx	Detail	Source provided for hard coded numbers in file
III-D-2.	Stand-Alone Cost - Operating Expenses - Rail Cars			
	169.	353. CSX Trailers and Containers Update_Revised.xlsx	2010	Source provided for hard coded numbers in file and in description on workpaper index
	170.	353. CSX Trailers and Containers Update_Revised.xlsx	2011	Source provided for hard coded numbers in file and in description on workpaper index
	171.	353. CSX Trailers and Containers Update_Revised.xlsx	2012	Source provided for hard coded numbers in file and in description on workpaper index
	172.	353. CSX Trailers and Containers Update_Revised.xlsx	2013	Source provided for hard coded numbers in file and in description on workpaper index
III-D-3.	Stand-Alone Cost - Operating Expenses - Personnel			
	173.	374. Fringe Benefit Double Count.xlsx	Avg T&E Salary	Source provided for hard coded numbers in file
	174.	379. TPIRR - Capital Budget-Rebuttal.xls	Sheet 1	Source provided for hard coded numbers in file
	175.	381. TPIRR - Operating Budget-Rebuttal.xls	Sheet 1	Source provided for hard coded numbers in file
	176.	382. TPIRR -Cell Phones & Pagers-Rebuttal.xls	Sheet 1	Source provided for hard coded numbers in file
	177.	383. TPIRR -Desktop Computer-Rebuttal.xls	Sheet 1	Source provided for hard coded numbers in file
	178.	384. TPIRR -Desktop Printers-	Sheet 1	Source provided for hard coded numbers in file
	179.	385. TPIRR G&A Outsourcing_Rebuttal.xlsx	Outside Services	Source provided for hard coded numbers in file
	180.	388. TPIRR Hotels Taxis_Open.xlsx	Total Cost	Source provided for hard coded numbers in file
	181.	388. TPIRR Hotels Taxis_Open.xlsx	Hotel&Taxi-Both_byState	Source provided for hard coded numbers in file
	182.	390. TPIRR -Lap Top Computer-Rebuttal.xls	Sheet 1	Source provided for hard coded numbers in file

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Exhibit III-A-1	<u>Line No.</u> (1)	<u>File</u> (2)	<u>Level</u> (3)	<u>Issue Addressed</u> (4)
	183.	391. TPIRR -Lap Top Printers- Rebuttal.xls	Sheet 1	Source provided for hard coded numbers in file
	184.	399. TPIRR Rebuttal Comp NTO.xls	NTO Personnel - CSXT	Source provided for hard coded numbers in file
	185.	399. TPIRR Rebuttal Comp NTO.xls	NTO Personnel - TPI Open	Source provided for hard coded numbers in file
	186.	400. TPIRR Rebuttal CSXT Benchmarking - GA (corrected and	Data with Net Rev	Source provided for hard coded numbers in file
	187.	400. TPIRR Rebuttal CSXT Benchmarking - GA (corrected and	Data (corrected w 2013)	Source provided for hard coded numbers in file
	188.	400. TPIRR Rebuttal CSXT Benchmarking - GA (corrected and	Data (corrected)	Source provided for hard coded numbers in file
	189.	400. TPIRR Rebuttal CSXT Benchmarking - GA (corrected and	Data (CSXT Reply)	Source provided for hard coded numbers in file
	190.	400. TPIRR Rebuttal CSXT Benchmarking - GA (corrected and	Ref_Open	Source provided for hard coded numbers in file
	191.	400. TPIRR Rebuttal CSXT Benchmarking - GA (corrected and	Ref_Reply	Source provided for hard coded numbers in file
	192.	400. TPIRR Rebuttal CSXT Benchmarking - GA (corrected and	Ref2	Source provided for hard coded numbers in file
	193.	407. TPIRR Salaries-2010_Revised.xlsx	KCS 2010 Exec Salary	Source provided for hard coded numbers in file
	194.	407. TPIRR Salaries-2010_Revised.xlsx	Directors	Source provided for hard coded numbers in file
	195.	413. Train Imbalance_Rebuttal.xlsx	Locos	Source provided for hard coded numbers in file
	196.	413. Train Imbalance_Rebuttal.xlsx	Crews	Source provided for hard coded numbers in file
III-D-4.	Stand-Alone Cost - Operating Expenses - Maintenance of Way			
	197.	423. Rebuttal Exhibit III-D-2 TPIRR MOW.xls	Tables	Source provided for hard coded numbers in file
	198.	423. Rebuttal Exhibit III-D-2 TPIRR MOW.xls	MOW Summary	Source provided for hard coded numbers in file
	199.	423. Rebuttal Exhibit III-D-2 TPIRR MOW.xls	Yard Cleaning	Source provided for hard coded numbers in file
	200.	423. Rebuttal Exhibit III-D-2 TPIRR MOW.xls	Vegetation Control	Source provided for hard coded numbers in file
	201.	426. Rebuttal TPI MOW Employee Positions and Descriptions.xlsx	TPI Opening MOW Staff	Source provided for hard coded numbers in file
	202.	426. Rebuttal TPI MOW Employee Positions and Descriptions.xlsx	CSXT Reply MOW Staff	Source provided for hard coded numbers in file
	203.	428. Rebuttal TPIRR System MOW Workload.xlsx	MOW Crew Requirement	Source provided for hard coded numbers in file and in description on workpaper index
	204.	430. TPIRR Rebuttal Comp MOW.xlsx	Comp by Component	Source provided for hard coded numbers in file
	205.	430. TPIRR Rebuttal Comp MOW.xlsx	Comp Staff by Title	Source provided for hard coded numbers in file
	206.	430. TPIRR Rebuttal Comp MOW.xlsx	MOW Personnel - CSXT	Source provided for hard coded numbers in file
	207.	430. TPIRR Rebuttal Comp MOW.xlsx	MOW Personnel - TPIRR	Source provided for hard coded numbers in file
	208.	430. TPIRR Rebuttal Comp MOW.xlsx	Master Equipment (2)	Source provided for hard coded numbers in file
III-D-8.	Stand-Alone Cost - Operating Expenses - Ad Valorem Tax			
	209.	435. TPIRR Ad Valorem 2010_Rebuttal.xls	OP 2010	Source provided for hard coded numbers in file
III-F.	Stand-Alone Cost - Road Property Investment			
	210.	446. Exh III-F-1_TPI Intermodal Facility Cost Comparison.xlsx	All	Spreadsheet showing the land and facility costs for IM terminals. The Opening numbers are linked to the "TPIRR Facilities.xlsx" spreadsheet submitted on Opening. The Rebuttal numbers are keyed in due to the fact that the file they are from has changed and is used for Supplemental Scenario 1. The Supplemental Rebuttal numbers are linked to the "TPIRR Facilities
	211.	447. III-F Total Rebuttal.xls	Sheet1	Source provided for hard coded numbers in file
	212.	448. Rebuttal Exhibit III-F-1.xlsx	Sheet1	Source provided for hard coded numbers in file

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Exhibit III-A-1 <u>Line No.</u> (1)	<u>File</u> (2)	<u>Level</u> (3)	<u>Issue Addressed</u> (4)
III-F-1. Stand-Alone Cost - Road Property Investment - Land			
213.	451. TPIRR Easement Fees_Rebuttal.xlsx	Overall Regression	Source for easement value per acre regression data is column K of the "Easement Fee" tab
214.	452. TPIRR Easements_Open.xlsx	Summary	Opening workpaper that was added as a source for "III-F Total Rebuttal.xlsx"
215.	450. TPI Land Valuation Report 2-9-2014.pdf	NA	Opening workpaper that was added as a source for various values listed below
Subdirectory: Atlanta GA			
216.	454. Atlanta Analysis.xlsx	Sheet1	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "ATL Masterfile.xls" tab "Use Data"
217.	454. Atlanta Analysis.xlsx	Dekalb 47	Source for hard coded numbers is the "Sheet 1" tab of this spreadsheet
218.	454. Atlanta Analysis.xlsx	Fulton 126	Source for hard coded numbers is the "Sheet 1" tab of this spreadsheet
219.	454. Atlanta Analysis.xlsx	Value Chg	Source for hard coded numbers is the "Sheet 1" tab of this spreadsheet
Subdirectory: Baltimore MD			
220.	456. Baltimore Analysis.xlsx	Aerial 03	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "BAL MasterFile.xls" tab "Use Data"
221.	456. Baltimore Analysis.xlsx	Aerial 03 sorted	Source for hard coded numbers is the "Aerial 03" tab of this spreadsheet
222.	456. Baltimore Analysis.xlsx	All Sales	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "BAL MasterFile.xls" tab "Use Data"
Subdirectory: Chicago IL			
223.	458. Chicago Analysis.xlsx	Sheet1	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "CHI MasterFile.xls" tab "Use Data"
224.	458. Chicago Analysis.xlsx	Value Changes	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "CHI MasterFile.xls" tab "Use Data"
225.	458. Chicago Analysis.xlsx	Discrete Values	Source for hard coded numbers is the "Value Changes" tab of this spreadsheet
Subdirectory: Jacksonville FL			
226.	459. Jacksonville Analysis.xlsx	Duval data	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "Duval_Merged Data_2008.xlsx"
227.	459. Jacksonville Analysis.xlsx	COM by Acres	Source for hard coded numbers is the "Duval data" tab of this spreadsheet
228.	459. Jacksonville Analysis.xlsx	COM by \$	Source for hard coded numbers is the "Duval data" tab of this spreadsheet
229.	459. Jacksonville Analysis.xlsx	RES by Acres	Source for hard coded numbers is the "Duval data" tab of this spreadsheet
230.	459. Jacksonville Analysis.xlsx	RES by \$	Source for hard coded numbers is the "Duval data" tab of this spreadsheet
231.	459. Jacksonville Analysis.xlsx	IND by Acres	Source for hard coded numbers is the "Duval data" tab of this spreadsheet
232.	459. Jacksonville Analysis.xlsx	IND by \$	Source for hard coded numbers is the "Duval data" tab of this spreadsheet
Subdirectory: Nashville & Chattanooga			
233.	463. Chattanooga Analysis.xlsx	CSX Values	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "CHAT MasterFile.xls" tab "Use Data"

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Exhibit III-A-1 <u>Line No.</u> (1)	<u>File</u> (2)	<u>Level</u> (3)	<u>Issue Addressed</u> (4)
234.	465. Nashville Analysis.xlsx	CSX Sales	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "Nashville_Combined.xlsx" tab "Sales Data Summarized"
235.	465. Nashville Analysis.xlsx	COM by Acres	Source for hard coded numbers is the "CSX Sales" tab of this spreadsheet
236.	465. Nashville Analysis.xlsx	COM by \$	Source for hard coded numbers is the "CSX Sales" tab of this spreadsheet
237.	465. Nashville Analysis.xlsx	RES by Acres	Source for hard coded numbers is the "CSX Sales" tab of this spreadsheet
238.	465. Nashville Analysis.xlsx	RES by \$	Source for hard coded numbers is the "CSX Sales" tab of this spreadsheet
239.	465. Nashville Analysis.xlsx	IND by Acres	Source for hard coded numbers is the "CSX Sales" tab of this spreadsheet
Subdirectory: Pittsburgh PA			
240.	468. Pittsburgh Analysis.xlsx	Sheet1	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "PIT MasterFile.xls" tab "Use Data"
241.	468. Pittsburgh Analysis.xlsx	COM 3 Mi Rad	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "Allenghemy_Merged Data_2008.xlsx" tab "Sales Data Summarized"
Subdirectory: TPI Routes Added			
242.	469. Subdirectory: Curtis Bay Branch	Segment	Source for hard coded numbers is google earth file "Extension of Curtis Bay Branch.kmz" from Rebuttal
243.	469. Subdirectory: Curtis Bay Branch	Valuation	Source for \$/AC in column P and AB is "TPI Land Valuation Report 2-9-2014.pdf" from
244.	470. Subdirectory: IL - BRC Forest Hill-Clearing Yd	Segment	Source for hard coded numbers is google earth file "IL - BRC Forest Hill to Clearing Yard.kmz" from Rebuttal
245.	470. Subdirectory: IL - BRC Forest Hill-Clearing Yd	Valuation	Source for \$/AC in column P and S is "TPI Land Valuation Report 2-9-2014.pdf" from Opening
246.	471. Subdirectory: IL - IHB Blue Island Yd-Bedford Pk	Segment	Source for hard coded numbers is google earth file "IL - IHB Blue Island Yard to Bedford Park.kmz" from Rebuttal
247.	471. Subdirectory: IL - IHB Blue Island Yd-Bedford Pk	Valuation	Source for \$/AC in column M, P, S, and AB is "TPI Land Valuation Report 2-9-2014.pdf" from Opening
248.	472. Subdirectory: IL-Rose Lake Yard to TRRA	Segment	Source for hard coded numbers is google earth file "IL - Rose Lake Yard to TRRA.kmz" from Rebuttal
249.	472. Subdirectory: IL-Rose Lake Yard to TRRA	Valuation	Source for \$/AC in column M and P is "TPI Land Valuation Report 2-9-2014.pdf" from
250.	473. Subdirectory: IL-TRRA to Madison Yard ESTL	Segment	Source for hard coded numbers is google earth file "IL - TRRA to Madison Yard ESTL.kmz" from Rebuttal
251.	473. Subdirectory: IL-TRRA to Madison Yard ESTL	Valuation	Source for \$/AC in column M, P, and S is "TPI Land Valuation Report 2-9-2014.pdf" from Opening
Subdirectory: TPI Yards			
252.	474. TPI Rebuttal Yard Acres.xlsx	Sheet1 (3)	The various sources for hard coded numbers in columns K-N have been identified
253.	476. TPI Yards and Land Values - ALL YARDS.xlsx	Major-Other	Source for col J, Acres, and col S and T, Values, is Opening workpaper "TPI Land Valuation Report 2-9-2014.pdf"

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Exhibit III-A-1	<u>Line No.</u> (1)	<u>File</u> (2)	<u>Level</u> (3)	<u>Issue Addressed</u> (4)
	254.	476. TPI Yards and Land Values - ALL YARDS.xlsx	IM-Auto-Bulk	Source for col J, Acres, and col S and T, Values, is Opening workpaper "TPI Land Valuation Report 2-9-2014.pdf"
	255.	476. TPI Yards and Land Values - ALL YARDS.xlsx	Summary	Source for col B, number of yards, and col C, total acres, is each categories respective tab
	256.	477. Yards Added in Rebuttal.xlsx	Segment	Source for hard coded numbers is google earth file "Yards Added in Rebuttal.kmz" from
	257.	477. Yards Added in Rebuttal.xlsx	Valuation	Source for \$/AC in column M, P, S, and AB is "TPI Land Valuation Report 2-9-2014.pdf" from Opening
Subdirectory: Washington DC				
	258.	480. Washington Analysis.xlsx	SheetI	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "WAS MasterFile.xls" tab "Use Data"
	259.	480. Washington Analysis.xlsx	RES Analysis	The various CSXT Reply workpapers that are used as sources for hard coded numbers have been identified
	260.	480. Washington Analysis.xlsx	RES-CSX Vals	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "WAS MasterFile.xls" tab "Use Data"
	261.	480. Washington Analysis.xlsx	RES-3	Rebuttal workpaper "TPI-Land Valuation Rebuttal Report Nov 5 2014.pdf" discusses this
	262.	480. Washington Analysis.xlsx	Juris Summary	Rebuttal workpaper "TPI-Land Valuation Rebuttal Report Nov 5 2014.pdf" discusses this
	263.	480. Washington Analysis.xlsx	COM DC Only	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "Washington
	264.	480. Washington Analysis.xlsx	COM All	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "Washington
	265.	480. Washington Analysis.xlsx	COM-All except DC	Source for hard coded numbers is CSXT III-F-1 Reply workpaper "Washington
Stand-Alone Cost - Road Property Investment - Roadbed Preparation				
III-F-2.	266.	481. Contech Pipe Weights.pdf	NA	Opening workpaper that was added as a source for "TPIRR Culvert Construction Rebuttal.xls"
	267.	482. Contech Pricing.pdf	NA	Opening workpaper that was added as a source for "TPIRR Culvert Construction Rebuttal.xls"
	268.	485. Culverts.xls	All	Discovery file that was added as a source for "TPIRR Culvert Construction Rebuttal.xlsx" and
	269.	484. CSXI Terminals (HC-DVD-56.xls	All	Opening workpaper that was added as a source for "TPIRR IM AUTO BULK Terminals.xlsx"
	270.	488. Highway Crossings on New Segments.pdf	NA	Opening workpaper that was added as a source for "TPIRR Rebuttal Grading.xlsx"
	271.	489. ICC Engineering Reports.pdf	NA	Opening workpaper that was added as a source for "TPIRR Rebuttal Grading.xlsx"
	272.	490. Intermodal Terminal Capacity Stats (C-DVD-41).xls	All	Opening workpaper that was added as a source for "TPIRR IM AUTO BULK Terminals.xlsx"
	273.	491. Land for waste quantities.pdf	NA	Opening workpaper that was added as a source for "TPIRR Rebuttal Grading.xlsx"
	274.	492. Masters.pdf	NA	Opening workpaper that was added as a source for "Cost of water per CY for TPIRR.xlsx"
	275.	493. Means Handbook pages.pdf	NA	Opening workpaper that was added as a source for various RS Means calculation
	276.	497. Sign Removal Costs.pdf	NA	Opening workpaper that was added as a source for "TPIRR Rebuttal Grading.xlsx"
	277.	498. Terminal_Profiles-CSXT.pdf	NA	Opening workpaper that was added as a source for "TPIRR IM AUTO BULK Terminals.xlsx"

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Exhibit III-A-1 Line No. (1)	File (2)	Level (3)	Issue Addressed (4)
278.	499. [REDACTED]	NA	Opening workpaper that was added as a source for "TPIRR IM AUTO BULK Terminals.xlsx"
279.	500. TPIRR Culvert Construction Rebuttal.xlsx	Unit Cost	Source for RS Means Historic Cost Factors is "ENR Quarterly Cost Report - Means Indexes.pdf" from Opening
280.	500. TPIRR Culvert Construction Rebuttal.xlsx	Unit Cost	Source for location factor values is "TPIRR Rebuttal Grading.xlsx" tab "Loc Factor" from Rebuttal
281.	501. [REDACTED]	All	Opening workpaper that was added as a source for "TPIRR Yard Matrix Rebuttal Grading.xlsx"
282.	502. [REDACTED]	All	Opening workpaper that was added as a source for "TPIRR Rebuttal Grading.xlsx"
283.	503. [REDACTED]	All	Opening workpaper that was added as a source for "TPIRR Rebuttal Grading.xlsx"
284.	504. TPIRR Rebuttal Grading.xlsx	Eng Reports	Source for hard coded numbers is "ICC Engineering Reports.pdf" from Opening
285.	504. TPIRR Rebuttal Grading.xlsx	Eng Rep Input	Source for hard coded numbers is "ICC Engineering Reports.pdf" from Opening
286.	504. TPIRR Rebuttal Grading.xlsx	Retaining Wall Distribution	Source for hard coded numbers is "ICC Engineering Reports.pdf" from Opening
287.	504. TPIRR Rebuttal Grading.xlsx	Eng Rep Seeding	Source for col G-I is "ICC Engineering Reports.pdf" from Opening
288.	504. TPIRR Rebuttal Grading.xlsx	Summary	Source for Opening numbers is "TPIRR Open Grading.xlsx" from Opening
289.	504. TPIRR Rebuttal Grading.xlsx	Unit Cost	Source for RS Means unit costs is "Means Handbook pages.pdf" from Opening
290.	505. [REDACTED]	NA	Opening workpaper that was added as a source for "Cost of water per CY for TPIRR.xlsx"
291.	506. [REDACTED]	All	Opening workpaper that was added as a source for "Cost of water per CY for TPIRR.xlsx"
292.	507. [REDACTED]	All	Opening workpaper that was added as a source for "TPIRR Rebuttal Grading.xlsx"
293.	508. TPIRR Route Miles Rebuttal Grading.xlsx	Location Factor	Source for location factor is "Means Handbook pages.pdf" from Opening
294.	509. [REDACTED]	All	Opening workpaper that was added as a source for "TPI Rebuttal Yard Acres.xlsx"
295.	511. Track_Leases2.xls	All	Opening workpaper that was added as a source for "TPIRR IM AUTO BULK Terminals.xlsx"
296.	512. TRANSFLO (C-DVD-10).xls	All	Opening workpaper that was added as a source for "TPIRR IM AUTO BULK Terminals.xlsx"
297.	514. Trestle Hollow Project Cost Sheet.pdf	NA	Opening workpaper that was added as a source for "TPIRR Rebuttal Grading.xlsx"
298.	515. Water prices from Ohio DOT.xlsx	All	Opening workpaper that was added as a source for "Cost of water per CY for TPIRR.xlsx"
Subdirectory: Soil Critique			
299.	526. STATSGO2_Soils_TPIRR_Rebuttal.xlsx	PA	Source for hard coded numbers is CSXT III-F-2 Reply workpaper "STATSGO2_Soils_TPIRR.xlsx"
300.	526. STATSGO2_Soils_TPIRR_Rebuttal.xlsx	OH	Source for hard coded numbers is CSXT III-F-2 Reply workpaper "STATSGO2_Soils_TPIRR.xlsx"
301.	526. STATSGO2_Soils_TPIRR_Rebuttal.xlsx	IL	Source for hard coded numbers is CSXT III-F-2 Reply workpaper "STATSGO2_Soils_TPIRR.xlsx"

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Exhibit III-A-1	<u>Line No.</u> (1)	<u>File</u> (2)	<u>Level</u> (3)	<u>Issue Addressed</u> (4)
	302.	526. STATSGO2_Soils_TPIRR_Rebuttal.xlsx	IN	Source for hard coded numbers is CSXT III-F-2 Reply workpaper "STATSGO2_Soils_TPIRR.xlsx"
	303.	526. STATSGO2_Soils_TPIRR_Rebuttal.xlsx	NY	Source for hard coded numbers is CSXT III-F-2 Reply workpaper "STATSGO2_Soils_TPIRR.xlsx"
III-F-3.	Stand-Alone Cost - Road Property Investment - Track Construction			
	304.	545. Index of material transportation cost.xlsx	Sheet1	Source for RCAFA values is "AAR September 2014.pdf" from Rebuttal
	305.	547. TPI Turnouts & Multi-Track Rebuttal.xlsx	Sheet1	Source for turnouts and tracks is TPI III-B Rebuttal workpaper "TPIRR Stick Diagrams Rebuttal.pdf"
	306.	548. Track Construction Rebuttal.xlsx	User Input	Source for hard coded numbers is "TPIRR Typical Sections.pdf"
	307.	548. Track Construction Rebuttal.xlsx	136 RE Rail	Source for RS Means Historic Cost Factors is "ENR Quarterly Cost Report - Means Indexes.pdf" from Opening
	308.	548. Track Construction Rebuttal.xlsx	115 RE Rail	Sources for hard coded numbers are Opening workpapers cited in cell C49
	309.	548. Track Construction Rebuttal.xlsx	14" Tie Plates	Sources for hard coded numbers are Opening workpapers cited in cell C49
	310.	548. Track Construction Rebuttal.xlsx	14" Tie Plates for Yard Tracks	Sources for hard coded numbers are Opening workpapers cited in cell C35
	311.	548. Track Construction Rebuttal.xlsx	18" Tie Plates	Sources for hard coded numbers are Opening workpapers cited in cell C35
	312.	548. Track Construction Rebuttal.xlsx	Spikes - Tangent up to 3 Deg	Sources for hard coded numbers are Opening workpapers cited in cell C35
	313.	548. Track Construction Rebuttal.xlsx	Spikes - 3 to 6 Deg	Sources for hard coded numbers are Opening workpapers cited in cell C35
	314.	548. Track Construction Rebuttal.xlsx	Spikes - Over 6 Deg	Sources for hard coded numbers are Opening workpapers cited in cell C35
	315.	548. Track Construction Rebuttal.xlsx	Anchors - Up to 3 Deg	Sources for hard coded numbers are Opening workpapers cited in cell C35
	316.	548. Track Construction Rebuttal.xlsx	Anchors - Over 3 Deg	Sources for hard coded numbers are Opening workpapers cited in cell C35
	317.	548. Track Construction Rebuttal.xlsx	Ties	Sources for hard coded numbers are Opening workpapers cited in cell C35
	318.	548. Track Construction Rebuttal.xlsx	Ties-Yard	Sources for hard coded numbers are Opening workpapers cited in cell C35
	319.	548. Track Construction Rebuttal.xlsx	Grade Crossing	Sources for hard coded numbers are Opening workpapers cited in cell C35
	320.	548. Track Construction Rebuttal.xlsx	Subballast Single Main	Sources for hard coded numbers are Opening workpapers cited in cell C25
	321.	548. Track Construction Rebuttal.xlsx	Subballast Double	Sources for hard coded numbers are Opening workpapers cited in cell C35
	322.	548. Track Construction Rebuttal.xlsx	Subballast Triple	Sources for hard coded numbers are Opening workpapers cited in cell C35
	323.	548. Track Construction Rebuttal.xlsx	Subballast 4 Tracks	Sources for hard coded numbers are Opening workpapers cited in cell C35
	324.	548. Track Construction Rebuttal.xlsx	Subballast Yard	Sources for hard coded numbers are Opening workpapers cited in cell C35
	325.	548. Track Construction Rebuttal.xlsx	Ballast ML Tangent	Sources for hard coded numbers are Opening workpapers cited in cell C35
	326.	548. Track Construction Rebuttal.xlsx	Ballast ML Curves 0 to 3 Deg	Sources for hard coded numbers are Opening workpapers cited in cell C38

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Exhibit III-A-1 Line No. (1)	File (2)	Level (3)	Issue Addressed (4)
327.	548. Track Construction Rebuttal.xlsx	Ballast ML Curves over 3	Sources for hard coded numbers are Opening workpapers cited in cell C37
328.	548. Track Construction Rebuttal.xlsx	Ballast for Yard Tracks	Sources for hard coded numbers are Opening workpapers cited in cell C37
329.	548. Track Construction Rebuttal.xlsx	No. 20 Turnouts	Sources for hard coded numbers are Opening workpapers cited in cell C41
330.	548. Track Construction Rebuttal.xlsx	No. 14 Turnouts-136	Sources for hard coded numbers are Opening workpapers cited in cell C41
331.	548. Track Construction Rebuttal.xlsx	No. 10 Turnouts-136	Sources for hard coded numbers are Opening workpapers cited in cell C41
332.	548. Track Construction Rebuttal.xlsx	No. 10 Turnouts-115	Sources for hard coded numbers are Opening workpapers cited in cell C41
333.	548. Track Construction Rebuttal.xlsx	Field Weld	Sources for hard coded numbers are Opening workpapers cited in cell C41
334.	548. Track Construction Rebuttal.xlsx	Rail Lubricator & Mats	Sources for hard coded numbers are Opening workpapers cited in cell C26
335.	548. Track Construction Rebuttal.xlsx	Crossbuck	Sources for hard coded numbers are Opening workpapers cited in cell C27
336.	548. Track Construction Rebuttal.xlsx	MP and Whistle Post	Sources for hard coded numbers are Opening workpapers cited in cell C21
337.	548. Track Construction Rebuttal.xlsx	ENS	Sources for hard coded numbers are Opening workpapers cited in cell C19
338.	548. Track Construction Rebuttal.xlsx	Wheel Stop	Sources for hard coded numbers are Opening workpapers cited in cell C19
339.	548. Track Construction Rebuttal.xlsx	Sliding Derail	Sources for hard coded numbers are Opening workpapers cited in cell C19
340.	548. Track Construction Rebuttal.xlsx	Switch Heater	Sources for hard coded numbers are Opening workpapers cited in cell C19
341.	548. Track Construction Rebuttal.xlsx	Double Switch Point Derail	Sources for hard coded numbers are Opening workpapers cited in cell C19
342.	548. Track Construction Rebuttal.xlsx	Diamond Crossings	Sources for hard coded numbers are Opening workpapers cited in cell C26 Sources for inputs are Opening workpapers cited in cell B26 and B27
Subdirectory: Ballast			
343.	549. AREMA Recommended Ballast Gradation.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
344.	550. Ballast & Sub-ballast Density.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
345.	551. Ballast and Sub-ballast Depth.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
346.	552. Ballast Contracts (CSX-TPI-HC-28916 to 28961).pdf	NA	Opening workpaper that was added as a source for "Ballast Prices by Supplier and Location CSXT Reply TPI Rebuttal.xlsx"
347.	553. Ballast Prices by Supplier and Location CSXT Reply TPI Rebuttal.xlsx	Ballast Pricing from Discovery	Source for col A-F is "Ballast Contracts (CSX-TPI-HC-28916 to 28961).pdf" from Opening
348.	554. [Redacted]	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Curves			
349.	556. [Redacted]	All	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Derails			
350.	557. A&K Railroad Quote-DoubleSwitchPoint.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
351.	558. Double Switch Point Length.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"

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Exhibit III-A-1 Line No. (1)	File (2)	Level (3)	Issue Addressed (4)
Subdirectory: Sliding Derail			
352. 559.	Sliding Derail Average Distance.xlsx	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
353. 560.	SlidingDerailCostEmail.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
354. 561.	SlidingDerailShippingCost.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Diamond Crossings			
355. 562.	Page III-F-155 from DUPONT NS REPLY III-F ROAD PROPERTY INVESTMENT - PUBLIC VERSION.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
356. 563.	TPIRR At-Grade Railroad Crossings.xlsx	All	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Lubricators & Mats			
357. 564.	Installation Price Lubricator.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
358. 565.	LB Foster - Lubricator Price Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
359. 566.	Lubricator Spacing.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
360. 567.	Matting Average Distance.xlsx	All	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
361. 568.	Railroad Track Absorbent Matting.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
362. 569.	UPS Mat Shipping.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: OTM			
363. 570.	A&K Plate Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
364. 571.	LB Anchor Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
365. 572.	LB Plate Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
366. 573.	LB Spike Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
367. 574.	Progress Anchor Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
368. 575.	Progress Plate Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
369. 576.	Progress Spike Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
370. 577.	RJ Plate Bid.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
371. 578.	TPI Rail Anchor Pattern Details.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
372. 579.	TPIRR Spiking Patterns.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
373. 580.	TPIRR Typical Tie Plate Details.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
374. 581.	TPIRR Typical Track Spike Detail.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
375. 582.	Unitrac Anchor Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
376. 583.	Unitrac Plate Quote II.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"

Changes Made to TPI Rebuttal Evidence to Comply with the Board's 7/24/15 Decisions

Exhibit III-A-1 Line No. (1)	File (2)	Level (3)	Issue Addressed (4)
377. 584.	Unitrac Plate Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
378. 585.	Unitrac Spike Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Rail			
379. 586.	Page 89 from CSX 2010 R-1 Revised PDF (searchable) 2011-07-07.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
380. 587.	Queen Labor Quote E-mail.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
381. 588.	Queen Rail Labor Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Rail Weld			
382. 589.	Bayline Weld Bid.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Roadway Grade Crossing			
383. 590.	2012 SCTRA Bid Sheets.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
384. 591.	2012 SCTRA Crossing Bid Prices.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
385. 592.	2012 SCTRA Crossing Specifications.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
386. 593.	TPI Crossings.xlsx	All	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Signs			
Subdirectory: Cross-buck			
387. 594.	2012 SCTRA Cross-buck Bid.pdf	All	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: ENS			
388. 595.	Email to Emedco for ENS Quote-1.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
389. 596.	Email to Emedco for ENS Quote-2.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
390. 597.	Emedco ENS Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
391. 598.	SignInstallation.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Mile Marker & Whistle Post			
392. 599.	Mile Marker Sign Estimate.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Sub-Ballast			
393. 600.	AREMA Sub-Ballast Specification.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
394. 601.	Base Placement RS Means 2012.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
395. 602.	Trestle Hollow Subballast.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Switch Heaters			
396. 603.	LubricatorShippingEstimate.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
397. 604.	Quote E20 No. 20 Switch.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
398. 605.	Switch Heater Average Distance.xlsx	All	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Ties			

Changes Made to TPI Rebuttal Evidence to Comply with the Board's 7/24/15 Decisions

Exhibit III-A-1	Line No. (1)	File (2)	Level (3)	Issue Addressed (4)
	399.	609. McCord Timber and Tie Turnouts Plant Location.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	400.	611. Tangent Tie 2009 Quote.xlsx	All	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	401.	612. Tie Cost - Page 87 from CSX 2010 R-1 Revised.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Turnouts				
	402.	614. A&K Turnout Quote Email.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	403.	615. A&K Turnout Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	404.	616. Bayline Turnout Bid.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	405.	617. LB Turnout Quote Email.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	406.	618. LB Turnout Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	407.	619. Progress 10 Turnout Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	408.	620. Progress 20 Turnout Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	409.	621. Progress Plant Location Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	410.	622. Progress Turnout Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	411.	623. Queen Turnout Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	412.	624. Turnouts.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	413.	625. Unitrac Plant Location Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	414.	626. Unitrac Turnout Quote.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Typical Sections				
	415.	627. TPIRR Typical Sections.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
Subdirectory: Wheel Stop				
	416.	628. TPIRR Wheel Stop Detail.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	417.	629. UPS Shipping Quote Wheel Stop.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	418.	630. Wheel Stops Average Distance.xlsx	All	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
	419.	631. WheelStopCost.pdf	NA	Opening workpaper that was added as a source for "Track Construction Rebuttal.xlsx"
III-F-4. Stand-Alone Cost - Road Property Investment - Tunnels				
	420.	633. TPI Tunnel Construction Rebuttal.xlsx	TPI Tunnels List	Source for col A-M is "2010 Active Tunnels.xls" from Opening
	421.	633. TPI Tunnel Construction Rebuttal.xlsx	Tunnel Unit Cost	Source for RS Means Historic Cost Factors is "ENR Quarterly Cost Report - Means Indexes.pdf" from Opening
	422.	632. 2010 Active Tunnels.xls	All	Opening workpaper that was added as a source for "TPI Tunnel Construction Rebuttal.xlsx"
III-F-5. Stand-Alone Cost - Road Property Investment - Bridges				

Changes Made to TPI Rebuttal Evidence to Comply with the Board's 7/24/15 Decisions

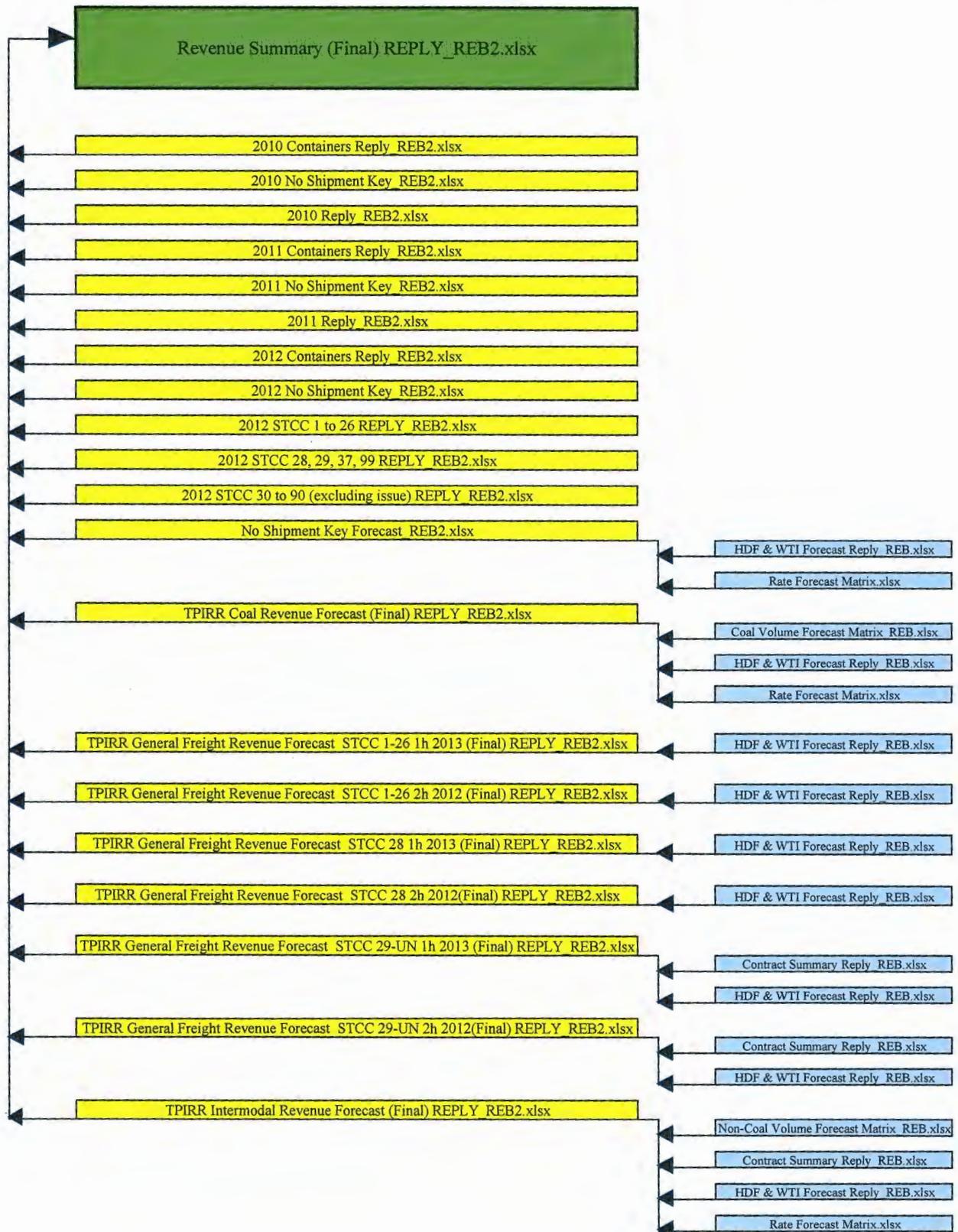
Exhibit III-A-1 Line No.	File	Level	Issue Addressed
(1)	(2)	(3)	(4)
423.	635. counties.xlsx	All	Opening workpaper that was added a source for "FHWA highway bridges by state and county TPIRR.xlsx
424.	636. Crossings.xls	All	Discovery file that was added as a source for "TPIRR Highway Overpass Construction TPI Rebuttal.xlsx"
425.	638. FHWA highway bridges by state and county TPIRR.xlsx	All	Opening workpaper that was added as a source for "TPIRR Highway Overpass Construction TPI Rebuttal.xlsx"
426.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Summary	Source for RS Means Historic Cost Factors is "ENR Quarterly Cost Report - Means Indexes.pdf" from Opening
427.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Tall Bridges	Sources listed in this tab are Opening workpapers
428.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Special Non-Moveable Bridges	Sources listed in this tab are Opening workpapers
429.	639. TPI Bridge Construction Costs Rebuttal.xlsx	TPI Special Moveable Bridges	Sources listed in this tab are Opening workpapers
430.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Combined Bridge Component Costs	Sources listed in this tab are Opening workpapers
431.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Abutment Piles	Sources listed in this tab are Opening workpapers
432.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Abut. Pile Tips	Sources listed in this tab are Opening workpapers
433.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Abut. Concrete	Sources listed in this tab are Opening workpapers
434.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Pier Piles	Sources listed in this tab are Opening workpapers
435.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Pier Pile Tips	Sources listed in this tab are Opening workpapers
436.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Steel Viaduct Concrete Pedestal	Sources listed in this tab are Opening workpapers
437.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Pier Concrete Costs	Sources listed in this tab are Opening workpapers
438.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Handrail	Sources listed in this tab are Opening workpapers
439.	639. TPI Bridge Construction Costs Rebuttal.xlsx	PVC Deck Drain	Sources listed in this tab are Opening workpapers
440.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Superstructure Type I	Sources listed in this tab are Opening workpapers
441.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Type I Elastomeric Pad	Sources listed in this tab are Opening workpapers
442.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Superstructure Type II	Sources listed in this tab are Opening workpapers
443.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Type II Elastomeric Pad	Sources listed in this tab are Opening workpapers
444.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Type II Steel Base PL	Sources listed in this tab are Opening workpapers
445.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Superstructure Type III	Sources listed in this tab are Opening workpapers
446.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Type III Elastomeric Pad	Sources listed in this tab are Opening workpapers
447.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Type III Steel Base PL	Sources listed in this tab are Opening workpapers

Changes Made to TPI Rebuttal Evidence to Comply with the Board's 7/24/15 Decisions

