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December 9, 2013

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BY HAND DELIVERY

Reamy Ancarrow, Esq.
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Surface Transportation Board
395 E Street, S.W.
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ENTERED
Office of Proceedings
December 9, 2013
Part of
Public Record

Re: STB Docket No. NOR 42136, *Intermountain Power Agency*
v. Union Pacific Railroad Company

Dear Ms. Ancarrow:

In accordance with your request this afternoon, we are providing under seal and redacted copies of IPA's Exhibit No. 4 from the November 14, 2013 oral argument in this proceeding.

Sincerely,



Andrew B. Kolesar III

Enclosures

cc: Counsel for Defendant (via email)

PUBLIC VERSION

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

INTERMOUNTAIN POWER AGENCY)	
)	
Complainant,)	
)	
v.)	Docket No. 42136
)	
UNION PACIFIC RAILROAD COMPANY)	
)	
Defendant.)	
)	

**Oral Argument Exhibit No. 4 of
Intermountain Power Agency**

*Non-Public
Material has been Redacted*

INTERMOUNTAIN POWER AGENCY

By: C. Michael Loftus
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Dated: November 14, 2013

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PUBLIC VERSION
 INFORMATION SUBJECT TO PROTECTIVE ORDER
 HAS BEEN REDACTED

IPA Oral Argument Exhibit No. 4

Z-Train Average Transit Times and Arrival Times At Destination

<u>Origin</u>		<u>Destination</u>		<u>Average Transit Time</u>	<u>Arrival Time</u>	
<u>City</u> (1)	<u>State</u> (2)	<u>City</u> (3)	<u>State</u> (4)	<u>(Hours) 1/</u> (5)	<u>Business Hours</u> 2/ (6)	<u>Non-Business Hours 3/</u> (7)

- 1.
- 2.
- 3.
- 4.
- 5.

REDACTED

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- 1/ Transit time is defined as difference between departure from origin station and arrival at destination station. Averages are based on UP Z-Trains operating over the IRR route from July 1, 2011 to June 30, 2012.
 - 2/ "Business Hours" defined as 8:00 am to 6:00 pm.
 - 3/ "Non-Business Hours" defined as 6:01 pm to 7:59 am.

Source: IPA Rebuttal e-workpaper "Z Train Transit Time.xlsx," Tab "Summary." IPA cites this workpaper in its Rebuttal Narrative at III-C-43 n.38.