

SIDLEY

SIDLEY AUSTIN LLP
1501 K STREET, N.W.
WASHINGTON, D.C. 20005
+1 202 736 8000
+1 202 736 8711 FAX

AMERICA • ASIA PACIFIC • EUROPE

+1 202 736 8889
RATKINS@SIDLEY.COM

ENTERED
Office of Proceedings
May 20, 2022
Part of
Public Record

CN-16

May 20, 2022

By E-Filing

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

Re: Finance Docket No. 36500, *Canadian Pacific Railway Company*,
et al.—Control—Kansas City Southern, et al. and Sub-Nos. 1-5

Dear Ms. Brown,

Canadian National Railway Company and its rail operating subsidiaries (collectively, “CN”) respectfully ask the Board to extend the deadline for filing amended comments and responsive applications in the above-captioned dockets to June 16, 2022. Pursuant to the Board’s *Decision No. 17*, Applicants filed an amended operating plan and voluminous new workpapers just before midnight on May 13, 2022 (CP-47/KCS-34) (“May 13 Filing”). Applicants’ May 13 Filing makes multiple changes to their Operating Plan and supporting workpapers, some of which go beyond the focused supplementation contemplated by *Decision No. 17*. Additional time is needed for interested parties to assess the changes and have “a meaningful opportunity to comment” on Applicants’ May 13 Filing. *Decision No. 17* at 5.

In *Decision No. 17*, the Board—at Applicants’ request—ordered that the “Density Workpaper” described by Applicants in their March 21, 2022 filing (CP-43/KCS-30) be used as the baseline traffic density values for the primary application and responsive applications, while withholding judgment on whether the density data set forth in that workpaper ultimately produces “an accurate or reliable estimate” for the Board’s public interest assessment.

Decision No. 17 at 5. Applicants were required to amend their Operating Plan to include an explicit identification of the baseline traffic density values, an explanation of how those values were generated, and an explanation of applicants' methodological rationale. *Id.* at 6. The Board also instructed Applicants "to revise as necessary and resubmit all workpapers associated with their Operating Plan" and to "amend, through the appropriate use of errata, any portions of the Application that depend on values that have changed." *Id.* Applicants were given until May 27, 2022 to submit the amendments requested by *Decision No. 17*.

Just before midnight on May 13, Applicants submitted the May 13 Filing: a 386-page pdf containing an amended operating plan and appendices. Applicants did not provide errata or any summary of the changes they had made, other than a brief cover letter. Indeed, Applicants have refused to provide either a redline of changes to their operating plan or Word versions of their original and revised operating plans from which such redlines could be created.¹ This refusal has materially impaired the ability of commenters to identify and understand the changes reflected in the Amended Operating Plan. Nevertheless, it is clear that the changes in the May 13 Filing and supporting workpapers go beyond the relatively straightforward directions contemplated by *Decision No. 17*. CN highlights a few of the most significant changes it has been able to identify thus far below.

Applicants have introduced a third version of Exhibit 14 that differs from their March filing purporting to align Exhibit 14 with the data submitted to OEA. In Applicants' March 21 response to *Decision No. 16*, they provided a new version of Exhibit 14 purportedly reflecting the modeled "Operating Plan Base Densities" in the so-called "Density Workpaper." CP-43/KCS-30 at ¶2 and Appendix A. These densities were also provided by the Applicants to the Board's Office of Environmental Analysis on October 28, 2021 in the so-called "Master Segment Table," and *Decision No. 17* contemplated that Applicants would include this information in their amended filing. *Decision No. 17* at 6 & n.6. But the density values

¹ See Exhibit 1 (May 14, 2021 email chain between counsel).

Honorable Cynthia T. Brown
May 20, 2022
Page 3

CN-16

in the new May 13 version of Exhibit 14 are materially different from the values in the March 21 Exhibit 14. In short, Applicants' May 13 Filing is now the third version of base year traffic densities that Applicants have proffered. As an example, Table 1 below shows the different values that have been provided *seriatim* for several segments of KCS's Springfield Line. These numbers are different than the numbers Applicants submitted to OEA in the environmental process.