Exhibit III-A-1 <u>Line No.</u> (1)	<u>File</u> (2)	<u>Level</u> (3)	<u>Issue Addressed</u> (4)
448.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Superstructure Type IV	Sources listed in this tab are Opening workpapers
449.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Type IV Elastomeric	Sources listed in this tab are Opening workpapers
450.	639. TPI Bridge Construction Costs Rebuttal.xlsx	Type IV Steel Base PL	Sources listed in this tab are Opening workpapers
451.	640. TPIRR Highway Overpass Construction TPI Rebuttal.xlsx	Summary	Source for RS Means Historic Cost Factors is "ENR Quarterly Cost Report - Means Indexes.pdf" from Opening
452.	640. TPIRR Highway Overpass Construction TPI Rebuttal.xlsx	Deck Area Calc	Source for hard coded numbers is CSXT Reply workpaper "TPIRR Highway Overpass Construction CSXT Reply.xlsx"
Subdirectory: References & Exhibits			
453.	641. BR04-Type II-1.pdf	NA	Opening workpaper that was added as a source for "TPI Bridge Construction Costs
454.	642. BR04-Type II-2.pdf	NA	Opening workpaper that was added as a source for "TPI Bridge Construction Costs
455.	643. BR04-Type II-3.pdf	NA	Opening workpaper that was added as a source for "TPI Bridge Construction Costs
456.	644. BR04-Type II-4.pdf	NA	Opening workpaper that was added as a source for "TPI Bridge Construction Costs
457.	645. BR04-Type II-5.pdf	NA	Opening workpaper that was added as a source for "TPI Bridge Construction Costs
458.	646. BR04-Type II-6.pdf	NA	Opening workpaper that was added as a source for "TPI Bridge Construction Costs
459.	647. BR04-Type II-7.pdf	NA	Opening workpaper that was added as a source for "TPI Bridge Construction Costs
460.	648. BR05-Type III-1.pdf	NA	Opening workpaper that was added as a source for "TPI Bridge Construction Costs
461.	649. BR05-Type III-2.pdf	NA	Opening workpaper that was added as a source for "TPI Bridge Construction Costs

TAB 3

SCHEMATIC OF THE SPREADSHEET LINKAGES IN THE TPIRR TRAFFIC AND REVENUE MODEL



SCHEMATIC OF THE SPREADSHEET LINKAGES IN THE TPIRR TRAFFIC AND REVENUE MODEL



TAB 4

List of TPIRR Trains Carrying High Priority UPS and Threads Express Traffic Over So-Called Leapfrog Segments in the Base Year

<u>Train Symbol</u>	<u>Train Suffix</u>																		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
Q037	152	Q031	148	Q032	146	Q034	143	Q038	51	Q040	51	Q033	50	Q036	46	Q039	8	Q035	7
105.	Q037	20130307	Q031	20130319	Q032	20130321	Q034	20130325											
106.	Q037	20130308	Q031	20130320	Q032	20130326	Q034	20130329											
107.	Q037	20130311	Q031	20130321	Q032	20130327	Q034	20130330											
108.	Q037	20130314	Q031	20130326	Q032	20130328	Q034	20130405											
109.	Q037	20130315	Q031	20130327	Q032	20130402	Q034	20130406											
110.	Q037	20130318	Q031	20130328	Q032	20130403	Q034	20130412											
111.	Q037	20130321	Q031	20130402	Q032	20130404	Q034	20130413											
112.	Q037	20130325	Q031	20130403	Q032	20130409	Q034	20130415											
113.	Q037	20130328	Q031	20130404	Q032	20130410	Q034	20130419											
114.	Q037	20130329	Q031	20130409	Q032	20130411	Q034	20130420											
115.	Q037	20130401	Q031	20130410	Q032	20130416	Q034	20130422											
116.	Q037	20130404	Q031	20130411	Q032	20130417	Q034	20130426											
117.	Q037	20130405	Q031	20130416	Q032	20130418	Q034	20130427											
118.	Q037	20130408	Q031	20130417	Q032	20130423	Q034	20130429											
119.	Q037	20130411	Q031	20130418	Q032	20130424	Q034	20130503											
120.	Q037	20130412	Q031	20130423	Q032	20130425	Q034	20130504											
121.	Q037	20130415	Q031	20130424	Q032	20130430	Q034	20130506											
122.	Q037	20130418	Q031	20130425	Q032	20130501	Q034	20130510											
123.	Q037	20130419	Q031	20130430	Q032	20130502	Q034	20130511											
124.	Q037	20130422	Q031	20130501	Q032	20130507	Q034	20130513											
125.	Q037	20130425	Q031	20130502	Q032	20130508	Q034	20130517											
126.	Q037	20130426	Q031	20130507	Q032	20130509	Q034	20130518											
127.	Q037	20130429	Q031	20130508	Q032	20130514	Q034	20130520											
128.	Q037	20130502	Q031	20130509	Q032	20130515	Q034	20130524											
129.	Q037	20130503	Q031	20130514	Q032	20130516	Q034	20130525											
130.	Q037	20130506	Q031	20130515	Q032	20130521	Q034	20130527											
131.	Q037	20130509	Q031	20130516	Q032	20130522	Q034	20130531											
132.	Q037	20130510	Q031	20130521	Q032	20130523	Q034	20130601											
133.	Q037	20130513	Q031	20130522	Q032	20130529	Q034	20130603											
134.	Q037	20130516	Q031	20130523	Q032	20130530	Q034	20130607											
135.	Q037	20130517	Q031	20130529	Q032	20130604	Q034	20130608											
136.	Q037	20130520	Q031	20130530	Q032	20130605	Q034	20130610											
137.	Q037	20130523	Q031	20130604	Q032	20130606	Q034	20130614											
138.	Q037	20130524	Q031	20130605	Q032	20130611	Q034	20130615											
139.	Q037	20130527	Q031	20130606	Q032	20130612	Q034	20130617											
140.	Q037	20130530	Q031	20130611	Q032	20130613	Q034	20130621											
141.	Q037	20130531	Q031	20130612	Q032	20130618	Q034	20130622											
142.	Q037	20130603	Q031	20130613	Q032	20130619	Q034	20130624											
143.	Q037	20130606	Q031	20130618	Q032	20130620	Q034	20130628											
144.	Q037	20130607	Q031	20130619	Q032	20130625													
145.	Q037	20130610	Q031	20130620	Q032	20130626													
146.	Q037	20130613	Q031	20130625	Q032	20130627													
147.	Q037	20130614	Q031	20130626															
148.	Q037	20130617	Q031	20130627															
149.	Q037	20130620																	
150.	Q037	20130621																	
151.	Q037	20130624																	
152.	Q037	20130627																	

PART III-C

TAB 1

RTC NODES: Narrative Referenced Locations

<u>City 1/</u> (1)	<u>State 1/</u> (2)	<u>Prefix 2/</u> (3)	<u>MP 2/</u> (4)	<u>RTC NODE 3/</u> (5)	<u>City 1/</u> (1)	<u>State 1/</u> (2)	<u>Prefix 2/</u> (3)	<u>MP 2/</u> (4)	<u>RTC NODE 3/</u> (5)
1. Alexandria Jct.	MD	BAA	33.6	BAA33.60-2	41. E. Haley	IN	QS	70.3	QS70.37-2
2. Atlanta	GA	OWA	0.0	WA0.00-1	42. East St. Louis	IL	QS	234.0	QS234.00-2
3. Augusta	GA	AK	460.5	AK460.50-1	43. Emporia	VA	A	64.8	A64.75-2
4. Avon	IN	QS	9.0	QS10.05-1	44. Equation	VA	SRN	0.0	SRN0.00-1
5. Baldwin	FL	SP	652.5	SP652.50-1	45. Etowah	TN	OOC	335.5	C335.10-1
6. Baltimore	MD	BAA	3.2	BAA3.22-1	46. Evansville	IN	OHT	323.4	HT323.45-1
7. Bay Minette	AL	000	641.2	641.44-2	47. Fairburn	GA	XXB	20.0	XXB20.05-2
8. Beech Island	SC	AK	452.1	AK452.15-2	48. Fayetteville	NC	A	209.7	A209.71-1
9. Belt Jct.	GA	SGB	567.1	SGB567.10-1	49. Fitzgerald	GA	ANB	655	ANB655.21-1
10. Bensenville	IL	DIH	39.1	DIH39.000-1	50. Flomaton	AL	000	607.0	606.69-3
11. Big Bend	FL	AZA	891.0	AZA891.15-1	51. Folkston	GA	ANA	621.1	ANA621.05-2
12. Birmingham	AL	000	392.1	392.10-1	52. Ford	KY	OKC	109.0	KC110.40-2
13. Bradenton	FL	AZA	917.8	AZA918.00-1	53. Fostoria	OH	BI	36.8	BI36.80-1
14. Bridgeport	WV	BA	299.0	BA298.45-2	54. Francesville	IN	OQB	10.3	QB10.30-1
15. Buffalo	NY	QD	0.3	QD0.35-2	55. Galion	OH	QJ	80.3	QJ80.31-1
16. Callahan	FL	A	624	A624.00-1	56. Galloway	FL	AR	851.5	AR851.40-1
17. Cartersville	GA	OWA	47.4	WA47.40-1	57. Georgia Power	GA	SGC	633.2	SGC633.20-1
18. Catawba	SC	SG	330.6	SG330.57-2	58. Grafton	WV	BA	278.0	BA278.00-1
19. Chattanooga	TN	OOJ	149	J149.07-1	59. Gravelton	NC	SF	270.5	SF270.40-2
20. Chicago	IL	DC	22.5	DC22.81-1	60. Greenwich	OH	BG	193.1	BG193.10-1
21. Cincinnati	OH	CA	664.9	CA664.90-3	61. Greenwood	SC	SG	426.6	SG426.60-1
22. Clarksburg	WV	BA	300.5	BA300.20-1	62. Griffin	FL	AR	854.0	AR852.49-1
23. Clinton	SC	SG	397.0	SG397.00-1	63. Hamilton	OH	BE	25.7	BE25.70-2
24. Collier	VA	A	26.7	A26.70-1	64. Hancock	WV	BA	123.00	BA123.01-4
25. Colpark	GA	XXB	10.0	XXB10.01-2	65. Henderson	KY	OOH	313.0	H313.02-2
26. Connelville	PA	BF	269.7	BF268.61-3	66. Howell Tower	GA	OWA	3.2	WA3.20-2
27. Contentnea	NC	A	139.0	A138.66-3	67. Hurricane	AL	000	649.3	649.30-1
28. Coosa Pines	AL	ANJ	925.1	ANJ925.18-2	68. Hyndman	PA	BF	193.0	BF194.48-3
29. Cowan	TN	OOJ	86.0	J86.00-3	69. Indianapolis	IN	QS	0.0	QS0.00-1
30. Crawfordsville	IN	OOQ	147.4	Q147.68-3	70. Jackson	TN	ONG	143.0	NG143.52-1
31. Crestline	OH	QJ	75.7	QJ75.70-2	71. Jacksonville	FL	A	642.5	A642.50-2
32. CSXT Milepost 000653.44	AL	000	653.4	653.50-1	72. Junta	GA	OWA	48.2	WA48.20-1
33. Cumberland	MD	BA	178.5	BA178.51-1	73. Kayne Avenue	TN	000	186.5	186.50-9
34. Decatur	AL	000	307.2	307.25-2	74. KC Jct.	KY	CA	662.6	CA662.60-1
35. Decoursey	KY	OKC	8.0	KC8.00-1	75. Killisyth	TN	OOC	218.0	C219.85-3
36. Deland	FL	ASE	753.3	ASE753.30-1	76. Lakeland	FL	AR	856.5	AR856.45-2
37. Deshler	OH	BI	62.6	BI62.60-1	77. Latonia	KY	OKC	4	KC4.00-1
38. Dolton	IL	OZA	16.9	ZA16.90-1	78. Laurens Wye	SC	AK	554.6	AK554.47-1
39. Dotiki Jct.	KY	OMF	298.3	MF298.30-1	79. Lilesville	NC	SF	273.5	SF273.43-2
40. Dover	SC	SG	394.9	SG394.90-1	80. Lima	OH	BE	130.8	BE131.50-3

RTC NODES: Narrative Referenced Locations

<u>City 1/</u> (1)	<u>State 1/</u> (2)	<u>Prefix 2/</u> (3)	<u>MP 2/</u> (4)	<u>RTC NODE 3/</u> (5)	<u>City 1/</u> (1)	<u>State 1/</u> (2)	<u>Prefix 2/</u> (3)	<u>MP 2/</u> (4)	<u>RTC NODE 3/</u> (5)
81. Lineville	AL	ANJ	881.1	ANJ882.00-2	117. Pittsburgh	PA	PLE	0.0	PLE0.00-1
82. Livingston	KY	OOC	145.0	C144.00-2	118. Richmond	VA	CFP	1.7	CFP2.05-3
83. Lordstown	OH	BG	91.0	BG91.35-3	119. Rochester	NY	QC	371.0	QC371.70-3
84. Louisville	KY	000	5.9	5.90-1	120. Rockingham	NC	SF	260.1	SF260.10-1
85. Madisonville	KY	OHE	137.8	HC275.00-1	121. Salem	IL	UP	254.1	UP252.95-1
86. Manchester	GA	ANB	788.3	ANB788.20-1	122. Sand Patch	PA	BF	211.0	BF211.03-3
87. Marion	OH	QJ	101.7	QJ101.70-3	123. Sanderson	KY	OKC	98.0	KC96.62-4
88. McCook	IL	DIH	28.0	DIH28.080-1	124. Selkirk	NY	QG	14.0	QG14.20-6
89. McDuffie Island Coal terminal	AL	4/	4/	667.30-2	125. Selkirk Jct	NY	QG	14.0	QG14.20-6
90. McKeesport	PA	PLY	15.1	PLM15.50-1	126. Seymour	IN	BC	87.00	BC87.08-1
91. Memphis	TN	OOF	371.4	F372.55-1	127. Shenandoah	WV	BA	89.0	BA87.41-3
92. Memphis Jct.	KY	000	118.0	118.00-1	128. Sherwood	TN	OOJ	97.0	J94.49-2
93. Middle Holmes Gap	TN	000	335	337.05-4	129. Smithfield	WV	BA	303.4	BA303.40-2
94. Mobile	AL	000	665.2	665.61-4	130. South Cowan	TN	OOJ	87.0	J84.00-3
95. Monon	IN	OQB	0.00	QB0.10-1	131. Starke	FL	S	679.1	S679.15-4
96. Montgomery	AL	000	488.1	488.10-1	132. Stilesboro	GA	SGC	633.2	SGC633.25-1
97. N. Hunt	IN	QSC	9.2	QSC9.20-1	133. Syracuse	NY	QC	285.0	QC285.00-1
98. N. Union City	GA	ANB	844.9	ANB844.92-1	134. Taft	FL	A	798.0	A797.62-2
99. Nashville	TN	000	185.7	185.70-1	135. Talladega	AL	ANJ	911.1	ANJ910.90-1
100. New Orleans	LA	000	800.5	800.85-1	136. Tampa	FL	S	841.5	S841.45-1
101. New River Jct.	OH	BE	28.2	BE28.00-1	137. Tandallon	TN	OOJ	94.0	J96.74-2
102. Newell	PA	PLM	49.5	PLM49.50-1	138. Terminal Railway Alabama State Docks	AL	4/	4/	667.30-2
103. Newton Falls	OH	BG	95.9	BG95.42-3	139. Terre Haute	IN	OZA	181.1	ZA181.05-1
104. North Bourne	KY	OOC	153.0	C155.00-4	140. Thornton Jct.	IL	OZA	20.2	ZA20.20-1
105. North Fort Estill	KY	OKC	120.0	KC119.65-2	141. Vinehill	TN	000	189.3	189.30-1
106. North Holmes Gap	TN	000	328.5	329.52-2	142. W. Haley	IN	QS	70.8	QS70.85-1
107. North Vernon	IN	BC	72.3	BC72.35-1	143. Wadesboro	NC	SF	277.1	SF277.34-2
108. Oakworth	AL	000	310.0	310.01-2	144. Wadley	AL	ANJ	857.7	ANJ857.75-2
109. Ohio Jct.	OH	BG	80.3	BG79.50-3	145. Wapakoneta	OH	BE	117.1	BE117.10-1
110. Oneco	FL	SW	875.0	SW1.10-2	146. Washington	DC	CFP	113.8	CFP113.80-1
111. Orangeburg	NY	QR	21.5	QR21.50-1	147. Waycross	GA	ANB	586.9	ANB586.95-1
112. Orlando	FL	A	792.4	A792.08-1	148. Weldon Connection	NC	A	81.1	A81.10-2
113. Palmetto	FL	AZA	914.8	AZA914.78-1	149. West Side Jct.	NC	SF	277.1	SF277.10-1
114. Parkwood Jct.	AL	000	404.1	404.10-1	150. Willard	OH	BI	0.2	BI0.30-1
115. Pembroke	NC	A	241.0	A241.00-1	151. Willow Creek	IN	BI	236.4	BI236.67-3
116. Pine Jct.	IN	DC	0.0	DC0.00-1	152. Winston	FL	AY	855.3	AY855.35-1
					153. Woodland	IL	OZA	82.6	ZA82.66-2

1/ TPI Opening and TPI Rebuttal Testimony.
 2/ Source: Rebuttal e-Workpaper "TPIRR Route Miles Rebuttal Grading.xlsx."
 3/ TPI RTC model.
 4/ Location is on the TASD (Terminal Railway Alabama State Docks).

TAB 2

RTC NODES: TPIRR Peak Period Traffic Origin Stations

<u>City</u> (1)	<u>State</u> (2)	<u>MP</u> (3)	<u>RTC Node 1/ (4)</u>	<u>City</u> (1)	<u>State</u> (2)	<u>MP</u> (3)	<u>RTC Node 1/ (4)</u>	<u>City</u> (1)	<u>State</u> (2)	<u>MP</u> (3)	<u>RTC Node 1/ (4)</u>
1. ABBEVILLE	SC	SG 440	SG441.83-2	41. BOTKINS	OH	BE 110	BE111.42-2	81. CONNELLSVILLE	PA	BF 270	BF268.61-3
2. AC CABIN	OH	CD 49	CD47.70-3	42. BOWLING GREEN	KY	000114	113.50-2	82. CONTENTNEA	NC	A 139	A138.66-3
3. ALICIA	PA	QO 3	LR6.70-2	43. BRADENTON	FL	AZA916	AZA917.50-2	83. COOSA STREET	AL	000486	485.10-3
4. ALIQUIPPA	PA	PLE 19	PLE22.89-3	44. BREMEN	IN	BI 183	BI181.91-3	84. CORBIN	KY	00C172	C172.10-3
5. ALSEN	NY	QR 105	QR102.98-2	45. BRIDGEPORT	AL	00J123	J121.80-4	85. CORDELE	GA	ANB695	ANB694.28-2
6. ANACOSTIA	DC	QL 134	CFP117.10-3	46. BROWNSVILLE	TN	00F319	F319.59-2	86. CRAWFORDSVILLE	IN	00Q147	Q145.17-2
7. ANDERSON	IN	00J102	QJ1248.45-5	47. BRUCETON	TN	000N95	N94.55-2	87. CRESTLINE	OH	QF 188	QJ76.84-4
8. ANSONIA	OH	QI 190	QI189.99-3	48. BRUNSWICK	MD	BA 76	BA78.45-4	88. CULLMAN	AL	000339	339.31-2
9. ASHTABULA HARBOR	OH	PLC 2	OY1.75-2	49. BRUNSWICK JUNCTION	GA	AN 588	AN588.25-3	89. CUMBERLAND	MD	BA 178	BA177.80-4
10. ATHENS	GA	SG 506	SG506.83-3	50. BUFFALO	NY	QC 434	QC436.90-6	90. CURTIS	IN	BI 247	BI246.43-3
11. ATKINSON	KY	00H277	HC276.50-2	51. BUFFALO KENMORE YD	NY	QDN 10	QDN9.05-3	91. DALTON	GA	00J189	WA99.16-2
12. ATLANTA	GA	SG 504	WA6.00-4	52. BULL RUN	TN	00C254	C255.65-2	92. DANVILLE	IL	OZA123	ZA122.88-3
13. ATLANTA HULSEY	GA	YYG171	YYG169.90-3	53. BUSCH	FL	S 626	S626.10-2	93. DAYTON	OH	BE 60	BE54.78-2
14. ATMORE	AL	000622	621.79-2	54. CALERA	AL	000426	421.55-2	94. DECOURSEY	KY	OKC117	KC7.80-2
15. AUGUSTA	GA	AK 459	AK459.30-2	55. CALHOUN	GA	00J210	WA80.50-2	95. DEFIANCE	OH	BI 87	BI88.00-3
16. AUGUSTA YD LIMIT	SC	AK 458	AK457.50-2	56. CALUMET PARK	IL	QDZ 6	IHB1.11-2	96. DEMMLER	PA	BF 317	PLY11.60-3
17. AVALON ST	TN	00F375	NI226.50-2	57. CAMAK	GA	YYG047	YYG46.95-3	97. DESHLER OS	OH	BE 165	BE162.60-3
18. AVON	IN	QS 9	QS12.30-4	58. CARDINAL 9	KY	OMC282	PEE4.65-1	98. DOLTON	IL	DC 10	ZA16.90-1
19. BAILEY MINE	PA	QON 15	BAI14.85-1	59. CAREY	OH	CD 74	CD73.48-3	99. DOTIKI	KY	OMF298	MF298.32-1
20. BALDWIN	FL	S 653	S653.50-3	60. CARLISLE	IN	OZA213	ZA215.86-2	100. DOVER OS	SC	SG 395	SG396.48-2
21. BALT BAY VIEW	MD	BAK 88	BAK89.62-3	61. CARTERSVILLE	GA	00J240	WA48.00-2	101. DUNKIRK	NY	QD 41	QD42.38-3
22. BALT CURTIS BAY	MD	BAO 8	BAO3.05-1	62. CATAWBA	SC	SG 331	SG330.57-2	102. EAST CHICAGO	IN	BIB 4	DC2.83-3
23. BALT PENN MARY EXIM	MD	BAL 5	BAL1.65-3	63. CAYUGA	IN	OZA141	ZA144.86-2	103. EAST ST LOUIS	IL	QS 235	QS234.23-3
24. BALT PENN MARY JCT	MD	BAL 4	BAL1.65-3	64. CENTRAL AVENUE	KY	000001	4.87-4	104. EAST THOMAS	AL	000390	393.65-3
25. BALT SPARROWS POINT	MD	BAL 3	BAL1.65-3	65. CHERRY RUN	WV	BA 114	BA115.25-3	105. EDGEMOOR	TN	00C255	C255.65-2
26. BALTIMORE	MD	BAA 1	BAA1.67-3	66. CHESAPEAKE JCT	DC	BA 075	CFP117.10-3	106. ELIZABETH	GA	00J264	WA21.20-3
27. BELLE ISLE	NY	QC 296	QC293.51-3	67. CHICAGO	IL	BIC 3	IHB1.11-2	107. EMERALD MINE	PA	QOW 0	WY2.70-3
28. BELLWOOD	VA	S 9	CFP2.05-4	68. CHICAGO 59TH ST	IL	DCQ 25	DC23.45-4	108. ETOWAH	TN	00C334	C332.95-2
29. BELT RR CONN TCS	IL	DC 25	DC23.45-4	69. CHICAGO CLEARING	IL	DC 27	BRC2.40-2	109. EVANSVILLE	IN	00H323	H323.20-3
30. BENNING	DC	QL 134	CFP117.10-3	70. CHICAGO TOFC	IL	000ZA3	DC11.76-4	110. EXERMONT	IL	QS 232	QS232.57-5
31. BERMUDA HUNDRED	VA	SAD 17	SAD17.18-1	71. CICERO	IL	DAL 32	DC33.05-3	111. FAIRBURN	GA	XXB023	XXB22.26-4
32. BESSEMER	PA	BF 319	PLY11.60-3	72. CIMARRON	KY	OHJ275	DRK1.40-2	112. FALKVILLE	AL	000325	327.56-3
33. BIG BEND	FL	AZA890	AZA890.15-2	73. CINCINNATI	OH	OKC110	BE2.10-3	113. FAYETTEVILLE	NC	A 210	A207.95-3
34. BIRMINGHAM	AL	000389	391.40-4	74. CINCINNATI TOFC	OH	00T110	BE4.45-4	114. FEDERAL 2 MINE	WV	QOF 5	YN6.05-1
35. BLADENSBURG	MD	BAR 2	CFP117.10-3	75. CLARKSBURG	WV	BA 303	BA301.50-2	115. FITZGERALD	GA	ANB659	ANB660.81-2
36. BLOUNT ISLAND	FL	SO 631	SO630.82-2	76. CLEVELAND COLLINWOOD	OH	QD 173	QD171.69-3	116. FLOMATON	AL	000608	606.69-3
37. BLU ISLAND INTERCHANGE	IL	DB 3	DB0.14-1	77. CLINTON	SC	SG 397	SG397.21-2	117. FOLKSTON	GA	A 609	ANA621.05-2
38. BLUE ISLAND	IL	QDZ 6	IHB1.11-2	78. COLEMAN	FL	S 766	S762.51-2	118. FOSTORIA	OH	BI 36	BI35.60-3
39. BOLIVAR	GA	00C407	C407.05-2	79. COLLIER	VA	A 26	A26.90-3	119. FOSTORIA TOWN ST	OH	CD 87	BI36.13-3
40. BOSTWICK	FL	A 689	A690.95-2	80. COLONA	PA	PLE 21	PLE18.50-3	120. FRANCISCO AVENUE	IL	DIH 16	DIH16.260-2

RTC NODES: TPIRR Peak Period Traffic Origin Stations

<u>City</u> (1)	<u>State</u> (2)	<u>MP</u> (3)	<u>RTC Node 1/</u> (4)	<u>City</u> (1)	<u>State</u> (2)	<u>MP</u> (3)	<u>RTC Node 1/</u> (4)	<u>City</u> (1)	<u>State</u> (2)	<u>MP</u> (3)	<u>RTC Node 1/</u> (4)
121. FREDERICKSBURG	VA	CFP 59	CFP58.25-4	161. JOHNSTON YD MEMP IC	TN	00F385	MCN6.40-1	201. MILLER	IN	BI 241	BI239.30-3
122. FT JCT	NC	AE 201	A208.89-3	162. JUNCTION CITY	GA	ANB762	ANB765.89-2	202. MOBILE	AL	000665	664.20-4
123. GAITHERSBURG	MD	BA 22	BA21.53-3	163. K C JUNCTION	KY	CA 661	BE4.45-4	203. MONON	IN	000Q88	Q86.25-2
124. GALION	OH	QI 80	QI78.98-3	164. KAYNE AVENUE	TN	000187	187.10-9	204. MONROE	NC	SF 306	SF303.95-2
125. GALLATIN	TN	000159	157.26-2	165. KELLAR SIDING OS	OH	BI 26	BI26.50-3	205. MONROE DTC	NC	SF 305	SF303.95-2
126. GARRETT	IN	BI 128	BI130.00-4	166. KINGSTON	NY	QR 88	QR90.39-2	206. MONROE YARD	NC	SF 307	SF303.95-2
127. GASTON	AL	ANJ940	ANJ939.80-2	167. KNOXVILLE	TN	00C277	C275.55-2	207. MONTGOMERY	AL	000489	485.10-3
128. GAUTIER	MS	000710	711.39-2	168. KREOLE	MS	000703	704.23-2	208. MURFREESBORO	TN	000J32	J31.06-2
129. GEORGIANA	AL	000548	547.24-2	169. LAFAYETTE	IN	00Q120	NS120.80-2	209. N WELDON CONNECTION	NC	A 81	A78.56-2
130. GRAFTON	WV	BA 280	BA280.10-1	170. LAKELAND	FL	A 852	A851.96-2	210. NASHVILLE	TN	000190	BA191.20-4
131. GRAVELTON	NC	SF 271	SF273.43-2	171. LAPAZ	IN	BI 190	BI189.29-3	211. NE EAST JUNCT CP	NC	5H 254	5H254.05-3
132. GREENWOOD	5C	5G 425	SG425.40-4	172. LATONIA	KY	00T105	BE2.10-3	212. NE VINITA CP	AL	0LB388	338.95-3
133. GUTHRIE	KY	00H216	H216.85-2	173. LAURENS	SC	AK 553	AK552.80-3	213. NEVILLE ISLAND	PA	PLE 6	PLE6.00-3
134. HAMILTON	OH	BE 25	BE23.15-3	174. LAWRENCEVILLE	GA	SG 544	SG543.90-2	214. NEW CASTLE	PA	BG 58	BG57.45-3
135. HAMLER	OH	BI 69	BI69.46-3	175. LEWISBURG	TN	0BA241	BA240.17-2	215. NEW JOHNSONVILLE	TN	000N79	N80.08-2
136. HAMLET	NC	S 249	S250.15-4	176. LIMA	OH	BE 131	BE131.52-4	216. NEW ORLEANS	LA	000801	798.98-3
137. HARPERS FERRY 1 INT	MD	BA 85	BA80.55-3	177. LINDEN	IN	00Q137	Q136.88-2	217. NEWELL	PA	PLM 51	PLM49.89-7
138. HARPSTER	OH	CD 56	CD54.87-2	178. LITHONIA	GA	YYG146	YYG147.28-2	218. NIAGARA FALLS	NY	QDN 25	QDN22.75-2
139. HAZLETON	IN	OZA248	ZA249.55-2	179. LOACHAPOKA	AL	XXB125	XXB123.42-2	219. NORTH BALTIMORE	OH	BI 51	BI50.75-3
140. HB TOWER	MD	BAK 96	BAA3.15-3	180. LOCKPORT	NY	QDL 59	QDL60.06-2	220. NORTH BIRMINGHAM	AL	0LB390	388.25-4
141. HENDERSON	KY	00H313	H312.55-2	181. LOCKPORT CONNECTION	NY	QDL 70	QDL69.60-2	221. NORTH NEWARK	NY	QC 339	QC338.60-3
142. HILLSDALE OS	IN	OZA159	ZA160.34-2	182. LOMAX	AL	000444	444.90-2	222. NORTH VERNON	IN	BC 72	BC73.40-3
143. HOOPESTON	IL	00ZA99	ZA99.02-2	183. LORDSTOWN	OH	BG 89	BG91.35-3	223. O BANNON	KY	000T14	T15.53-IND2
144. HOOPPOINT	FL	S 844	S841.60-3	184. LOUISVILLE	KY	000006	8.05-8	224. OAK ST NASHVILLE	TN	000189	186.93-9
145. HOPEWELL	VA	SAC 23	SAC22.41-2	185. LOVERIDGE MINE	WV	QO 79	LR76.05-2	225. OAKTOWN	IN	OZA220	ZA218.95-2
146. HOWELLS TRANSFER	GA	SG 575	SG575.55-2	186. LYONS	NY	QC 335	QC336.09-3	226. OAKWORTH	AL	000309	307.25-2
147. HUGH	FL	S 663	S662.40-3	187. MAGELLA	AL	000395	395.87-3	227. OGLETHORPE	GA	ANB728	ANB728.80-2
148. HYDE	TN	OKM208	C206.35-2	188. MANCHESTER	GA	ANB788	ANB788.20-2	228. OHIO JCT	OH	BG 80	BG79.50-3
149. INDIANAPOLIS	IN	OKC110	BD123.18-1	189. MARION	OH	CD 46	CD46.49-4	229. ONEAL	AL	000424	420.75-2
150. INDIANAPOLIS HAWTHO	IN	QIB 9	QIB8.59-1	190. MARION YARD	OH	QI 101	CD47.70-3	230. ONECO	FL	AZA921	5W0.80-2
151. INDIANAPOLIS IU	IN	QI 284	QS11.48-1	191. MARLBORO	VA	S 4	CFP2.05-4	231. OVERPECK JUNCTION	OH	BE 31	BE29.89-3
152. IVORYDALE	OH	BE 7	BE7.55-3	192. MARTINSBURG	WV	BA 100	BA100.30-3	232. OXMOOR	AL	000398	400.22-3
153. J TOWER	WV	BA 302	BA303.40-2	193. MARY LEE	AL	000387	387.05-3	233. PA TOWER	MD	BAA 34	BAA35.50-1
154. JACKSON	TN	ONG152	NG152.00-1	194. MEDARYVILLE	IN	0QB103	QB89.00-1	234. PARR	IN	000Q66	Q66.40-2
155. JACKSONVILLE	FL	A 640	A640.25-8	195. MEMPHIS	TN	00F371	F370.05-3	235. PASCAGOULA	MS	000707	705.23-2
156. JACKSONVILLE EX IM	FL	S 633	ASK636.67-2	196. MEMPHIS JCT	KY	000118	116.97-2	236. PATIO	KY	OKC207	KC98.62-4
157. JACKSONVILLE TOFC	FL	ASK638	ASK638.90-2	197. MEMPHIS PIGEON INDU	TN	00F387	F370.05-3	237. PECAN	FL	A 695	A695.63-2
158. JEFFERSON	GA	GGM 12	GGM14.49-1	198. MEMPHIS TN YARD	TN	00F381	NI226.50-3	238. PEMBROKE	NC	A 241	A242.84-2
159. JEFFERSONVILLE	IN	0BB015	LIRC7.25-2	199. MILAN	TN	00F283	F283.35-2	239. PINE JCT	IN	BIA248	BI246.43-3
160. JESSUP	MD	BAA 16	BAA16.03-3	200. MILFORD	VA	CFP 38	CFP38.24-3	240. PITTSBURGH	PA	BFA328	PLE3.70-4

RTC NODES: TPIRR Peak Period Traffic Origin Stations

City (1)	State (2)	MP (3)	RTC Node 1/ (4)	City (1)	State (2)	MP (3)	RTC Node 1/ (4)	City (1)	State (2)	MP (3)	RTC Node 1/ (4)
241. PLANT CITY	FL	AY 858	S820.64-2	271. SELKIRK	NY	QG 15	QG14.20-6	301. TREVILION	TN	00C205	C206.35-2
242. PLEASANT RIDGE	IN	000Q77	Q78.60-2	272. SELKIRK SK	NY	QG 11	QG14.20-6	302. TUCKER	GA	SG 561	SG561.09-2
243. POINT OF ROCKS	MD	BA 64	BA42.75-4	273. SENECA	NY	QD 4	QD4.44-3	303. TULLAHOMA	TN	000J69	J67.85-2
244. PORT DCS BLOCK	NY	QDL 61	QDL60.06-2	274. SHELBURN	IN	OZA199	ZA199.50-2	304. UNION CITY	GA	ANB844	ANB843.76-2
245. PRINCETON	IN	OZA259	ZA261.10-4	275. SHORTERS	AL	XXB152	XXB151.60-2	305. UPPER SANDUSKY	OH	CD 64	CD63.77-2
246. QUINLAN	FL	5O 627	SO627.55-2	276. SIBERT OS	AL	000667	665.61-4	306. VARNONS	AL	000421	424.83-2
247. RA JUNCTION	IL	OZA120	ZA120.96-3	277. SIDNEY	OH	QI 164	QI164.51-3	307. VINCENNES	IN	OZA235	ZA237.96-2
248. RADNOR YARD	TN	BA 191	BA191.20-3	278. SINKS	KY	00C137	KC151.60-2	308. W R O JCT	IN	OZA150	ZA150.89-2
249. REYNOLDS	IN	000Q96	Q97.44-2	279. SMYRNA	TN	000J20	J20.20-2	309. WADESBORO	NC	SF 278	5F278.34-2
250. RICHMOND ACCA	VA	AACA	CFP4.30-3	280. SOCIAL CIRCLE	GA	YYG119	YYG119.98-2	310. WALMORE	NY	QDN 23	QDL69.60-2
251. RICHMOND AY	VA	A 2	CFP2.05-4	281. SOUTH ALICE	AL	000394	393.65-3	311. WANNEE JCT	FL	S 681	S679.15-4
252. RICHMOND TOFC	VA	S 0	SRN1.64-3	282. SOUTH BIRMINGHAM	AL	000392	391.93-11	312. WANSFORD	IN	OZA284	ZA285.07-2
253. RIDGEWAY	OH	QI 125	QI124.66-3	283. SOUTH HAMLET YARD	NC	S 251	S250.15-4	313. WAUHATCHIE	TN	00J146	J144.50-4
254. RINGO	IN	QS 72	QS71.61-3	284. SOUTH LAKELAND	FL	A 853	A856.10-2	314. WAYCROSS	GA	AN 587	AN588.25-3
255. RIVERDALE	IL	DC 11	DC11.76-14	285. SOUTH PEMBROKE	NC	A 243	A242.84-2	315. WELDON	NC	A 83	A84.76-2
256. ROANOKE RAPIDS	NC	SA 83	SA79.20-1	286. SOUTH SCHENECTADY	NY	QG 33	QG32.60-2	316. WEST ASHTABULA	OH	QD 130	QD128.26-3
257. ROCHESTER	NY	QC 371	QC367.98-3	287. SOUTH WEST NYACK	NY	QR 23	QR23.60-3	317. WEST DESHLER	OH	BI 73	BI64.65-3
258. ROCKINGHAM	NC	SF 260	SF258.67-2	288. ST JOE	IN	BI 116	BI116.18-3	318. WEST NYACK	NY	QR 24	QR23.60-3
259. ROCKPORT	FL	AZA882	AZA882.99-2	289. starke	fl	S 676	S679.15-4	319. WEST ROSE LAKE	IL	QS 239	QS234.43-7
260. ROCKWOOD	PA	BF 227	BF226.70-3	290. STILESBORO	GA	SGC633	SGC633.20-1	320. WHEELWRIGHT	VA	SAC 12	SAC11.95-3
261. ROCKY MOUNT	NC	A 121	A120.26-3	291. SULLIVAN	IN	OZA204	ZA203.58-2	321. WIDOWS CREEK	AL	00J119	J118.25-4
262. ROTTERDAM JCT	NY	QG 79	QG39.35-3	292. SYRACUSE	NY	QC 285	QC285.85-3	322. WILDWOOD	FL	S 761	S760.30-2
263. RT NO 30 DTC	OH	CD 73	CD73.48-3	293. SYRACUSE MONTREAL J	NY	QC 291	QC283.95-3	323. WILLARD	OH	BG 204	BI0.93-4
264. S END BROWN STREET	VA	S 21	SRN1.45-3	294. TAFT	FL	A 798	A795.75-2	324. WILLARD WEST	OH	BG 203	BI3.00-13
265. SALAK	SC	SG 428	SG425.40-4	295. TALLADEGA	AL	ANJ910	ANJ913.77-2	325. WILLOW CREEK OS	IN	BI 237	BI236.67-3
266. SALEM	IL	BC 268	UP250.85-3	296. TAMPA	FL	S 841	S840.10-3	326. WILSON	NC	A 136	A137.16-3
267. SANFORD	FL	A 765	A763.86-2	297. TERRE HAUTE	IN	OZA178	ZA179.40-2	327. WINSTON	FL	AY 856	AY856.55-2
268. SAVOY	KY	00C191	C190.85-2	298. TERRE HAUTE DUANE	IN	QS 71	QS70.37-3	328. WINSTON YARD	FL	AY 856	AY856.55-1
269. SE PALMER	GA	A708	SG534.87-2	299. THEODORE	AL	000680	679.47-3	329. WORTHVILLE	KY	000T54	T56.07-2
270. SEALSTON	VA	CFD 4	CFQ7.95-1	300. TRENTON	OH	BE 34	BE34.20-2	330. YOUNG	IN	OZA186	ZA186.60-2
								331. YUKON	FL	A 653	A652.99-2

1/ Source: TPI RTC Models.

