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Ms. Cynthia Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

RE: EP 661 (Sub-No. 2)—Joint Letter in Support of Petition for Modification of the Procedural Schedule

Dear Ms. Brown:

The American Chemistry Council (“ACC”) and The Dow Chemical Company support the petition of Highroad Consulting, Ltd., for modification of the procedural schedule for this proceeding. On June 30, 2014, Highroad filed a petition for extension of the procedural schedule to August 4, 2014, for opening comments and September 15, 2014, for reply comments. Both the ACC and Dow agree that the extension will permit more thorough analysis and development of cost evidence and provide time to examine additional issues and alternatives to the safe harbor provision.

Sincerely,



Jeffrey O. Moreno
Jason D. Tutrone

*Counsel for the American Chemistry Council and
The Dow Chemical Company*