**Table 1: Applicants' May 13 Base Year Tonnage Numbers
for the Springfield Line Differ from the Previous Numbers**

Subdivision	Segment	Actual 2019 Gross Tons Per Mile Original Application Exhibit 14²	Modeled 2019 Gross Tons Per Mile March 21 Exhibit 14 and OEA numbers³	Modeled 2019 Gross Tons Per Mile May 13 Exhibit 14⁴
Mexico	Kansas City, MO – Slater, MO	10,376	5,833	6,166
Mexico	Slater, MO – Mexico, MO	8,809	3,714	4,281
Roodhouse	Mexico, MO – Roodhouse	6,655	3,390	4,019
Springfield	Roodhouse, MO – Murrayville, IL	3,090	25	998
Springfield	Murrayville, IL – Springfield, IL	43	25	168

While CN has highlighted the changes on Springfield Line segments for illustrative purposes, similar inexplicable changes to base year densities occur on many other KCS segments. CN is still investigating the nature and scope of those changes and the implications that they might have for its

² See CP-26/KCS-14, Railroad Control Application, Vol. 2 at 497-499, Exhibit 14.

³ See CP-43/KCS-30, Applicants' Response to Decision No. 16 at Appendix A, "KCS Operating Plan Base (2019)." These numbers matched what was submitted to OEA on October 28, 2021. Applicants' Response to OEA Information Request No. 1, October 28, 2021 ("October 2021 CP Environmental Submission"), Master Segment Table.

⁴ See CP-47/KCS-34, Applicants' Amended Operating Plan at Exhibit 14 pp. 51-52, "KCS Operating Plan Base (2019)."

responsive application, but the fact that the May 13 Filing diverges so significantly from the March 21 filing that itself purported to correct Applicants' original density data certainly warrants a brief extension of time to respond.

Applicants changed yard activity assumptions from what was submitted to OEA. According to Appendix T to the May 13 filing, the Baton Rouge yard is processing 413 cars per day in the base scenario and 528 cars per day in the post-merger scenario—increases from the 171 base cars and 221 post-merger cars in the October 2021 OEA submission.⁵ Similarly, Appendix T has the Kansas City yard processing 2,029 cars per day in the base scenario and 2,498 in the post-transaction scenarios—increases from the 1,748 base cars and 2,142 post-merger cars in the October 2021 OEA submission.⁶ CN is still assessing the reasons for and implications of these changes.

Applicants have removed key workpapers. Multiple workpapers describing Applicants' operating plan methodology that were included in its original Application were not included in its May 13 filing.⁷ It is currently not clear whether those workpapers remain operative or whether the methodologies described in those workpapers have been disavowed.

⁵ Compare May 13 Filing Appendix T at 15 *with* Attachment 2 to October 2021 CP Environmental Submission.

⁶ Compare May 13 Filing Appendix T at 15 *with* Attachment 2 to October 2021 CP Environmental Submission.

⁷ The following workpapers were included in the Original Application, but are not included in the Amended May 13 workpapers: FD 36500 – Work Paper – HC – Cars Per Day – Methodology; FD 36500 – Work Paper – HC – Gross Ton Miles, Train Miles, Train Weights and MGT – Methodology; FD 36500 – Work Paper – HC – System Model – Methodology; FD 36500 – Work Paper – HC – Methodology Section 7.1-Locomotives; FD 36500 – Work Paper – HC – Methodology Section 7.2 - Rolling Stock; and FD 36500 – Work Paper – HC – Trains Per Day – Methodology.

Honorable Cynthia T. Brown
May 20, 2022
Page 6

CN-16

Applicants added other new workpapers. Applicants also included operating plan workpapers on May 13 that they did not include in their original filing. For example, a number of additional MultiRail data files were included, including two MultiRail traffic tables identified as number 17 and number 19.

* * *

For these reasons, the Board should set the deadline for amended comments and responsive applications for June 16, 2022. This brief two-week extension would provide sufficient time for parties to identify and understand changes to Applicants' operating plan and the implications of those changes for comments and responsive applications. It would also be consistent with the overall transaction review timetable contemplated by *Decision No. 17*, which had given Applicants until May 27 to amend their application (and thus would have made amended comments and responsive applications due on June 16).