TAB 3

RTC NODES: TPIRR Peak Period Traffic Destination Stations

City (1)	State (2)	MP (3)	RTC Node 1/ (4)	City (1)	State (2)	MP (3)	RTC Node 1/ (4)	City (1)	State (2)	MP (3)	RTC Node 1/ (4)
1. 24TH STR INTERLOCK	AL	000397	391.40-4	42. BERKELEY RUN OS	WV	BA 271	BA282.00-3	83. CENTRAL AVENUE	KY	000001	2.95-4
2. 39TH ST EXTENSION	IL	DC 29	UPG14.433-D	43. BERMUDA HUNDRED	VA	SAD 17	SAD20.30-1	84. CHATTANOOGA	TN	00J152	J149.22-3
3. 51ST ST INTLG NO 2	IL	DC 28	UPG14.433-D	44. BESSEMER	PA	BF 319	PLY11.60-3	85. CHERRY RUN	WV	BA 114	BA114.08-3
4. 59TH STREET IL NO2	IL	DC 23	DC25.35-4	45. BIG BEND	FL	AZA890	AZA892.15-2	86. CHESAPEAKE JCT	DC	BAR 4	CFP117.05-4
5. ABBEVILLE	SC	SG 440	SG441.83-2	46. BIRMINGHAM	AL	000389	393.65-3	87. CHICAGO	IL	DD 2	DC13.90-4
6. AC CABIN	OH	CD 49	CD45.70-3	47. BLADENSBURG	MD	BAR 2	CFP115.10-3	88. CHICAGO 59TH ST	IL	DCQ 25	DC25.35-4
7. ACCA	VA	CFP 2.38	CFP4.30-3	48. BLOUNT ISLAND	FL	SO 631	SO632.25-2	89. CHICAGO 71ST STREET	IL	DIH 23	DIH28.320-3
8. ACCA YARD	VA	CFP 2.38	CFP4.30-3	49. BLU ISLAND INTERCHANGE	IL	DB 3	DB0.20-1	90. CHICAGO CLEARING	IL	DC 27	BRC4.75-2
9. ALICIA	PA	QO 3	LR6.70-2	50. BLUE ISLAND	IL	DIH 20	IHB3.20-2	91. CHICAGO TOFC	IL	000ZA3	DC13.90-4
10. ALIQUIPPA	PA	PLE 19	PLE18.50-3	51. BOLIVAR	GA	00C407	C407.05-2	92. CICERO	IL	DAL 32	DC34.90-3
11. AMPHILL	VA	S 5	S6.00-3	52. BOSTWICK	FL	A 689	A692.81-2	93. CIMARRON	KY	0HJ275	DRK3.40-2
12. ANDERSON	TN	00J102	J101.35-2	53. BOTKINS	OH	BE 110	BE110.42-2	94. CINCINNATI	OH	OKC110	BE2.10-3
13. ANSONIA	OH	QI 190	QI189.99-3	54. BOWLING GREEN	KY	000114	112.90-2	95. CINCINNATI TOFC	OH	00T110	BE4.45-4
14. ARMONA	TN	00C289	C288.91-2	55. BOYLES YARD OS	AL	000399	399.00-3	96. CLARKSBURG	WV	BA 303	BA303.30-2
15. ASH ST INTLG NO 1	IL	DC 31	GI2.35-2	56. BRADENTON	FL	AZA916	AZA917.50-2	97. CLEVELAND COLLINWOOD	OH	QD 173	QD171.69-3
16. ASHTABULA	OH	QD 127	QD124.67-4	57. BRC WEST SUB	IL	DIH 31	DIH28.320-3	98. CLINTON	SC	SG 397	SG398.11-2
17. ASHTABULA HARBOR	OH	PLC 2	OY3.14-2	58. BREMEN	IN	BI 183	BI183.10-3	99. COLEMAN	FL	S 766	S763.11-2
18. ATHENS	GA	SG 506	SG508.75-2	59. BRIDGEPORT	AL	00J123	J120.95-4	100. COLLIER	VA	A 26	A26.90-3
19. ATKINSON	KY	00H277	HC276.50-2	60. BROWNSVILLE	TN	00F319	F320.08-1	101. COLONA	PA	PLE 21	PLE22.89-3
20. ATLANTA	GA	ANB865	WA4.00-3	61. BRUCETON	TN	000N95	N96.07-2	102. CONNELLSVILLE	PA	BF 270	BF268.61-3
21. ATLANTA HULSEY	GA	YYG171	YYG169.90-3	62. BRUNSWICK	MD	BA 76	BA73.31-3	103. CONTENTNEA	NC	A 139	A137.16-3
22. ATMORE	AL	000622	619.75-2	63. BRUNSWICK JUNCTION	GA	AN 588	AN590.70-4	104. COOSA STREET	AL	000486	486.95-3
23. AUGUSTA	GA	AK 459	AK459.30-2	64. BUFFALO	NY	QC 434	QC436.90-6	105. CORBIN	KY	00C172	C172.10-3
24. AUGUSTA YARD	GA	AK 459	AK459.30-2	65. BUFFALO KENMORE YD	NY	QDN 10	QDN10.42-3	106. CORDELE	GA	ANB695	ANB692.25-2
25. AUGUSTA YD LIMIT	SC	AK 458	AK457.50-2	66. BUSCH	FL	S 626	S628.05-2	107. CPGROV DOLTON	IL	DCC 10	DC10.67-2
26. AVALON ST	TN	00F375	N1227.20-3	67. BV MAIN YL	FL	AY 855	AY858.50-2	108. CRAWFORDSVILLE	IN	00Q147	Q147.62-2
27. AVON	IN	QS 9	QS10.10-3	68. BYINGTON	TN	00C263	C263.97-1	109. CRESTLINE	OH	QF 188	QF76.84-4
28. BAILEY MINE	PA	QON 15	BAI16.85-1	69. CALERA	AL	000426	421.55-2	110. CRESTLINE JCT	OH	QI 75	QI76.84-4
29. BALDWIN	FL	S 653	S655.70-3	70. CALHOUN	GA	00J210	WA79.57-2	111. CULLMAN	AL	000339	339.31-2
30. BALT BAY VIEW	MD	BAK 88	BAK88.62-3	71. CALUMET PARK	IL	QDZ 6	IHB3.20-2	112. CUMBERLAND	MD	BA 178	BA177.80-4
31. BALT CURTIS BAY	MD	BAO 8	BAO0.00-1	72. CALUMET PARK OS	IL	DCC 7	IHB3.20-2	113. CURTIS	IN	BI 247	BI248.12-3
32. BALT PENN MARY EXIM	MD	BAL 5	BAL3.70-3	73. CAMAK	GA	YYG047	YYG48.10-2	114. DALTON	GA	00J189	WA99.16-1
33. BALT PENN MARY JCT	MD	BAL 4	BAL3.70-3	74. CARDINAL 9	KY	OMC282	PEE6.65-1	115. DANVILLE	IL	OZA123	ZA121.68-3
34. BALT SPARROWS POINT	MD	BAL 3	BAL3.70-3	75. CAREY	OH	CD 74	CD73.48-3	116. DAYTON	OH	BE 60	BE64.55-2
35. BALT WEST BALTIMORE	MD	BAA 3	BAA1.67-3	76. CARLISLE	IN	OZA213	ZA215.86-2	117. DECATUR	AL	Y103	307.25-2
36. BALTIMORE	MD	BAA 1	BAA1.67-4	77. CARLISLE	OH	BE 44	BE41.54-2	118. DECOURSEY	KY	OKC117	KC6.65-2
37. BATTLEBORO	NC	A 111	A112.07-3	78. CARTERSVILLE	GA	00J240	WA48.00-2	119. DEFIANCE	OH	BI 87	BI88.21-3
38. BAY ST LOUIS	MS	000757	754.23-2	79. CATAWBA	SC	SG 331	SG330.57-2	120. DEMMLER	PA	BF 317	PLY14.44-3
39. BELLE ISLE	NY	QC 296	QC293.51-3	80. CAYUGA	IN	OZA141	ZA143.59-2	121. DESHLER OS	OH	BE 165	BI64.65-3
40. BENNING	DC	BAR 7	CFP115.10-3	81. CEICO	OH	QD 125	QD124.67-3	122. DIXIE	NC	SE 271	SE272.00-2
41. BENSENVILLE YARD	IL	DIH 20	CPE15.000-A	82. CENTRAL	FL	S 813	S812.40-2	123. DOTIKI	KY	OMF298	MF300.35-1

RTC NODES: TPIRR Peak Period Traffic Destination Stations

<u>City</u> (1)	<u>State</u> (2)	<u>MP</u> (3)	<u>RTC Node 1/</u> (4)	<u>City</u> (1)	<u>State</u> (2)	<u>MP</u> (3)	<u>RTC Node 1/</u> (4)	<u>City</u> (1)	<u>State</u> (2)	<u>MP</u> (3)	<u>RTC Node 1/</u> (4)
124. DOVER OS	SC	SG 395	SG393.15-2	165. HARPERS FERRY 1 INT	MD	BA 85	BA82.55-3	206. LAWRENCEVILLE	GA	SG 544	SG541.98-2
125. DUNKIRK	NY	QD 41	QD37.13-3	166. HARPSTER	OH	CD 56	CD54.87-2	207. LEWISBURG	TN	OBA241	BA238.92-2
126. EAST CHICAGO	IN	BIB 4	DC3.36-4	167. HAZLETON	IN	OZA248	ZA250.37-2	208. LIMA	OH	BE 131	BE132.71-4
127. EAST ST LOUIS	IL	QS 235	QS236.47-3	168. HB TOWER	MD	BAK 96	BAK95.80-1	209. LINDEN	IN	00Q137	Q136.88-2
128. EAST ST LOUIS ROSE LAKE	IL	QS 231	TRRA4.00-A	169. HENDERSON	KY	00H313	H313.02-2	210. LINDEN SIDING	IN	00Q138	Q136.88-2
129. EAST THOMAS	AL	000390	391.40-4	170. HILLSDALE OS	IN	OZA159	ZA155.24-2	211. LITHONIA	GA	YYG146	YYG146.02-2
130. EDGEMOOR	TN	00C255	C253.65-2	171. HOOPESTON	IL	00ZA99	ZA97.94-2	212. LOACHAPOKA	AL	XXB125	XXB123.42-2
131. EDGEWOOD	FL	SP 639	A647.96-2	172. HOOPOINT	FL	S 844	S843.50-3	213. LOCKPORT	NY	QDL 59	QDL58.74-2
132. ELBERTON	GA	SG 472	SG472.80-2	173. HOPEWELL	VA	SAC 23	SAC23.14-2	214. LOMAX	AL	000444	443.80-2
133. ELIZABETH	GA	00J264	WA21.20-3	174. HOWELLS TRANSFER	GA	SG 575	SG573.00-2	215. LORDSTOWN	OH	BG 89	BG89.90-3
134. EMERALD MINE	PA	QOW 0	WY4.70-3	175. HUGH	FL	S 663	S663.00-3	216. LOUISVILLE	KY	000006	8.10-9
135. ETOWAH	TN	00C334	C332.95-2	176. HYDE	TN	OKM208	C208.30-2	217. LOVERIDGE MINE	WV	QO 79	LR78.10-2
136. EVANSVILLE	IN	00H323	H323.20-3	177. INDIANAPOLIS	IN	OKC110	BD122.00-1	218. LYONS	NY	QC 335	QC336.09-3
137. EXERMONT	IL	QS 232	QS233.65-3	178. INDIANAPOLIS HAWTHO	IN	QIB 9	QIB6.70-2	219. MAGELLA	AL	000395	395.87-3
138. F TOWER	OH	BI 35	BI34.13-3	179. INDIANAPOLIS IU	IN	QI 284	BD122.00-1	220. MANCHESTER	GA	ANB788	ANB788.20-2
139. FAIRBURN	GA	XXB023	XXB20.10-4	180. IVORYDALE	OH	BE 7	BE9.00-3	221. MANCHESTER FIFTH AV	GA	ANJ788	ANB786.15-2
140. FALKVILLE	AL	000325	327.56-3	181. J TOWER	WV	BA 302	BA305.45-2	222. MARION	OH	CD 46	CD46.39-4
141. FAYETTEVILLE	NC	A 210	A209.26-3	182. JACKSON	TN	ONG152	NG152.35-2	223. MARION YARD	OH	QI 101	CD47.70-3
142. FEDERAL 2 MINE	WV	QOF 5	YN8.05-1	183. JACKSONVILLE	FL	A 640	A640.25-8	224. MARLBORO	VA	VA	CFP4.30-3
143. FIRESTONE	NC	A 133	A133.00-1	184. JACKSONVILLE EX IM	FL	S 633	ASK638.93-2	225. MARTINSBURG	WV	BA 100	BA99.80-1
144. FITZGERALD	GA	ANB659	ANB660.54-2	185. JACKSONVILLE FEC	FL	AJT 20	SP636.05-2	226. MARY LEE	AL	000387	384.90-3
145. FLINT RIVER	GA	ANB727	ANB727.70-2	186. JACKSONVILLE TOFC	FL	ASK638	ASK638.90-2	227. MAXTON	NC	SE 276	SE277.03-1
146. FLOMATON	AL	000608	607.77-3	187. jefferson	ga	GGM 12	WA4.00-3	228. MEDARYVILLE	IN	OQB103	QB10.30-1
147. FOLKSTON	GA	A 609	ANA617.55-2	188. JEFFERSONVILLE	IN	0BB015	LIRC7.25-2	229. MEMPHIS JCT	KY	000118	117.97-2
148. FOSTORIA	OH	BI 36	BI34.13-3	189. JESSUP	MD	BAA 16	BAA16.03-3	230. MEMPHIS PIGEON INDU	TN	00F387	F370.99-4
149. FOSTORIA TOWN ST	OH	CD 87	BI34.13-3	190. JOHNSTON YD MEMP IC	TN	00F385	MCN8.40-1	231. MEMPHIS TN YARD	TN	00F381	NI227.20-3
150. FREDERICKSBURG	VA	CFP 59	CFP58.74-4	191. JUNCTION CITY	GA	ANB762	ANB765.89-2	232. MILLER	IN	BI 241	BI241.25-3
151. GAITHERSBURG	MD	BA 22	BA20.72-3	192. K C JUNCTION	KY	CA 661	BE4.45-4	233. MOBILE	AL	000665	665.61-4
152. GALION	OH	QI 80	QI78.98-3	193. KAYNE AVENUE	TN	000187	185.98-3	234. MONON	IN	000Q88	Q88.18-2
153. GALLATIN	TN	000159	158.50-2	194. KELLAR SIDING OS	OH	BI 26	BI24.60-3	235. MONROE	NC	SF 306	SF306.10-2
154. GARRETT	IN	BI 128	BI127.92-4	195. KENNESAW	GA	00J257	WA26.02-2	236. MONROE YARD	NC	SF 307	SF306.10-2
155. GASTON	AL	ANJ940	ANJ938.62-2	196. KERRGLAS	NC	A 134	A133.89-1	237. MONTGOMERY	AL	000489	486.95-3
156. GAUTIER	MS	000710	711.39-2	197. KINGSTON	NY	QR 88	QR87.61-2	238. MURFREESBORO	TN	000J32	J32.36-1
157. GEORGIANA	AL	000548	549.14-2	198. KNOXVILLE	TN	00C277	C275.55-2	239. N WELDON CONNECTION	NC	A 81	A81.84-2
158. GRAFTON	WV	BA 280	BA278.00-1	199. KREOLE	MS	000703	702.73-2	240. NASHVILLE	TN	000190	BA193.70-3
159. GREEN SPRING	WV	BA 164	BA164.30-4	200. LAFAYETTE	IN	00Q120	NS118.80-2	241. NE EAST JUNCT CP	NC	SH 254	SH256.05-3
160. GREENWOOD	SC	SG 425	SG427.70-3	201. LAKELAND	FL	A 852	A853.73-2	242. NE VINITA CP	AL	0LB388	384.90-3
161. GUTHRIE	KY	00H216	H216.85-2	202. LAKELAND JCT OS	FL	AR 855	A851.96-2	243. NEVILLE ISLAND	PA	PLE 6	PLE6.90-3
162. HAMILTON	OH	BE 25	BE24.98-3	203. LAPAZ	IN	BI 190	BI190.76-3	244. NEW CASTLE	PA	BG 58	BG55.60-3
163. HAMLER	OH	BI 69	BI69.46-3	204. LATONIA	KY	00T105	BE4.45-4	245. NEW JOHNSONVILLE	TN	000N79	N80.08-2
164. HAMLET	NC	S 249	S248.05-3	205. LAURENS	SC	AK 553	AK554.47-3	246. NEW ORLEANS	LA	000801	800.80-3

RTC NODES: TPIRR Peak Period Traffic Destination Stations

<u>City</u> (1)	<u>State</u> (2)	<u>MP</u> (3)	<u>RTC Node 1/</u> (4)	<u>City</u> (1)	<u>State</u> (2)	<u>MP</u> (3)	<u>RTC Node 1/</u> (4)	<u>City</u> (1)	<u>State</u> (2)	<u>MP</u> (3)	<u>RTC Node 1/</u> (4)
247. NEW RIVER JCT	OH	BE 28	BE29.89-3	288. ROANOKE RAPIDS	NC	SA 83	SA80.00-1	329. STILESBORO	GA	SGC633	SGC631.20-1
248. NEWELL	PA	PLM 51	PLM51.89-3	289. ROCHESTER	NY	QC 371	QC367.98-3	330. SULLIVAN	IN	OZA204	ZA202.02-2
249. NIAGARA FALLS	NY	QDN 25	QDN28.10-2	290. ROCKINGHAM	NC	SF 260	SF259.47-2	331. SYRACUSE	NY	QC 285	QC283.95-3
250. NORTH BALTIMORE	OH	BI 51	BI52.78-3	291. ROCKPORT	FL	AZA882	AZA882.01-2	332. SYRACUSE MONTREAL J	NY	QC 291	QC285.85-3
251. NORTH BIRMINGHAM	AL	OLB390	390.30-3	292. ROCKWOOD	PA	BF 227	BF224.70-3	333. TAFT	FL	A 798	A797.62-2
252. NORTH COLLIER	VA	A 27	CFP4.30-3	293. ROCKY FACE	GA	00J184	WA103.95-2	334. TALLADEGA	AL	ANJ910	ANJ913.00-2
253. NORTH NEWARK	NY	QC 339	QC338.72-3	294. ROCKY MOUNT	NC	A 121	A122.25-3	335. TAMPA	FL	S 841	S841.40-3
254. O BANNON	KY	000T14	T18.03-IND	295. ROLL AVENUE CHICAGO	IL	DC 012	DC13.90-4	336. TERRE HAUTE	IN	OZA178	QS68.69-3
255. OAK ST NASHVILLE	TN	000189	187.10-9	296. ROTTERDAM JCT	NY	QG 39	QG39.35-3	337. TERRE HAUTE DUANE	IN	QS 71	QS68.42-3
256. OAKTOWN	IN	OZA220	ZA219.85-2	297. RT NO 30 DTC	OH	CD 73	CD65.29-2	338. THEODORE	AL	000680	680.30-3
257. OAKWORTH	AL	000309	310.01-2	298. RUSSELL	MD	QL 130	QL130.00-2	339. TRENTON	OH	BE 34	BE34.40-2
258. OGLETHORPE	GA	ANB728	ANB728.80-2	299. S END BROWN STREET	VA	S 21	SRN3.40-3	340. TUCKER	GA	SG 561	SG560.95-3
259. OHIO JCT	OH	BG 80	BG78.22-3	300. SALAK	SC	SG 428	SG427.70-4	341. TULLAHOMA	TN	000J69	J67.70-2
260. ONEAL	AL	000424	420.75-2	301. SALEM	IL	BC 268	UP252.75-3	342. UNION CITY	GA	ANB844	ANB844.50-2
261. ONECO	FL	AZA921	SW1.10-2	302. SANFORD	FL	A 765	A766.72-2	343. UNION CITY	IN	QI 198	QI198.04-3
262. ORANGEBURG	NY	QR 42	QR21.60-3	303. SAVOY	KY	00C191	C192.15-2	344. UPPER SANDUSKY	OH	CD 64	CD65.29-2
263. OVERPECK JUNCTION	OH	BE 31	BE28.250-3	304. SCHENECTADY	NY	QG 31	QG31.40-2	345. VARNONS	AL	000421	424.83-2
264. PA TOWER	MD	BAA 34	BAA35.50-1	305. SE PALMER	GA	A708	SG536.72-2	346. VINCENNES	IN	OZA235	ZA233.06-2
265. PALATKA	FL	A 698	A697.31-2	306. SEALSTON	VA	CFD 4	CFQ9.15-1	347. W R O JCT	IN	OZA150	ZA149.19-2
266. PARIS	KY	OKC190	KC80.70-2	307. SELKIRK	NY	QG 15	QG11.80-11	348. WADESBORO	NC	SF 278	SF278.00-2
267. PARIS ROAD XOVER	LA	000796	794.83-3	308. SELKIRK SK	NY	QG 11	QG11.80-11	349. WALMORE	NY	QDN 23	QDL70.30-2
268. PARKTON	NC	A 223	A221.95-2	309. SENECA	NY	QD 4	QD4.44-3	350. WANNEE JCT	FL	S 681	S681.15-4
269. PARR	IN	000Q66	Q65.45-2	310. SEYMOUR	IN	BC 87	BC87.02-2	351. WANSFORD	IN	OZA284	ZA282.25-2
270. PASCAGOULA	MS	000707	706.41-2	311. SHELburn	IN	OZA199	ZA198.30-2	352. WATERLOO SIDING	SC	AK 544	AK543.33-2
271. PATIO	KY	OKC207	KC96.62-4	312. SHERM SIDING	GA	SG 508	SG506.83-3	353. WAUHATCHIE	TN	00J146	J146.30-4
272. PECAN	FL	A 695	A697.31-2	313. SHORTERS	AL	XXB152	XXB151.60-2	354. WAYCROSS	GA	AN 587	AN590.70-4
273. PEMBROKE	NC	A 241	A244.80-2	314. SIDNEY	OH	QI 164	BE99.16-3	355. WAYCROSS S WYE OS	GA	AN 589	ANA589.40-3
274. PITTSBURGH	PA	BFA328	PLE4.70-3	315. SINKS	KY	00C137	KC149.40-2	356. WELDON	NC	A 83	A88.88-2
275. PLEASANT RIDGE	IN	000Q77	Q77.32-2	316. SMYRNA	TN	000J20	J20.63-2	357. WEST ASHTABULA	OH	QD 130	QD128.26-3
276. POINT OF ROCKS	MD	BA 64	BA41.09-4	317. SOCIAL CIRCLE	GA	YYG119	YYG118.18-2	358. WEST DESHLER	OH	BI 73	BI62.60-3
277. PORT DCS BLOCK	NY	QDL 61	QDL58.74-2	318. SOUTH ALICE	AL	000394	391.40-4	359. WEST STOCK YARD	NY	QC 437	QC434.85-11
278. POWER PARK	FL	SO 630	SO632.25-2	319. SOUTH ANDERSON YARD	IN	QI 247	QI248.50-5	360. WHEELWRIGHT	VA	SAC 12	SAC9.95-3
279. PRINCETON	IN	OZA259	ZA259.10-4	320. SOUTH BIRMINGHAM	AL	000392	392.52-11	361. WIDOWS CREEK	AL	00J119	J120.15-4
280. RA JUNCTION	IL	OZA120	ZA120.96-3	321. SOUTH LAKE LAND	FL	A 853	A853.73-2	362. WILDWOOD	FL	S 761	S766.02-2
281. RADNOR YARD	TN	BA 191	BA193.70-4	322. SOUTH PEMBROKE	NC	A 243	A244.80-2	363. WILLARD	OH	BG 204	BI0.93-4
282. RENSSELAER	IN	000Q73	Q72.65-3	323. SOUTH SCHENECTADY	NY	QG 33	QG31.40-2	364. WILLARD WEST	OH	BG 203	BI3.00-13
283. REYNOLDS	IN	000Q96	Q96.40-2	324. SOUTH WELDON	NC	A 85	A88.88-2	365. WILLOW CREEK OS	IN	BI 237	BI237.98-3
284. RICHMOND ACCA	VA	CFP023	CFP2.05-3	325. SOUTH WEST NYACK	NY	QR 23	QR21.60-3	366. WILSON	NC	A 136	A137.16-3
285. RIDGEWAY	OH	QI 125	QI122.56-3	326. ST JOE	IN	BI 116	BI116.18-3	367. WINSTON	FL	AY 856	AY858.50-1
286. RINGO	IN	QS 72	QS69.66-3	327. STARKE	fl	S 676	S681.15-4	368. WINSTON YARD	FL	AY 856	AY858.50-2
287. RIVERDALE	IL	DC 11	DC13.90-4	328. STEVENSON	AL	00J113	J111.68-2	369. WORTHVILLE	KY	000T54	T54.42-2
								370. YOUNG	IN	OZA186	ZA187.00-2

1/ Source: TPI RTC Models.

TAB 4

RTC NODES: TPIRR Peak Period Traffic Interchange Locations

Cty 1/ (1)	From		From MP 1/ (4)	To Prefix 1/ (5)	To MP 1/ (6)	Length (miles) 1/ (7)	From Node 2/ (8)	To Node 2/ (9)	TPIRR Yard Name 1/ (10)
	State 1/ (2)	Prefix 1/ (3)							
1. Akron	OH	BG	129.40	BG	128.47	0.93	BG129.45-1	BG128.47-1	Akron Interchange
2. Aliquippa	PA	PLE	20.40	4/	4/	0.95	PLE18.45-2	PLE22.95-2	Aliquippa Interchange
3. Ansley	MS	000	763.25	000	764.45	1.20	763.25-1	764.45-1	Ansley Interchange
4. Ansonia	OH	QI	191.25	QI	189.93	1.32	QI191.25-1	QI189.93-1	Ansonia Interchange
5. Barberton	OH	BG	137.60	BG	136.70	0.90	BG137.60-1	BG136.70-1	Barberton Interchange
6. Bardstown Jct.	KY	000	20.90	000	22.05	1.15	20.90-1	22.05-1	Bardstown Jct. Interchange
7. Barnett	GA	YYG	58.30	4/	4/	0.95	YYG57.75-1	YYG58.25-1	Barnett Interchange
8. Batavia	NY	QC	404.70	4/	4/	0.95	QC402.46-1	QC406.62-1	Batavia Interchange
9. Beech Island	SC	AK	454.00	AK	452.10	1.90	AK452.10-1	AK454.00-1	Beech Island Interchange
10. Buffalo / CP Draw	NY	QD	1.70	4/	4/	0.95	QD1.70-2	QD1.66-2	Buffalo / CP Draw Interchange
11. Cherry Run	WV	BA	115.30	BA	114.03	1.27	BA115.30-2	BA114.03-2	Cherry Run Interchange
12. Colesburg	TN	00N	39.40	4/	4/	0.95	N38.80-1	N39.80-1	Colesburg Interchange
13. Conneaut	OH	QD	114.60	4/	4/	0.95	QD114.55-2	QD114.67-2	Conneaut Interchange
14. Contentnea 3/	NC	A	139.00	4/	4/	1.90	A137.10-1	A138.72-1	Contentnea Interchange
15. Crawfordsville 3/	IN	00Q	147.40	4/	4/	1.90	Q145.12-1	Q147.72-1	Crawfordsville Interchange
16. Danville	IL	OZA	120.94	OZA	122.90	1.96	ZA120.94-1	ZA122.90-1	Danville Interchange
17. Defiance	OH	BI	88.00	4/	4/	0.95	BI87.95-2	BI88.26-2	Defiance Interchange
18. Dixie	NC	SE	269.96	SE	272.05	2.09	SE269.96-1	SE272.05-1	Dixie Interchange
19. Dossett	TN	00C	250.00	4/	4/	1.90	C252.20-1	C254.97-1	Dossett Interchange
20. Doswell	VA	CFP	21.80	4/	4/	1.90	CFP21.80-2	CFP21.85-2	Doswell Interchange
21. Dover	SC	SG	394.90	4/	4/	1.90	SG394.90-1	SG392.85-3	Dover Interchange
22. E. Chester (L&C Connection)	SC	SG	346.30	4/	4/	0.95	SG347.44-1	SG349.56-1	E. Chester (L&C Connection) Interchange
23. East Curtis	IN	BI	248.18	BI	246.37	1.81	BI248.18-1	BI246.37-1	East Curtis Interchange
24. Effingham	IL	QS	141.75	QS	140.60	1.15	QS141.75-1	QS140.60-1	Effingham Interchange
25. Elizabeth	GA	OWA	23.25	OWA	21.25	2.00	WA23.25-1	WA21.15-1	Elizabeth Interchange
26. Erie Station	PA	QD	86.90	4/	4/	0.95	QD83.21-2	QD87.37-2	Erie Station Interchange
27. Fayetteville	NC	A	210.60	4/	4/	0.95	A207.90-1	A209.31-1	Fayetteville Interchange
28. Folkston	GA	A	602.20	4/	4/	1.90	A602.72-1	A605.050-1	Folkston Interchange
29. Green Spring	WV	BA	166.20	BA	164.25	1.95	BA166.21-2	BA164.24-2	Green Spring Interchange
30. Greencastle	IN	QS	39.27	QS	38.20	1.07	QS39.27-1	QS38.20-1	Greencastle Interchange
31. Greenville	IL	QS	190.30	4/	4/	0.95	QS186.37-1	QS189.46-1	Greenville Interchange
32. Greenwich	OH	BG	195.08	BG	192.90	2.18	BG195.08-1	BG192.90-1	Greenwich Interchange
33. Guthrie	KY	00H	215.80	00H	215.32	0.48	H215.90-1	H215.32-1	Guthrie Interchange
34. Hamler	OH	BI	71.00	BI	69.40	1.60	BI71.00-2	BI69.40-2	Hamler Interchange
35. Harpers Ferry	WV	BA	81.30	4/	4/	1.90	BA80.50-1	BA82.55-3	Harpers Ferry Interchange
36. Henderson 3/	KY	00H	312.45	4/	4/	1.90	H311.88-1	H313.08-1	Henderson Interchange
37. Hillsdale	IN	OZA	154.02	OZA	155.29	1.27	ZA154.02-1	ZA155.29-1	Hillsdale Interchange
38. Holton	TN	00C	206.00	4/	4/	1.90	C206.00-1	C206.40-1	Holton Interchange
39. Hopewell	VA	SAC	23.30	4/	4/	0.95	SAC22.38-1	SAC23.19-1	Hopewell Interchange
40. Humboldt	TN	00F	294.70	4/	4/	0.95	F294.62-1	F294.90-1	Humboldt Interchange
41. Indianapolis / Dale Siding	IN	QSL	1.48	QSL	4.00	2.52	QSL1.48-1	QSL4.00-1	Indianapolis / Dale Siding Interchange
42. Indianapolis 3/	IN	BD	122.00	4/	4/	1.90	BD122.00-1	BD123.20-1	Indianapolis Interchange
43. Jefferson	GA	GGM	15.60	4/	4/	1.90	GGM15.60-1	SG507.80-2	Jefferson Interchange
44. KC Jct.	KY	CA	662.60	4/	4/	1.90	CA662.60-2	CA663.62-2	KC Jct. Interchange
45. Lakeland 3/	FL	AR	856.50	4/	4/	1.90	A851.90-1	A856.15-1	Lakeland Interchange
46. Landover	MD	QL	130.85	QL	128.80	2.05	QL130.85-1	QL130.00-1	Landover Interchange
47. Laurens Wye	SC	AK	554.60	4/	4/	0.95	AK552.76-1	AK554.47-1	Laurens Wye Interchange
48. Magella	AL	000	394.52	000	395.92	1.40	394.52-2	395.92-2	Magella Interchange
49. Martinsburg	WV	BA	101.55	BA	99.75	1.80	BA101.55-1	BA99.75-1	Martinsburg Interchange
50. Memphis Jct.	KY	000	117.99	000	116.94	1.05	117.99-1	116.94-1	Memphis Jct. Interchange
51. N. Englewood	TN	00C	326.40	4/	4/	0.95	C326.39-1	C327.95-1	N. Englewood Interchange
52. N. Savoy	KY	00C	190.80	00C	192.20	1.40	C190.80-1	C192.20-1	N. Savoy Interchange
53. New River Junction	OH	BE	29.96	BE	28.20	1.76	BE29.96-2	BE28.20-2	New River Junction Interchange
54. Newark	NY	QC	341.00	QC	340.35	0.65	QC341.00-1	QC340.35-1	Newark Interchange
55. Niagara Falls	NY	QDN	28.20	4/	4/	0.95	QDN22.70-1	QDN28.15-1	Niagara Falls Interchange
56. North Vernon	IN	BC	73.70	BC	72.30	1.40	BC73.70-1	BC72.35-1	North Vernon Interchange
57. Oneco	FL	AZA	916.64	AZA	917.56	0.92	AZA916.64-1	AZA917.56-1	Oneco Interchange
58. Paris	KY	OKC	80.64	OKC	84.68	4.04	KC80.64-1	KC84.68-1	Paris Interchange
59. Pascagoula	MS	000	706.80	4/	4/	1.90	705.17-1	706.47-1	Pascagoula Interchange
60. Patty	TN	00C	343.65	00C	344.75	1.10	C343.65-1	C344.75-1	Patty Interchange

RTC NODES: TPIRR Peak Period Traffic Interchange Locations

City 1/ (1)	From		From MP 1/ (4)	To Prefix 1/ (5)	To MP 1/ (6)	Length (miles) 1/ (7)	From Node 2/ (8)	To Node 2/ (9)	TPIRR Yard Name 1/ (10)
	State 1/ (2)	Prefix 1/ (3)							
61. Pine Junction 3/	IN	DC	0.00	4/	4/	1.90	DC0.00-2	DC0.22-2	Pine Junction Interchange
62. Pittsburgh (P & OV Jct.)	PA	PLE	6.95	PLE	5.95	1.00	PLE6.95-2	PLE5.95-2	Pittsburgh (P & OV Jct.) Interchange
63. Pittsburgh (PLE 0.0 = PLY 0.0)	PA	PLE	1.35	PLE	0.70	0.65	PLE1.35-1	PLE0.70-1	Pittsburgh (PLE 0.0 = PLY 0.0) Interchange
64. Pittsburgh / McKees Rocks	PA	PLE	4.75	PLE	3.65	1.10	PLE4.75-2	PLE3.65-2	Pittsburgh / McKees Rocks Interchange
65. Plant City	FL	S	820.59	S	823.10	2.51	S820.59-1	S821.60-2	Plant City Interchange
66. Point of Rocks	MD	BA	42.80	BA	41.04	1.76	BA42.80-1	BA41.04-1	Point of Rocks Interchange
67. Reynolds	IN	OOQ	95.80	4/	4/	0.95	Q96.14-1	Q97.50-1	Reynolds Interchange
68. Rockwood 3/	PA	BF	226.80	4/	4/	1.90	BF226.45-2	BF224.70-3	Rockwood Interchange
69. Rotterdam Jct.	NY	QG	40.23	QG	39.30	0.93	QG40.23-1	QG39.30-1	Rotterdam Jct. Interchange
70. S. Bridgeport	AL	OOJ	122.30	4/	4/	1.90	J120.90-2	J121.85-2	S. Bridgeport Interchange
71. S. Georgiana	AL	000	549.10	4/	4/	0.95	S47.18-1	549.20-1	S. Georgiana Interchange
72. S. Oglethorpe	GA	ANB	728.83	ANB	727.60	1.23	ANB728.83-1	ANB727.58-1	S. Oglethorpe Interchange
73. S. Tullahoma	TN	OOJ	69.20	4/	4/	1.90	J67.65-1	J67.91	S. Tullahoma Interchange
74. Selma	NC	A	160.80	A	161.90	1.10	A160.80-1	A161.94-1	Selma Interchange
75. Sinks	KY	OKC	151.60	4/	4/	1.90	KC149.35-1	C138.25-1	Sinks Interchange
76. Social Circle	GA	YYG	119.40	4/	4/	0.95	YYG118.12-1	YYG120.04-1	Social Circle Interchange
77. Starke 3/	FL	S	679.10	4/	4/	1.90	S679.10-1	S681.15-4	Starke Interchange
78. Sullivan	IN	OZA	204.40	4/	4/	0.95	ZA201.69-1	ZA203.64-1	Sullivan Interchange
79. Talladega	AL	ANJ	910.90	4/	4/	1.90	ANJ911.73-1	ANJ913.82-1	Talladega Interchange
80. Terre Haute (INRD Belt)	IN	OZA	181.10	4/	4/	0.95	ZA179.35-1	ZA182.18-1	Terre Haute (INRD Belt) Interchange
81. Tiffin	OH	BI	26.53	BI	24.55	1.98	BI26.53-2	BI24.55-2	Tiffin Interchange
82. Utica / CP 235	NY	QC	237.85	QC	235.33	2.52	QC237.85-1	QC235.33-1	Utica / CP 235 Interchange
83. Vine Hill	TN	000	189.30	4/	4/	0.95	187.35-1	189.30-1	Vine Hill Interchange
84. W. Black Lane	IL	QS	233.75	QS	231.75	2.00	QS233.75-2	QS231.75-2	W. Black Lane Interchange
85. Wadesboro (W. S. Jct.)	NC	SF	278.39	SF	277.31	1.08	SF278.39-1	SF277.31-1	Wadesboro (W. S. Jct.) Interchange
86. Wartrace	TN	OOJ	55.00	4/	4/	1.90	J53.85-1	J55.72-1	Wartrace Interchange
87. Warwick	OH	BG	143.80	4/	4/	0.95	BG144.04-1	BG146.72-1	Warwick Interchange
88. Weldon Connection	NC	A	81.10	4/	4/	1.90	A81.10-2	A79.10-3	Weldon Connection Interchange
89. Wellington	OH	QJ	46.28	QJ	44.80	1.48	QJ46.28-1	QJ44.80-1	Wellington Interchange
90. Wellsboro	IN	BI	213.80	4/	4/	0.95	BI213.80-1	BI214.05-1	Wellsboro Interchange
91. Willoughby	TN	00C	274.35	00C	275.60	1.25	C274.35-1	C275.60-1	Willoughby Interchange
92. Willow Creek 3/	IN	BI	236.40	4/	4/	1.90	BI236.62-1	BI238.03-1	Willow Creek Interchange
93. Winchester / N Cabin	KY	OKC	96.00	4/	4/	1.90	KC96.57-2	KC98.67-2	Winchester / N Cabin Interchange
94. Winchester / Patio	KY	OKC	97.10	4/	4/	1.90	KC96.57-2	KC98.67-2	Winchester / Patio Interchange
95. Youngstown	OH	BG	76.90	BG	75.58	1.32	BG76.90-2	BG75.58-2	Youngstown Interchange
96. Youngstown / Ohio Jct.	OH	BG	79.55	BG	78.20	1.35	BG79.56-2	BG78.18-2	Youngstown / Ohio Jct. Interchange

1/ Source: Rebuttal e-Workpaper "TPIRR Route Miles Rebuttal Grading.xlsx."

2/ Source: TPI RTC Models.

3/ Addition in CSXT Reply Accepted in TPI Rebuttal

4/ Mileposts not listed in Rebuttal e-Workpaper "TPIRR Yard Matrix Rebuttal Grading.xlsx"

TAB 5

RTC NODES: TPIRR Customer Lead Tracks

<u>City 1/</u>	<u>State 1/</u>	<u>Prefix 1/</u>	<u>MP 1/</u>	<u>From Node 2/</u>	<u>To Node 2/</u>	<u>TPIRR Yard Name 1/</u>
(1)	(2)	(3)	(4)	(5)	(6)	(7)
1. Baltimore	MD	BAO	0.00	BAO0.00-1	BAO3.25-1	Curtis Bay Extension
2. Camak	GA	YYG	46.10	YYG46.90-1	YYG48.30-1	Camak Lead
3. Cartersville	GA	00C	418.90	C418.82-2	C416.00-2	Wyvern Lead
4. Elizabethtown	KY	000	42.80	40.32-1	43.62-1	Elizabethtown Lead
5. Henderson	KY	00H	311.80	H311.88-1	H313.08-1	Henderson Lead
6. Jackson	TN	ONG	143.00	NG152.00-1	NG152.35-2	Jackson Lead
7. Jacksonville	FL	ASK	640.40	ASK636.65-1	ASK638.95-1	Adcom Spur
8. Jessup	MD	BAA	16.30	BAA15.77-1	BAA14.52-3	Jessup Lead
9. Lewisburg	TN	OBA	239.60	BA238.86-1	BA240.23-1	Lewisburg Spur
10. Lithonia	GA	YYG	148.40	YYG145.96-1	YYG147.80-1	Lithonia Lead
11. Louisville	KY	000	5.00	2.92-1	4.90-3	Louisville Lead
12. Michoud	LA	000	793.20	793.30-2	794.86-2	Michoud Lead
13. Montgomery	AL	000	488.00	490.00-3	492.70-3	SL Lead
14. Nashville	TN	00N	2.90	N0.73-1	N2.98-1	ONW Spur
15. Nashville	TN	000	185.00	185.91-1	187.16-1	Front Street Spur
16. New Johnsonville	TN	00N	77.50	N78.26-1	N80.14-1	New Johnson Lead
17. Niagara	NY	QDN	25.00	QDN22.70-1	QDN28.15-1	Niagara Lead
18. Palmetto	FL	AZA	914.60	AZA913.30-1	AZA913.91-1	Palmetto Lead
19. Pasgagoula	MS	000	703.00	705.17-1	706.47-1	Pascagoula Lead
20. Patio	KY	OKC	96.10	KC96.57-2	KC98.67-2	Winchester Lead
21. Sidney	OH	QI	166.20	QI163.76-1	QI164.56-1	Sidney Lead
22. Starke	FL	S	679.70	S679.10-1	S681.15-4	Starke Lead
23. Sutton	FL	AZA	882.10	AZA881.95-1	AZA883.34-1	Sutton Lead
24. Theodore	AL	000	679.30	679.33-1	679.55-1	Theodore / Degussa Lead

1/ Source: Rebuttal e-Workpaper "TPIRR Yard Matrix Rebuttal Grading.xlsx" - TPIRR Yards Level

2/ Source: TPI RTC Models.

TAB 6

RTC NODES: Random Outages

CSKT Reply RTC Permit Number (1)	TPI Rebuttal RTC Permit Number (2)	Subdivision (3)	Beginning RTC Node (4)	Ending RTC Node (5)	Beginning MP (6)	Ending MP (7)	Day (8)	Start Time		Duration In Minutes (11)	Description (12)	Outages Excluded from TPI Rebuttal RTC / (13)
								DD:HH:MM:SS (9)	DD:HH:MM:SS (10)			
1.	87	Abbeville	SG452.90-1	SG453.76-1	453.35	453.55	8	8:03:13:00	8:04:13:00	60	SWITCH PROBLEMS	
2.	88	Abbeville	SG534.43-1	SG534.81-1	534.6	534.8	5	5:10:05:00	5:12:01:00	116	TRACK CONDITION	
3.	89	Abbeville	SG534.43-1	SG534.81-1	534.6	534.8	9	9:14:15:00	9:15:00:00	45	TRACK CONDITION	
4.	90	Abbeville	SG536.02-1	SG537.60-1	536.7	536.9	12	12:12:02:00	12:12:33:00	31	TRACK CONDITION	
5.	91	Abbeville	SG536.02-1	SG537.60-1	536.7	536.9	6	6:15:06:00	6:15:51:00	45	TRACK CONDITION	
6.	92	Abbeville	SG537.90-1	SG538.17-1	537.9	538.1	5	5:20:18:00	5:20:48:00	30	TRACK CONDITION	
7.	93	Abbeville	SG537.90-1	SG538.17-1	537.9	538.1	7	7:01:50:00	7:02:26:00	36	TRACK CONDITION	
8.	94	Abbeville	SG537.90-1	SG538.17-1	537.9	538.1	7	7:19:40:00	7:20:08:00	28	TRACK CONDITION	
9.	95	Abbeville	SG539.70-1	SG539.93-1	539.7	539.9	12	12:14:46:00	12:15:20:00	34	STICKING CAR BR	
10.	96	Abbeville	SG539.70-1	SG539.93-1	539.7	539.9	6	6:23:28:00	6:23:48:00	20	TRACK CONDITION	
11.	97	Abbeville	SG542.80-1	SG543.70-1	542.85	543.05	11	11:12:12:00	11:14:11:00	119	TRACK CONDITION	
12.	98	Abbeville	SG542.80-1	SG543.70-1	542.85	543.05	4	4:14:07:00	4:15:48:00	101	TRACK CONDITION	
13.	99	Atlanta Term OWA	WA6.42-1	WA7.25-1	6.5	6.7	11	11:00:22:00	11:01:28:00	66	UNKNOWN	
14.	100	Atlanta Term OWA	WA6.42-1	WA7.25-1	6.5	6.7	11	11:07:08:00	11:10:42:00	214	TRACK CONDITION	
15.	101	Atlanta Term OWA	WA6.42-1	WA7.25-1	6.5	6.7	11	11:15:19:00	11:16:33:00	74	TRACK CONDITION	
16.	102	Atlanta Term OWA	WA6.42-1	WA7.25-1	6.5	6.7	12	12:06:53:00	12:07:11:00	18	TRACK CONDITION	
17.	103	Atlanta Term OWA	WA6.42-1	WA7.25-1	6.5	6.7	6	6:09:56:00	6:10:38:00	42	TRACK CONDITION	
18.	104	Atlanta Term OWA	WA6.42-1	WA7.25-1	6.5	6.7	9	9:03:06:00	9:03:56:00	50	TRACK CONDITION	
19.	105	Atlanta Term OWA	WA16.55-1	WA17.71-1	17.5	17.7	4	4:03:49:00	4:04:18:00	29	DD/NOTHING FOUN	
20.	106	Atlanta Term OWA	WA21.90-1	WA22.20-1	21.9	22.1	6	6:03:13:00	6:04:22:00	69	UNDESIRED EMERG	
21.	107	Atlanta Term SG	SG561.24-1	SG562.93-1	562.15	562.35	10	10:01:13:00	10:01:35:00	22	TRACK CONDITION	
22.	108	Atlanta Term SG	SG561.24-1	SG562.93-1	562.15	562.35	12	12:12:02:00	12:12:35:00	33	SWITCH PROBLEMS	
23.	109	Atlanta Term SG	SG561.24-1	SG562.93-1	562.15	562.35	12	12:13:41:00	12:14:02:00	21	TRACK CONDITION	
24.	84	AWP W of A	XX822.31-1	XX822.65-1	22.4	22.6	12	12:23:40:00	12:23:57:00	17	TRACK CONDITION	
25.	85	AWP W of A	XX881.46-1	XX882.20-1	81.9	82.1	5	5:13:42:00	5:13:58:00	16	TRACK CONDITION	
26.	86	AWP W of A	XX8112.35-1	XX8113.55-1	112.9	113.1	9	9:07:38:00	9:08:41:00	63	SWITCH PROBLEMS	
27.	2/	Baltimore Terminal	2/	2/	BACS.9	BACS.1	10	10:18:39:00	12:02:00:00	1881	TRACK CONDITION	Adjacent/Parallel to SARR
28.	3/	Baltimore Terminal	3/	3/	BACS.9	BACS.1	7	7:12:54:00	7:15:07:00	133	TRACK CONDITION	Adjacent/Parallel to SARR
29.	326	Barr BI	BI239.16-1	BI240.40-1	239.2	239.4	7	7:22:48:00	8:01:50:00	182	TRACK CONDITION	
30.	327	Barr BI	BI245.68-1	BI246.40-1	246.2	246.4	10	10:05:55:00	10:06:24:00	29	OTHER	
31.	328	Barr DC	DC2.38-1	DC2.74-1	2.5	2.7	3	3:00:24:00	3:00:42:00	18	OTHER	
32.	329	Barr DC	DC2.38-1	DC2.74-1	2.5	2.7	3	3:04:59:00	3:07:40:00	161	OTHER	
33.	330	Barr DC	DC10.02-1	DC10.57-1	10.35	10.55	5	5:11:04:00	5:11:33:00	29	TRACK CONDITION	
34.	331	Barr DC	DC11.27-1	DC11.50-1	11.29	11.49	11	11:03:20:00	11:03:53:00	33	OTHER	
35.	332	Barr DC	DC13.42-2	DC14.35-2	13.8	14	11	11:15:52:00	11:16:11:00	19	TRACK CONDITION	
36.	333	Barr DC	DC13.42-2	DC14.35-2	13.8	14	9	9:10:40:00	9:10:56:00	16	SWITCH PROBLEMS	
37.	334	Blue Island	DC13.42-2	DC14.35-2	14.01	14.21	12	12:18:56:00	12:19:47:00	51	TRACK CONDITION	
38.	335	Blue Island	DC21.20-1	DC22.81-1	22.4	22.6	4	4:19:41:00	4:21:25:00	104	TRACK CONDITION	
39.	336	Blue Island	DC22.87-1	DC23.14-1	22.91	23.11	11	11:19:08:00	11:19:37:00	29	TRACK CONDITION	
40.	337	Blue Island	DC22.87-1	DC23.14-1	22.91	23.11	12	12:19:05:00	12:20:41:00	96	TRACK CONDITION	
41.	338	Blue Island	DC22.87-1	DC23.14-1	22.91	23.11	3	3:11:57:00	3:12:31:00	34	TRACK CONDITION	
42.	339	Blue Island	DC22.87-1	DC23.14-1	22.91	23.11	4	4:23:21:00	4:23:50:00	29	TRACK CONDITION	
43.	340	Blue Island	DC24.00-1	DC25.44-1	24.4	24.6	12	12:18:01:00	12:18:22:00	21	TRACK CONDITION	
44.	341	Blue Island	DC24.00-1	DC25.44-1	24.4	24.6	7	7:18:35:00	7:19:19:00	44	TRACK CONDITION	
45.	342	Blue Island	DC24.00-1	DC25.44-1	24.4	24.6	9	9:08:58:00	9:09:35:00	37	TRACK CONDITION	
46.	343	Blue Island	DC27.50-1	DC28.60-1	27.9	28.1	5	5:22:57:00	6:01:14:00	137	TRACK CONDITION	
47.	110	Boyles Terminal	383.12-1	383.64-1	383.4	383.6	4	4:13:27:00	4:14:36:00	69	TRACK CONDITION	
48.	111	Boyles Terminal	383.12-1	383.64-1	383.4	383.6	9	9:19:35:00	9:19:57:00	22	TRACK CONDITION	
49.	112	Boyles Terminal	384.95-1	386.75-1	386	386.2	10	10:01:52:00	10:02:10:00	18	TRACK CONDITION	
50.	113	Boyles Terminal	384.95-1	386.75-1	386	386.2	9	9:21:28:00	9:23:08:00	100	TRACK CONDITION	
51.	114	Boyles Terminal	384.95-1	386.75-1	386.4	386.6	10	10:06:15:00	10:06:32:00	17	TRACK CONDITION	
52.	115	Boyles Terminal	392.22-1	393.53-1	393.3	393.5	10	10:02:54:00	10:03:11:00	17	TRACK CONDITION	
53.	317	Bridgeport	BA278.00-1	BA280.15-1	280	280.2	5	5:02:16:00	5:02:37:00	21	TRACK CONDITION	
54.	318	Bridgeport	BA278.00-1	BA280.15-1	280	280.2	9	9:08:22:00	9:08:50:00	28	TRACK CONDITION	
55.	319	Bridgeport	BA280.35-2	BA280.90-2	280.4	280.6	11	11:11:08:00	11:11:24:00	16	TRACK CONDITION	
56.	320	Bridgeport	BA281.52-2	BA282.00-2	281.52	281.72	4	4:05:24:00	4:05:49:00	25	TRACK CONDITION	
57.	321	Bridgeport	BA281.52-2	BA282.00-2	281.52	281.72	8	8:03:52:00	8:05:55:00	123	TRACK CONDITION	
58.	322	Bridgeport	BA291.45-1	BA293.97-1	292	292.2	6	6:22:21:00	6:22:45:00	24	TRACK CONDITION	
59.	323	Bridgeport	BA300.83-1	BA301.50-1	301.3	301.5	7	7:01:29:00	7:04:29:00	180	MISCELLANEOUS D	
60.	622	Bruceton	N38.87-1	N39.55-1	38.9	39.1	8	8:17:30:00	8:17:49:00	19	TRACK CONDITION	
61.	623	Bruceton	N62.77-1	N63.42-1	62.9	63.1	7	7:19:21:00	7:19:43:00	22	TRACK CONDITION	
62.	624	Bruceton	N84.73-1	N88.53-1	86.9	87.1	7	7:09:08:00	7:09:32:00	24	TRACK CONDITION	
63.	1	Buffalo Terminal QC	QC432.85-1	QC434.20-1	433.63	433.83	7	7:06:37:00	7:06:53:00	16	SWITCH PROBLEMS	
64.	2	Buffalo Terminal QC	QC432.85-1	QC434.20-1	433.63	433.83	8	8:09:42:00	8:10:19:00	37	SWITCH PROBLEMS	
65.	625	C E and D	ZA193.70-1	ZA195.92-1	194.9	195.1	6	6:07:12:00	6:09:14:00	122	OTHER	
66.	626	C E and D	ZA236.11-1	ZA236.95-1	236.75	236.95	3	3:10:42:00	3:11:41:00	59	TRACK CONDITION	
67.	627	C E and D	ZA259.72-1	ZA260.17-1	259.9	260.1	6	6:22:22:00	6:22:59:00	37	TRACK CONDITION	
68.	628	C E and D	ZA261.81-1	ZA262.29-1	261.9	262.1	8	8:16:34:00	8:16:53:00	19	TRACK CONDITION	
69.	629	C E and D	ZA261.81-1	ZA262.29-1	261.9	262.1	9	9:16:29:00	9:17:24:00	55	TRACK CONDITION	
70.	204	Capital	BAA6.81-1	BAA9.20-1	6.9	7.1	10	10:06:56:00	10:07:45:00	49	TRACK CONDITION	
71.	205	Capital	BAA6.81-1	BAA9.20-1	6.9	7.1	11	11:21:26:00	12:05:24:00	478	TRACK CONDITION	
72.	206	Capital	BAA6.81-1	BAA9.20-1	6.9	7.1	4	4:21:55:00	4:22:12:00	17	TRACK CONDITION	
73.	207	Capital	BAA6.81-1	BAA9.20-1	6.9	7.1	8	8:02:17:00	8:03:11:00	54	TRACK CONDITION	
74.	208	Capital	BAA6.81-1	BAA9.20-1	6.9	7.1	8	8:07:16:00	8:08:06:00	50	TRACK CONDITION	
75.	209	Capital	BAA16.45-1	BAA17.70-1	17.5	17.7	8	8:23:15:00	8:23:35:00	20	TRACK CONDITION	
76.	210	Capital	BAA28.08-1	BAA30.35-1	28.9	29.1	3	3:21:09:00	3:22:54:00	105	DD/NOTHING FOUN	
77.	211	Capital	BAA28.08-1	BAA30.35-1	28.91	29.11	5	5:19:03:00	5:19:38:00	35	UNDESIRED EMERG	
78.	212	Capital	BAA32.78-1	BAA33.58-1	32.9	33.1	12	12:16:36:00	12:17:51:00	75	TRAIN SEPARATIO	
79.	4/	Capital CFP	4/	4/	CFPA11.93	CFPA12.13	12	12:17:38:00	12:20:24:00	166	OTHER	Adjacent/Parallel to SARR
80.	116	Cartersville	SGC639.85-1	SGC640.10-1	639.9	640.1	5	5:13:27:00	5:15:05:00	98	TRACK CONDITION	
81.	3	Castleton	QR132.55-1	QG11.61-1	11.4	11.6	11	11:04:38:00	11:06:24:00	106	TRACK CONDITION	
82.	4	Castleton	QR132.55-1	QG11.61-1	11.4	11.6	4	4:03:10:00	4:03:37:00	27	TRACK CONDITION	
83.	5	Castleton	QR132.55-1	QG11.61-1	11.4	11.6	5	5:11:04:00	5:11:24:00	20	TRACK CONDITION	
84.	42	CC	KC9.85-1	KC10.08-1	9.8	10	6	6:07:42:00	6:07:58:00	16	TRACK CONDITION	
85.	43	CC	KC9.85-1	KC10.08-1	9.8	10	6	6:21:28:00	6:22:01:00	33	DD/NOTHING FOUN	
86.	44	CC	KC13.72-1	KC14.30-1	14.1	14.3	6	6:03:08:00	6:03:33:00	25	TRACK CONDITION	
87.	45	CC	KC45.91-1	KC47.50-1	46	46.2	12	12:05:23:00	12:06:14:00	51	SWITCH PROBLEMS	
88.	46	CC	KC56.45-1	KC56.70-1	56.5	56.7	7	7:23:54:00	8:00:15:00	21	TRACK CONDITION	
89.	47	CC	KC56.45-1	KC56.70-1	56.5	56.7	8	8:01:08:00	8:01:48:00	40	TRACK CONDITION	
90.	48	CC	KC93.28-1	KC93.63-1	93.4	93.6	11	11:18:14:00	11:18:51:00	37	UNDESIRED EMERG	

RTC NODES: Random Outages

CSXT Reply RTC Permt Number	TPI Rebuttal RTC Permt Number	Subdivision	Beginning RTC Node	Ending RTC Node	Beginning MP	Ending MP	Day	Start Time	End Time	Duration In Minutes	Description	Outages Excluded from TPI Rebuttal RTC / (13)
								DD:HH:MM:SS	DD:HH:MM:SS			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
91.	49	CC	KC116.00-1	KC118.20-1	117.4	117.6	4	4:11:32:00	4:12:01:00	29	ENGINE FAILURE	
92.	50	CC	KC120.82-1	KC121.70-1	120.9	121.1	11	11:10:09:00	11:12:37:00	148	ENGINE FAILURE	
93.	51	CC	KC120.82-1	KC121.70-1	120.9	121.1	5	5:22:32:00	5:22:49:00	17	ENGINE FAILURE	
94.	52	CC	KC122.90-1	KC125.81-1	122.9	123.1	11	11:09:01:00	11:09:27:00	26	ENGINE FAILURE	
95.	53	CC	KC122.90-1	KC125.81-1	122.9	123.1	7	7:16:15:00	7:16:32:00	17	TRACK CONDITION	
96.	54	CC	KC134.67-1	KC137.08-1	136	136.2	7	7:17:57:00	7:18:45:00	48	UNDESIREM EMERG	
97.	55	CC	KC143.48-1	KC144.20-1	143.9	144.1	8	8:03:41:00	8:08:04:00	263	TRACK CONDITION	
98.	56	CC	KC148.62-1	KC149.70-2	149.3	149.5	4	4:03:05:00	4:11:39:00	514	ENGINE FAILURE	
99.	630	Chattanooga	J17.74-1	J18.12-1	17.9	18.1	12	12:21:59:00	12:22:19:00	20	TRACK CONDITION	
100.	631	Chattanooga	J17.74-1	J18.12-1	17.9	18.1	3	3:23:50:00	4:00:24:00	34	TRACK CONDITION	
101.	632	Chattanooga	J29.54-1	J30.28-1	29.9	30.1	9	9:09:51:00	9:10:53:00	62	OTHER	
102.	633	Chattanooga	J32.79-1	J33.99-1	32.9	33.1	8	8:08:43:00	8:09:48:00	65	OTHER	
103.	634	Chattanooga	J55.72-1	J56.24-1	55.9	56.1	8	8:10:59:00	8:11:48:00	49	OTHER	
104.	635	Chattanooga	J79.40-1	J80.14-1	79.9	80.1	8	8:12:55:00	8:14:32:00	97	SWITCH PROBLEMS	
105.	636	Chattanooga	J112.38-1	J112.70-1	112.47	112.67	7	7:22:19:00	7:22:55:00	36	TRACK CONDITION	
106.	637	Chattanooga	J119.64-1	J121.00-1	119.9	120.1	9	9:03:11:00	9:03:52:00	41	TRACK CONDITION	
107.	638	Chattanooga	J127.30-1	J127.51-1	127.3	127.5	12	12:13:22:00	12:16:32:00	190	SWITCH PROBLEMS	
108.	639	Chattanooga	J143.19-1	J143.42-1	143.2	143.4	5	5:14:33:00	5:15:45:00	72	TRACK CONDITION	
109.	640	Chattanooga	J146.75-1	J147.11-1	146.9	147.1	12	12:01:46:00	12:04:13:00	147	UNKNOWN	
110.	641	Chattanooga	J148.77-2	J149.18-2	148.9	149.1	7	7:19:18:00	7:20:16:00	58	ENGINE FAILURE	
111.	536	Cincinnati Term BE	BE2.05-1	BE4.50-1	3.7	3.9	12	12:08:56:00	12:11:27:00	151	TRACK CONDITION	
112.	537	Cincinnati Term BE	BE2.05-1	BE4.50-1	3.7	3.9	12	12:19:39:00	12:22:53:00	194	TRACK CONDITION	
113.	538	Cincinnati Term BE	BE2.05-1	BE4.50-1	3.7	3.9	12	12:23:07:00	13:03:45:00	278	TRACK CONDITION	
114.	539	Cincinnati Term BE	BE2.05-1	BE4.50-1	3.7	3.9	5	5:18:08:00	5:21:42:00	214	TRACK CONDITION	
115.	540	Cincinnati Term BE	BE2.05-1	BE4.50-1	3.7	3.9	8	8:19:33:00	8:21:25:00	112	TRACK CONDITION	
116.	541	Cincinnati Term BE	BE11.88-1	BE12.10-1	11.9	12.1	10	10:17:53:00	10:18:12:00	19	TRACK CONDITION	
117.	542	Cincinnati Term BE	BE11.88-1	BE12.10-1	11.9	12.1	12	12:12:10:00	12:12:44:00	34	TRACK CONDITION	
118.	543	Cincinnati Term BE	BE11.88-1	BE12.10-1	11.9	12.1	12	12:12:57:00	12:13:21:00	24	SWITCH PROBLEMS	
119.	544	Cincinnati Term BE	BE11.88-1	BE12.10-1	11.9	12.1	5	5:11:09:00	5:11:30:00	21	SWITCH PROBLEMS	
120.	545	Cincinnati Term BE	BE11.88-1	BE12.10-1	11.9	12.1	7	7:12:48:00	7:13:10:00	22	DEFECT DETECTOR	
121.	546	Cincinnati Term BE	BE11.88-1	BE12.10-1	11.9	12.1	8	8:04:01:00	8:05:37:00	96	TRACK CONDITION	
122.	547	Cincinnati Term BE	BE14.81-1	BE16.20-1	15	15.2	5	5:00:39:00	5:02:06:00	87	DD/NOTHING FOUN	
123.	548	Cincinnati Term BE	BE14.81-1	BE16.20-1	15	15.2	8	8:16:15:00	8:17:55:00	100	DRAGGING EQUIPM	
124.	421	Cleveland Short Line	QD53.79-1	QD54.70-1	3.8	4	12	12:10:48:00	12:11:05:00	17	TRACK CONDITION	
125.	422	Cleveland Short Line	QD53.79-1	QD54.70-1	3.8	4	6	6:03:31:00	6:04:07:00	36	UNKNOWN	
126.	423	Cleveland Short Line	QD53.79-1	QD54.70-1	3.8	4	8	8:04:22:00	8:04:55:00	33	TRACK CONDITION	
127.	424	Cleveland Short Line	QD53.79-1	QD54.70-1	3.8	4	8	8:06:26:00	8:06:45:00	19	TRACK CONDITION	
128.	425	Cleveland Short Line	QD53.79-1	QD54.70-1	3.8	4	9	9:08:35:00	9:09:10:00	35	TRACK CONDITION	
129.	426	Cleveland Terminal	QD171.30-1	QD171.42-1	171.2	171.4	10	10:22:51:00	11:00:47:00	116	TRACK CONDITION	
130.	427	Cleveland Terminal	QD171.30-1	QD171.42-1	171.2	171.4	7	7:00:56:00	7:02:00:00	64	TRACK CONDITION	
131.	428	Cleveland Terminal	QD171.30-1	QD171.42-1	171.2	171.4	7	7:21:58:00	7:22:50:00	52	TRACK CONDITION	
132.	476	Columbus	CD63.60-1	CD63.80-1	63.6	63.8	8	8:08:12:00	8:09:19:00	67	DD/NOTHING FOUN	
133.	477	Columbus	CD63.60-1	CD63.80-1	63.6	63.8	9	9:16:36:00	9:18:46:00	130	TRAIN INSPECTIO	
134.	478	Columbus	CD70.93-1	CD71.45-1	71	71.2	4	4:14:18:00	4:14:59:00	41	TRACK CONDITION	
135.	213	Cumberland	BA98.12-1	BA98.63-1	98.2	98.4	6	6:16:05:00	6:17:45:00	100	CURFEW	
136.	214	Cumberland	BA98.12-1	BA98.63-1	98.2	98.4	7	7:03:17:00	7:03:38:00	21	TRACK CONDITION	
137.	215	Cumberland	BA104.35-1	BA105.11-1	104.9	105.1	10	10:23:14:00	11:00:00:00	46	DEFECT DETECTOR	
138.	216	Cumberland	BA112.30-1	BA113.75-1	113.5	113.7	12	12:00:17:00	12:01:31:00	74	TRAIN INSPECTIO	
139.	217	Cumberland	BA112.30-1	BA113.75-1	113.5	113.7	12	12:05:38:00	12:06:54:00	76	TRACK CONDITION	
140.	218	Cumberland	BA112.30-1	BA113.75-1	113.5	113.7	3	3:03:20:00	3:03:51:00	31	TRACK CONDITION	
141.	219	Cumberland	BA112.30-1	BA113.75-1	113.5	113.7	4	4:02:32:00	4:03:41:00	69	TRACK CONDITION	
142.	220	Cumberland	BA112.30-1	BA113.75-1	113.5	113.7	4	4:05:05:00	4:06:14:00	69	TRACK CONDITION	
143.	221	Cumberland	BA112.30-1	BA113.75-1	113.5	113.7	7	7:19:39:00	7:21:50:00	131	TRACK CONDITION	
144.	222	Cumberland	BA112.30-1	BA113.75-1	113.5	113.7	9	9:09:45:00	9:11:32:00	107	TRAIN INSPECTIO	
145.	223	Cumberland	BA123.01-1	BA123.40-1	123.01	123.21	11	11:01:20:00	11:03:50:00	150	ENGINE FAILURE	
146.	224	Cumberland	BA123.01-1	BA123.40-1	123.01	123.21	12	12:12:39:00	12:13:39:00	60	ENGINE FAILURE	
147.	225	Cumberland	BA126.70-1	BA127.30-1	126.9	127.1	4	4:08:31:00	4:08:47:00	16	TRACK CONDITION	
148.	226	Cumberland	BA126.70-1	BA127.30-1	126.9	127.1	9	9:06:54:00	9:07:21:00	27	TRACK CONDITION	
149.	227	Cumberland	BA139.37-1	BA141.50-1	139.46	139.66	12	12:17:51:00	12:21:31:00	220	CURFEW	
150.	228	Cumberland	BA157.96-1	BA158.85-1	158	158.2	4	4:12:28:00	4:14:13:00	105	ENGINE FAILURE	
151.	229	Cumberland	BA157.96-1	BA158.85-1	158	158.2	6	6:18:25:00	6:19:31:00	66	CURFEW	
152.	230	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	10	10:01:59:00	10:02:32:00	33	SWITCH PROBLEMS	
153.	231	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	10	10:03:33:00	10:04:14:00	41	SWITCH PROBLEMS	
154.	232	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	10	10:04:36:00	10:05:06:00	30	SWITCH PROBLEMS	
155.	233	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	10	10:05:32:00	10:05:52:00	20	SWITCH PROBLEMS	
156.	234	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	10	10:06:06:00	10:06:28:00	22	SWITCH PROBLEMS	
157.	235	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	10	10:15:50:00	10:17:13:00	83	ENGINE SWAPS	
158.	236	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	11	11:02:36:00	11:03:38:00	62	SWITCH PROBLEMS	
159.	237	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	11	11:04:17:00	11:04:52:00	35	TRACK CONDITION	
160.	238	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	11	11:15:51:00	11:16:13:00	22	SWITCH PROBLEMS	
161.	239	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	11	11:20:06:00	12:00:40:00	274	TRACK CONDITION	
162.	240	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	3	3:07:55:00	3:09:14:00	79	SWITCH PROBLEMS	
163.	241	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	3	3:21:28:00	3:22:06:00	38	SWITCH PROBLEMS	
164.	242	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	3	3:22:22:00	3:22:40:00	18	SWITCH PROBLEMS	
165.	243	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	4	4:01:37:00	4:02:22:00	45	SWITCH PROBLEMS	
166.	244	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	4	4:02:25:00	4:03:03:00	38	SWITCH PROBLEMS	
167.	245	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	4	4:04:07:00	4:04:55:00	48	SWITCH PROBLEMS	
168.	246	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	4	4:06:37:00	4:07:02:00	25	SWITCH PROBLEMS	
169.	247	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	4	4:13:18:00	4:13:45:00	27	SWITCH PROBLEMS	
170.	248	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	4	4:21:39:00	4:22:08:00	29	SWITCH PROBLEMS	
171.	249	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	5	5:04:06:00	5:04:30:00	24	TRACK CONDITION	
172.	250	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	7	7:03:29:00	7:03:53:00	24	SWITCH PROBLEMS	
173.	251	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	7	7:04:20:00	7:04:46:00	26	SWITCH PROBLEMS	
174.	252	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	7	7:05:00:00	7:05:26:00	26	SWITCH PROBLEMS	
175.	253	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	7	7:15:09:00	7:15:52:00	43	SWITCH PROBLEMS	
176.	254	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	7	7:16:46:00	7:17:12:00	26	SWITCH PROBLEMS	
177.	255	Cumberland	BA160.85-1	BA162.30-1	161.9	162.1	8	8:05:42:00	8:05:59:00	17	SWITCH PROBLEMS	
178.	256	Cumberland	BA163.70-1	BA163.90-1	163.7	163.9	4	4:20:15:00	4:20:41:00	26	STICKING CAR BR	
179.	257	Cumberland	BA170.82-1	BA170.82-1	170.5	170.7	7	7:23:22:00	8:00:18:00	56	TRACK CONDITION	
180.	258	Cumberland	BA175.75-1	BA177.85-1	176.92	177.12	8	8:11:28:00	8:13:04:00	96	NO CABOOSE/ETD	

RTC NODES: Random Outages

CSXT Reply RTC Permit Number	TPI Rebuttal RTC Permit Number	Subdivision	Beginning RTC Node	Ending RTC Node	Beginning MP	Ending MP	Day	Start Time DD:HH:MM:SS	End Time DD:HH:MM:SS	Duration In Minutes	Description	Outages Excluded from TPI Rebuttal RTC //
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
181.	259	Cumberland Terminal	BF178.71-1	BF179.04-1	178.8	179	10	10:19:04:00	10:19:23:00	19	TRACK CONDITION	
182.	260	Cumberland Terminal	BF178.71-1	BF179.04-1	178.8	179	11	11:08:19:00	11:08:54:00	35	TRACK CONDITION	
183.	261	Cumberland Terminal	BF178.71-1	BF179.04-1	178.8	179	4	4:14:26:00	4:15:53:00	87	TRACK CONDITION	
184.	262	Cumberland Terminal	BF178.71-1	BF179.04-1	178.8	179	5	5:15:40:00	5:17:26:00	106	OTHER	
185.	263	Cumberland Terminal	BF178.71-1	BF179.04-1	178.8	179	6	6:13:11:00	6:13:27:00	16	TRACK CONDITION	
186.	264	Cumberland Terminal	BF178.71-1	BF179.04-1	178.8	179	8	8:17:45:00	8:18:42:00	57	TRACK CONDITION	
187.	265	Cumberland Terminal	BF178.71-1	BF179.04-1	178.8	179	9	9:09:52:00	9:11:27:00	95	TRACK CONDITION	
188.	429	Erie West	QD85.46-1	QD86.30-1	85.53	85.73	6	6:21:19:00	6:21:46:00	27	TRACK CONDITION	
189.	430	Erie West	QD124.51-1	QD124.97-1	124.51	124.71	11	11:11:38:00	11:12:09:00	31	TRACK CONDITION	
190.	431	Erie West	QD124.51-1	QD124.97-1	124.51	124.71	12	12:14:41:00	12:15:16:00	35	TRACK CONDITION	
191.	432	Erie West	QD124.51-1	QD124.97-1	124.51	124.71	5	5:08:24:00	5:08:42:00	18	TRACK CONDITION	
192.	433	Erie West	QD124.51-1	QD124.97-1	124.51	124.71	6	6:15:18:00	6:17:59:00	161	TRACK CONDITION	
193.	434	Erie West	QD124.51-1	QD124.97-1	124.51	124.71	9	9:16:07:00	9:20:10:00	243	TRACK CONDITION	
194.	435	Erie West	QD128.10-1	QD128.41-1	128.1	128.3	5	5:23:06:00	5:23:43:00	37	SWITCH PROBLEMS	
195.	436	Erie West	QD153.08-1	QD154.11-1	153.9	154.1	7	7:23:07:00	8:00:27:00	80	TRACK CONDITION	
196.	642	Evansville Term OZA	ZA279.55-1	ZA279.55-1	279.2	279.4	5	5:12:21:00	5:12:37:00	16	TRACK CONDITION	
197.	479	Fitzgerald	ANB595.51-1	ANB596.31-1	595.9	596.1	12	12:13:42:00	12:14:04:00	22	SWITCH PROBLEMS	
198.	480	Fitzgerald	ANB613.80-1	ANB614.15-1	613.9	614.1	12	12:11:02:00	12:11:47:00	45	SWITCH PROBLEMS	
199.	481	Fitzgerald	ANB613.80-1	ANB614.15-1	613.9	614.1	6	6:13:36:00	6:13:54:00	18	TRACK CONDITION	
200.	482	Fitzgerald	ANB642.30-1	ANB643.20-1	642.9	643.1	5	5:13:06:00	5:13:41:00	35	SWITCH PROBLEMS	
201.	483	Fitzgerald	ANB649.63-1	ANB650.13-1	649.9	650.1	12	12:15:32:00	12:16:07:00	35	TRACK CONDITION	
202.	484	Fitzgerald	ANB649.63-1	ANB650.13-1	649.9	650.1	4	4:12:44:00	4:13:26:00	42	DEFECT DETECTOR	
203.	485	Fitzgerald	ANB654.87-1	ANB655.21-1	654.9	655.1	10	10:13:54:00	10:14:10:00	16	TRACK CONDITION	
204.	486	Fitzgerald	ANB654.87-1	ANB655.21-1	654.9	655.1	8	8:11:06:00	8:11:35:00	29	TRACK CONDITION	
205.	487	Fitzgerald	ANB691.89-1	ANB692.20-1	691.9	692.1	11	11:01:46:00	11:02:11:00	25	UNKNOWN	
206.	488	Fitzgerald	ANB691.89-1	ANB692.20-1	691.9	692.1	12	12:16:57:00	12:17:14:00	17	TRACK CONDITION	
207.	489	Fitzgerald	ANB691.89-1	ANB692.20-1	691.9	692.1	7	7:21:46:00	7:22:39:00	53	ENGINE FAILURE	
208.	490	Fitzgerald	ANB692.65-1	ANB693.72-1	693.15	693.35	9	9:01:12:00	9:01:35:00	23	TRACK CONDITION	
209.	491	Fitzgerald	ANB697.40-1	ANB698.08-1	697.6	697.8	9	9:15:25:00	9:15:59:00	34	TRACK CONDITION	
210.	492	Fitzgerald	ANB709.81-1	ANB710.13-1	709.9	710.1	11	11:18:04:00	11:19:02:00	58	CODE FAILURE	
211.	493	Fitzgerald	ANB709.81-1	ANB710.13-1	709.9	710.1	4	4:17:32:00	4:17:53:00	21	TRACK CONDITION	
212.	494	Fitzgerald	ANB709.81-1	ANB710.13-1	709.9	710.1	5	5:08:16:00	5:08:50:00	34	TRACK CONDITION	
213.	495	Fitzgerald	ANB717.37-1	ANB717.88-1	717.4	717.6	11	11:19:43:00	11:20:28:00	45	ENGINE SWAPS	
214.	496	Fitzgerald	ANB761.20-1	ANB762.22-1	761.2	761.4	11	11:16:54:00	11:17:14:00	20	TRACK CONDITION	
215.	344	Garrett	B1115.83-1	B1116.71-1	116.5	116.7	7	7:00:07:00	7:00:28:00	21	DEFECT DETECTOR	
216.	345	Garrett	B1115.83-1	B1116.71-1	116.5	116.7	7	7:03:11:00	7:03:34:00	23	DEFECT DETECTOR	
217.	346	Garrett	B1124.50-1	B1124.82-1	124.6	124.8	8	8:10:38:00	8:10:56:00	18	TRACK CONDITION	
218.	347	Garrett	B1127.90-1	B1128.15-1	127.9	128.1	11	11:10:55:00	11:11:22:00	27	TRACK CONDITION	
219.	348	Garrett	B1127.90-1	B1128.15-1	127.9	128.1	11	11:14:15:00	11:14:49:00	34	OPERATIONAL DEL	
220.	349	Garrett	B1129.80-1	B1130.23-1	129.9	130.1	10	10:17:22:00	10:17:54:00	32	TRACK CONDITION	
221.	350	Garrett	B1129.80-1	B1130.23-1	129.9	130.1	12	12:20:12:00	12:20:36:00	24	TRACK CONDITION	
222.	351	Garrett	B1139.10-1	B1142.71-1	139.9	140.1	5	5:18:19:00	5:19:33:00	74	OPERATIONAL DEL	
223.	352	Garrett	B1150.21-1	B1151.12-1	150.9	151.1	11	11:16:28:00	11:16:48:00	20	OPERATIONAL DEL	
224.	353	Garrett	B1150.21-1	B1151.12-1	150.9	151.1	8	8:11:15:00	8:12:19:00	64	ENGINE FAILURE	
225.	354	Garrett	B1165.54-1	B1165.80-1	165.6	165.8	7	7:11:12:00	7:11:55:00	43	TRACK CONDITION	
226.	355	Garrett	B1165.54-1	B1165.80-1	165.6	165.8	7	7:12:32:00	7:13:23:00	51	TRACK CONDITION	
227.	356	Garrett	B1175.04-1	B1175.63-1	175.3	175.5	6	6:11:35:00	6:11:55:00	20	TRACK CONDITION	
228.	357	Garrett	B1183.90-1	B1184.27-1	183.9	184.1	11	11:19:43:00	11:20:46:00	63	OPERATIONAL DEL	
229.	358	Garrett	B1183.90-1	B1184.27-1	183.9	184.1	5	5:07:39:00	5:08:08:00	29	TRACK CONDITION	
230.	359	Garrett	B1198.92-1	B1199.24-1	199	199.2	9	9:04:47:00	9:07:11:00	144	TRACK CONDITION	
231.	360	Garrett	B1202.59-1	B1204.10-1	202.6	202.8	12	12:01:40:00	12:02:04:00	24	ENGINE FAILURE	
232.	361	Garrett	B1202.59-1	B1204.10-1	202.6	202.8	12	12:16:03:00	12:16:34:00	31	OPERATIONAL DEL	
233.	362	Garrett	B1202.59-1	B1204.10-1	202.6	202.8	9	9:06:03:00	9:08:30:00	147	UNKNOWN	
234.	437	Garrett East	B182.10-1	B182.30-1	82.1	82.3	9	9:11:38:00	9:13:41:00	123	HOT BOX	
235.	438	Garrett East	B197.17-1	B197.65-1	97.2	97.4	12	12:12:07:00	12:13:20:00	73	OPERATIONAL DEL	
236.	5/	Greenwich	5/	5/	QIR17.86	QIR18.06	5	5:05:05:00	5:05:47:00	42	UNDESIRED EMERG	Adjacent/Parallel to SARR
237.	439	Greenwich	Q136.90-1	Q137.10-1	36.9	37.1	8	8:07:15:00	8:07:36:00	21	TRACK CONDITION	
238.	373	Hamlet Terminal 5	S250.20-1	S248.90-1	250	250.2	7	7:20:34:00	7:21:32:00	58	TRACK CONDITION	
239.	643	Henderson	H177.85-1	H179.87-1	178.9	179.1	4	4:10:35:00	4:13:00:00	145	TRACK CONDITION	
240.	644	Henderson	H177.85-1	H179.87-1	178.9	179.1	6	6:10:06:00	6:10:42:00	36	TRACK CONDITION	
241.	645	Henderson	H177.85-1	H179.87-1	178.9	179.1	7	7:10:16:00	7:11:41:00	85	TRACK CONDITION	
242.	646	Henderson	H180.77-1	H181.15-1	180.9	181.1	12	12:14:47:00	12:15:13:00	26	HOT BOX	
243.	647	Henderson	H180.77-1	H181.15-1	180.9	181.1	6	6:13:00:00	6:13:51:00	51	SWITCH PROBLEMS	
244.	648	Henderson	H201.75-1	H202.85-1	201.9	202.1	5	5:16:14:00	5:16:49:00	35	TRACK CONDITION	
245.	649	Henderson	H214.01-1	H214.51-1	214.3	214.5	6	6:21:28:00	6:21:56:00	28	TRACK CONDITION	
246.	650	Henderson	H214.01-1	H214.51-1	214.3	214.5	7	7:15:16:00	7:16:18:00	62	TRACK CONDITION	
247.	651	Henderson	H214.01-1	H214.51-1	214.3	214.5	8	8:16:37:00	8:17:22:00	45	TRACK CONDITION	
248.	652	Henderson	H214.01-1	H214.51-1	214.3	214.5	9	9:11:02:00	9:11:18:00	16	TRACK CONDITION	
249.	653	Henderson	H214.01-1	H214.51-1	214.3	214.5	9	9:12:41:00	9:13:36:00	55	TRACK CONDITION	
250.	654	Henderson	H223.43-1	H224.22-1	223.9	224.1	4	4:20:51:00	4:21:14:00	23	TRACK CONDITION	
251.	655	Henderson	H241.55-1	H245.59-1	241.9	242.1	8	8:12:02:00	8:12:20:00	18	SWITCH PROBLEMS	
252.	656	Henderson	HC276.80-1	H279.03-1	277.9	278.1	9	9:04:54:00	9:05:10:00	16	TRACK CONDITION	
253.	657	Henderson	H285.42-1	H287.17-1	285.9	286.1	8	8:15:00:00	8:15:44:00	44	TRACK CONDITION	
254.	658	Henderson	H293.58-1	H293.58-1	293.2	293.4	6	6:10:56:00	6:11:21:00	25	TRACK CONDITION	
255.	6/	IHB Main Line	6/	6/	DIHO	DIHO.2	10	10:19:59:00	10:20:48:00	49	TRACK CONDITION	Adjacent/Parallel to SARR
256.	7/	IHB Main Line	7/	7/	DIHO	DIHO.2	10	10:22:27:00	10:22:44:00	17	TRACK CONDITION	Adjacent/Parallel to SARR
257.	8/	IHB Main Line	8/	8/	DIHO	DIHO.2	12	12:13:06:00	12:14:10:00	64	TRACK CONDITION	Adjacent/Parallel to SARR
258.	9/	IHB Main Line	9/	9/	DIHO	DIHO.2	3	3:07:27:00	3:11:17:00	230	TRACK CONDITION	Adjacent/Parallel to SARR
259.	10/	IHB Main Line	10/	10/	DIHO	DIHO.2	5	5:15:05:00	5:16:23:00	78	TRACK CONDITION	Adjacent/Parallel to SARR
260.	11/	IHB Main Line	11/	11/	DIHO	DIHO.2	6	6:13:23:00	6:13:47:00	24	TRACK CONDITION	Adjacent/Parallel to SARR
261.	12/	IHB Main Line	12/	12/	DIHO	DIHO.2	8	8:12:10:00	8:12:26:00	16	SWITCH PROBLEMS	Adjacent/Parallel to SARR
262.	13/	IHB Main Line	13/	13/	DIHO	DIHO.2	8	8:17:23:00	8:18:58:00	95	TRACK CONDITION	Adjacent/Parallel to SARR
263.	14/	IHB Main Line	14/	14/	DIHO	DIHO.2	9	9:06:13:00	9:06:44:00	31	TRACK CONDITION	Adjacent/Parallel to SARR
264.	15/	IHB Main Line	15/	15/	DIH1.9	DIH2.1	10	10:15:10:00	10:15:40:00	30	TRACK CONDITION	Adjacent/Parallel to SARR
265.	16/	IHB Main Line	16/	16/	DIH1.9	DIH2.1	4	4:13:47:00	4:14:38:00	51	TRACK CONDITION	Adjacent/Parallel to SARR
266.	17/	IHB Main Line	17/	17/	DIH2.79	DIH2.99	9	9:23:13:00	9:23:31:00	18	TRACK CONDITION	Adjacent/Parallel to SARR
267.	18/	IHB Main Line	18/	18/	DIH14.76	DIH14.96	3	3:13:11:00	3:14:36:00	85	TRACK CONDITION	Adjacent/Parallel to SARR
268.	19/	IHB Main Line	19/	19/	DIH14.76	DIH14.96	3	3:18:12:00	3:18:37:00	25	TRACK CONDITION	Adjacent/Parallel to SARR
269.	20/	IHB Main Line	20/	20/	DIH14.76	DIH14.96	8	8:05:05:00	8:06:02:00	57	TRACK CONDITION	Adjacent/Parallel to SARR
270.	21/	IHB Main Line	21/	21/	DIH14.76	DIH14.96	9	9:07:46:00	9:08:09:00	23	TRACK CONDITION	Adjacent/Parallel to SARR