Respectfully submitted,

/s/ Raymond A. Atkins

Raymond A. Atkins
Terence M. Hynes
Matthew J. Warren
Sidley Austin LLP
1501 K Street, N.W.
Washington, DC 20005
(202) 736-8000
ratkins@sidley.com

*Counsel for Canadian National
Railway Company*

cc: Parties of Record in FD 36500 and Sub-Dockets 1-5

EXHIBIT 1

From: [David Meyer](#)
To: [Rosenthal, Michael](#); [pac@harkinscunningham.com](#)
Cc: [Stoffers, Brandon M.](#); [alarocca@steptoe.com](#); [AMcDonald@bakerandmiller.com](#); [areid@lepeabody.com](#); [Asteel@mayerbrown.com](#); [asullivan@harkinscunningham.com](#); [Brienne.kucerik@weil.com](#); [calexander@kaplankirsch.com](#); [cassandra_quach@cpr.ca](#); [charlotte.mcfaddin@weil.com](#); [christopher.borek@analysisgroup.com](#); [cspitulnik@kaplankirsch.com](#); [Cyr, Marc-André O.](#); [daniel.baquet@weil.com](#); [david.hunt@oliverwyman.com](#); [dsago@steptoe.com](#); [eglavich@bakerandmiller.com](#); [eme@harkinscunningham.com](#); [ffuentes@macf.com.mx](#); [Golden, Nathan H.](#); [Heflin, Jason O.](#); [Hynes, Samantha F.](#); [ivan.maryanchyk@analysisgroup.com](#); [Jason.Tutrone@thompsonhine.com](#); [jcollins@harkinscunningham.com](#); [Coniglio, Joseph V.](#); [jeffrey.macher@georgetown.edu](#); [Jeff.Moreno@thompsonhine.com](#); [joshua.levinson@analysisgroup.com](#); [JSonger@kcsouthern.com](#); [Karyn.Booth@thompsonhine.com](#); [kfw@sloverandloftus.com](#); [kgardiner@crowell.com](#); [kjd@sloverandloftus.com](#); [lgoldschmidt@steptoe.com](#); [louis.leblanc@oliverwyman.com](#); [matkeson@compasslexecon.com](#); [mayoj@georgetown.edu](#); [mbfox@steptoe.com](#); [Warren, Matthew J.](#); [millis@lepeabody.com](#); [nkling@harkinscunningham.com](#); [olivia.podos@analysisgroup.com](#); [Orlich, Frank P.](#); [owilliams@steptoe.com](#); [Aqarwal, Pratik](#); [pap@sloverandloftus.com](#); [Paris, Adam S.](#); [pdenton@steptoe.com](#); [peter.jones@analysisgroup.com](#); [prescott.overbey@analysisgroup.com](#); [Prezioso, Julia E.](#); [privas@macf.com.mx](#); [rbrown@harkinscunningham.com](#); [rmulholland@lepeabody.com](#); [Pal, Rajib](#); [rthibault@lepeabody.com](#); [Sarnoff, Zachary A.](#); [Mordi, Sally](#); [steven.newborn@weil.com](#); [Taratuta-Titus, Rachel G.](#); [tc@lepeabody.com](#); [tcooper@lepeabody.com](#); [thuy.le@analysisgroup.com](#); [tim@lepeabody.com](#); [Vandergrift, Sophia A.](#); [WMullins@bakerandmiller.com](#)
Subject: Re: STB Docket No. FD36500 - Applicants" Resubmitted Operating Plan Workpapers
Date: Saturday, May 14, 2022 10:40:51 AM

EXTERNAL EMAIL - Use caution with links and attachments

I am not sure I have meta-data-free Word versions that match the before and after you are looking for – Adobe says you can compare PDFs

How to compare PDF files:

1. Open Acrobat for Mac or PC and choose **“Tools” > “Compare Files.”**
2. Click **“Select File”** at left to choose the older file version you want to compare.
3. Click **“Select File”** at right to choose the newer file version you want to compare.
4. Click the **Compare** button.
5. Review the **Compare Results** summary.
6. Click **“Go to First Change”** to review each file difference between the older document and the newer document.

David L. Meyer
Law Office of David L. Meyer
202-294-1399

=====

This message may be confidential and privileged. Use or disclosure by anyone other than an intended addressee is prohibited. If you received this message in error, please delete it and advise the sender by reply email.