RTC NODES: Random Outages

CSXT Reply RTC Permt Number	TPI Rebuttal RTC Permt Number	Subdivision	Beginning RTC Node	Ending RTC Node	Beginning MP	Ending MP	Day	Start Time		Duration In Minutes	Description	Outages Excluded from TPI Rebuttal RTC I/ (13)
								DD:HH:MM:SS	DD:HH:MM:SS			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
271.	22/	IHB Main Line	22/	22/	DIH14.76	DIH14.96	9	9:08:29:00	9:10:48:00	139	TRACK CONDITION	Adjacent/Parallel to SARR
272.	23/	IHB Main Line	23/	23/	DIH14.76	DIH14.96	9	9:18:11:00	9:19:59:00	108	TRACK CONDITION	Adjacent/Parallel to SARR
273.	363	IHB Main Line	DIH15.240-1	DIH16.320-1	15.32	15.52	8	8:05:11:00	8:05:36:00	25	TRACK CONDITION	
274.	364	IHB Main Line	DIH15.240-1	DIH16.320-1	15.57	15.77	5	5:12:46:00	5:17:42:00	296	TRACK CONDITION	
275.	365	IHB Main Line	DIH15.240-1	DIH16.320-1	15.57	15.77	8	8:16:35:00	8:17:23:00	48	TRACK CONDITION	
276.	366	IHB Main Line	DIH16.400-1	DIH17.490-1	17.16	17.36	11	11:01:19:00	11:01:43:00	24	TRACK CONDITION	
277.	367	IHB Main Line	DIH16.400-1	DIH17.490-1	17.16	17.36	11	11:06:56:00	11:07:38:00	42	TRACK CONDITION	
278.	368	IHB Main Line	DIH16.400-1	DIH17.490-1	17.16	17.36	7	7:08:13:00	7:10:02:00	109	TRACK CONDITION	
279.	369	IHB Main Line	DIH16.400-1	DIH17.490-1	17.16	17.36	7	7:18:53:00	7:19:44:00	51	TRACK CONDITION	
280.	370	IHB Main Line	DIH16.400-1	DIH17.490-1	17.16	17.36	8	8:22:52:00	8:23:14:00	22	TRACK CONDITION	
281.	371	IHB Main Line	DIH16.400-1	DIH17.490-1	17.16	17.36	8	8:23:39:00	9:00:08:00	29	TRACK CONDITION	
282.	372	IHB Main Line	DIH20.060-1	DIH21.130-1	20.9	21.1	7	7:16:32:00	7:17:15:00	43	TRACK CONDITION	
283.	24/	Indianapolis Ln QII	24/	24/	QI248.4	QI248.6	8	8:15:59:00	8:16:43:00	44	TRACK CONDITION	Adjacent/Parallel to SARR
284.	440	Indianapolis QI	QI154.28-1	QI154.28-1	153.42	153.62	5	5:15:29:00	5:15:52:00	23	TRACK CONDITION	
285.	441	Indianapolis QI	QI154.28-1	QI154.28-1	153.42	153.62	6	6:12:17:00	6:12:34:00	17	DEFECT DETECTOR	
286.	442	Indianapolis QI	QI154.28-1	QI154.28-1	153.42	153.62	6	6:18:47:00	6:19:18:00	31	DEFECT DETECTOR	
287.	443	Indianapolis QI	QI154.28-1	QI154.28-1	153.42	153.62	6	6:21:17:00	6:21:43:00	26	DEFECT DETECTOR	
288.	444	Indianapolis QI	QI199.00-1	QI200.11-1	199.01	199.21	12	12:21:26:00	12:21:45:00	19	TRACK CONDITION	
289.	445	Indianapolis QI	QI229.26-1	QI229.62-1	229.4	229.6	6	6:04:16:00	6:04:41:00	25	TRACK CONDITION	
290.	446	Indianapolis QI	QI245.08-1	QI245.65-1	245.42	245.62	8	8:16:58:00	8:17:40:00	42	TRACK CONDITION	
291.	621	Indianapolis Ter Q5C	Q5C12.25-1	Q5C12.6	12.5	12.7	5	5:10:10:00	5:11:06:00	56	SWITCH PROBLEMS	
292.	447	Indianapolis Term QI	QI283.58-1	Q50.00-1	283.6	283.8	10	10:14:53:00	10:16:10:00	77	TRACK CONDITION	
293.	448	Indianapolis Term QI	QI283.58-1	Q50.00-1	283.6	283.8	11	11:00:34:00	11:00:53:00	19	TRACK CONDITION	
294.	449	Indianapolis Term QI	QI283.58-1	Q50.00-1	283.6	283.8	3	3:14:50:00	3:16:00:00	70	TRACK CONDITION	
295.	450	Indianapolis Term QI	QI283.58-1	Q50.00-1	283.6	283.8	4	4:00:29:00	4:00:55:00	26	TRACK CONDITION	
296.	451	Indianapolis Term QI	QI283.58-1	Q50.00-1	283.6	283.8	4	4:03:50:00	4:06:59:00	189	TRACK CONDITION	
297.	452	Indianapolis Term QI	QI283.58-1	Q50.00-1	283.6	283.8	4	4:14:12:00	4:16:06:00	114	TRACK CONDITION	
298.	453	Indianapolis Term QI	QI283.58-1	Q50.00-1	283.6	283.8	5	5:07:38:00	5:07:55:00	17	TRACK CONDITION	
299.	454	Indianapolis Term QI	QI283.58-1	Q50.00-1	283.6	283.8	5	5:12:35:00	6:00:41:00	726	TRACK CONDITION	
300.	455	Indianapolis Term QS	Q57.80-1	Q59.13-1	8.86	9.06	7	7:08:24:00	7:11:26:00	182	TRACK CONDITION	
301.	456	Indianapolis Term QS	Q57.80-1	Q59.13-1	8.86	9.06	9	9:12:04:00	9:13:24:00	80	TRACK CONDITION	
302.	457	Indianapolis Term QS	Q510.05-1	Q512.35-1	11.72	11.92	6	6:04:53:00	6:06:14:00	81	TRACK CONDITION	
303.	324	Jacksonville Term SP	SP643.57-1	SP644.38-1	643.6	643.8	12	12:14:36:00	12:17:36:00	180	TRACK CONDITION	
304.	497	Jesup	ANAS88.12-1	ANAS88.41-1	588.2	588.4	4	4:08:49:00	4:09:19:00	30	CODE FAILURE	
305.	57	KD	C143.00-1	C145.00-1	143.9	144.1	8	8:01:50:00	8:02:21:00	31	ENGINE FAILURE	
306.	58	KD	C153.44-1	C154.69-1	153.9	154.1	5	5:14:46:00	5:15:40:00	54	ENGINE FAILURE	
307.	59	KD	C163.70-1	C164.73-1	164.3	164.5	8	8:10:04:00	8:10:49:00	45	ENGINE FAILURE	
308.	60	KD	C163.70-1	C164.73-1	164.3	164.5	8	8:11:57:00	8:13:51:00	114	ENGINE FAILURE	
309.	61	KD	C172.05-1	C172.47-1	172.25	172.45	11	11:06:11:00	11:10:11:00	240	ENGINE FAILURE	
310.	62	KD	C174.00-1	C174.90-1	174	174.2	11	11:11:27:00	11:11:52:00	25	TRACK CONDITION	
311.	63	KD	C174.00-1	C174.90-1	174	174.2	9	9:11:24:00	9:11:41:00	17	DEFECT DETECTOR	
312.	64	KD	C174.00-1	C174.90-1	174.7	174.9	11	11:16:38:00	11:18:17:00	99	DEFECT DETECTOR	
313.	65	KD	C174.00-1	C174.90-1	174.7	174.9	11	11:18:38:00	11:19:35:00	57	TRACK CONDITION	
314.	66	KD	C174.00-1	C174.90-1	174.7	174.9	5	5:08:30:00	5:08:55:00	25	TRACK CONDITION	
315.	67	KD	C174.00-1	C174.90-1	174.7	174.9	5	5:12:21:00	5:12:45:00	24	TRACK CONDITION	
316.	68	KD	C174.00-1	C174.90-1	174.7	174.9	8	8:23:40:00	9:00:40:00	60	DEFECT DETECTOR	
317.	69	KD	C174.00-1	C174.90-1	174.7	174.9	9	9:17:47:00	9:21:50:00	243	ENGINE FAILURE	
318.	70	KD	C192.86-1	C193.50-1	192.9	193.1	8	8:11:32:00	8:13:12:00	100	TRACK CONDITION	
319.	71	KD	C200.72-1	C202.44-1	201.3	201.5	4	4:03:17:00	4:06:45:00	208	TRACK CONDITION	
320.	72	KD	C206.05-1	C206.40-1	206.2	206.4	8	8:08:43:00	8:09:41:00	58	TRACK CONDITION	
321.	73	KD	C249.30-1	C250.15-1	249.9	250.1	4	4:13:42:00	4:14:36:00	54	TRACK CONDITION	
322.	74	KD	C249.30-1	C250.15-1	249.9	250.1	8	8:13:51:00	8:15:55:00	124	TRACK CONDITION	
323.	75	KD	C266.00-1	C268.44-1	266.53	266.73	9	9:13:01:00	9:13:20:00	19	DEFECT DETECTOR	
324.	76	KD	C266.00-1	C268.44-1	267.9	268.1	12	12:11:24:00	12:12:50:00	86	SWITCH PROBLEMS	
325.	77	KD	C274.13-1	C274.40-1	274.2	274.4	7	7:23:03:00	8:01:27:00	144	TRACK CONDITION	
326.	78	KD	C274.13-1	C274.40-1	274.2	274.4	8	8:04:36:00	8:06:16:00	100	TRACK CONDITION	
327.	79	KD	C277.12-1	C277.90-1	277.6	277.8	8	8:02:29:00	8:02:47:00	18	TRACK CONDITION	
328.	80	KD	C281.78-1	C282.10-1	281.9	282.1	5	5:14:56:00	5:18:27:00	211	ENGINE FAILURE	
329.	81	KD	C284.70-1	C286.55-1	284.9	285.1	12	12:12:51:00	12:13:08:00	17	DEFECT DETECTOR	
330.	82	KD	C312.14-1	C313.38-1	312.7	312.9	12	12:08:22:00	12:09:04:00	42	TRACK CONDITION	
331.	83	KD	C312.14-1	C313.38-1	312.7	312.9	7	7:16:14:00	7:20:53:00	279	OTHER	
332.	266	Keystone	BF183.55-1	BF184.19-1	183.9	184.1	7	7:13:28:00	7:13:48:00	20	UNDESIRABLE EMERG	Adjacent/Parallel to SARR
333.	25/	Keystone	25/	25/	BA183.9	BA184.1	8	8:19:00:00	8:19:19:00	19	TRACK CONDITION	
334.	267	Keystone	BF199.61-1	BF199.74-1	199.5	199.7	11	11:00:30:00	11:00:47:00	17	TRACK CONDITION	
335.	268	Keystone	BF199.61-1	BF199.74-1	199.5	199.7	7	7:20:07:00	7:20:25:00	18	HOT BOX	
336.	269	Keystone	BF212.20-1	BF212.20-1	211	211.2	11	11:01:38:00	11:02:00:00	22	ENGINE FAILURE	
337.	270	Keystone	BF210.98-1	BF212.20-1	211	211.2	8	8:05:53:00	8:07:39:00	106	TRACK CONDITION	
338.	271	Keystone	BF210.98-1	BF212.20-1	211	211.2	9	9:15:55:00	9:17:39:00	104	OTHER	
339.	272	Keystone	BF215.35-1	BF216.30-1	216.09	216.29	6	6:13:22:00	6:14:42:00	80	OTHER	
340.	273	Keystone	BF215.35-1	BF216.30-1	216.09	216.29	7	7:10:02:00	7:12:17:00	135	OTHER	
341.	274	Keystone	BF215.35-1	BF216.30-1	216.09	216.29	8	8:08:35:00	8:08:53:00	18	ENGINE FAILURE	
342.	275	Keystone	BF235.24-1	BF237.10-1	236.9	237.1	12	12:15:51:00	12:16:51:00	60	OTHER	
343.	276	Keystone	BF235.24-1	BF237.10-1	236.9	237.1	8	8:16:34:00	8:16:57:00	23	TRACK CONDITION	
344.	277	Keystone	BF244.21-1	BF244.55-1	244.21	244.41	11	11:12:17:00	11:13:17:00	60	UNDESIRABLE EMERG	
345.	498	Lakeland	A854.21-1	A854.42-1	854.22	854.42	4	4:10:43:00	4:11:05:00	22	TRACK CONDITION	
346.	499	Lakeland	A854.52-1	A855.06-1	854.65	854.85	7	7:05:31:00	7:05:49:00	18	TRACK CONDITION	
347.	500	Lakeland	A854.52-1	A855.06-1	854.65	854.85	8	8:05:30:00	8:05:57:00	27	TRACK CONDITION	
348.	26/	Lakeland	26/	26/	AY859.9	AY860.1	12	12:08:45:00	12:09:08:00	23	TRACK CONDITION	Adjacent/Parallel to SARR
349.	278	Landover	QL130.60-1	QL130.80-1	130.6	130.8	6	6:20:29:00	6:23:59:00	210	TRACK CONDITION	
350.	117	Lineville	ANJ789.10-1	ANJ790.00-1	789.5	789.7	4	4:03:40:00	4:04:22:00	42	TRACK CONDITION	
351.	118	Lineville	ANJ789.10-1	ANJ790.00-1	789.5	789.7	4	4:21:58:00	4:23:40:00	102	TRACK CONDITION	
352.	119	Lineville	ANJ789.10-1	ANJ790.00-1	789.5	789.7	5	5:06:31:00	5:07:23:00	52	DEFECT DETECTOR	
353.	120	Lineville	ANJ789.10-1	ANJ790.00-1	789.5	789.7	6	6:09:08:00	6:10:01:00	53	TRACK CONDITION	
354.	121	Lineville	ANJ789.10-1	ANJ790.00-1	789.5	789.7	9	9:21:44:00	9:22:48:00	64	TRACK CONDITION	
355.	122	Lineville	ANJ795.90-1	ANJ796.50-1	795.9	796.1	5	5:00:29:00	5:00:51:00	22	ENGINE FAILURE	
356.	123	Lineville	ANJ825.50-1	ANJ826.10-1	825.9	826.1	4	4:06:04:00	4:06:20:00	16	TRACK CONDITION	
357.	124	Lineville	ANJ847.88-1	ANJ848.22-1	847.9	848.1	5	5:13:55:00	5:15:33:00	98	DEFECT DETECTOR	
358.	125	Lineville	ANJ880.63-1	ANJ881.21-1	880.9	881.1	9	9:06:29:00	9:07:52:00	83	AIR TROUBLE	
359.	126	Lineville	ANJ882.86-1	ANJ883.46-1	882.9	883.1	9	9:15:17:00	9:15:35:00	18	TRACK CONDITION	
360.	127	Lineville	ANJ949.90-1	ANJ950.47-1	949.9	950.1	12	12:04:53:00	12:07:53:00	180	TRACK CONDITION	

RTC NODES: Random Outages

CSXT Reply RTC Permit Number	TPI Rebuttal RTC Permit Number	Subdivision	Beginning RTC Node	Ending RTC Node	Beginning MP	Ending MP	Day	Start Time	End Time	Duration In Minutes	Description	Outages Excluded from TPI Rebuttal RTC / (13)
								DD:HH:MM:SS	DD:HH:MM:SS			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
361.	549	Louisville Cincinnati	T13.42-1	T14.61-1	13.7	13.9	9	9:17:07:00	9:17:32:00	25	DEFECT DETECTOR	
362.	550	Louisville Cincinnati	T52.76-1	T53.10-1	52.9	53.1	5	5:06:47:00	5:07:03:00	16	TRACK CONDITION	
363.	551	Louisville Cincinnati	T52.76-1	T53.10-1	52.9	53.1	9	9:14:17:00	9:15:42:00	85	ENGINE FAILURE	
364.	552	Louisville Cincinnati	T84.83-1	T85.12-1	84.9	85.1	8	8:11:31:00	8:13:10:00	99	DEFECT DETECTOR	
365.	553	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	11	11:14:39:00	11:15:05:00	26	TRACK CONDITION	
366.	554	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	11	11:21:45:00	11:22:12:00	27	TRACK CONDITION	
367.	555	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	11	11:23:02:00	11:23:27:00	25	TRACK CONDITION	
368.	556	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	11	11:23:42:00	12:00:14:00	32	TRACK CONDITION	
369.	557	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	12	12:21:32:00	12:22:21:00	49	TRACK CONDITION	
370.	558	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	12	12:23:16:00	12:23:43:00	27	TRACK CONDITION	
371.	559	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	4	4:03:25:00	4:04:16:00	51	TRACK CONDITION	
372.	560	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	4	4:08:04:00	4:08:31:00	27	TRACK CONDITION	
373.	561	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	4	4:08:58:00	4:09:24:00	26	TRACK CONDITION	
374.	562	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	4	4:12:06:00	4:12:33:00	27	TRACK CONDITION	
375.	563	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	5	5:23:58:00	6:00:28:00	30	TRACK CONDITION	
376.	564	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	6	6:16:39:00	6:17:53:00	74	TRACK CONDITION	
377.	565	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	7	7:08:37:00	7:09:08:00	31	TRACK CONDITION	
378.	566	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	7	7:09:29:00	7:12:11:00	162	TRACK CONDITION	
379.	567	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	8	8:18:16:00	8:19:49:00	93	TRACK CONDITION	
380.	568	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	9	9:14:27:00	9:15:14:00	47	CAR DEPT. B/O E	
381.	569	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	9	9:20:06:00	9:20:30:00	24	TRACK CONDITION	
382.	570	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	9	9:21:35:00	9:21:59:00	24	TRACK CONDITION	
383.	571	Louisville Term 000	2.89-1	3.19-3	2.9	3.1	9	9:22:02:00	9:23:15:00	73	TRACK CONDITION	
384.	572	Louisville Term 000	5.45-3	6.55-3	5.8	6	10	10:07:20:00	10:08:08:00	48	CAR DEPT. B/O E	
385.	573	Louisville Term 000	5.45-3	6.55-3	6.3	6.5	9	9:08:18:00	9:08:40:00	22	TRACK CONDITION	
386.	574	Louisville Term 000	6.60-3	6.96-3	6.64	6.84	6	6:15:49:00	6:16:13:00	24	TRACK CONDITION	
387.	575	Louisville Term 000	6.60-3	6.96-3	6.64	6.84	8	8:15:50:00	8:17:36:00	106	TRACK CONDITION	
388.	576	Louisville Term OTR	TR2.61-2	TR2.93-2	2.7	2.9	7	7:00:09:00	7:01:32:00	83	OTHER	
389.	128	M and M	489.00-1	490.37-1	489.9	490.1	11	11:06:27:00	11:08:03:00	96	TRACK CONDITION	
390.	129	M and M	489.00-1	490.37-1	489.9	490.1	11	11:20:32:00	11:21:07:00	35	TRACK CONDITION	
391.	130	M and M	489.00-1	490.37-1	489.9	490.1	6	6:20:15:00	6:20:48:00	33	TRACK CONDITION	
392.	131	M and M	498.19-1	499.17-1	498.9	499.1	6	6:04:50:00	6:07:02:00	132	ENGINE FAILURE	
393.	132	M and M	540.28-1	542.50-1	541.9	542.1	4	4:01:17:00	4:01:51:00	34	CAR DEPT. B/O E	
394.	133	M and M	606.86-1	607.10-1	606.9	607.1	3	3:00:44:00	3:01:03:00	19	DEFECT DETECTOR	
395.	134	M and M	606.86-1	607.10-1	606.9	607.1	3	3:02:00:00	3:03:58:00	118	DEFECT DETECTOR	
396.	135	M and M	641.44-1	642.40-1	641.9	642.1	5	5:16:58:00	5:18:41:00	103	DD/NOTHING FOUN	
397.	577	Main Line	13.87-1	14.69-1	13.9	14.1	10	10:02:18:00	10:02:39:00	21	TRACK CONDITION	
398.	578	Main Line	13.87-1	14.69-1	13.9	14.1	4	4:06:48:00	4:07:06:00	18	TRACK CONDITION	
399.	579	Main Line	13.87-1	14.69-1	13.9	14.1	4	4:09:53:00	4:10:24:00	31	TRACK CONDITION	
400.	580	Main Line	13.87-1	14.69-1	13.9	14.1	7	7:19:15:00	7:19:57:00	42	TRACK CONDITION	
401.	581	Main Line	13.87-1	14.69-1	13.9	14.1	7	7:20:15:00	7:20:36:00	21	TRACK CONDITION	
402.	582	Main Line	13.87-1	14.69-1	13.9	14.1	9	9:02:11:00	9:02:50:00	39	TRACK CONDITION	
403.	583	Main Line	13.87-1	14.69-1	13.9	14.1	9	9:19:26:00	9:19:58:00	32	TRACK CONDITION	
404.	584	Main Line	15.91-1	16.41-1	15.9	16.1	4	4:10:36:00	4:10:52:00	16	TRACK CONDITION	
405.	585	Main Line	15.91-1	16.41-1	15.9	16.1	5	5:20:33:00	5:20:52:00	19	TRACK CONDITION	
406.	586	Main Line	39.14-1	40.32-1	40.1	40.3	8	8:10:25:00	8:12:27:00	122	AIR TROUBLE	
407.	587	Main Line	43.68-1	44.05-1	43.7	43.9	8	8:00:58:00	8:02:45:00	107	OTHER	
408.	588	Main Line	55.17-1	57.00-1	55.9	56.1	5	5:12:36:00	5:13:48:00	72	SWITCH PROBLEMS	
409.	589	Main Line	85.29-1	86.59-1	85.9	86.1	12	12:09:09:00	12:11:26:00	137	ENGINE FAILURE	
410.	590	Main Line	118.00-1	118.39-1	118	118.2	10	10:03:53:00	10:05:38:00	105	TRACK CONDITION	
411.	591	Main Line	118.00-1	118.39-1	118	118.2	12	12:01:18:00	12:02:05:00	47	TRACK CONDITION	
412.	592	Main Line	118.00-1	118.39-1	118	118.2	4	4:01:15:00	4:01:33:00	18	TRACK CONDITION	
413.	593	Main Line	118.00-1	118.39-1	118	118.2	6	6:18:36:00	6:18:52:00	16	TRACK CONDITION	
414.	594	Main Line	118.00-1	118.39-1	118	118.2	7	7:22:51:00	7:23:11:00	20	TRACK CONDITION	
415.	595	Main Line	130.41-1	131.23-1	130.9	131.1	4	4:14:35:00	4:15:21:00	46	TRACK CONDITION	
416.	136	Manchester	ANB785.75-1	ANB788.10-1	786	786.2	4	4:03:52:00	4:04:20:00	28	TRACK CONDITION	
417.	137	Manchester	ANB785.75-1	ANB788.10-1	786.7	786.9	12	12:03:53:00	12:05:58:00	125	TRACK CONDITION	
418.	138	Manchester	ANB785.75-1	ANB788.10-1	786.7	786.9	6	6:02:59:00	6:04:09:00	70	TRACK CONDITION	
419.	139	Manchester	ANB785.75-1	ANB788.10-1	786.7	786.9	9	9:21:56:00	9:22:36:00	40	TRACK CONDITION	
420.	659	Memphis OOF	F290.63-1	F291.22-1	290.9	291.1	10	10:10:09:00	10:10:39:00	30	OTHER	
421.	660	Memphis OOF	F315.88-1	F317.63-1	316	316.2	11	11:16:43:00	11:17:37:00	54	SWITCH PROBLEMS	
422.	661	Memphis OON	N93.99-1	N94.69-1	94.33	94.53	12	12:02:19:00	12:02:55:00	36	TRACK CONDITION	
423.	662	Memphis OON	N93.99-1	N94.69-1	94.33	94.53	7	7:08:52:00	7:09:25:00	33	TRACK CONDITION	
424.	663	Memphis OON	N96.12-1	N96.34-1	96.13	96.33	12	12:03:40:00	12:04:24:00	44	TRACK CONDITION	
425.	664	Memphis OON	N96.12-1	N96.34-1	96.13	96.33	5	5:12:59:00	5:14:02:00	63	DEFECT DETECTOR	
426.	665	Memphis Terminal	F371.20-1	F371.82-1	371.3	371.5	5	5:10:25:00	5:11:00:00	35	TRACK CONDITION	
427.	666	Memphis Terminal	F371.20-1	F371.82-1	371.4	371.6	10	10:06:00:00	10:06:31:00	31	SWITCH PROBLEMS	
428.	667	Memphis Terminal	F371.20-1	F371.82-1	371.4	371.6	11	11:08:06:00	11:10:24:00	138	SWITCH PROBLEMS	
429.	668	Memphis Terminal	F371.20-1	F371.82-1	371.4	371.6	11	11:18:22:00	11:18:38:00	16	SWITCH PROBLEMS	
430.	669	Memphis Terminal	F371.20-1	F371.82-1	371.4	371.6	12	12:06:18:00	12:07:28:00	70	SWITCH PROBLEMS	
431.	670	Memphis Terminal	F371.20-1	F371.82-1	371.4	371.6	12	12:14:34:00	12:15:25:00	51	SWITCH PROBLEMS	
432.	671	Memphis Terminal	F371.20-1	F371.82-1	371.4	371.6	7	7:07:14:00	7:08:33:00	79	SWITCH PROBLEMS	
433.	672	Memphis Terminal	F371.20-1	F371.82-1	371.4	371.6	8	8:06:22:00	8:07:21:00	59	SWITCH PROBLEMS	
434.	673	Memphis Terminal	F371.20-1	F371.82-1	371.4	371.6	9	9:08:25:00	9:11:25:00	180	SWITCH PROBLEMS	
435.	279	Metropolitan	BA17.40-1	BA17.40-1	17.2	17.4	9	9:16:29:00	9:17:47:00	78	DD/NOTHING FOUN	
436.	280	Metropolitan	BA32.65-1	BA37.26-1	33.4	33.6	11	11:15:19:00	11:15:44:00	25	TRACK CONDITION	
437.	281	Metropolitan	BA73.80-1	BA75.20-1	74.9	75.1	4	4:07:32:00	4:08:10:00	38	SWITCH PROBLEMS	
438.	282	Metropolitan	BA73.80-1	BA75.20-1	74.9	75.1	5	5:14:20:00	5:14:37:00	17	TRACK CONDITION	
439.	283	Metropolitan	BA73.80-1	BA75.20-1	74.9	75.1	6	6:07:16:00	6:15:08:00	472	TRACK CONDITION	
440.	284	Metropolitan	BA73.80-1	BA75.20-1	74.9	75.1	7	7:05:33:00	7:06:00:00	27	SWITCH PROBLEMS	
441.	6	Mohawk	QC196.12-1	QC200.37-1	198.7	198.9	10	10:04:56:00	10:06:01:00	65	SWITCH PROBLEMS	
442.	7	Mohawk	QC214.25-1	QC216.50-1	215	215.2	12	12:18:26:00	12:19:54:00	88	TRACK CONDITION	
443.	8	Mohawk	QC235.28-1	QC237.00-1	235.3	235.5	11	11:16:45:00	11:17:17:00	32	TRACK CONDITION	
444.	9	Mohawk	QC235.28-1	QC237.00-1	235.3	235.5	5	5:17:19:00	5:19:45:00	146	TRACK CONDITION	
445.	10	Mohawk	QC235.28-1	QC237.00-1	235.3	235.5	7	7:14:05:00	7:14:23:00	18	TRACK CONDITION	
446.	11	Mohawk	QC287.44-1	QC290.64-1	290.3	290.5	5	5:08:54:00	5:09:55:00	61	SWITCH PROBLEMS	
447.	12	Mohawk	QC287.44-1	QC290.64-1	290.3	290.5	5	5:11:21:00	5:11:55:00	34	SWITCH PROBLEMS	
448.	13	Mohawk	QC287.44-1	QC290.64-1	290.3	290.5	5	5:13:40:00	5:14:09:00	29	SWITCH PROBLEMS	
449.	374	Monroe SF	SF286.83-1	SF287.86-1	286.9	287.1	10	10:11:00:00	10:14:23:00	203	UNDESIRE EMERG	
450.	375	Monroe SF	SF286.83-1	SF287.86-1	286.9	287.1	9	9:14:32:00	9:15:03:00	31	TRACK CONDITION	

RTC NODES: Random Outages

CSXT Reply RTC Permit Number (1)	TPI Rebuttal RTC Permit Number (2)	Subdivision (3)	Beginning RTC Node (4)	Ending RTC Node (5)	Beginning MP (6)	Ending MP (7)	Day (8)	Start Time DD:HH:MM:SS (9)	End Time DD:HH:MM:SS (10)	Duration In Minutes (11)	Description (12)	Outages Excluded from TPI Rebuttal RTC // (13)
451.	376	Monroe SF	SF295.56-1	SF295.81-1	295.6	295.8	4	4:07:17:00	4:08:17:00	60	ENGINE FAILURE	
452.	377	Monroe SF	SF304.65-1	SF305.10-1	304.9	305.1	7	7:12:18:00	7:13:18:00	60	TRACK CONDITION	
453.	378	Monroe SF	SF305.70-1	SF306.10-1	305.9	306.1	9	9:07:16:00	9:07:35:00	19	TRACK CONDITION	
454.	379	Monroe SG	SG319.03-1	SG319.67-1	319.3	319.5	7	7:08:00:00	7:08:31:00	31	DEFECT DETECTOR	
455.	380	Monroe SG	SG327.95-1	SG328.30-1	328.1	328.3	6	6:16:21:00	6:16:42:00	21	TRACK CONDITION	
456.	381	Monroe SG	SG329.40-1	SG330.25-1	329.9	330.1	6	6:17:20:00	6:17:42:00	22	TRACK CONDITION	
457.	382	Monroe SG	SG331.64-1	SG332.54-1	331.9	332.1	9	9:07:57:00	9:08:16:00	19	TRACK CONDITION	
458.	383	Monroe SG	SG360.83-1	SG361.19-1	360.9	361.1	10	10:07:31:00	10:07:52:00	21	TRACK CONDITION	
459.	458	Mount Victory	QI75.75-1	QI76.08-1	75.85	76.05	11	11:19:59:00	11:20:26:00	27	TRACK CONDITION	
460.	459	Mount Victory	QI75.75-1	QI76.08-1	75.85	76.05	9	9:01:54:00	9:02:52:00	58	TRACK CONDITION	
461.	460	Mount Victory	QI124.49-1	QI124.72-1	124.5	124.7	12	12:11:41:00	12:12:50:00	69	SWITCH PROBLEMS	
462.	461	Mount Victory	QI124.49-1	QI124.72-1	124.5	124.7	9	9:15:05:00	9:20:02:00	297	TRACK CONDITION	
463.	140	N O and M	666.85-1	667.13-1	665.3	665.5	12	12:01:24:00	12:02:19:00	55	TRACK CONDITION	
464.	141	N O and M	666.85-1	667.13-1	665.3	665.5	4	4:03:45:00	4:04:23:00	38	TRACK CONDITION	
465.	142	N O and M	666.85-1	667.13-1	665.3	665.5	4	4:10:00:00	4:10:35:00	35	TRACK CONDITION	
466.	143	N O and M	666.85-1	667.13-1	665.3	665.5	4	4:23:52:00	5:00:39:00	47	TRACK CONDITION	
467.	144	N O and M	666.85-1	667.13-1	665.3	665.5	5	5:01:28:00	5:01:58:00	30	TRACK CONDITION	
468.	145	N O and M	666.85-1	667.13-1	665.3	665.5	7	7:00:57:00	7:01:26:00	29	TRACK CONDITION	
469.	146	N O and M	666.85-1	667.13-1	666.9	667.1	3	3:02:48:00	3:03:56:00	68	CAR DEPT. B/O E	
470.	147	N O and M	666.85-1	667.13-1	666.9	667.1	5	5:16:51:00	5:17:27:00	36	SWITCH PROBLEMS	
471.	148	N O and M	706.10-1	706.31-1	706.11	706.31	10	10:16:58:00	10:17:14:00	16	TRACK CONDITION	
472.	149	N O and M	706.10-1	706.31-1	706.11	706.31	5	5:15:58:00	5:16:40:00	42	TRACK CONDITION	
473.	150	N O and M	706.10-1	706.31-1	706.11	706.31	7	7:04:52:00	7:11:25:00	393	TRACK CONDITION	
474.	151	N O and M	706.10-1	706.31-1	706.11	706.31	9	9:02:31:00	9:07:14:00	283	TRACK CONDITION	
475.	152	N O and M	780.39-1	781.71-1	780.95	781.15	10	10:06:54:00	10:07:25:00	31	OTHER	
476.	153	N O and M	780.39-1	781.71-1	780.95	781.15	10	10:11:45:00	10:14:23:00	158	TRACK CONDITION	
477.	154	N O and M	780.39-1	781.71-1	780.95	781.15	11	11:10:58:00	11:11:17:00	19	TRACK CONDITION	
478.	155	N O and M	780.39-1	781.71-1	780.95	781.15	11	11:13:17:00	11:14:47:00	90	TRACK CONDITION	
479.	156	N O and M	780.39-1	781.71-1	780.95	781.15	6	6:19:14:00	6:19:51:00	37	TRACK CONDITION	
480.	157	N O and M	780.39-1	781.71-1	780.95	781.15	6	6:20:48:00	7:03:34:00	406	TRACK CONDITION	
481.	158	N O and M	780.39-1	781.71-1	780.95	781.15	9	9:12:02:00	9:12:59:00	57	TRACK CONDITION	
482.	159	N O and M	792.01-1	793.23-1	793	793.2	10	10:18:06:00	10:18:45:00	39	TRACK CONDITION	
483.	160	N O and M	792.01-1	793.23-1	793	793.2	10	10:20:14:00	10:20:54:00	40	TRACK CONDITION	
484.	161	N O and M	792.01-1	793.23-1	793	793.2	11	11:21:03:00	11:21:48:00	45	TRACK CONDITION	
485.	162	N O and M	792.01-1	793.23-1	793	793.2	11	11:23:19:00	12:00:15:00	56	TRACK CONDITION	
486.	163	N O and M	792.01-1	793.23-1	793	793.2	12	12:08:50:00	12:09:41:00	51	TRACK CONDITION	
487.	164	N O and M	792.01-1	793.23-1	793	793.2	12	12:11:35:00	12:12:01:00	26	TRACK CONDITION	
488.	165	N O and M	792.01-1	793.23-1	793	793.2	3	3:12:05:00	3:12:46:00	41	TRACK CONDITION	
489.	166	N O and M	792.01-1	793.23-1	793	793.2	4	4:04:43:00	4:05:05:00	22	TRACK CONDITION	
490.	167	N O and M	792.01-1	793.23-1	793	793.2	4	4:11:56:00	4:12:25:00	29	TRACK CONDITION	
491.	168	N O and M	792.01-1	793.23-1	793	793.2	5	5:05:07:00	5:05:47:00	40	TRACK CONDITION	
492.	169	N O and M	792.01-1	793.23-1	793	793.2	5	5:20:52:00	5:21:19:00	27	TRACK CONDITION	
493.	170	N O and M	792.01-1	793.23-1	793	793.2	5	5:23:37:00	5:23:54:00	17	TRACK CONDITION	
494.	171	N O and M	792.01-1	793.23-1	793	793.2	6	6:04:38:00	6:04:56:00	18	TRACK CONDITION	
495.	172	N O and M	792.01-1	793.23-1	793	793.2	8	8:13:02:00	8:14:27:00	85	TRACK CONDITION	
496.	173	N O and M	792.01-1	793.23-1	793	793.2	8	8:20:50:00	8:21:08:00	18	TRACK CONDITION	
497.	174	N O and M	795.29-1	796.00-1	795.8	796	10	10:23:47:00	11:00:03:00	16	TRACK CONDITION	
498.	175	N O and M	795.29-1	796.00-1	795.8	796	11	11:05:11:00	11:05:49:00	38	TRACK CONDITION	
499.	176	N O and M	795.29-1	796.00-1	795.8	796	3	3:23:29:00	3:23:45:00	16	TRACK CONDITION	
500.	177	N O and M	795.29-1	796.00-1	795.8	796	4	4:19:18:00	4:20:20:00	62	TRACK CONDITION	
501.	178	N O and M	795.29-1	796.00-1	795.8	796	8	8:10:56:00	8:11:27:00	31	TRACK CONDITION	
502.	179	N O and M	795.29-1	796.00-1	795.8	796	9	9:14:29:00	9:14:57:00	28	TRACK CONDITION	
503.	180	N O and M	795.29-1	796.00-1	795.8	796	9	9:22:24:00	9:22:50:00	26	TRACK CONDITION	
504.	325	Nahunta	A635.05-1	A635.30-1	635.1	635.3	5	5:14:20:00	5:14:38:00	18	DEFECT DETECTOR	
505.	462	New Castle	BG57.45-1	BG58.00-1	57.8	58	11	11:06:53:00	11:07:23:00	30	ENGINE FAILURE	
506.	463	New Castle	BG87.40-1	BG88.20-1	87.59	87.79	10	10:07:38:00	10:09:36:00	118	TRACK CONDITION	
507.	464	New Castle	BG87.40-1	BG88.20-1	87.59	87.79	8	8:04:01:00	8:04:23:00	22	TRACK CONDITION	
508.	465	New Castle	BG143.60-1	BG143.98-1	143.71	143.91	12	12:09:46:00	12:10:05:00	19	SWITCH PROBLEMS	
509.	466	New Castle	BG145.35-1	BG145.75-1	145.4	145.6	9	9:14:52:00	9:15:09:00	17	TRACK CONDITION	
510.	467	New Castle	BG155.49-1	BG155.82-1	155.6	155.8	7	7:07:34:00	7:07:59:00	25	SWITCH PROBLEMS	
511.	468	New Castle	BG175.54-1	BG177.59-1	176.65	176.85	6	6:10:38:00	6:11:26:00	48	TRACK CONDITION	
512.	14	Niagara	QDN25.00-1	QDN25.5-1	26.1	26.3	11	11:16:00:00	11:16:57:00	57	SWITCH PROBLEMS	
513.	15	Niagara	QDN25.00-1	QDN25.5-1	26.1	26.3	12	12:12:41:00	12:13:00:00	19	TRACK CONDITION	
514.	16	Niagara	QDN25.00-1	QDN25.5-1	26.1	26.3	3	3:11:13:00	3:11:33:00	20	TRACK CONDITION	
515.	17	Niagara	QDN25.00-1	QDN25.5-1	26.1	26.3	5	5:11:33:00	5:11:55:00	22	TRACK CONDITION	
516.	27/	Niagara	27/	27/	QDN26.55	QDN26.75	10	10:06:45:00	10:07:17:00	32	TRACK CONDITION	Adjacent/Parallel to SARR
517.	28/	Niagara	28/	28/	QDN26.55	QDN26.75	10	10:12:41:00	10:14:41:00	120	TRACK CONDITION	Adjacent/Parallel to SARR
518.	29/	Niagara	29/	29/	QDN26.55	QDN26.75	11	11:07:11:00	11:07:39:00	28	TRACK CONDITION	Adjacent/Parallel to SARR
519.	30/	Niagara	30/	30/	QDN26.55	QDN26.75	11	11:13:37:00	11:17:36:00	239	TRACK CONDITION	Adjacent/Parallel to SARR
520.	31/	Niagara	31/	31/	QDN26.55	QDN26.75	12	12:03:45:00	12:04:06:00	21	TRACK CONDITION	Adjacent/Parallel to SARR
521.	32/	Niagara	32/	32/	QDN26.55	QDN26.75	3	3:03:48:00	3:04:19:00	31	TRACK CONDITION	Adjacent/Parallel to SARR
522.	33/	Niagara	33/	33/	QDN26.55	QDN26.75	3	3:06:45:00	3:07:08:00	23	TRACK CONDITION	Adjacent/Parallel to SARR
523.	34/	Niagara	34/	34/	QDN26.55	QDN26.75	3	3:12:41:00	3:14:44:00	123	TRACK CONDITION	Adjacent/Parallel to SARR
524.	35/	Niagara	35/	35/	QDN26.55	QDN26.75	4	4:07:11:00	4:07:54:00	43	TRACK CONDITION	Adjacent/Parallel to SARR
525.	36/	Niagara	36/	36/	QDN26.55	QDN26.75	4	4:12:44:00	4:15:08:00	144	TRACK CONDITION	Adjacent/Parallel to SARR
526.	37/	Niagara	37/	37/	QDN26.55	QDN26.75	5	5:03:47:00	5:04:11:00	24	TRACK CONDITION	Adjacent/Parallel to SARR
527.	38/	Niagara	38/	38/	QDN26.55	QDN26.75	6	6:03:45:00	6:04:22:00	37	TRACK CONDITION	Adjacent/Parallel to SARR
528.	39/	Niagara	39/	39/	QDN26.55	QDN26.75	8	8:03:45:00	8:04:06:00	21	TRACK CONDITION	Adjacent/Parallel to SARR
529.	40/	Niagara	40/	40/	QDN26.55	QDN26.75	9	9:03:48:00	9:04:13:00	25	TRACK CONDITION	Adjacent/Parallel to SARR
530.	41/	Niagara	41/	41/	QDN26.55	QDN26.75	9	9:07:11:00	9:07:49:00	38	TRACK CONDITION	Adjacent/Parallel to SARR
531.	384	North End	A23.25-1	A24.45-1	23.9	24.1	10	10:15:08:00	10:16:34:00	86	OTHER	
532.	385	North End	A23.25-1	A24.45-1	23.9	24.1	6	6:13:44:00	6:14:28:00	44	TRACK CONDITION	
533.	386	North End	A26.60-1	A26.80-1	26.6	26.8	6	6:23:03:00	6:23:52:00	49	TRACK CONDITION	
534.	387	North End	A41.47-1	A42.60-1	42.1	42.3	12	12:18:06:00	12:19:10:00	64	OTHER	
535.	388	North End	A96.24-1	A97.45-1	97.2	97.4	3	3:03:27:00	3:03:49:00	22	TRACK CONDITION	
536.	389	North End	A112.56-1	A112.11-1	111.9	112.1	10	10:21:13:00	10:21:30:00	17	TRACK CONDITION	
537.	390	North End	A112.56-1	A112.11-1	111.9	112.1	10	10:21:40:00	10:22:12:00	32	TRACK CONDITION	
538.	391	North End	A112.56-1	A112.11-1	111.9	112.1	11	11:01:49:00	11:04:51:00	182	TRACK CONDITION	
539.	392	North End	A112.56-1	A112.11-1	111.9	112.1	3	3:08:43:00	3:09:38:00	55	TRACK CONDITION	
540.	393	North End	A112.56-1	A112.11-1	111.9	112.1	4	4:14:24:00	4:14:43:00	19	TRACK CONDITION	