From: Michael Rosenthal <mrosenthal@cov.com>

Date: Saturday, May 14, 2022 at 10:34 AM

To: David Meyer <david@meyerlawdc.com>, "Paul Cunningham Esq." <pac@harkinscunningham.com>

Cc: "Stoffers, Brandon M." <stoffersb@sullcrom.com>, Tony Larocca <alarocca@steptoe.com>, "AMcDonald@bakerandmiller.com" <AMcDonald@bakerandmiller.com>, "areid@lepeabody.com" <areid@lepeabody.com>, "Adrian L. Steel, Jr." <asteel@mayerbrown.com>, "asullivan@harkinscunningham.com" <asullivan@harkinscunningham.com>, "Kucerik, Brianne" <Brianne.kucerik@weil.com>, "calexander@kaplankirsch.com" <calexander@kaplankirsch.com>, Cassandra Quach <cassandra_quach@cpr.ca>, "charlotte.mcfaddin@weil.com" <charlotte.mcfaddin@weil.com>, "christopher.borek@analysisgroup.com" <christopher.borek@analysisgroup.com>, "cspitulnik@kaplankirsch.com" <cspitulnik@kaplankirsch.com>, "Cyr, Marc-André O." <cyrm@sullcrom.com>, "daniel.baquet@weil.com" <daniel.baquet@weil.com>, David Hunt <david.hunt@oliverwyman.com>, "dsago@steptoe.com" <dsago@steptoe.com>, Erin Glavich <eglavich@bakerandmiller.com>, "eme@harkinscunningham.com" <eme@harkinscunningham.com>, "ffuentes@macf.com.mx" <ffuentes@macf.com.mx>, "Golden, Nathan H." <goldenn@sullcrom.com>, "Heflin, Jason O." <heflinj@sullcrom.com>, "Hynes, Samantha F." <hyness@sullcrom.com>, "ivan.maryanchyk@analysisgroup.com" <ivan.maryanchyk@analysisgroup.com>, "Jason.Tutrone@thompsonhine.com" <Jason.Tutrone@thompsonhine.com>, "jcollins@harkinscunningham.com" <jcollins@harkinscunningham.com>, "jconiglio@sidley.com" <jconiglio@sidley.com>, "jeffrey.macher@georgetown.edu" <jeffrey.macher@georgetown.edu>, Jeff Moreno <Jeff.Moreno@thompsonhine.com>, "joshua.levinson@analysisgroup.com" <joshua.levinson@analysisgroup.com>, "JSonger@kcsouthern.com" <JSonger@kcsouthern.com>, Karyn Booth <Karyn.Booth@thompsonhine.com>, "kfw@sloverandloftus.com" <kfw@sloverandloftus.com>, "kgardiner@crowell.com" <kgardiner@crowell.com>, "kjd@sloverandloftus.com" <kjd@sloverandloftus.com>, "lgoldschmidt@steptoe.com" <lgoldschmidt@steptoe.com>, "louis.leblanc@oliverwyman.com" <louis.leblanc@oliverwyman.com>, "matkeson@compasslexecon.com" <matkeson@compasslexecon.com>,

"mayoj@georgetown.edu" <mayoj@georgetown.edu>, "mbfox@steptoe.com" <mbfox@steptoe.com>, Matthew Warren <mjwarren@sidley.com>, "mlillis@lepeabody.com" <mlillis@lepeabody.com>, "nkling@harkinscunningham.com" <nkling@harkinscunningham.com>, "olivia.podos@analysisgroup.com" <olivia.podos@analysisgroup.com>, "Orlich, Frank P." <orlichf@sullcrom.com>, "owilliams@steptoe.com" <owilliams@steptoe.com>, "Agarwal, Pratik" <PAgarwal@cov.com>, "pap@sloverandloftus.com" <pap@sloverandloftus.com>, Adam Paris <Parisa@sullcrom.com>, "Peter W. Denton" <pdenton@steptoe.com>, "peter.jones@analysisgroup.com" <peter.jones@analysisgroup.com>, "prescott.overbey@analysisgroup.com" <prescott.overbey@analysisgroup.com>, Julia Prezioso <prezioso@sullcrom.com>, "privas@macf.com.mx" <privas@macf.com.mx>, "rbrown@harkinscunningham.com" <rbrown@harkinscunningham.com>, "rmulholland@lepeabody.com" <rmulholland@lepeabody.com>, "rpal@sidley.com" <rpal@sidley.com>, "rthibault@lepeabody.com" <rthibault@lepeabody.com>, Zachary Sarnoff <sarnoffz@sullcrom.com>, "Mordi, Sally" <smordi@steptoe.com>, Steve Newborn <steven.newborn@weil.com>, Rachel Taratuta-Titus <taratutar@sullcrom.com>, "tc@lepeabody.com" <tc@lepeabody.com>, "tcooper@lepeabody.com" <tcooper@lepeabody.com>, "thuy.le@analysisgroup.com" <thuy.le@analysisgroup.com>, "tim@lepeabody.com" <tim@lepeabody.com>, Sophia Vandergrift <vandergrifts@sullcrom.com>, William Mullins <WMullins@bakerandmiller.com>

Subject: RE: STB Docket No. FD36500 - Applicants' Resubmitted Operating Plan Workpapers

David,

Could you please provide the current and prior versions in Word format so we can perform a comparison to identify changes from the original. Thank you.

Regards,

Mike

From: David Meyer <david@meyerlawdc.com>

Sent: Saturday, May 14, 2022 8:55 AM

To: pac@harkinscunningham.com

Cc: Stoffers, Brandon M. <stoffersb@sullcrom.com>; alarocca@steptoe.com; AMcDonald@bakerandmiller.com; areid@lepeabody.com; Asteel@mayerbrown.com; asullivan@harkinscunningham.com; Brianne.kucerik@weil.com; calexander@kaplankirsch.com; cassandra_quach@cpr.ca; charlotte.mcfaddin@weil.com; christopher.borek@analysisgroup.com; cspitulnik@kaplankirsch.com; Cyr, Marc-André O. <cym@sullcrom.com>; daniel.baquet@weil.com; david.hunt@oliverwyman.com; dsago@steptoe.com; eglavich@bakerandmiller.com; eme@harkinscunningham.com; ffuentes@macf.com.mx; Golden, Nathan H. <goldenn@sullcrom.com>; Heflin, Jason O. <heflinj@sullcrom.com>; Hynes, Samantha F. <hyness@sullcrom.com>; ivan.maryanchyk@analysisgroup.com;

Jason.Tutrone@thompsonhine.com; jcollins@harkinscunningham.com; jconiglio@sidley.com;
jeffrey.macher@georgetown.edu; Jeff.Moreno@thompsonhine.com;
joshua.levinson@analysisgroup.com; JSonger@kcsouthern.com; Karyn.Booth@thompsonhine.com;
kfw@sloverandloftus.com; kgardiner@crowell.com; kjd@sloverandloftus.com;
lgoldschmidt@steptoe.com; louis.leblanc@oliverwyman.com; matkeson@compasslexecon.com;
mayoj@georgetown.edu; mbfox@steptoe.com; Godlin, Merri <MGodlin@cov.com>;
mjwarren@sidley.com; mlillis@lepeabody.com; Rosenthal, Michael <mrosenthal@cov.com>;
nkling@harkinscunningham.com; olivia.podos@analysisgroup.com; Orlich, Frank P.
<orlichf@sullcrom.com>; owilliams@steptoe.com; Agarwal, Pratik <PAgarwal@cov.com>;
pap@sloverandloftus.com; Paris, Adam S. <Parisa@sullcrom.com>; pdenton@steptoe.com;
peter.jones@analysisgroup.com; prescott.overbey@analysisgroup.com; Prezioso, Julia E.
<prezioso@sullcrom.com>; privas@macf.com.mx; rbrown@harkinscunningham.com;
rmulholland@lepeabody.com; rpal@sidley.com; rthibault@lepeabody.com; Sarnoff, Zachary A.
<sarnoffz@sullcrom.com>; Mordi, Sally <smordi@steptoe.com>; Sra, Sahel <SSra@cov.com>;
steven.newborn@weil.com; Taratuta-Titus, Rachel G. <taratutar@sullcrom.com>;
tc@lepeabody.com; tcooper@lepeabody.com; thuy.le@analysisgroup.com; tim@lepeabody.com;
Vandergrift, Sophia A. <vandergrifts@sullcrom.com>; WMullins@bakerandmiller.com
Subject: Re: STB Docket No. FD36500 - Applicants' Resubmitted Operating Plan Workpapers

[EXTERNAL]

Sorry Paul, you can generate that

Sent from my iPhone

On May 14, 2022, at 8:18 AM, pac@harkinscunningham.com wrote:

Good morning, Brandon.

This is to request that Applicants provide a copy of the operating plan that shows the changes made from the original plan.