RTC NODES: Random Outages

CSXT Reply RTC Permit Number (1)	TPI Rebuttal RTC Permit Number (2)	Subdivision (3)	Beginning RTC Node (4)	Ending RTC Node (5)	Beginning MP (6)	Ending MP (7)	Day (8)	Start Time DD:HH:MM:SS (9)	End Time DD:HH:MM:SS (10)	Duration In Minutes (11)	Description (12)	Outages Excluded from TPI Rebuttal RTC // (13)
541.	394	North End	A111.56-1	A112.11-1	111.9	112.1	7	7:19:11:00	7:19:33:00	22	TRACK CONDITION	
542.	395	North End	A111.56-1	A112.11-1	111.9	112.1	9	9:15:48:00	9:16:13:00	25	TRACK CONDITION	
543.	396	North End	A119.73-1	A120.00-1	119.8	120	7	7:09:09:00	7:10:14:00	65	TRACK CONDITION	
544.	285	Philadelphia	BAK89.78-1	BAK90.60-1	89.9	90.1	12	12:04:09:00	12:04:28:00	19	TRACK CONDITION	
545.	286	Philadelphia	BAK89.78-1	BAK90.60-1	89.9	90.1	3	3:18:25:00	3:18:47:00	22	TRACK CONDITION	
546.	287	Philadelphia	BAK89.78-1	BAK90.60-1	89.9	90.1	3	3:22:13:00	3:22:46:00	33	TRACK CONDITION	
547.	288	Philadelphia	BAK89.78-1	BAK90.60-1	89.9	90.1	8	8:13:26:00	8:13:51:00	25	TRACK CONDITION	
548.	289	Philadelphia	BAK94.40-1	BAK95.80-1	95.6	95.8	5	5:10:20:00	5:10:41:00	21	TRACK CONDITION	
549.	290	Philadelphia	BAK94.40-1	BAK95.80-1	95.6	95.8	8	8:14:31:00	8:17:24:00	173	TRACK CONDITION	
550.	291	Pittsburgh BF	BF274.85-1	BF275.45-1	274.9	275.1	12	12:09:01:00	12:09:55:00	54	TRACK CONDITION	
551.	292	Pittsburgh BF	BF274.85-1	BF275.45-1	274.9	275.1	4	4:11:32:00	4:12:04:00	32	SWITCH PROBLEMS	
552.	293	Pittsburgh BF	BF276.45-1	BF277.70-1	276.9	277.1	4	4:06:45:00	4:07:25:00	40	SWITCH PROBLEMS	
553.	294	Pittsburgh BF	BF276.45-1	BF277.70-1	276.9	277.1	5	5:20:43:00	5:21:28:00	45	TRACK CONDITION	
554.	295	Pittsburgh BF	BF277.85-1	BF278.22-1	277.9	278.1	12	12:15:33:00	12:16:15:00	42	SWITCH PROBLEMS	
555.	296	Pittsburgh BF	BF285.10-1	BF285.50-1	285.3	285.5	6	6:23:20:00	7:00:00:00	40	UNKNOWN	
556.	297	Pittsburgh BF	BF285.10-1	BF285.50-1	285.3	285.5	8	8:04:39:00	8:05:24:00	45	ENGINE FAILURE	
557.	298	Pittsburgh PLE	PLE8.98-1	PLE9.93-1	9.7	9.9	9	9:22:40:00	10:03:04:00	264	ENGINE FAILURE	
558.	299	Pittsburgh PLE	PLE11.25-1	PLE11.55-1	11.3	11.5	12	12:23:36:00	13:00:18:00	42	SWITCH PROBLEMS	
559.	300	Pittsburgh PLE	PLE18.27-1	PLE18.50-1	18.3	18.5	10	10:03:17:00	10:03:51:00	34	TRACK CONDITION	
560.	301	Pittsburgh PLE	PLE22.80-1	PLE23.13-1	22.9	23.1	7	7:16:42:00	7:17:54:00	72	DD/NOTHING FOUN	
561.	302	Pittsburgh PLE	PLE28.60-1	PLE33.80-1	29.4	29.6	8	8:00:19:00	8:00:49:00	30	UNDESIREM EMERG	
562.	303	Pittsburgh PLE	PLE43.00-1	PLE54.00-1	43.1	43.3	6	6:12:43:00	6:13:04:00	21	SWITCH PROBLEMS	
563.	304	Pittsburgh PLY	PLY2.42-1	PLY3.28-1	2.71	2.91	8	8:05:56:00	8:07:30:00	94	SWITCH PROBLEMS	
564.	305	Pittsburgh PLY	PLY2.42-1	PLY3.28-1	2.71	2.91	9	9:20:35:00	9:21:12:00	37	TRACK CONDITION	
565.	306	Pittsburgh PLY	PLY16.80-2	PLY17.20-2	16.9	17.1	3	3:08:33:00	3:08:53:00	20	ENGINE FAILURE	
566.	307	RF&P	CFP10.66-1	CFP11.10-1	10.9	11.1	11	11:16:09:00	11:17:09:00	60	OTHER	
567.	308	RF&P	CFP19.56-1	CFP21.10-1	20.9	21.1	10	10:06:33:00	10:09:06:00	153	UNDESIREM EMERG	
568.	309	RF&P	CFP19.56-1	CFP21.10-1	20.9	21.1	6	6:09:55:00	6:10:19:00	24	TRACK CONDITION	
569.	310	RF&P	CFP22.31-1	CFP23.28-1	22.9	23.1	12	12:16:39:00	12:17:23:00	44	DD/NOTHING FOUN	
570.	311	RF&P	CFP22.31-1	CFP23.28-1	22.9	23.1	8	8:09:48:00	8:10:10:00	22	TRACK CONDITION	
571.	312	RF&P	CFP58.88-1	CFP59.70-1	59.2	59.4	12	12:12:28:00	12:14:55:00	147	TRACK CONDITION	
572.	313	RF&P	CFP58.88-1	CFP59.70-1	59.2	59.4	7	7:14:54:00	7:15:28:00	34	OTHER	
573.	314	RF&P	CFP60.99-1	CFP61.20-1	61	61.2	5	5:20:10:00	5:23:35:00	205	OTHER	
574.	315	RF&P	CFP70.73-1	CFP71.11-1	70.9	71.1	9	9:17:52:00	9:19:40:00	108	OTHER	
575.	316	RF&P	CFP96.65-1	CFP98.88-1	96.9	97.1	8	8:01:18:00	8:01:44:00	26	DD/NOTHING FOUN	
576.	397	Richmond Terminal	CFP1.30-1	CFP1.94-1	1.6	1.8	10	10:01:21:00	10:02:05:00	44	TRACK CONDITION	
577.	398	Richmond Terminal	CFP1.30-1	CFP1.94-1	1.6	1.8	10	10:08:18:00	10:09:49:00	91	TRACK CONDITION	
578.	399	Richmond Terminal	CFP1.30-1	CFP1.94-1	1.6	1.8	3	3:02:39:00	3:03:11:00	32	TRACK CONDITION	
579.	400	Richmond Terminal	CFP1.30-1	CFP1.94-1	1.6	1.8	4	4:05:09:00	4:06:25:00	76	TRACK CONDITION	
580.	401	Richmond Terminal	CFP1.30-1	CFP1.94-1	1.6	1.8	9	9:11:30:00	9:13:12:00	102	TRACK CONDITION	
581.	42/	Richmond Terminal	42/	ARN3.2	ARN3.4	ARN3.8	11	11:11:45:00	11:12:07:00	22	TRACK CONDITION	Adjacent/Parallel to SARR
582.	402	Richmond Terminal	CFP3.29-1	CFP4.96-1	3.3	3.5	10	10:23:58:00	11:00:16:00	18	TRACK CONDITION	
583.	403	Richmond Terminal	CFP3.29-1	CFP4.96-1	3.3	3.5	11	11:16:28:00	11:17:50:00	82	TRACK CONDITION	
584.	404	Richmond Terminal	CFP3.29-1	CFP4.96-1	3.3	3.5	3	3:05:37:00	3:06:00:00	23	TRACK CONDITION	
585.	405	Richmond Terminal	CFP3.29-1	CFP4.96-1	3.3	3.5	4	4:18:32:00	4:18:57:00	25	TRACK CONDITION	
586.	406	Richmond Terminal	CFP3.29-1	CFP4.96-1	3.3	3.5	8	8:08:10:00	8:09:09:00	59	OTHER	
587.	407	Richmond Terminal	CFP3.29-1	CFP4.96-1	3.3	3.5	9	9:05:00:00	9:05:46:00	46	TRACK CONDITION	
588.	408	Richmond Terminal	CFP3.29-1	CFP4.96-1	3.3	3.5	9	9:23:43:00	10:00:05:00	22	TRACK CONDITION	
589.	409	Richmond Terminal	CFP3.29-1	CFP4.96-1	4.3	4.5	10	10:11:22:00	10:11:43:00	21	TRACK CONDITION	
590.	410	Richmond Terminal	CFP3.29-1	CFP4.96-1	4.3	4.5	9	9:09:35:00	9:10:00:00	25	TRACK CONDITION	
591.	411	Richmond Terminal	CFP3.29-1	CFP4.96-1	4.7	4.9	3	3:22:09:00	3:22:43:00	34	TRACK CONDITION	
592.	18	River	QR33.55-1	QR33.45-1	33.2	33.4	7	7:03:13:00	7:06:33:00	200	TRACK CONDITION	
593.	19	River	QR78.71-1	QR80.10-1	79.9	80.1	7	7:15:34:00	7:17:49:00	135	TRACK CONDITION	
594.	20	River	QR90.39-1	QR91.15-1	90.4	90.6	6	6:13:44:00	6:14:03:00	19	SWITCH PROBLEMS	
595.	21	River	QR90.39-1	QR91.15-1	90.4	90.6	6	6:14:45:00	6:15:09:00	24	TRACK CONDITION	
596.	22	River	QR120.00-1	QR121.32-1	121	121.2	5	5:10:25:00	5:11:13:00	48	SWITCH PROBLEMS	
597.	23	River	QR120.00-1	QR121.32-1	121	121.2	6	6:05:02:00	6:05:28:00	26	TRACK CONDITION	
598.	24	Rochester	QC334.23-1	QC336.09-1	334.8	335	9	9:19:21:00	9:20:29:00	68	TRACK CONDITION	
599.	25	Rochester	QC336.30-1	QC339.50-1	338.5	338.7	5	5:00:45:00	5:01:46:00	61	DERAILMENT DELA	
600.	26	Rochester	QC336.30-1	QC339.50-1	338.5	338.7	7	7:11:37:00	7:12:33:00	56	SWITCH PROBLEMS	
601.	27	Rochester	QC359.08-1	QC361.14-1	359.1	359.3	8	8:05:36:00	8:06:09:00	33	TRACK CONDITION	
602.	28	Rochester	QC363.00-1	QC365.02-1	363.4	363.6	5	5:16:04:00	5:16:57:00	53	TRACK CONDITION	
603.	29	Rochester	QC368.03-1	QC369.84-1	368.8	369	12	12:20:14:00	12:20:35:00	21	TRACK CONDITION	
604.	30	Rochester	QC368.03-1	QC369.84-1	368.8	369	9	9:12:22:00	9:13:10:00	48	TRACK CONDITION	
605.	31	Rochester	QC380.92-1	QC382.62-1	382.39	382.59	6	6:14:25:00	6:15:31:00	66	TRACK CONDITION	
606.	32	Rochester	QC393.66-1	QC394.60-1	393.7	393.9	3	3:08:39:00	3:09:07:00	28	TRACK CONDITION	
607.	674	S and N A North 000	295.69-1	296.54-1	295.9	296.1	10	10:00:26:00	10:01:22:00	56	TRACK CONDITION	
608.	675	S and N A North 000	295.69-1	296.54-1	295.9	296.1	6	6:16:43:00	6:17:03:00	20	TRACK CONDITION	
609.	676	S and N A North 000	303.37-1	305.46-1	304.9	305.1	10	10:19:17:00	10:19:53:00	36	TRACK CONDITION	
610.	677	S and N A North 000	303.37-1	305.46-1	304.9	305.1	10	10:22:03:00	10:22:40:00	37	TRACK CONDITION	
611.	678	S and N A North 000	303.37-1	305.46-1	304.9	305.1	11	11:13:47:00	11:14:06:00	19	TRACK CONDITION	
612.	679	S and N A North 000	303.37-1	305.46-1	304.9	305.1	11	11:15:39:00	11:15:55:00	16	TRACK CONDITION	
613.	680	S and N A North 000	303.37-1	305.46-1	304.9	305.1	12	12:14:33:00	12:14:52:00	19	TRACK CONDITION	
614.	681	S and N A North 000	303.37-1	305.46-1	304.9	305.1	5	5:10:46:00	5:11:16:00	30	TRACK CONDITION	
615.	682	S and N A North 000	303.37-1	305.46-1	304.9	305.1	5	5:11:21:00	5:11:46:00	25	TRACK CONDITION	
616.	683	S and N A North 000	303.37-1	305.46-1	304.9	305.1	7	7:02:59:00	7:03:35:00	36	TRACK CONDITION	
617.	684	S and N A North 000	303.37-1	305.46-1	304.9	305.1	7	7:10:37:00	7:11:12:00	35	TRACK CONDITION	
618.	685	S and N A North 000	303.37-1	305.46-1	304.9	305.1	8	8:00:37:00	8:01:05:00	28	OTHER	
619.	686	S and N A North 000	303.37-1	305.46-1	304.9	305.1	8	8:09:46:00	8:10:08:00	22	TRACK CONDITION	
620.	687	S and N A North 000	303.37-1	305.46-1	304.9	305.1	8	8:14:55:00	8:15:46:00	51	TRACK CONDITION	
621.	688	S and N A North 000	303.37-1	305.46-1	304.9	305.1	9	9:12:33:00	9:12:51:00	18	TRACK CONDITION	
622.	689	S and N A North 000	303.37-1	305.46-1	304.9	305.1	9	9:21:51:00	9:23:02:00	71	TRACK CONDITION	
623.	690	S and N A North 000	317.00-1	319.50-1	318.9	319.1	12	12:16:13:00	12:16:29:00	16	TRACK CONDITION	
624.	691	S and N A North 000	335.70-1	338.25-1	335.7	335.9	9	9:12:04:00	9:12:20:00	16	TRACK CONDITION	
625.	692	S and N A North 000	335.70-1	338.25-1	338	338.2	7	7:00:44:00	7:01:43:00	59	CAR DEPT. B/O E	
626.	693	S and N A North 000	335.70-1	338.25-1	338	338.2	7	7:18:39:00	7:19:15:00	36	TRACK CONDITION	
627.	694	S and N A North 000	335.70-1	338.25-1	338	338.2	9	9:02:16:00	9:02:59:00	43	TRACK CONDITION	
628.	695	S and N A North 000	340.23-1	341.10-1	340.9	341.1	10	10:17:01:00	10:17:23:00	22	TRACK CONDITION	
629.	696	S and N A North 000	340.23-1	341.10-1	340.9	341.1	3	3:17:08:00	3:17:30:00	22	TRACK CONDITION	
630.	697	S and N A North 000	340.23-1	341.10-1	340.9	341.1	7	7:16:15:00	7:16:38:00	23	TRACK CONDITION	

RTC NODES: Random Outages

CSXT Reply RTC Permit Number	TPI Rebuttal RTC Permit Number	Subdivision	Beginning RTC Node	Ending RTC Node	Beginning MP	Ending MP	Day	Start Time		End Time		Duration In Minutes	Description	Outages Excluded from TPI Rebuttal RTC / (13)
								DD:HH:MM:SS	DD:HH:MM:SS	DD:HH:MM:SS	DD:HH:MM:SS			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)		
631.	698	S and N A North OOD	340.23-1	341.10-1	340.9	341.1	7	7:17:30:00	7:17:59:00	29	TRACK CONDITION			
632.	699	S and N A North OBA	BA239.70-1	BA240.17-1	239.9	240.1	8	8:02:55:00	8:03:19:00	24	TRACK CONDITION			
633.	181	S and N A South	403.50-1	404.10-1	403.9	404.1	4	4:13:46:00	4:14:10:00	24	SWITCH PROBLEMS			
634.	182	S and N A South	417.80-1	418.35-1	418	418.2	3	3:13:34:00	3:15:31:00	117	TRACK CONDITION			
635.	183	S and N A South	417.80-1	418.35-1	418	418.2	6	6:22:47:00	7:00:00:00	73	TRACK CONDITION			
636.	184	S and N A South	423.14-1	424.83-1	423.75	423.95	4	4:07:51:00	4:12:41:00	290	TRACK CONDITION			
637.	185	S and N A South	459.77-1	460.27-1	459.85	460.05	6	6:11:07:00	6:17:03:00	356	SWITCH PROBLEMS			
638.	186	S and N A South	484.90-1	485.10-1	484.9	485.1	4	4:21:39:00	4:22:12:00	33	TRACK CONDITION			
639.	187	S and N A South	484.90-1	485.10-1	484.9	485.1	9	9:02:17:00	9:04:25:00	128	TRACK CONDITION			
640.	188	S and N A South	484.90-1	485.10-1	484.9	485.1	9	9:04:52:00	9:05:51:00	59	TRACK CONDITION			
641.	189	S and N A South	484.90-1	485.10-1	484.9	485.1	9	9:09:50:00	9:10:09:00	19	TRACK CONDITION			
642.	201	Sanford	A654.28-1	A655.11-1	654.9	655.1	5	5:00:20:00	5:00:50:00	30	RDU RELATED DEF			
643.	502	Sanford	A654.28-1	A655.11-1	654.9	655.1	5	5:21:04:00	5:21:20:00	16	TRACK CONDITION			
644.	503	Sanford	A666.85-1	A667.16-1	666.9	667.1	5	5:18:13:00	5:18:51:00	38	WEATHER -FLASH			
645.	504	Sanford	A696.56-1	A697.17-1	696.9	697.1	6	6:04:50:00	6:05:08:00	18	OTHER			
646.	505	Sanford	A761.90-1	A762.14-1	761.9	762.1	6	6:22:24:00	6:23:10:00	46	TRACK CONDITION			
647.	506	Sanford	A776.17-1	A777.24-1	776.9	777.1	10	10:10:04:00	10:10:21:00	17	TRACK CONDITION			
648.	507	Sanford	A780.63-1	A781.19-1	780.9	781.1	12	12:00:13:00	12:00:35:00	22	TRACK CONDITION			
649.	508	Sanford	A791.88-1	A792.24-1	791.9	792.1	6	6:16:37:00	6:17:30:00	53	TRACK CONDITION			
650.	509	Sanford	A795.75-2	A797.62-2	796.6	796.8	6	6:01:20:00	6:01:52:00	32	TRACK CONDITION			
651.	510	Sanford	A795.75-2	A797.62-2	796.6	796.8	6	6:18:19:00	6:18:58:00	39	TRACK CONDITION			
652.	511	Sanford	A795.75-2	A797.62-2	796.6	796.8	9	9:01:33:00	9:02:36:00	63	TRACK CONDITION			
653.	33	Selkirk QC	QC170.00-1	QC170.00-1	169.8	170	7	7:17:00:00	7:17:26:00	26	SWITCH PROBLEMS			
654.	34	Selkirk QC	QC173.32-1	QC173.32-1	173.1	173.3	7	7:18:34:00	7:18:55:00	21	TRACK CONDITION			
655.	35	Selkirk QG	QG31.75-1	QG32.60-1	31.9	32.1	5	5:17:01:00	5:17:45:00	44	TRACK CONDITION			
656.	36	Selkirk QG	QG31.75-1	QG32.60-1	31.9	32.1	6	6:15:47:00	6:16:13:00	26	TRACK CONDITION			
657.	37	Selkirk QG	QG31.75-1	QG32.60-1	31.9	32.1	7	7:10:36:00	7:10:59:00	23	TRACK CONDITION			
658.	38	Selkirk QG	QG31.75-1	QG32.60-1	31.9	32.1	7	7:15:56:00	7:16:44:00	48	TRACK CONDITION			
659.	39	Selkirk QG	QG31.75-1	QG32.60-1	31.9	32.1	8	8:14:26:00	8:15:18:00	52	TRACK CONDITION			
660.	43/	Selkirk QG	43/	43/	QCC31.9	QCC32.1	9	9:14:11:00	9:14:33:00	22	TRACK CONDITION	Adjacent/Parallel to SARR		
661.	40	Selkirk QG	QG37.23-1	QG39.30-1	37.9	38.1	12	12:08:44:00	12:09:04:00	20	TRACK CONDITION			
662.	41	Selkirk QG	QG37.23-1	QG39.30-1	37.9	38.1	6	6:09:17:00	6:09:42:00	25	TRACK CONDITION			
663.	412	South End	A120.95-1	A122.01-1	121.6	121.8	10	10:10:57:00	10:11:32:00	35	ENGINE FAILURE			
664.	413	South End	A123.05-1	A123.31-1	123.1	123.3	12	12:00:10:00	12:00:44:00	34	TRACK CONDITION			
665.	414	South End	A123.05-1	A123.31-1	123.1	123.3	6	6:15:26:00	6:16:21:00	55	TRACK CONDITION			
666.	415	South End	A164.54-1	A165.10-1	164.7	164.9	5	5:16:49:00	5:17:36:00	47	TRACK CONDITION			
667.	416	South End	A171.82-1	A172.76-1	171.9	172.1	6	6:13:57:00	6:14:22:00	25	OTHER			
668.	417	South End	A176.20-1	A176.47-1	176.2	176.4	11	11:14:53:00	11:15:31:00	38	TRACK CONDITION			
669.	418	South End	A208.89-1	A209.10-1	208.9	209.1	7	7:18:34:00	7:18:58:00	24	TRACK CONDITION			
670.	419	South End	A227.50-1	A228.19-1	227.6	227.8	10	10:02:29:00	10:02:54:00	25	TRACK CONDITION			
671.	420	Spartanbug	AK543.23-1	AK543.23-1	542.9	543.1	10	10:20:56:00	10:21:22:00	26	TRACK CONDITION			
672.	596	St Louis	QS23.79-1	QS25.51-1	23.8	24	4	4:16:47:00	4:17:09:00	22	DEFECT DETECTOR			
673.	597	Toledo	BE25.70-1	BE26.00-1	25.7	25.9	9	9:02:10:00	9:02:39:00	29	TRACK CONDITION			
674.	598	Toledo	BE27.65-1	BE28.11-1	27.9	28.1	10	10:11:24:00	10:12:54:00	90	TRACK CONDITION			
675.	599	Toledo	BE27.65-1	BE28.11-1	27.9	28.1	12	12:08:34:00	12:08:55:00	21	TRACK CONDITION			
676.	600	Toledo	BE27.65-1	BE28.11-1	27.9	28.1	12	12:22:34:00	13:00:34:00	120	ENGINE FAILURE			
677.	601	Toledo	BE27.65-1	BE28.11-1	27.9	28.1	5	5:07:44:00	5:08:01:00	17	TRACK CONDITION			
678.	602	Toledo	BE27.65-1	BE28.11-1	27.9	28.1	9	9:16:41:00	9:17:01:00	20	TRACK CONDITION			
679.	603	Toledo	BE30.30-1	BE31.79-1	30.31	30.51	4	4:13:47:00	4:14:17:00	30	OTHER			
680.	604	Toledo	BE40.10-1	BE41.43-1	41	41.2	11	11:11:06:00	11:11:27:00	21	TRACK CONDITION			
681.	605	Toledo	BE42.90-1	BE44.26-1	43.8	44	11	11:11:57:00	11:13:17:00	80	OTHER			
682.	606	Toledo	BE57.75-1	BE58.43-1	58.2	58.4	11	11:16:52:00	11:17:09:00	17	TRACK CONDITION			
683.	607	Toledo	BE72.90-1	BE73.34-1	72.9	73.1	3	3:18:44:00	3:19:29:00	45	STICKING CAR BR			
684.	608	Toledo	BE75.29-1	BE75.55-1	75.3	75.5	6	6:13:56:00	6:14:16:00	20	SWITCH PROBLEMS			
685.	609	Toledo	BE77.30-1	BE77.80-1	77.6	77.8	3	3:15:52:00	3:17:12:00	80	STICKING CAR BR			
686.	610	Toledo	BE79.81-1	BE80.12-1	79.9	80.1	12	12:18:33:00	12:20:53:00	140	CAR DEPT. 8/O E			
687.	611	Toledo	BE79.81-1	BE80.12-1	79.9	80.1	4	4:08:40:00	4:09:41:00	61	SWITCH PROBLEMS			
688.	612	Toledo	BE79.81-1	BE80.12-1	79.9	80.1	8	8:16:17:00	8:19:15:00	178	TRACK CONDITION			
689.	613	Toledo	BE102.09-1	BE102.99-1	102.6	102.8	8	8:11:22:00	8:11:50:00	28	DEFECT DETECTOR			
690.	614	Toledo	BE126.90-1	BE127.75-1	126.9	127.1	10	10:01:50:00	10:03:56:00	126	TRACK CONDITION			
691.	615	Toledo	BE126.90-1	BE127.75-1	126.9	127.1	10	10:19:00:00	10:20:52:00	111	TRACK CONDITION			
692.	616	Toledo	BE126.90-1	BE127.75-1	126.9	127.1	11	11:19:12:00	11:20:15:00	63	TRACK CONDITION			
693.	617	Toledo	BE129.11-1	BE129.36-1	129.11	129.31	7	7:13:09:00	7:13:40:00	31	SWITCH PROBLEMS			
694.	618	Toledo	BE129.11-1	BE129.36-1	129.11	129.31	8	8:09:43:00	8:10:00:00	17	TRACK CONDITION			
695.	619	Toledo	BE130.67-1	BE130.99-1	130.7	130.9	11	11:08:17:00	11:08:37:00	20	OTHER			
696.	620	Toledo	BE130.67-1	BE130.99-1	130.71	130.91	6	6:10:32:00	6:11:00:00	28	TRACK CONDITION			
697.	621	Toledo	BE131.90-1	BE132.30-1	131.9	132.1	7	7:18:55:00	7:21:41:00	166	DEFECT DETECTOR			
698.	190	W and A	WA39.94-1	WA42.28-1	42	42.2	12	12:04:18:00	12:04:53:00	35	TRACK CONDITION			
699.	191	W and A	WA49.85-1	WA50.49-1	49.9	50.1	3	3:01:43:00	3:04:49:00	186	TRACK CONDITION			
700.	192	W and A	WA49.85-1	WA50.49-1	49.9	50.1	3	3:12:35:00	3:16:59:00	264	TRACK CONDITION			
701.	193	W and A	WA49.85-1	WA50.49-1	49.9	50.1	4	4:16:57:00	4:19:03:00	126	TRACK CONDITION			
702.	194	W and A	WA56.60-1	WA57.72-1	56.9	57.1	11	11:03:03:00	11:04:09:00	66	DEFECT DETECTOR			
703.	195	W and A	WA56.60-1	WA57.72-1	56.9	57.1	4	4:03:43:00	4:05:36:00	113	DEFECT DETECTOR			
704.	196	W and A	WA84.34-1	WA85.67-1	84.65	84.85	11	11:02:58:00	11:04:02:00	64	HOT BOX			
705.	197	W and A	WA98.84-1	WA99.16-1	98.9	99.1	5	5:00:33:00	5:02:30:00	117	WORK STOPPAGE			
706.	198	W and A	WA107.03-1	WA108.00-1	107.75	107.95	6	6:22:58:00	6:23:17:00	19	TRACK CONDITION			
707.	199	W and A	WA120.65-1	WA121.21-1	120.9	121.1	6	6:05:06:00	6:05:24:00	18	TRACK CONDITION			
708.	200	W and A	WA127.83-1	WA128.40-1	127.92	128.12	12	12:12:56:00	12:18:18:00	322	TRACK CONDITION			
709.	201	W and A	WA127.83-1	WA128.40-1	127.92	128.12	4	4:13:06:00	4:13:26:00	20	TRACK CONDITION			
710.	202	W and A	WA127.83-1	WA128.40-1	127.92	128.12	6	6:16:20:00	6:19:30:00	190	TRACK CONDITION			
711.	203	W and A	WA135.48-1	WA135.72-1	135.5	135.7	10	10:01:27:00	10:02:58:00	91	TRACK CONDITION			
712.	512	Wildwood AR	AR828.89-1	AR829.41-1	828.9	829.1	6	6:08:57:00	6:09:20:00	23	TRACK CONDITION			
713.	513	Wildwood AR	AR828.89-1	AR829.41-1	828.9	829.1	7	7:03:20:00	7:04:19:00	59	DEFECT DETECTOR			
714.	514	Wildwood S	S652.85-1	S652.95-1	652.7	652.9	3	3:22:11:00	3:22:39:00	28	TRACK CONDITION			
715.	515	Wildwood S	S652.85-1	S652.95-1	652.7	652.9	7	7:12:21:00	7:12:49:00	28	TRACK CONDITION			
716.	516	Wildwood S	S652.85-1	S652.95-1	652.7	652.9	7	7:16:54:00	7:17:23:00	29	TRACK CONDITION			
717.	517	Wildwood S	S652.85-1	S652.95-1	652.7	652.9	8	8:03:40:00	8:04:03:00	23	TRACK CONDITION			
718.	518	Wildwood S	S655.37-1	S655.91-3	655.7	655.9	5	5:04:27:00	5:04:43:00	16	TRACK CONDITION			
719.	519	Wildwood S	S655.37-1	S655.91-3	655.7	655.9	7	7:17:14:00	7:17:43:00	29	TRACK CONDITION			
720.	520	Wildwood S	S655.37-1	S655.91-3	655.7	655.9	7	7:21:18:00	7:21:37:00	19	TRACK CONDITION			

RTC NODES: Random Outages

CSXT Reply RTC Permit Number	TPI Rebuttal RTC Permit Number	Subdivision	Beginning RTC Node	Ending RTC Node	Beginning MP	Ending MP	Day	Start Time	End Time	Duration In Minutes	Description	Outages Excluded from TPI Rebuttal RTC / (13)
								DD:HH:MM:SS	DD:HH:MM:SS			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
721.	521	Wildwood S	5675.86-1	5676.20-1	675.9	676.1	11	11:23:23:00	12:00:08:00	45	UNDESIRED EMERG	
722.	522	Wildwood S	5675.86-1	5676.20-1	675.9	676.1	12	12:15:23:00	12:15:45:00	22	TRACK CONDITION	
723.	523	Wildwood S	5679.64-1	5680.37-1	680	680.2	5	5:17:23:00	5:18:04:00	41	TRACK CONDITION	
724.	524	Wildwood S	5689.63-1	5690.18-1	689.9	690.1	5	5:19:51:00	5:20:28:00	37	WEATHER -FLASH	
725.	525	Wildwood S	5724.77-1	5725.65-1	724.9	725.1	7	7:23:10:00	7:23:26:00	16	TRACK CONDITION	
726.	526	Wildwood S	5724.77-1	5725.65-1	724.9	725.1	7	7:23:50:00	8:00:35:00	45	AIR TROUBLE	
727.	527	Wildwood S	5730.79-1	5731.10-1	730.9	731.1	4	4:05:13:00	4:07:24:00	131	ACCIDENT	
728.	528	Wildwood S	5759.85-1	5760.24-1	759.9	760.1	6	6:03:40:00	6:04:24:00	44	RDU RELATED DEF	
729.	529	Wildwood S	5759.85-1	5760.24-1	759.9	760.1	6	6:09:26:00	6:09:50:00	24	SWITCH PROBLEMS	
730.	530	Wildwood S	5759.85-1	5760.24-1	759.9	760.1	7	7:21:44:00	7:22:04:00	20	OTHER	
731.	531	Wildwood S	5766.87-1	5768.91-1	766.9	767.1	8	8:00:56:00	8:02:02:00	66	HOT BOX	
732.	470	Willard	817.80-1	818.26-1	8	8.2	4	4:08:31:00	4:09:19:00	48	ENGINE FAILURE	
733.	471	Willard	817.80-1	818.26-1	8	8.2	5	5:11:40:00	5:14:40:00	180	ENGINE FAILURE	
734.	472	Willard	8136.30-1	8136.52-1	36.3	36.5	12	12:10:18:00	12:10:34:00	16	SWITCH PROBLEMS	
735.	473	Willard	8136.30-1	8136.52-1	36.3	36.5	9	9:20:42:00	9:21:48:00	66	SWITCH PROBLEMS	
736.	474	Willard Term B1	810.10-1	810.30-1	0.1	0.3	4	4:14:09:00	4:14:36:00	27	TRACK CONDITION	
737.	475	Willard Term B1	810.10-1	810.30-1	0.1	0.3	6	6:06:45:00	6:07:09:00	24	TRACK CONDITION	
738.	700	Woodland	ZA116.45-1	ZA117.98-1	116.9	117.1	12	12:14:41:00	12:15:04:00	23	TRACK CONDITION	
739.	532	Yeoman	5817.80-1	5818.33-1	817.9	818.1	12	12:07:24:00	12:10:21:00	177	SWITCH PROBLEMS	
740.	533	Yeoman	5817.80-1	5818.33-1	817.9	818.1	5	5:08:09:00	5:09:37:00	88	SWITCH PROBLEMS	
741.	534	Yeoman	5817.80-1	5818.33-1	817.9	818.1	6	6:07:42:00	6:07:59:00	17	SWITCH PROBLEMS	
742.	535	Yeoman	5820.88-1	5821.29-1	820.9	821.1	8	8:15:52:00	8:16:57:00	65	SWITCH PROBLEMS	

- 1/ See Rebuttal e-Workpaper "11-OnSARR & Applicable Delays-TPI Rebuttal.xlsx", CSXT Outage Errors Level. The Off-SARR outage identification process is described in steps 1 through 6.
- 2/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 156024 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 71 Column G.
- 3/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 156777 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 68 Column G.
- 4/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 205214 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 785 Column G.
- 5/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 118698 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 256 Column G.
- 6/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 155641 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 286 Column G.
- 7/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 151037 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 287 Column G.
- 8/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 154641 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 288 Column G.
- 9/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 12482 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 277 Column G.
- 10/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 150134 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 279 Column G.
- 11/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 157820 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 280 Column G.
- 12/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 153483 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 281 Column G.
- 13/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 152519 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 282 Column G.
- 14/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 153893 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 283 Column G.
- 15/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 151416 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 285 Column G.
- 16/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 153525 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 278 Column G.
- 17/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 150905 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 284 Column G.
- 18/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 154387 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 223 Column G.
- 19/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 150079 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 224 Column G.
- 20/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 154059 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 228 Column G.
- 21/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 155869 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 231 Column G.
- 22/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 148992 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 232 Column G.
- 23/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 149601 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 233 Column G.
- 24/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 153151 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 294 Column G.
- 25/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 152036 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 92 Column G.
- 26/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 150548 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 349 Column G.
- 27/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 155481 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 507 Column G.
- 28/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 152076 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 508 Column G.
- 29/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 150489 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 509 Column G.
- 30/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 155157 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 796 Column G.
- 31/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 150399 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 511 Column G.
- 32/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 149734 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 497 Column G.
- 33/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 154410 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 498 Column G.
- 34/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 149436 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 794 Column G.
- 35/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 154030 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 500 Column G.
- 36/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 152517 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 795 Column G.
- 37/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 153739 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 501 Column G.
- 38/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 158667 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 503 Column G.
- 39/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 156590 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 504 Column G.
- 40/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 156523 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 505 Column G.
- 41/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 151204 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 506 Column G.
- 42/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 150107 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 601 Column G.
- 43/ See CSXT Reply e-workpapers "11-OnSARR & Applicable Delays.xlsx", Period Delays Level, Excel Row 151426 Column V, and "111-SARR Delay Worksheet.xlsx", Summary Level, Excel Row 641 Column G.

TAB 7

RTC NODES: Yards

<u>City 1/</u>	<u>State 1/</u>	<u>From</u>	<u>From MP 1/</u>	<u>To Prefix 1/</u>	<u>To MP 1/</u>	<u>Length</u>	<u>From Node 2/</u>	<u>To Node 2/</u>	<u>TPIRR Yard Name 1/</u>
(1)	(2)	Prefix 1/ (3)	(4)	(5)	(6)	(miles) 1/ (7)	(8)	(9)	(10)
A. MAJOR YARDS									
1. Atlanta	GA	OWA	6.10	OWA	3.90	2.20	WA6.10-1	WA3.90-1	Tilford
2. Birmingham	AL	000	384.80	000	387.15	2.35	384.80-1	387.15-1	Boyles
3. Chicago	IL	DC	13.95	DC	11.71	2.24	DC13.95-1	DC11.71-1	Barr
4. Cincinnati	OH	BE	4.55	BE	2.00	2.55	BE4.55-1	BE2.00-1	Queensgate
5. Cumberland	MD	BA	177.90	BA	175.70	2.20	BA177.90-1	BA175.70-1	Cumberland
6. Hamlet 3/	NC	S	250.20	SF	248.00	2.20	S250.25-1	S247.95-1	Hamlet
7. Indianapolis	IN	QS	12.40	QS	10.00	2.40	QS12.40-1	QS10.00-1	Avon
8. Louisville	KY	000	5.55	000	8.20	2.65	5.55-1	8.20-1	Osborn
9. Nashville	TN	OBA	191.10	OBA	193.80	2.70	BA191.10-1	BA193.80-1	Radnor
10. Selkirk	NY	QG	14.30	QG	11.70	2.60	QG14.30-1	QG11.70-1	Selkirk
11. Waycross	GA	AN	588.15	AN	590.80	2.65	AN588.15-1	AN590.80-1	Rice
12. Willard	OH	BI	3.05	BI	0.88	2.17	BI3.05-1	BI0.88-1	Willard
B. OTHER YARDS									
13. Ashtabula	OH	QD	130.32	QD	128.20	2.12	QD130.32-2	QD128.20-2	Ashtabula
14. Atkinson	KY	OHC	276.60	OHC	274.30	2.30	HC276.60-1	HC274.30-1	Atkinson
15. Atlanta	GA	YYG	170.00	YYG	167.50	2.50	YYG170.00-1	YYG167.50-1	Hulsey
16. Augusta	GA	AK	459.40	AK	457.40	2.00	AK459.40-1	AK457.40-1	Augusta
17. Baldwin	FL	S	653.40	S	655.80	2.40	S653.40-1	S655.80-1	Baldwin
18. Baltimore	MD	BAK	88.50	BAK	89.66	1.16	BAK88.60-1	BAK89.66-1	Bay View
19. Baltimore	MD	BAA	1.61	BAA	3.21	1.60	BAA1.61-1	BAA3.21-1	Mount Winans
20. Benning	DC	CFP	117.20	CFP	115.00	2.20	CFP117.20-2	CFP115.00-2	Benning
21. Birmingham	AL	000	391.35	000	393.70	2.35	391.35-1	393.70-1	Alice
22. Bruceston	TN	N	94.44	N	96.18	1.74	N94.44-1	N96.18-1	Bruceston
23. Brunswick	MD	BA	78.49	BA	73.09	5.40	BA78.49-2	BA73.09-2	Brunswick
24. Buffalo	NY	QC	437.00	QC	434.70	2.30	QC437.00-1	QC434.70-1	Frontier
25. Busch	FL	S	627.30	S	625.40	1.90	S626.07-1	S626.79-1	Busch
26. Calera 4/	AL	000	423.50	000	424.1	0.60	421.49-1	424.89-1	Calera Yard
27. Cartersville 4/	GA	OWA	48.00	OWA	48.80	0.80	WA46.00-1	WA48.05-1	Cartersville Yard
28. Chattanooga 5/	TN	OOJ	144.40	OOJ	146.40	2.00	J144.40-3	J146.40-3	Wauhatchie
29. Chicago	IL	DC	25.35	DC	23.40	1.95	DC25.35-4	DC23.42-4	59th Street
30. Cicero	IL	DC	34.95	DC	33.00	1.95	DC34.90-3	DC33.02-3	Cicero
31. Cleveland	OH	QD	174.17	QD	171.59	2.58	QD174.17-1	QD171.59-1	Collinwood
32. Collier	VA	A	26.85	A	29.10	2.25	A26.85-1	A29.10-1	Collier
33. Connellsville	PA	BF	270.56	BF	268.50	2.06	BF270.56-1	BF268.50-1	Connellsville
34. Corbin	KY	00C	172.00	00C	174.90	2.90	C172.00-1	C174.90-1	Corbin
35. Crestline / Gallion	OH	QI	79.05	QI	76.80	2.25	QI79.05-1	QI76.80-1	Crestline / Gallion
36. Curtis Bay (freight) 4/	MD	BAO	0.00	6/	6/	6/	BAO0.00-1	BAO3.25-1	Curtis Bay Freight Yard
37. Curtis Bay Coal Terminal 4/	MD	BAO	0.00	6/	6/	6/	BAO0.00-1	BAO3.25-1	Curtis Bay Coal Terminal
38. Danville	IL	OZA	126.24	OZA	127.53	1.29	ZA126.24-1	ZA127.53-1	Brewer
39. Dayton	OH	BE	64.60	BE	62.70	1.90	BE64.65-1	BE62.70-2	Dayton
40. Demmler	PA	PLY	14.48	PLY	11.55	2.93	PLY14.48-1	PLY11.55-1	Demmler
41. Deshler	OH	BI	64.70	BI	62.55	2.15	BI64.70-1	BI62.55-1	Deshler
42. East St. Louis	IL	QS	236.57	QS	234.13	2.44	QS236.57-2	QS234.13-2	Rose Lake
43. Etowah	TN	00C	332.85	00C	335.15	2.30	C332.85-1	C335.15-1	Etowah
44. Evansville	IN	00H	323.50	00H	321.35	2.15	H323.50-1	H321.35-1	Howell
45. Fitzgerald	GA	ANB	660.87	ANB	658.71	2.16	ANB660.87-1	ANB658.71-1	Fitzgerald
46. Flomaton	AL	000	606.63	000	607.83	1.20	606.63-2	607.83-2	Flomaton
47. Fostoria	OH	BI	36.19	BI	34.05	2.14	BI36.19-1	BI34.05-1	Fostoria
48. Garrett	IN	BI	130.06	BI	127.86	2.20	BI130.06-1	BI127.86-1	Garrett
49. Grafton	WV	BA	280.15	BA	278.00	2.15	BA280.15-1	BA278.00-1	Grafton
50. Greenwood	SC	SG	427.80	SG	425.30	2.50	SG427.80-1	SG425.30-1	Maxwell
51. Indianapolis	IN	QIB	8.70	QIB	9.90	1.20	QIB6.65-1	QIB8.64-1	Hawthorne
52. Ivorydale 4/	OH	BE	7.50	BE	8.5	1.00	BE7.50-2	BE9.05-2	Ivorydale Yard
53. Jacksonville	FL	A	640.20	A	642.19	1.99	A640.20-1	A642.19-1	Moncrief
54. Lafayette	IN	00Q	117.61	00Q	118.90	1.29	Q117.61-1	Q118.90-1	Lafayette
55. Lima	OH	BE	133.65	BE	131.01	2.64	BE133.65-1	BE131.01-1	Lima
56. Lockport	NY	QDL	60.12	QDL	58.71	1.41	QDL60.12-1	QDL58.74-1	Lockport
57. Manchester	GA	ANB	788.25	ANB	786.10	2.15	ANB788.25-1	ANB786.10-1	Manchester
58. Marion 3/	OH	CD	47.75	CD	45.67	2.08	CD47.75-2	CD45.67-2	Marion
59. Memphis	TN	00F	370.01	00F	371.03	1.02	F370.01-1	F371.03-1	Leewood
60. Memphis	TN	0NI	226.45	0NI	227.20	0.75	NI226.45-1	NI227.20-1	Sargent
61. Mobile	AL	000	664.10	000	665.65	1.55	664.10-2	665.65-2	Siebert
62. Monroe	NC	SF	306.15	SF	303.90	2.25	SF306.15-1	SF303.90-1	Monroe
63. Montgomery	AL	000	485.00	000	487.05	2.05	485.00-1	487.05-1	S & N
64. Nashville	TN	000	185.91	000	187.16	1.25	185.91-1	187.16-1	Kayne Ave.
65. New Castle	PA	BG	57.72	BG	55.50	2.22	BG57.72-2	BG55.50-2	New Castle
66. New Orleans	LA	000	798.88	000	800.90	2.02	798.88-2	800.90-2	Gentilly
67. Newell	PA	PLM	49.79	PLM	51.99	2.20	PLM49.79-1	PLM51.99-1	Newell
68. Oakworth 4/	AL	000	308.10	000	309.8	1.70	307.19-1	310.07-1	Oakworth Yard
69. Orangeburg	NY	QR	23.65	QR	21.55	2.10	QR23.65-1	QR21.55-1	Orangeburg
70. Orlando / Taft	FL	A	795.70	A	797.67	1.97	A795.72-2	A797.62-2	Taft
71. Pembroke	NC	A	242.80	A	244.80	2.00	A242.80-1	A244.80-1	Pembroke

RTC NODES: Yards

City 1/ (1)	State 1/ (2)	From Prefix 1/ (3)	From MP 1/ (4)	To Prefix 1/ (5)	To MP 1/ (6)	Length (miles) 1/ (7)	From Node 2/ (8)	To Node 2/ (9)	TPIRR Yard Name 1/ (10)
72. Richmond	VA	CFP	4.40	CFP	1.94	2.46	CFP4.40-1	CFP1.94-1	Acca
73. Ridgeway	OH	QI	124.72	QI	122.51	2.21	QI124.72-1	QI122.50-1	Ridgeway
74. Rochester	NY	QC	370.00	QC	368.00	2.00	QC373.03-1	QC367.92-1	Rochester
75. Rockport	FL	AZA	881.95	AZA	883.34	1.39	AZA881.95-1	AZA883.34-1	Rockport
76. Rocky Mount	NC	A	120.15	A	122.35	2.20	A120.15-2	A122.35-2	Rocky Mount
77. South Anderson	IN	QII	248.55	QII	247.25	1.30	QII248.55-1	QII247.25-1	South Anderson
78. Syracuse	NY	QC	286.02	QC	283.84	2.18	QC286.02-1	QC283.84-1	DeWitt
79. Tampa 3/	FL	S	839.50	S	841.45	1.95	S839.50-2	S841.45-2	Yoeman
80. Terre Haute	IN	OZA	172.69	OZA	174.72	2.03	ZA172.69-1	ZA174.72-1	Terre Haute
81. Union	OH	CD	73.43	CD	74.38	0.95	CD73.43-2	CD74.38-2	Union
82. Vincennes	IN	OZA	235.70	OZA	238.02	2.32	ZA235.70-1	ZA238.02-1	Vincennes
83. Widows Creek	TN	OOJ	118.30	OOJ	119.50	1.20	J118.10-1	J119.56-1	Widows Creek
84. Wildwood	FL	S	762.50	S	766.10	3.60	S762.45-1	S766.08-1	Wildwood
85. Winston	FL	AY	856.50	AY	858.55	2.05	AY856.50-1	AY858.50-1	Winston
86. Worthville	KY	OOT	55.30	OOT	54.00	1.30	T54.36-1	T56.13-1	Worthville
C. INTERMODAL TERMINALS									
87. Atlanta - Fairburn	GA	XXB	20.00	Connects to: Main Line			XXB19.90-1	XXB22.47-1	Atlanta - Fairburn IM
88. Atlanta - Hulsey	GA	YYG	169.50	Hulsey Yard			YYG167.50-1	YYG170.00-1	Atlanta - Hulsey IM Baltimore IM (Leased from Maryland Port Authority)
89. Baltimore 7/	MD	BAL	1.80	Private Track			BAL1.60-1	BAL3.70-3	Buffalo IM
90. Buffalo	NY	QD	5.20	Seneca Yard			QD4.39-1	QD5.08-1	Chicago - 59th Street IM
91. Chicago - 59th Street	IL	DC	23.10	59th Street Yard			DC23.42-4	DC25.35-4	Chicago - Bedford Park IM
92. Chicago - Bedford Park	IL	DIH	26.10	Trackage Rights over IHB			DIH25.960-1	DIH28.320-3	Cincinnati IM
93. Cincinnati	OH	BE	3.20	Queensgate Yard			BE4.55-1	BE2.00-1	Cleveland IM
94. Cleveland	OH	QD	174.00	Collinwood Yard			QD174.17-1	QD171.59-1	East St. Louis IM
95. East St. Louis	IL	QS	234.10	Main Line			QS236.57-2	QS234.13-2	Evansville IM
96. Evansville	IN	OOH	322.50	Howell Yard			H323.50-1	H321.35-1	Indianapolis IM
97. Indianapolis	IN	QS	11.90	Avon Yard			QS12.40-1	QS10.00-1	Jacksonville IM
98. Jacksonville	FL	ASK	638.00	Main Line			ASK636.65-1	ASK638.95-1	Louisville IM
99. Louisville 4/	KY	000	6.50	Osborn Yard			5.50-1	8.20-1	Marion IM (CN owned)
100. Marion 4/	OH	QI	95.70	Main Line			QI95.73-1	CD47.75-2	Mobile IM
101. Memphis	TN	---	---	CN track			MCN6.40-1	MCN8.40-1	Nashville IM
102. Mobile	AL	000	665.00	Siebert Yard			664.10-2	665.65-2	New Orleans IM
103. Nashville	TN	DBA	190.50	Radnor Yard			BA191.10-1	BA193.80-1	North Baltimore IM
104. New Orleans	LA	000	799.50	Main Line			798.88-2	800.90-2	Orlando IM
105. North Baltimore 4/	OH	BI	53.00	Main Line			BI50.67-2	BI52.88-2	Syracuse IM
106. Orlando	FL	A	797.00	Main Line			A795.72-2	A797.62-2	Tampa IM
107. Syracuse	NY	QC	285.80	Main Line			QC286.02-1	QC283.84-1	
108. Tampa	FL	S	840.10	Main Line			S839.40-1	S841.50-2	
D. AUTOMOTIVE TERMINALS 8/									
109. Baltimore	MD	BAO	0.00	Connects to: Private Track			BAO0.00-1	BAO3.25-1	Fairfield/Seawall Auto Facility
110. Baltimore	MD	BAO	0.00	Private Track			BAO0.00-1	BAO3.25-1	Curtis Bay Airports Auto Facility
111. Birmingham	AL	000	387.50	Boyles Yard			384.80-1	387.15-1	Birmingham Auto
112. Bowling Green	KY	000	108.30	Bristow Yard			108.40-1	109.65-1	Bowling Green Auto (GM owned)
113. Cincinnati	OH	BE	17.60	Main Line			BE17.40-1	BE18.80-1	Cementdale Auto Facility
114. Jacksonville / Blount Island	FL	SO	636.70	Main Line			SO630.80-2	SO632.90-2	Blount Island Auto
115. Jessup	MD	BAA	15.80	Jessup Yard			BAA15.97-1	BAA17.70-1	Annapolis Junction Auto Facility
116. Lawrenceville	GA	SG	540.90	Main Line			SG545.20-1	SG546.80-2	Lawrenceville (Atlanta) Auto
117. Louisville	KY	000	5.00	Strawberry Yard			2.92-1	4.90-3	Louisville Strawberry Yard Auto
118. Louisville	KY	000	6.60	Osborn Yard			5.50-1	8.20-1	Louisville Auto (Ford)
119. Marion	OH	QI	97.80	Main Line			QI101.43-2	QI95.79-2	Marion Auto Facility
120. Memphis	TN	---	---	BNSF track			9/	9/	Memphis Auto Facility (BNSF owned)
121. Nashville	TN	OBA	190.00	Radnor Yard			BA191.10-1	BA193.80-1	Nashville Auto Facility (North)
122. Nashville	TN	OBA	192.30	Radnor Yard			BA191.10-1	BA193.80-1	Nashville Auto Facility (South)
123. O'Bannon	KY	OOT	14.90	Main Line			T14.61-1	T14.88-1	O'Bannon Auto (Ford)
124. Orlando	FL	A	797.70	Orlando IM Track			A795.72-2	A797.62-2	Orlando Auto
125. Selkirk	NY	QG	14.40	Selkirk Yard			QG11.70-1	QG14.30-1	Selkirk Auto Facility
126. Smyrna	TN	OOJ	23.60	Main Line			J23.29-1	J25.25-1	Smyrna Auto Facility
127. Warren	OH	BG	91.00	Main Line			BG89.85-1	BG91.40-1	Lordstown Auto Facility
128. West Point	GA	XXB	82.20	Main Line			XXB82.91-1	XXB85.47-1	West Point Auto (KIA owned)
E. BULK TRANSFER TERMINALS									
129. Atlanta	GA	SG	575.00	Main Line / adjacent to Howells Yard			SG572.95-1	SG575.60-1	Atlanta Transflo
130. Augusta	GA	YYG	2.40	Main Line			YYG1.95-1	YYG3.15-1	Augusta Transflo
131. Birmingham	AL	000	387.00	Boyles Yard			384.80-1	387.15-1	Birmingham Transflo
132. Buffalo	NY	QC	436.20	Main Line			QC434.70-1	QC437.00-1	Buffalo Transflo
133. Chattanooga	TN	OOJ	148.50	Main Line			J147.20-2	J149.30-2	Chattanooga Transflo
134. Cincinnati	OH	BE	4.60	Queensgate Yard			BE4.55-1	BE2.00-1	Cincinnati Transflo
135. Clarksburg	WV	BAK	302.90	Main Line			BA301.44-1	BA303.35-1	Clarksburg Transflo
136. Cleveland	OH	QD	174.50	Main Line			QD171.59-1	QD174.17-1	Cleveland East Transflo
137. Dalton	GA	OWA	96.00	Main Line			WA96.00-1	WA96.40-1	Dalton Transflo
138. East Chicago	IN	DC	3.8; 4.4	Main Line (2 points)			DC2.77-2	DC3.42-2	East Chicago Transflo

RTC NODES: Yards

City 1/ (1)	State 1/ (2)	From		Length			From Node 2/ (8)	To Node 2/ (9)	TPIRR Yard Name 1/ (10)
		Prefix 1/ (3)	From MP 1/ (4)	To Prefix 1/ (5)	To MP 1/ (6)	(miles) 1/ (7)			
139. Evansville	IN	OZC	284.60	Main Line			ZC283.30-1	YTL1.10-1	Evansville Transflo
140. Fairmont	WV	BS	302.70	Main Line			BS302.05-2	BS304.10-3	Fairmont Transflo
141. Indianapolis	IN	QIB	8.70	Hawthorne Yard			QIB6.65-1	QIB8.64-1	Indianapolis Transflo
142. Jacksonville	FL	SP	637.90	Main Line			SP635.99-1	SP638.87-1	Jacksonville Transflo
143. Knoxville	TN	00C	274.90	Main Line / adjacent to Knoxville Yard			C274.35-1	C275.60-1	Knoxville Transflo
144. Louisville	KY	000	8.50	Osborn Yard			5.50-1	8.20-1	Louisville Transflo
145. Nashville	TN	000	188.00	Main Line			185.91-1	187.16-1	Nashville Transflo
146. New Orleans	LA	000	800.50	Main Line			798.88-2	800.90-2	New Orleans Transflo
147. Petersburg	VA	A	27.50	Collier Yard			A26.85-1	A29.10-1	Petersburg Transflo
148. Richmond	VA	CFP	2.50	Acca Yard			CFP4.40-1	CFP1.94-1	Richmond Transflo
149. Sanford	FL	A	766.10	Main Line			A763.80-1	A766.78-1	Sanford Transflo
150. Syracuse	NY	QC	286.10	Main Line			QC283.84-1	QC286.02-1	Syracuse Transflo
151. Tampa	FL	S	843.20	Main Line			S839.40-1	S841.45-2	Tampa Transflo

PARTIALLY-OWNED YARDS 4/

152. Chicago	IL	DIH	26.5	6/	6/		BRC2.35-1	BRC4.75-1	BRC Clearing Yard
153. East St. Louis	IL	QS	237.0	6/	6/		TRRA4.00-A	TRRA6.05-B	TRRA Madison Yard

F. INTERCHANGE YARDS

154. Akron	OH	BG	129.40	BG	128.47	0.93	BG129.45-1	BG128.47-1	Akron Interchange
155. Aliquippa	PA	PLE	20.40	6/	6/	0.95	PLE18.45-2	PLE22.95-2	Aliquippa Interchange
156. Ansley	MS	000	763.25	000	764.45	1.20	763.25-1	764.45-1	Ansley Interchange
157. Ansonia	OH	QI	191.25	QI	189.93	1.32	QI191.25-1	QI189.93-1	Ansonia Interchange
158. Barberton	OH	BG	137.60	BG	136.70	0.90	BG137.60-1	BG136.70-1	Barberton Interchange
159. Bardstown Jct.	KY	000	20.90	000	22.05	1.15	20.90-1	22.05-1	Bardstown Jct. Interchange
160. Barnett	GA	YYG	58.30	6/	6/	0.95	YYG57.75-1	YYG58.25-1	Barnett Interchange
161. Batavia	NY	QC	404.70	6/	6/	0.95	QC402.46-1	QC406.62-1	Batavia Interchange
162. Beech Island	SC	AK	454.00	AK	452.10	1.90	AK452.10-1	AK454.00-1	Beech Island Interchange
163. Buffalo / CP Draw	NY	QD	1.70	6/	6/	0.95	QD1.70-2	QD1.66-2	Buffalo / CP Draw Interchange
164. Cherry Run	WV	BA	115.30	BA	114.03	1.27	BA115.30-2	BA114.03-2	Cherry Run Interchange
165. Colesburg	TN	00N	39.40	6/	6/	0.95	N38.80-1	N39.80-1	Colesburg Interchange
166. Conneaut	OH	QD	114.60	6/	6/	0.95	QD114.55-2	QD114.67-2	Conneaut Interchange
167. Contentnea 4/	NC	A	139.00	6/	6/	1.90	A137.10-1	A138.72-1	Contentnea Interchange
168. Crawfordsville 4/	IN	00Q	147.40	6/	6/	1.90	Q145.12-1	Q147.72-1	Crawfordsville Interchange
169. Danville	IL	OZA	120.94	OZA	122.90	1.96	ZA120.94-1	ZA122.90-1	Danville Interchange
170. Defiance	OH	BI	88.00	6/	6/	0.95	BI87.95-2	BI88.26-2	Defiance Interchange
171. Dixie	NC	SE	269.96	SE	272.05	2.09	SE269.96-1	SE272.05-1	Dixie Interchange
172. Dossett	TN	00C	250.00	6/	6/	1.90	C252.20-1	C254.97-1	Dossett Interchange
173. Doswell	VA	CFP	21.80	6/	6/	1.90	CFP21.80-2	CFP21.85-2	Doswell Interchange
174. Dover	SC	SG	394.90	6/	6/	1.90	SG394.90-1	SG392.85-3	Dover Interchange
175. E. Chester (L&C Connection)	SC	SG	346.30	6/	6/	0.95	SG347.44-1	SG349.56-1	E. Chester (L&C Connection) Interchange
176. East Curtis	IN	BI	248.18	BI	246.37	1.81	BI248.18-1	BI246.37-1	East Curtis Interchange
177. Effingham	IL	QS	141.75	QS	140.60	1.15	QS141.75-1	QS140.60-1	Effingham Interchange
178. Elizabeth	GA	OWA	23.25	OWA	21.25	2.00	WA23.25-1	WA21.15-1	Elizabeth Interchange
179. Erie Station	PA	QD	86.90	6/	6/	0.95	QD83.21-2	QD87.37-2	Erie Station Interchange
180. Fayetteville	NC	A	210.60	6/	6/	0.95	A207.90-1	A209.31-1	Fayetteville Interchange
181. Folkston	GA	A	602.20	6/	6/	1.90	A602.72-1	A605.050-1	Folkston Interchange
182. Green Spring	WV	BA	166.20	BA	164.25	1.95	BA166.21-2	BA164.24-2	Green Spring Interchange
183. Greencastle	IN	QS	39.27	QS	38.20	1.07	QS39.27-1	QS38.20-1	Greencastle Interchange
184. Greenville	IL	QS	190.30	6/	6/	0.95	QS186.37-1	QS189.46-1	Greenville Interchange
185. Greenwich	OH	BG	195.08	BG	192.90	2.18	BG195.08-1	BG192.90-1	Greenwich Interchange
186. Guthrie	KY	00H	215.80	00H	215.32	0.48	H215.90-1	H215.32-1	Guthrie Interchange
187. Hamler	OH	BI	71.00	BI	69.40	1.60	BI71.00-2	BI69.40-2	Hamler Interchange
188. Harpers Ferry	WV	BA	81.30	6/	6/	1.90	BA80.50-1	BA82.55-3	Harpers Ferry Interchange
189. Henderson 4/	KY	00H	312.45	6/	6/	1.90	H311.88-1	H313.08-1	Henderson Interchange
190. Hillsdale	IN	OZA	154.02	OZA	155.29	1.27	ZA154.02-1	ZA155.29-1	Hillsdale Interchange
191. Holton	TN	00C	206.00	6/	6/	1.90	C206.00-1	C206.40-1	Holton Interchange
192. Hopewell	VA	SAC	23.30	6/	6/	0.95	SAC22.38-1	SAC23.19-1	Hopewell Interchange
193. Humboldt	TN	OOF	294.70	6/	6/	0.95	F294.62-1	F294.90-1	Humboldt Interchange
194. Indianapolis / Dale Siding	IN	QSL	1.48	QSL	4.00	2.52	QSL1.48-1	QSL4.00-1	Indianapolis / Dale Siding Interchange
195. Indianapolis 4/	IN	BD	122.00	6/	6/	1.90	BD122.00-1	BD123.20-1	Indianapolis Interchange
196. Jefferson	GA	GGM	15.60	6/	6/	1.90	GGM15.60-1	SG507.80-2	Jefferson Interchange
197. KC Jct.	KY	CA	662.60	6/	6/	1.90	CA662.60-2	CA663.62-2	KC Jct. Interchange
198. Lakeland 4/	FL	AR	856.50	6/	6/	1.90	A851.90-1	A856.15-1	Lakeland Interchange
199. Landover	MD	QL	130.85	QL	128.80	2.05	QL130.85-1	QL130.00-1	Landover Interchange
200. Laurens Wye	SC	AK	554.60	6/	6/	0.95	AK552.76-1	AK554.47-1	Laurens Wye Interchange
201. Magella	AL	000	394.52	000	395.92	1.40	394.52-2	395.92-2	Magella Interchange
202. Martinsburg	WV	BA	101.55	BA	99.75	1.80	BA101.55-1	BA99.75-1	Martinsburg Interchange
203. Memphis Jct.	KY	000	117.99	000	116.94	1.05	117.99-1	116.94-1	Memphis Jct. Interchange
204. N. Englewood	TN	00C	326.40	6/	6/	0.95	C326.39-1	C327.95-1	N. Englewood Interchange
205. N. Savoy	KY	00C	190.80	00C	192.20	1.40	C190.80-1	C192.20-1	N. Savoy Interchange
206. New River Junction	OH	BE	29.96	BE	28.20	1.76	BE29.96-2	BE28.20-2	New River Junction Interchange
207. Newark	NY	QC	341.00	QC	340.35	0.65	QC341.00-1	QC340.35-1	Newark Interchange
208. Niagara Falls	NY	QDN	28.20	6/	6/	0.95	QDN22.70-1	QDN28.15-1	Niagara Falls Interchange

RTC NODES: Yards

City 1/ (1)	State 1/ (2)	From		Length			From Node 2/ (8)	To Node 2/ (9)	TPIRR Yard Name 1/ (10)
		Prefix 1/ (3)	From MP 1/ (4)	To Prefix 1/ (5)	To MP 1/ (6)	(miles) 1/ (7)			
209. North Vernon	IN	BC	73.70	BC	72.30	1.40	BC73.70-1	BC72.35-1	North Vernon Interchange
210. Oneco	FL	AZA	916.64	AZA	917.56	0.92	AZA916.64-1	AZA917.56-1	Oneco Interchange
211. Paris	KY	OKC	80.64	OKC	84.68	4.04	KC80.64-1	KC84.68-1	Paris Interchange
212. Pascagoula	MS	000	706.80	6/	6/	1.90	705.17-1	706.47-1	Pascagoula Interchange
213. Patty	TN	00C	343.65	00C	344.75	1.10	C343.65-1	C344.75-1	Patty Interchange
214. Pine Junction 4/	IN	DC	0.00	6/	6/	1.90	DC0.00-2	DC0.22-2	Pine Junction Interchange
215. Pittsburgh (P & OV Jct.)	PA	PLE	6.95	PLE	5.95	1.00	PLE6.95-2	PLE5.95-2	Pittsburgh (P & OV Jct.) Interchange
216. Pittsburgh (PLE 0.0 = PLY 0.0)	PA	PLE	1.35	PLE	0.70	0.65	PLE1.35-1	PLE0.70-1	Pittsburgh (PLE 0.0 = PLY 0.0) Interchange
217. Pittsburgh / McKees Rocks	PA	PLE	4.75	PLE	3.65	1.10	PLE4.75-2	PLE3.65-2	Pittsburgh / McKees Rocks Interchange
218. Plant City	FL	S	820.59	S	823.10	2.51	S820.59-1	S821.60-2	Plant City Interchange
219. Point of Rocks	MD	BA	42.80	BA	41.04	1.76	BA42.80-1	BA41.04-1	Point of Rocks Interchange
220. Reynolds	IN	00Q	95.80	6/	6/	0.95	Q96.14-1	Q97.50-1	Reynolds Interchange
221. Rockwood 4/	PA	BF	226.80	6/	6/	1.90	BF226.45-2	BF224.70-3	Rockwood Interchange
222. Rotterdam Jct.	NY	QG	40.23	QG	39.30	0.93	QG40.23-1	QG39.30-1	Rotterdam Jct. Interchange
223. S. Bridgeport	AL	00J	122.30	6/	6/	1.90	J120.90-2	J121.85-2	S. Bridgeport Interchange
224. S. Georgiana	AL	000	549.10	6/	6/	0.95	547.18-1	549.20-1	S. Georgiana Interchange
225. S. Oglethorpe	GA	ANB	728.83	ANB	727.60	1.23	ANB728.83-1	ANB727.58-1	S. Oglethorpe Interchange
226. S. Tullahoma	TN	00J	69.20	6/	6/	1.90	J67.65-1	J67.91	S. Tullahoma Interchange
227. Selma	NC	A	160.80	A	161.90	1.10	A160.80-1	A161.94-1	Selma Interchange
228. Sinks	KY	OKC	151.60	6/	6/	1.90	KC149.35-1	C138.25-1	Sinks Interchange
229. Social Circle	GA	YYG	119.40	6/	6/	0.95	YYG118.12-1	YYG120.04-1	Social Circle Interchange
230. Starke 4/	FL	S	679.10	6/	6/	1.90	S679.10-1	S681.15-4	Starke Interchange
231. Sullivan	IN	OZA	204.40	6/	6/	0.95	ZA201.69-1	ZA203.64-1	Sullivan Interchange
232. Talladega	AL	ANJ	910.90	6/	6/	1.90	ANJ911.73-1	ANJ913.82-1	Talladega Interchange
233. Terre Haute (INRD Belt)	IN	OZA	181.10	6/	6/	0.95	ZA179.35-1	ZA182.18-1	Terre Haute (INRD Belt) Interchange
234. Tiffin	OH	BI	26.53	BI	24.55	1.98	BI26.53-2	BI24.55-2	Tiffin Interchange
235. Utica / CP 235	NY	QC	237.85	QC	235.33	2.52	QC237.85-1	QC235.33-1	Utica / CP 235 Interchange
236. Vine Hill	TN	000	189.30	6/	6/	0.95	187.35-1	189.30-1	Vine Hill Interchange
237. W. Black Lane	IL	QS	233.75	QS	231.75	2.00	QS233.75-2	QS231.75-2	W. Black Lane Interchange
238. Wadesboro (W. S. Jct.)	NC	SF	278.39	SF	277.31	1.08	SF278.39-1	SF277.31-1	Wadesboro (W. S. Jct.) Interchange
239. Wartrace	TN	00J	55.00	6/	6/	1.90	J53.85-1	J55.72-1	Wartrace Interchange
240. Warwick	OH	BG	143.80	6/	6/	0.95	BG144.04-1	BG146.72-1	Warwick Interchange
241. Weldon Connection	NC	A	81.10	6/	6/	1.90	A81.10-2	A79.10-3	Weldon Connection Interchange
242. Wellington	OH	QI	46.28	QI	44.80	1.48	QI46.28-1	QI44.80-1	Wellington Interchange
243. Wellsboro	IN	BI	213.80	6/	6/	0.95	BI213.80-1	BI214.05-1	Wellsboro Interchange
244. Willoughby	TN	00C	274.35	00C	275.60	1.25	C274.35-1	C275.60-1	Willoughby Interchange
245. Willow Creek 4/	IN	BI	236.40	6/	6/	1.90	BI236.62-1	BI238.03-1	Willow Creek Interchange
246. Winchester / N Cabin	KY	OKC	96.00	6/	6/	1.90	KC96.57-2	KC98.67-2	Winchester / N Cabin Interchange
247. Winchester / Patio	KY	OKC	97.10	6/	6/	1.90	KC96.57-2	KC98.67-2	Winchester / Patio Interchange
248. Youngstown	OH	BG	76.90	BG	75.58	1.32	BG76.90-2	BG75.58-2	Youngstown Interchange
249. Youngstown / Ohio Jct.	OH	BG	79.55	BG	78.20	1.35	BG79.56-2	BG78.18-2	Youngstown / Ohio Jct. Interchange

G. FOREIGN YARDS

250. Chicago	IL						CPE13.100-A	CPE15.100-D	CP's Bensenville Yd
251. Chicago	IL						UPG12.439-A	UPG14.333-A	UP's Proviso Yard
252. Chicago	IL						IHB1.11-2	IHB3.20-2	IHB Blue Island Yard
253. Memphis	TN						MCN6.40-1	MCN8.40-1	CN Johnston Yard
254. New Orleans	LA						CN2.05-1	CN4.05-1	CN Mays Yard

1/ Source: Rebuttal e-Workpaper "TPIRR Route Miles Rebuttal Grading.xlsx."

2/ Source: TPI RTC Models

3/ Changed in Rebuttal

4/ Accepted CSXT Reply

5/ Yard is located on Wauhatchee Yard Branch

6/ Mileposts not listed in Rebuttal e-Workpaper "TPIRR Yard Matrix Rebuttal Grading.xlsx"

7/ Facility leased from Maryland Port Authority.

8/ Location information (milepost) derived from auto facility profiles provided by CSXT in discovery combined with track charts and Google Earth.