Thank you.

pac

Paul A. Cunningham
Harkins Cunningham LLP
1750 K Street, NW
Washington, DC 20006

Mobile: 202-415-4026
Fax: 202-973-7610
pac@harkinscunningham.com

NOTICE TO RECIPIENT: If you are not the intended recipient of this email, you are prohibited from sharing, copying, or otherwise using or disclosing its contents. If you have received this email in error, please notify

the sender immediately by reply email and permanently delete this email and any attachments without reading, forwarding or saving them. Thank you.

From: "Stoffers, Brandon M." <stoffersb@sullcrom.com>
To: "owilliams@steptoe.com" <owilliams@steptoe.com>, "pac@harkinscunningham.com" <pac@harkinscunningham.com>, "Mrosenthal@Cov.com" <Mrosenthal@Cov.com>, "pagarwal@cov.com" <pagarwal@cov.com>, "ffuentes@macf.com.mx" <ffuentes@macf.com.mx>, "privas@macf.com.mx" <privas@macf.com.mx>, "jeff.moreno@thompsonhine.com" <jeff.moreno@thompsonhine.com>, "karyn.booth@thompsonhine.com" <karyn.booth@thompsonhine.com>, "Jason.Tutrone@ThompsonHine.com" <Jason.Tutrone@ThompsonHine.com>, "tc@lepeabody.com" <tc@lepeabody.com>, "tcooper@lepeabody.com" <tcooper@lepeabody.com>, "areid@lepeabody.com" <areid@lepeabody.com>, "rthibault@lepeabody.com" <rthibault@lepeabody.com>, "rmulholland@lepeabody.com" <rmulholland@lepeabody.com>, "millis@lepeabody.com" <millis@lepeabody.com>, "tim@lepeabody.com" <tim@lepeabody.com>, "daniel.baquet@weil.com" <daniel.baquet@weil.com>, "cspitulnik@kaplankirsch.com" <cspitulnik@kaplankirsch.com>, "calexander@kaplankirsch.com" <calexander@kaplankirsch.com>, "pdenton@steptoe.com" <pdenton@steptoe.com>, "mjwarren@sidley.com" <mjwarren@sidley.com>, "rpal@sidley.com" <rpal@sidley.com>, "jconiglio@sidley.com" <jconiglio@sidley.com>, "david.hunt@oliverwyman.com" <david.hunt@oliverwyman.com>, "louis.leblanc@oliverwyman.com" <louis.leblanc@oliverwyman.com>, "Asteel@mayerbrown.com" <Asteel@mayerbrown.com>, "alarocca@steptoe.com" <alarocca@steptoe.com>, "kgardiner@crowell.com" <kgardiner@crowell.com>, "asullivan@harkinscunningham.com" <asullivan@harkinscunningham.com>, "eme@harkinscunningham.com" <eme@harkinscunningham.com>, "jcollins@harkinscunningham.com" <jcollins@harkinscunningham.com>, "nkling@harkinscunningham.com" <nkling@harkinscunningham.com>, "rbrown@harkinscunningham.com" <rbrown@harkinscunningham.com>, "Brianne.kucerik@weil.com" <Brianne.kucerik@weil.com>, "charlotte.mcfaddin@weil.com" <charlotte.mcfaddin@weil.com>, "steven.newborn@weil.com" <steven.newborn@weil.com>, "mayoj@georgetown.edu" <mayoj@georgetown.edu>, "jeffrey.macher@georgetown.edu" <jeffrey.macher@georgetown.edu>, "christopher.borek@analysisgroup.com" <christopher.borek@analysisgroup.com>, "ivan.maryanchyk@analysisgroup.com" <ivan.maryanchyk@analysisgroup.com>, "peter.jones@analysisgroup.com" <peter.jones@analysisgroup.com>, "olivia.podos@analysisgroup.com" <olivia.podos@analysisgroup.com>, "prescott.overbey@analysisgroup.com" <prescott.overbey@analysisgroup.com>, "thuy.le@analysisgroup.com" <thuy.le@analysisgroup.com>, "joshua.levinson@analysisgroup.com" <joshua.levinson@analysisgroup.com>, "lgoldschmidt@steptoe.com" <lgoldschmidt@steptoe.com>, "mbfox@steptoe.com" <mbfox@steptoe.com>, "dsago@steptoe.com" <dsago@steptoe.com>, "matkeson@compasslexecon.com" <matkeson@compasslexecon.com>, "kfw@sloverandloftus.com" <kfw@sloverandloftus.com>, "pap@sloverandloftus.com" <pap@sloverandloftus.com>, "kjd@sloverandloftus.com" <kjd@sloverandloftus.com>, "ssra@cov.com" <ssra@cov.com>, "mgodlin@cov.com" <mgodlin@cov.com>, "Mordi, Sally" <smordi@Steptoe.com>
Cc: "cassandra_quach@cpr.ca" <cassandra_quach@cpr.ca>, "jsonger@kcsouthern.com" <jsonger@kcsouthern.com>, "david@meyerlawdc.com" <david@meyerlawdc.com>, "Paris, Adam S." <Parisa@sullcrom.com>, "wmullins@bakerandmiller.com" <wmullins@bakerandmiller.com>, "Vandergrift, Sophia A." <vandergrifts@sullcrom.com>, "Hynes, Samantha F." <hyness@sullcrom.com>, "Sarnoff, Zachary A." <sarnoffz@sullcrom.com>, "eglavich@bakerandmiller.com" <eglavich@bakerandmiller.com>, "amcdonald@bakerandmiller.com" <amcdonald@bakerandmiller.com>, "Heflin, Jason O."

<heflinj@sullcrom.com>, "Cyr, Marc-André O." <cyrm@sullcrom.com>, "Golden, Nathan H." <goldenn@sullcrom.com>, "Orlich, Frank P." <orlichf@sullcrom.com>, "Prezioso, Julia E." <prezioso@sullcrom.com>, "Taratuta-Titus, Rachel G." <taratutar@sullcrom.com>

Date: 05/14/2022 00:48

Subject: RE: STB Docket No. FD36500 - Applicants' Resubmitted Operating Plan Workpapers

All,

Applicants have uploaded to the VDR the workpapers accompanying Applicants' Amended Operating Plan that were sent to the Board today in response to Decision No. 17. These can be found in the new folder "Resubmitted Operating Plan Workpapers."

Sincerely,
Brandon

Brandon M. Stoffers
Sullivan & Cromwell LLP
T: (310) 712-6637 | C: (978)-987-6558

From: Stoffers, Brandon M.

Sent: Friday, February 25, 2022 4:23 PM

To: owilliams@steptoe.com; pac@harkinscunningham.com; Mrosenthal@Cov.com; pagarwal@cov.com; ffuentes@macf.com.mx; privas@macf.com.mx; jeff.moreno@thompsonhine.com; karyn.booth@thompsonhine.com; Jason.Tutrone@ThompsonHine.com; tc@lepeabody.com; tcooper@lepeabody.com; areid@lepeabody.com; rthibault@lepeabody.com; rmulholland@lepeabody.com; mlillis@lepeabody.com; tim@lepeabody.com; daniel.baquet@weil.com; cspitulnik@kaplankirsch.com; calexander@kaplankirsch.com; pdenton@steptoe.com; mjwarren@sidley.com; rpal@sidley.com; jconiglio@sidley.com; david.hunt@oliverwyman.com; louis.leblanc@oliverwyman.com; Asteel@mayerbrown.com; alarocca@steptoe.com; kgardiner@crowell.com; asullivan@harkinscunningham.com; eme@harkinscunningham.com; jcollins@harkinscunningham.com; nkling@harkinscunningham.com; rbrown@harkinscunningham.com; Brianne.kucerik@weil.com; charlotte.mcfaddin@weil.com; steven.newborn@weil.com; mayoj@georgetown.edu; jeffrey.macher@georgetown.edu; christopher.borek@analysisgroup.com; ivan.maryanchyk@analysisgroup.com; peter.jones@analysisgroup.com; olivia.podos@analysisgroup.com; prescott.overbey@analysisgroup.com; thuy.le@analysisgroup.com; joshua.levinson@analysisgroup.com; lgoldschmidt@steptoe.com; mbfox@steptoe.com; dsago@steptoe.com; matkeson@compasslexecon.com; kfw@sloverandloftus.com; pap@sloverandloftus.com; kjd@sloverandloftus.com; ssra@cov.com; mgodlin@cov.com; Mordi, Sally <smordi@Steptoe.com>

Cc: cassandra_quach@cpr.ca; jsonger@kcsouthern.com; david@meyerlawdc.com;