9/ Foreign Yard not modeled in RTC

TAB 8

**Summary of TPIRR Local and Yard Train Lists in NOR 42121 Evidence
(Base Year Train List)**

<u>Train Group/Narrative Section 1/</u> (1)	<u>Rebuttal Pages</u> (2)	<u>Train Count Source</u> (3)	<u>TPI Opening 2/</u> (4)	<u>CSXT Reply</u>		<u>TPI Rebuttal 5/</u> (8)	<u>TPI</u> (9)	<u>TPI Added Supplemental</u> (10)	<u>TPI Total Supplemental</u> (11)		
				<u>RTC Trains 3/</u> (5)	<u>Operating Statistics 4/</u> (6)						<u>Narrative</u> (7)
1. Opening Locals	xxx	Traffic Data	42,208	42,208	xxx	42,208	42,208	0	0	42,208	22/
2. CSXT Alleged Excluded Local Trains	xxx	Traffic Data	0	5,940	xxx	15,834	11,373	4,461	4,461	15,834	
a. On/Off-SARR Locals	III-C-44 to III-C-53	Traffic Data	0	5,940	xxx	5,940	10/ 5,940	0	0	5,940	22/
b. No CarEvent Locals	III-C-74 to III-C-77	Traffic Data	xxx	xxx	xxx	5,302	11/ 2,069	3,233	3,233	20/ 5,302	22/
c. Empty Car Trains	III-C-77	Traffic Data	xxx	xxx	xxx	2,558	12/ 2,558	0	0	2,558	22/
d. Manually Removed Trains	III-C-77 to III-C-78	Traffic Data	xxx	xxx	xxx	332	13/ 332	0	0	332	22/
e. Trains Removed for Unknown Reasons	III-C-78 to III-C-82	Traffic Data	xxx	xxx	xxx	1,702	14/ 474	1,228	1,228	20/ 1,702	22/
f. Subtotal: First-Mile/Last Mile Switching Local Trains		Traffic Data	xxx	xxx	xxx	9,894	15/ 5,433	4,461	4,461	9,894	
3. Overtime Locals 7/	III-C-158 to III-C-159	Traffic Data	0	0	xxx	0	0	0	0	0	
4. Subtotal - Non-Yard Locals	xxx	xxx	42,208	48,148	60,788	58,042	53,581	4,461	4,461	58,042	
5. Industrial Yard ("Y") Trains	III-C-61 to III-C-74	MultiRail	0	832	8/ 0	9/ 28,860	16/ 0	28,860	25,119	21/ 25,119	21/
a. Zero Carloads in MultiRail	xxx	MultiRail	xxx	xxx	xxx	11,180	17/ 0	11,180	0	0	
b. Fraction of a Carload in MultiRail	xxx	MultiRail	xxx	xxx	xxx	3,432	18/ 0	3,432	0	0	
c. At least 1 Carload in MultiRail	xxx	MultiRail	xxx	xxx	xxx	14,248	19/ 0	14,248	25,119	21/ 25,119	21/
6. Total	xxx	xxx	42,208	48,148	60,788	86,902	53,581	33,321	29,580	83,161	
7. Difference from Opening	xxx	xxx	xxx	5,940	18,580	44,694	11,373	xxx	xxx	40,953	

(Footnotes on Page 2)

Summary of TPIRR Local and Yard Train Lists in NOR 42121 Evidence
(Base Year Train List)

Footnotes:

- 1/ TPI Rebuttal Narrative pages III-C-44 to III-C-83 and III-C-158 to III-C-159.
- 2/ TPI Opening Workpaper "Train List Local V06 12162013_v4.xlsx", tab "Train List ALL".
- 3/ CSXT Reply Workpaper "TPIRR Open Train Lists Corrected.xlsx".
- 4/ CSXT Reply Workpaper "TPIRR Reply Train Lists.xlsx" which is pulled into CSXT Reply Workpaper "TPIRR Operating Statistics_Reply.xlsx" for train statistics calculations. Locals are identified in "TPIRR Reply Train Lists.xlsx" at level "Road_NonUnit" in Column A "Train Category" = "SARR LOCAL" (which is an output from MultiRail), Yard Trains are identified in "TPIRR Reply Train Lists.xlsx" at level "Road_NonUnit" in Column A "Train Category" = "SARR YARD" (which is an output from MultiRail).
- 5/ TPI Rebuttal Workpaper "Train List Local V05 12162013_v4_Rebuttal_v2.xlsx" tab "Train List ALL" by excel Column D "Train Group".
- 6/ STB Decision in Docket No. NOR 42121 decided July 21, 2015, page 6 footnote 25 states "On reply, CSXT argues that TPI omitted approximately 44,000 local trains. CSXT Reply III-C-16. On rebuttal, TPI adds approximately 11,000 of the trains that CSXT claims were missing, leaving approximately 33,000 trains in dispute. TPI Rebuttal I-21."
- 7/ CSXT only added 16 overtime locals to its peak period train list in reply and made no edits to its base year train list for this set of trains. 16 weekly overtime locals * 52 weeks per year = 832 assumed base year trains.
- 8/ In its Reply narrative at III-C-174 CSXT states that the 16 industrial yard trains added to the peak week are representative of the 28,860 MultiRail base year yard trains, however CSXT provides no workpapers to support this connection.
- 9/ The CSXT Reply Workpaper "TPIRR Reply Train Lists.xlsx" tab "Road_NonUnit" calculates the annual statistics including train counts, locomotive hours and locomotive unit miles in Columns N through AG. However, in excel range A654:L745 of "TPIRR Reply Train Lists.xlsx" tab "Road_NonUnit" for trains in the train category "SARR YARD" these cells are blank. In the file "TPIRR Operating Statistics_Reply.xlsx" on the tab "Summary" the source for "SD40-2 Local Locomotive Unit Miles" is from the sum of "TPIRR Reply Train Lists.xlsx" tab "Road_NonUnit" row AA where Column O is equal to "Locals". As range O654:AZ745 for SARR YARD trains are blank, this statistic does not take into account CSXT's Yard trains from MultiRail. CSXT calculates the yard train information which is pulled into "TPIRR Operating Statistics_Reply.xlsx" on the tab "Summary" cell I19 "SD40-2 Switch Locomotive Unit Miles", in the file "TPIRR Yard Operations_Reply.xlsx" which is filed in III-D-3 evidence. This is the same file TPI utilizes in Opening and Rebuttal, and is not related to the train lists in III-C, as it accounts for Yard trains in a different manner. See TPI Rebuttal III-C-170 to III-C-171 and TPI Petition for Reconsideration and Clarification filed July 31, 2015 Pages 2 through 9 on for further discussion.
- 10/ CSXT Reply Narrative page III-C-26, "CSXT corrects this serious flaw in TPI's operating plan by adding to the TPIRR's train list 5,940 trains that provided local train service to customer facilities located on the TPIRR."
- 11/ CSXT Reply Narrative page III-C-32, "Specifically, it appears that 5,302 of those trains were discarded because they were not associated with selected traffic in the car event data (at least on certain days), and therefore did not meet TPI's "automated" train selection criteria."
- 12/ CSXT Reply Narrative page III-C-33, "Another 2,558 local trains appear to have been discarded by TPI because they handled only empty cars."
- 13/ CSXT Reply Narrative page III-C-34, "CSXT's analysis of TPI's workpapers indicates that 332 their local trains were initially selected by TPI but were subsequently removed from the TPIRR train list as a result of a "manual review" process."
- 14/ CSXT Reply Narrative page III-C-35, "CSXT could not discern the reason(s) why TPI excluded the remaining 1,702 local trains that participated in handling the TPIRR's Base Year traffic."
- 15/ CSXT Reply Narrative page III-C-31, "TPI's operating plan also failed to account for another 9,894 local trains that provide critical "first-miles/last mile" service for TPIRR's selected traffic."
- 16/ CSXT Reply Narrative page III-C-31, "TPI cannot assume that the critical work performed by the 28,860 industrial yard trains that its train selection methodology overlooked could be performed by other TPIRR locomotives and crews. CSXT corrects this massive deficiency in the TPIRR's local train service plan by adding to the TPIRR's train list those industrial yard trains that handled selected traffic between a TPIRR yard and
- 17/ CSXT Reply Workpaper "TPIRR Reply Train Lists_Supplemental.xlsx" at level "Road_NonUnit", sum of Column D where Column A "Train Category"="SARR YARD" and Column H "Cars" is zero. To facilitate these calculations and to avoid "SUMIF" errors from, TPI has added a level "Supplemental_Summary" to the file for this summary.
- 18/ CSXT Reply Workpaper "TPIRR Reply Train Lists_Supplemental.xlsx" at level "Road_NonUnit", sum of Column D where Column A "Train Category"="SARR YARD" and Column H "Cars" is greater than zero but less than one. To facilitate these calculations and to avoid "SUMIF" errors from, TPI has added a level "Supplemental_Summary" to the file for this summary.
- 19/ CSXT Reply Workpaper "TPIRR Reply Train Lists_Supplemental.xlsx" at level "Road_NonUnit", sum of Column D where Column A "Train Category"="SARR YARD" and Column H "Cars" is greater than one. To facilitate these calculations and to avoid "SUMIF" errors from, TPI has added a level "Supplemental_Summary" to the file for this summary.
- 20/ TPI Supplemental Workpaper "Train List Local V05 12162013_v4.xlsx", tab "Train List ALL" excel Column D "Train Group".
- 21/ TPI Supplemental Workpaper "Y trn 1 on with miles.xlsx", tab "Train Compilation".
- 22/ TPI Supplemental Workpaper "Train List Local V05 12162013_v4_Rebuttal_v2_supplemental.xlsx" tab "Train List ALL" excel by Column D "Train Group".

TAB 9

**Summary of TPIRR Local and Yard Train Lists in NOR 42121 Evidence
(Peak Period Train List)**

<u>Train Group/Narrative Section 1/</u> (1)	<u>Rebuttal Pages</u> (2)	<u>Train Count Source</u> (3)	<u>TPI Opening 2/</u> (4)	<u>CSXT Reply</u>			<u>TPI Rebuttal 4/</u> (8)	<u>STB Requested Additional TPI Supplemental 5/</u> (9)	<u>TPI Added Supplemental</u> (10)			
				<u>RTC Trains</u> (5)	<u>Operating Statistics 3/</u> (6)	<u>Narrative</u> (7)						
1. Opening Locals	xxx	Traffic Data	1,102	1,102	6/	xxx	1,102	0	0			
2. CSXT Alleged Excluded Local Trains	xxx	Traffic Data	0	95		xxx	95	246	86	13/	86	
a. On/Off-SARR Locals	III-C-44 to III-C-53	Traffic Data	0	95	7/	xxx	95	10/ 95	0		0	
b. No CarEvent Locals	III-C-74 to III-C-77	Traffic Data	xxx	xxx		xxx	0	56	66		66	
c. Empty Car Trains	III-C-77	Traffic Data	xxx	xxx		xxx	0	71	0		0	
d. Manually Removed Trains	III-C-77 to III-C-78	Traffic Data	xxx	xxx		xxx	0	16	0		0	
e. Trains Removed for Unknown Reasons	III-C-78 to III-C-82	Traffic Data	xxx	xxx		xxx	0	8	20		20	
f. Subtotal: First-Mile/Last Mile Switching Local Trains		Traffic Data	xxx	xxx		xxx	0	151	86		86	
3. Overtime Locals	III-C-158 to III-C-159	Traffic Data	0	22	8/	xxx	22	11/ 0	0		0	
4. Subtotal - Non-Yard Locals	xxx	xxx	1,102	1,219		xxx	1,219	1,348	86		86	
5. Industrial Yard ("Y") Trains	III-C-61 to III-C-74	MultiRail	0	11	9/	xxx	16	12/ 11	791	14/	653	16/
a. Zero Carloads in MultiRail	xxx	MultiRail	xxx	xxx		xxx	xxx	xxx	xxx		xxx	
b. Fractionally a Carload in MultiRail	xxx	MultiRail	xxx	xxx		xxx	xxx	xxx	xxx		xxx	
c. At least 1 Carload in MultiRail	xxx	MultiRail	xxx	xxx		xxx	xxx	xxx	xxx		xxx	
6. Total	xxx	xxx	1,102	1,230		xxx	1,235	1,359	877		739	
7. Difference from Opening	xxx	xxx	xxx	128		xxx	133	257	877		739	

(Footnotes on Page 2)

Summary of TPIRR Local and Yard Train Lists in NOR 42121 Evidence
(Peak Period Train List)

Footnotes:

- 1/ TPI Rebuttal Narrative pages III-C-44 to III-C-83 and III-C-158 to III-C-159.
- 2/ TPI Opening Workpaper "Train List Local V06 12162013_v4_PeakPeriod.xlsx", tab "Train List ALL".
- 3/ CSXT Reply file "TPIRR Reply Train Lists.xlsx" is a MultiRail output with average trains per week, it does not identify peak week trains or contain information to determine peak period trains.
- 4/ TPI Rebuttal III-C-162 "7. All of the trains from TPI's Opening RTC simulation plus; a. 95 local trains added by CSXT; b. 11 industrial yard trains added by CSXT; c. 151 additional local trains identified by TPI;"
- 5/ The STB decision does not specifically state or reference these numbers, however these are representative of the base year trains the STB requested be included in TPI base year train list.
- 6/ CSXT Reply Narrative III-C-71 stating "Based upon the adjustments discussed above, CSXT's Reply RTC simulation includes 7 fewer road trains and 133 more local trains than TPI's Opening RTC simulation." This statement along with review of CSXT's reply workpapers, indicates CSXT began with TPI's Opening RTC train list. See CSXT Reply RTC file "CSXT Reply TPI.TRAIN".
- 7/ CSXT Reply Workpaper "Addl SARR Locals for Reply RTC.xlsx" at tab "with RTC detail" which details the 95 trains CSXT added to the RTC model to account for local trains.
- 8/ CSXT Reply Workpaper "TPI_Locals_with_Overtime_in_RTC_Model.xlsx", 22 trains highlighted in green in Column B in which TPI added a second train to account for "overtime" in RTC model.
- 9/ CSXT Reply Workpaper "CSXT Reply TPIRR Industry Yard Jobs RTC Details.xlsx" at tab "Sheet 1" identifies 16 new yard trains CSXT added to the reply RTC. However, as noted in TPI Rebuttal III-C-17, CSXT RTC workpapers indicated that it actually included only 11 Y trains in its RTC inputs.
- 10/ CSXT Reply III-C-177 "Based upon the adjustments discussed above, CSXT's Reply RTC simulation includes 7 fewer road trains and 133 more local trains than TPI's Opening RTC simulation." minus Line 4 and Line 6.
- 11/ CSXT Reply III-C-177 "For each of the 22 train symbols listed in Figure III-C-25, witness Wheeler conservatively added one train during the peak week to accommodate the efficient handling of TPI's projected traffic growth."
- 12/ CSXT Reply III-C-174 "Witness Wheeler addressed this omission in TPI's operating plan and RTC Model by adding a sample of 16 industrial yard trains to the TPIRR's peak week train list."
- 13/ These 86 trains are the trains from the additional 4,461 non yard locals the STB requested TPI add to its train list that fall in the peak period of December 8, 2012 through December 17, 2012.
- 14/ CSXT's MultiRail train list does not provide any date details, it is simply weekly average train starts. CSXT's data for SARR YARD trains is 28,860 annual trains, which is based off of 555 train starts per week which is 7 days (not peak period which is 10 days). For peak period TPI has used $28,860 \text{ annual trains} \div 365 \text{ days per year} \times 10 \text{ day peak period}$.
- 15/ TPI Supplemental Workpaper "Train List Local V05 12162013_v4_Rebuttal_v2_supplemental.xlsx", tab Supp_Added Peak Period Trains" based on excel Column E "Train Group".
- 16/ TPI Supplemental Workpaper "Peak Y trn 1 on with miles PEAK GROWTH.xlsx" at tab "Peak Train Compilation".

TAB 10

Summary of TPIRR Local and Yard Train Lists in NOR 42121 Evidence
(Base Year Train List With Other Yard Trains)

<u>Train Group/Narrative Section 1/</u> (1)	<u>Rebuttal Pages</u> (2)	<u>Train Count Source</u> (3)	<u>TPI Opening</u> (4)	<u>CSXT Reply Operating Statistics</u> (5)	<u>TPI Rebuttal</u> (6)	<u>TPI Total Supplemental</u> (7)
1. Total Non-Yard Locals 2/	III-C-44 to III-C-53, III-C-74 to III-C-82	Traffic Data (TPI)/ MultiRail (CSXT)	42,208	60,788	53,581	58,042
2. Industrial Yard ("Y") Trains 3/	III-C-61 to III-C-74	Traffic Data	0	0	0	25,119
3. Other Yard Trains	III-C-72, III-C-135	Yard Matrix	153,665	4/ 184,526	5/ 153,665	6/ 128,546
4. Total - Non-Yard Locals and Industrial Yard "Y" Trains		Line 1 + Line 2	42,208	60,788	8/ 53,581	83,161

1/ TPI Rebuttal Narrative pages III-C-44 to III-C-83 and III-C-158 to III-C-159.

2/ TPI Supplemental/Compliance Exhibit III-C-8, Line 4.

3/ TPI Supplemental/Compliance Exhibit III-C-8, Line 5.

4/ TPI Opening workpaper "TPIRR Yard Operations.xlsx" at tab "Sheet1", sum of excel column AA "TPI daily yard jobs" row 6 through row 90 * 365 days.

5/ CSXT Reply workpaper "TPIRR Yard Operations_Reply.xlsx" at tab "Sheet1", cell AQ21 * 365 days.

6/ TPI Rebuttal workpaper "TPIRR Yard Operations_Rebuttal.xlsx" at tab "Sheet1", sum of excel column AA "TPI daily yard jobs" row 6 through row 90 * 365 days.

7/ TPI Supplemental workpaper "TPIRR Yard Operations_Rebuttal_Supplemental.xlsx" at tab "Sheet1", sum of excel column AA "TPI daily yard jobs" row 6 through row 90 - cell AA106 "Adjustment for Yard Trains handled as Locals" * 365 days.

8/ Includes thousands of local trains that only carried a fraction of a car. See, TPI Rebuttal at III-C-25-26.

TAB 11

TPIRR UPS and Threads Express Trains Marked for Removal

CSXT ID	CSXT Suffix	CSXT Train ID	RTC Train ID
(1)	(2)	(3)	(4)
1. a. Q031	20121211	Q031201212111	M0559BALSOU
b.		Q031201212112	M0560FOLJAC
2. a. Q031	20121212	Q031201212121	M0561BALSOU
b.		Q031201212122	M0562FOLJAC
3. a. Q031	20121213	Q031201212131	M0563BALSOU
b.		Q031201212132	M0564FOLJAC
4. a. Q032	20121211	Q032201212111	M0565JACFOL
b.		Q032201212112	M0566SOUBAL
5. a. Q032	20121212	Q032201212121	M0567JACFOL
b.		Q032201212122	M0568SOUBAL
6. a. Q032	20121213	Q032201212131	M0569JACFOL
b.		Q032201212132	M0570SOUBAL
7. a. Q033	20121214	Q033201212141	M0571BALSOU
b.		Q033201212142	M0572FOLJAC
8. a. Q034	20121208	Q034201212081	M0573JACFOL
b.		Q034201212082	M0574SOUBAL
9. a. Q034	20121210	Q034201212101	M0575JACFOL
b.		Q034201212102	M0576SOUBAL
10. a. Q034	20121214	Q034201212141	M0577JACFOL
b.		Q034201212142	M0578SOUBAL
11. a. Q034	20121215	Q034201212151	M0579JACFOL
b.		Q034201212152	M0580SOUBAL
12. a. Q034	20121217	Q034201212171	M0581JACFOL
b.		Q034201212172	M0582SOUBAL
13. a. Q035	20121211	Q035201212111	M0583BALSOU
b.		Q035201212112	M0584FOLJAC
14. a. Q035	20121214	Q035201212141	M0585BALSOU
b.		Q035201212142	M0586FOLJAC
15. a. Q036	20121209	Q036201212091	M0587JACFOL
b.		Q036201212092	M0588SOUBAL
16. a. Q036	20121216	Q036201212161	M0589JACFOL
b.		Q036201212162	M0590SOUBAL
17. a. Q037	20121210	Q037201212101	M0591MONNE
b.		Q037201212102	M0592FOLJAC
18. a. Q037	20121213	Q037201212131	M0593MONNE
b.		Q037201212132	M0594FOLJAC
19. a. Q037	20121214	Q037201212141	M0595MONNE
b.		Q037201212142	M0596FOLJAC
20. a. Q037	20121217	Q037201212171	M0597MONNE
b.		Q037201212172	M0598FOLJAC
21. a. Q038	20121208	Q038201212081	M0599JACMON
22. a. Q038	20121215	Q038201212151	M0600JACMON
23. a. Q039	20121212	Q039201212121	M0601BALSOU
b.		Q039201212122	M0602FOLJAC
24. a. Q039	20121213	Q039201212131	M0603BALSOU
b.		Q039201212132	M0604FOLJAC

Source: "TPIRR 2013 High Priority Intermodal Trains List V03 20151001.xlsx"

PART III-F

TAB 1

Summary of TPI Intermodal Facility Costs

Item (1)	Source (2)	Intermodal Facilities Totals			Difference 1/ (6)
		Opening (3)	Rebuttal 5/ (4)	Supplemental Scenario 1 Rebuttal (5)	
1. Land	6/	\$288,919,533	\$0	\$288,919,533	\$288,919,533
2. Total Cost of Facilities	7/	\$2,006,285	\$757,100 2/	\$2,006,285	\$1,249,185
3. Total Cost of Pavements and Fencing	8/	\$153,358,824	\$0	\$159,961,594 3/	\$159,961,594
4. Total Cost of Lighting	9/	\$20,329,017	\$0	\$21,119,380 4/	\$21,119,380
5. Total Cost of Drainage	10/	\$18,031,740	\$4,111,637 2/	\$18,031,740	\$13,920,103
6. Facilities	Sum of Lines 2 through 5	\$193,725,866	\$4,868,737	\$201,118,999	\$196,250,262
7. Engineering (10%)	Line 6 x 10%	\$19,372,587	\$486,874	\$20,111,900	\$19,625,026
8. Mobilization (2.7%)	Line 6 x 2.7%	\$5,230,598	\$131,456	\$5,430,213	\$5,298,757
9. Contingencies (10%)	Sum of Lines 6 through 8 x 10%	\$21,832,905	\$548,707	\$22,666,111	\$22,117,405
10. Grand Total	Line 1 + Sum of Lines 6 through Line 9	\$529,081,489	\$6,035,773	\$538,246,756	\$532,210,983

1/ Column (5) - Column (4).

2/ In its Rebuttal evidence TPI included facilities costs for 2 intermodal yards and drainage costs for 6 intermodal yards. These values in Column (4) are also included in the Opening costs shown in Column (3)

3/ This cost is greater than Opening due to TPI's acceptance of CSXT's Reply increase in Asphalt Pavement and Concrete unit costs.

4/ This cost is greater than Opening due to TPI's acceptance of CSXT's Reply increase in the Lighting 20' (poles) unit cost.

5/ TPI has not linked the Rebuttal numbers in column (4) due to the fact that the supplemental rebuttal files are using the same name. The Rebuttal land value can be found in the original Rebuttal III-F-1\TPI Yards workpaper filed November 5, 2014 "TPI Rebuttal Yards and Land Values-FINAL.xlsx" tab "Summary", cell E9 and the Rebuttal facilities values can be found in the original Rebuttal III-F-7 workpaper filed November 5, 2014 "TPIRR Facilities Rebuttal.xlsx" tab "TPIRR Yards", cell AQ92 through cell AV110.

6/ The Opening land value of \$288,919,533 has been pulled from the III-F-1\TPI Yards Opening workpaper "TPI Yards and Land Values - ALL YARDS.xlsx". This value comes from cell E9 of the "Summary" tab. The Rebuttal land value of \$0 comes from cell E9 of the "Summary" tab found in TPI's original III-F-1/TPI Yards Rebuttal workpaper filed November 5, 2014 "TPI Rebuttal Yards and Land Values-FINAL.xlsx". This value is hard coded and has not been linked due to the fact that the land value is changing in TPI's supplemental evidence. As can be seen in column (5), TPI has included the land values for the 19 Intermodal ("IM") facilities that were included in Opening. The value in Line 1, Column (5) is pulled from the Rebuttal III-F-1\TPI Yards supplemental file "TPI Rebuttal Yards and Land Values-FINAL.xlsx" tab "Summary" cell E9. In order to include these land costs in its Rebuttal evidence, TPI added the IM terminal values used in Opening to the "IM-Auto_Bulk" tab of the "TPI Rebuttal Yards and Land Values-FINAL.xlsx" spreadsheet. These values were added to cells S8-T47 (these are the columns labeled "Value 1" and "Value 2" respectively). Upon adding the Opening values, TPI was able to follow the same process as used in Opening and calculate the "Average Value" for each IM terminal. The average values can be found in cells U8-U48. The final step in including the Opening IM facility land values was to calculate the "Land Value for Yard" in column V. This was done by multiplying the "Average Value" by the "Acres" for each IM terminal. The sum of the IM terminal "Land Value for Yard" values for the 19 IM facilities is equal to \$288,919,533. This is the same value that TPI included in its Opening evidence.

7/ In the III-F-7 Opening workpaper "TPIRR Facilities.xlsx" tab "TPIRR Yards" cells AG92-AG110, TPI included guard booths at all of the IM terminals in its Opening evidence. TPI did not include these guard booths on Rebuttal. In its Supplemental evidence, TPI has included these costs. This can be seen in "TPIRR Facilities Rebuttal.xlsx". As can be seen in cells AG92-AG110 of the "TPIRR Yards" tab, TPI has now included the guard booths at all of the IM terminals. The Supplemental guard booth unit price of \$21,949.77 is the same unit price that was used in Opening.

TPI has also included the Opening turntables for the Mobile, AL IM terminal. TPI has included the Mobile turntables at the same Opening unit price of \$832,139.82. This can be seen in cell AM103 of the "TPIRR Yards" tab.

By including the guard booths and turntables, TPI's supplemental rebuttal total cost of facilities is equal to \$2,006,285 (the same cost as Opening). TPI's Rebuttal value of \$757,100 can be seen in the original Rebuttal III-F-7 workpaper "TPIRR Facilities Rebuttal.xlsx" tab "TPIRR Yards".

8/ TPI has included the IM facility pavement and fencing costs that were taken out on Rebuttal. The calculations for these costs can be seen in the "Yard Pavements and Fence Costs" tab of "TPIRR Facilities Rebuttal.xlsx". On Opening, TPI included IM facility values for the "Yard Specific Input Info (CEPC researched)" columns (See Opening workpaper "TPIRR Facilities.xlsx" tab "Yard Pavements and Fence Costs" cells I121-M139). TPI has included these input values that were used on Opening and calculated each IM facilities cost for asphalt pavement (cells P121-P139), concrete (cells S121-S139), gravel (cells V121-V139), fence (cells Y121-Y139), and pavement marking (cells AB121-AB139). After updating the IM facility costs listed above in the "Yard Pavements and Fence Costs" tab, the totals flow through to the "TPIRR Yards" tab. The total cost of pavements and fencing at each IM terminal can be seen in cells AR92-AR110. There is an increase in total cost for yard pavements and fence due to an increase in unit costs for asphalt pavement and concrete. TPI's Rebuttal value of \$0 can be seen in the original Rebuttal III-F-7 workpaper "TPIRR Facilities Rebuttal.xlsx" tab "TPIRR Yards".

9/ TPI has updated the "Yard Lighting Costs" tab to include the IM terminal input info for the 100' poles, 40' poles, and 20' poles based on TPI's Opening numbers from the "Yard Lighting Costs" tab of "TPIRR Facilities.xlsx". This can be seen in cells I136-K154 of "TPIRR Facilities Rebuttal.xlsx". TPI has also adjusted the Memphis and Baltimore IM facility calculations to reflect the pole numbers used in Opening (cells L145, O145, R145, L154, O154, and R154). This allows TPI to calculate the total lighting cost for each of the nineteen IM terminals (cells U136-U154). The total lighting costs for each IM terminal then flow through to the "TPIRR Yards" tab and can be seen in cells AS92-AS110. There is an increase in total cost for lighting due to an increase in the unit cost for Lighting 20' (poles). TPI's Rebuttal value of \$0 can be seen in the original Rebuttal III-F-7 workpaper "TPIRR Facilities Rebuttal.xlsx" tab "TPIRR Yards".

10/ For drainage costs, TPI has adjusted the IM facility calculations in the "Yard Drainage Costs" tab of "TPIRR Facilities Rebuttal.xlsx". TPI has followed the methodology it used in Opening (See Opening workpaper "TPIRR Facilities.xlsx" tab "Yard Drainage Costs") and calculated the quantities for catch basins (cells M126-M144), headwalls (cells O126-O144), amount of 24" CMP (cells Q126-Q144), and amount of 36" CMP (cells T126-T144). These calculations are based on the area of the yard. TPI has adjusted the acres in cells G126-G144 to reflect the numbers that were used in Opening. The total cost of drainage at each IM terminal can then be seen in the "TPIRR Yards" tab in cells AT92-AT110.

PART III-H

TAB 1

TPIRR STAND-ALONE COSTS AND REVENUES - SCENARIO #1

Revenue Requirements to Cover Total Stand-Alone Costs

<u>Period</u>	<u>Quarter</u>	<u>Quarterly Capital Requirement Road Property</u>	<u>Quarterly Operating Expense</u>	<u>Annual Stand-Alone Requirement</u>	<u>Annual Stand-Alone Revenues</u>	<u>Overpayments Or Shortfalls In Revenues</u>	<u>PV Difference</u>	<u>Cumulative PV Difference</u>
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
1	3Q 2010	\$851,262,386	\$616,064,546					
2	4Q 2010	\$868,762,117	\$636,069,202	\$2,972,158,251	\$2,967,269,268	-\$4,888,983	-\$4,888,983	-\$4,888,983
3	1Q 2011	\$867,078,429	\$648,130,536					
4	2Q 2011	\$866,651,547	\$695,660,656					
5	3Q 2011	\$891,015,954	\$692,254,182					
6	4Q 2011	\$903,747,156	\$693,804,005	\$6,258,342,464	\$6,540,524,412	\$282,181,948	\$252,948,133	\$248,059,150
7	1Q 2012	\$905,321,007	\$676,362,315					
8	2Q 2012	\$928,526,550	\$685,995,048					
9	3Q 2012	\$932,134,016	\$677,271,400					
10	4Q 2012	\$928,683,466	\$698,901,524	\$6,433,195,327	\$6,775,701,537	\$342,506,210	\$275,838,913	\$523,898,063
11	1Q 2013	\$931,447,314	\$713,174,866					
12	2Q 2013	\$926,803,067	\$719,384,838					
13	3Q 2013	\$945,352,495	\$698,555,023					
14	4Q 2013	\$944,058,456	\$696,753,559	\$6,575,529,619	\$7,075,518,341	\$499,988,723	\$364,555,213	\$888,453,276
15	1Q 2014	\$960,846,605	\$719,237,014					
16	2Q 2014	\$976,993,735	\$714,700,023					
17	3Q 2014	\$983,559,550	\$721,582,803					
18	4Q 2014	\$985,671,157	\$715,485,529	\$6,778,076,416	\$7,490,864,818	\$712,788,402	\$466,314,145	\$1,354,767,421
19	1Q 2015	\$993,787,333	\$739,702,039					
20	2Q 2015	\$998,883,453	\$738,407,561					
21	3Q 2015	\$1,009,265,552	\$743,945,617					
22	4Q 2015	\$1,013,391,934	\$744,763,958	\$6,982,147,446	\$7,956,707,123	\$974,559,677	\$573,397,631	\$1,928,165,053
23	1Q 2016	\$1,027,871,076	\$778,900,534					
24	2Q 2016	\$1,032,787,964	\$777,109,062					
25	3Q 2016	\$1,044,883,130	\$785,968,106					
26	4Q 2016	\$1,049,165,083	\$795,635,513	\$7,292,320,468	\$8,544,944,372	\$1,252,623,904	\$662,823,112	\$2,590,988,164
27	1Q 2017	\$1,057,477,743	\$813,409,033					
28	2Q 2017	\$1,065,487,171	\$817,544,407					
29	3Q 2017	\$1,073,560,911	\$821,700,807					
30	4Q 2017	\$1,081,699,550	\$825,777,064	\$7,556,656,686	\$8,976,604,705	\$1,419,948,020	\$675,738,846	\$3,266,727,010
31	1Q 2018	\$1,091,738,161	\$858,878,871					
32	2Q 2018	\$1,101,465,558	\$865,329,630					
33	3Q 2018	\$1,111,284,679	\$871,828,838					
34	4Q 2018	\$1,121,196,464	\$878,227,525	\$7,899,949,726	\$9,576,704,155	\$1,676,754,428	\$717,637,943	\$3,984,364,953
35	1Q 2019	\$1,136,293,584	\$914,330,963					
36	2Q 2019	\$1,146,948,116	\$921,041,589					
37	3Q 2019	\$1,157,706,255	\$927,801,467					
38	4Q 2019	\$1,168,569,072	\$934,452,035	\$8,307,143,081	\$10,270,791,028	\$1,963,647,948	\$755,838,570	\$4,740,203,523
39	1Q 2020	\$1,178,794,257	\$974,145,755					
40	2Q 2020	\$1,189,112,711	\$980,887,274	\$4,322,939,997	\$5,514,763,719	\$1,191,823,722	\$435,053,025	\$5,175,256,548

Source: Supplemental/Compliance e-workpaper "Exhibit III-H-1_Rebuttal.xlsm," worksheet "Netting."

TAB 2

TPIRR STAND-ALONE COSTS AND REVENUES - SCENARIO #2

Revenue Requirements to Cover Total Stand-Alone Costs

<u>Period</u>	<u>Quarter</u>	<u>Quarterly Capital Requirement Road Property</u>	<u>Quarterly Operating Expense</u>	<u>Annual Stand-Alone Requirement</u>	<u>Annual Stand-Alone Revenues</u>	<u>Overpayments Or Shortfalls In Revenues</u>	<u>PV Difference</u>	<u>Cumulative PV Difference</u>
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
1	3Q 2010	\$851,262,386	\$615,215,577					
2	4Q 2010	\$868,762,117	\$635,189,461	\$2,970,429,540	\$2,967,269,268	-\$3,160,273	-\$3,160,273	-\$3,160,273
3	1Q 2011	\$867,078,429	\$647,228,613					
4	2Q 2011	\$866,651,547	\$694,685,345					
5	3Q 2011	\$891,015,954	\$691,185,336					
6	4Q 2011	\$903,747,156	\$692,732,766	\$6,254,325,146	\$6,540,524,412	\$286,199,266	\$256,549,261	\$253,388,988
7	1Q 2012	\$905,321,007	\$675,316,072					
8	2Q 2012	\$928,526,550	\$684,933,904					
9	3Q 2012	\$932,134,016	\$676,223,750					
10	4Q 2012	\$928,683,466	\$697,820,416	\$6,428,959,181	\$6,775,701,537	\$346,742,357	\$279,250,512	\$532,639,500
11	1Q 2013	\$931,447,314	\$712,065,536					
12	2Q 2013	\$926,803,067	\$718,265,848					
13	3Q 2013	\$945,352,495	\$697,468,434					
14	4Q 2013	\$944,058,456	\$695,669,772	\$6,571,130,922	\$7,075,518,341	\$504,387,420	\$367,762,421	\$900,401,921
15	1Q 2014	\$960,846,605	\$718,111,459					
16	2Q 2014	\$976,993,735	\$713,581,569					
17	3Q 2014	\$983,559,550	\$720,453,578					
18	4Q 2014	\$985,671,157	\$714,365,845	\$6,773,583,499	\$7,490,864,818	\$717,281,318	\$469,253,462	\$1,369,655,383
19	1Q 2015	\$993,787,333	\$738,534,952					
20	2Q 2015	\$998,883,453	\$737,242,516					
21	3Q 2015	\$1,009,265,552	\$742,771,835					
22	4Q 2015	\$1,013,391,934	\$743,588,884	\$6,977,466,457	\$7,956,707,123	\$979,240,666	\$576,151,766	\$1,945,807,148
23	1Q 2016	\$1,027,871,076	\$777,661,267					
24	2Q 2016	\$1,032,787,964	\$775,872,646					
25	3Q 2016	\$1,044,883,130	\$784,717,595					
26	4Q 2016	\$1,049,165,083	\$794,369,621	\$7,287,328,382	\$8,544,944,372	\$1,257,615,990	\$665,464,663	\$2,611,271,811
27	1Q 2017	\$1,057,477,743	\$812,110,368					
28	2Q 2017	\$1,065,487,171	\$816,239,141					
29	3Q 2017	\$1,073,560,911	\$820,388,904					
30	4Q 2017	\$1,081,699,550	\$824,458,653	\$7,551,422,441	\$8,976,604,705	\$1,425,182,264	\$678,229,769	\$3,289,501,581
31	1Q 2018	\$1,091,738,161	\$857,498,955					
32	2Q 2018	\$1,101,465,558	\$863,939,350					
33	3Q 2018	\$1,111,284,679	\$870,428,116					
34	4Q 2018	\$1,121,196,464	\$876,816,523	\$7,894,367,807	\$9,576,704,155	\$1,682,336,348	\$720,026,961	\$4,009,528,542
35	1Q 2019	\$1,136,293,584	\$912,852,711					
36	2Q 2019	\$1,146,948,116	\$919,552,488					
37	3Q 2019	\$1,157,706,255	\$926,301,436					
38	4Q 2019	\$1,168,569,072	\$932,941,252	\$8,301,164,913	\$10,270,791,028	\$1,969,626,115	\$758,139,660	\$4,767,668,202
39	1Q 2020	\$1,178,794,257	\$972,560,776					
40	2Q 2020	\$1,189,112,711	\$979,291,326	\$4,319,759,070	\$5,514,763,719	\$1,195,004,649	\$436,214,163	\$5,203,882,365

Source: Supplemental/Compliance e-workpaper "Exhibit III-H-1_Rebuttal_Supplemental.xlsm," worksheet "Netting."

TAB 3

TPIRR STAND-ALONE COSTS AND REVENUES - SCENARIO #3

Revenue Requirements to Cover Total Stand-Alone Costs

<u>Period</u>	<u>Quarter</u>	<u>Quarterly Capital Requirement Road Property</u>	<u>Quarterly Operating Expense</u>	<u>Annual Stand-Alone Requirement</u>	<u>Annual Stand-Alone Revenues</u>	<u>Overpayments Or Shortfalls In Revenues</u>	<u>PV Difference</u>	<u>Cumulative PV Difference</u>
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
1	3Q 2010	\$851,262,386	\$612,657,054					
2	4Q 2010	\$868,762,117	\$632,546,553	\$2,965,228,109	\$2,962,099,455	-\$3,128,654	-\$3,128,654	-\$3,128,654
3	1Q 2011	\$867,078,429	\$644,528,330					
4	2Q 2011	\$866,651,547	\$691,784,076					
5	3Q 2011	\$891,015,954	\$688,258,055					
6	4Q 2011	\$903,747,156	\$689,798,931	\$6,242,862,478	\$6,529,198,490	\$286,336,012	\$256,671,840	\$253,543,186
7	1Q 2012	\$905,321,007	\$672,503,066					
8	2Q 2012	\$928,526,550	\$682,080,836					
9	3Q 2012	\$932,134,016	\$673,406,964					
10	4Q 2012	\$928,683,466	\$694,913,669	\$6,417,569,574	\$6,765,362,025	\$347,792,452	\$280,096,211	\$533,639,398
11	1Q 2013	\$931,447,314	\$709,074,788					
12	2Q 2013	\$926,803,067	\$715,249,058					
13	3Q 2013	\$945,352,495	\$694,538,995					
14	4Q 2013	\$944,058,456	\$692,747,888	\$6,559,272,062	\$7,064,640,301	\$505,368,238	\$368,477,562	\$902,116,960
15	1Q 2014	\$960,846,605	\$715,060,953					
16	2Q 2014	\$976,993,735	\$710,550,305					
17	3Q 2014	\$983,559,550	\$717,393,122					
18	4Q 2014	\$985,671,157	\$711,331,250	\$6,761,406,677	\$7,479,047,607	\$717,640,930	\$469,488,724	\$1,371,605,683
19	1Q 2015	\$993,787,333	\$735,352,700					
20	2Q 2015	\$998,883,453	\$734,065,833					
21	3Q 2015	\$1,009,265,552	\$739,571,327					
22	4Q 2015	\$1,013,391,934	\$740,384,855	\$6,964,702,985	\$7,943,424,117	\$978,721,132	\$575,846,090	\$1,947,451,773
23	1Q 2016	\$1,027,871,076	\$774,252,862					
24	2Q 2016	\$1,032,787,964	\$772,472,080					
25	3Q 2016	\$1,044,883,130	\$781,278,262					
26	4Q 2016	\$1,049,165,083	\$790,887,985	\$7,273,598,442	\$8,528,870,662	\$1,255,272,220	\$664,224,462	\$2,611,676,235
27	1Q 2017	\$1,057,477,743	\$808,512,518					
28	2Q 2017	\$1,065,487,171	\$812,622,999					
29	3Q 2017	\$1,073,560,911	\$816,754,378					
30	4Q 2017	\$1,081,699,550	\$820,806,097	\$7,536,921,368	\$8,959,148,666	\$1,422,227,298	\$676,823,531	\$3,288,499,766
31	1Q 2018	\$1,091,738,161	\$853,650,204					
32	2Q 2018	\$1,101,465,558	\$860,061,692					
33	3Q 2018	\$1,111,284,679	\$866,521,335					
34	4Q 2018	\$1,121,196,464	\$872,881,067	\$7,878,799,161	\$9,557,504,585	\$1,678,705,425	\$718,472,954	\$4,006,972,720
35	1Q 2019	\$1,136,293,584	\$908,702,701					
36	2Q 2019	\$1,146,948,116	\$915,372,019					
37	3Q 2019	\$1,157,706,255	\$922,090,286					
38	4Q 2019	\$1,168,569,072	\$928,699,916	\$8,284,381,947	\$10,249,519,111	\$1,965,137,164	\$756,411,793	\$4,763,384,513
39	1Q 2020	\$1,178,794,257	\$968,083,888					
40	2Q 2020	\$1,189,112,711	\$974,783,457	\$4,310,774,312	\$5,502,982,275	\$1,192,207,962	\$435,193,285	\$5,198,577,798

Source: Supplemental/Compliance e-workpaper "Exhibit III-H-1_Rebuttal_Supplemental_v2.xlsm," worksheet "Netting."

TAB 4

TPIRR MMM Model - Scenario #1

	<u>Year</u> (1)	MMM Revenue to Variable <u>Cost Ratio</u> (2)
1.	July -Dec 2010	NO REDUCTION
2.	2011	261.6%
3.	2012	255.5%
4.	2013	222.3%
5.	2014	195.8%
6.	2015	175.8%
7.	2016	161.9%
8.	2017	156.9%
9.	2018	149.3%
10.	2019	143.7%
11.	Jan-Jun 2020	135.7%

Source: Supplemental/Compliance e-workpaper "TPIRR MMM Rebuttal.xlsm."

TAB 5

TPIRR MMM Model - Scenario #2

	<u>Year</u> (1)	MMM Revenue to Variable <u>Cost Ratio</u> (2)
1.	July -Dec 2010	NO REDUCTION
2.	2011	260.4%
3.	2012	254.3%
4.	2013	221.4%
5.	2014	195.2%
6.	2015	175.3%
7.	2016	161.5%
8.	2017	156.6%
9.	2018	149.0%
10.	2019	143.4%
11.	Jan-Jun 2020	135.5%

Source: Supplemental/Compliance e-workpaper "TPIRR MMM Rebuttal_Supplemental.xlsm."

TAB 6

TPIRR MMM Model - Scenario #3

	<u>Year</u> (1)	<u>MMM Revenue to Variable Cost Ratio</u> (2)
1.	July -Dec 2010	NO REDUCTION
2.	2011	260.3%
3.	2012	254.0%
4.	2013	221.2%
5.	2014	195.1%
6.	2015	175.4%
7.	2016	161.6%
8.	2017	156.7%
9.	2018	149.1%
10.	2019	143.5%
11.	Jan-Jun 2020	135.6%

Source: Supplemental/Compliance e-workpaper "TPIRR MMM
Rebuttal_Supplemental_v2.xlsm."