

**BEFORE THE
SURFACE TRANSPORTATION BOARD
DOCKET NO. FD 36496**

ENTERED
Office of Proceedings
August 16, 2022
Part of
Public Record

**APPLICATION OF THE NATIONAL RAILROAD PASSENGER
CORPORATION UNDER 49 U.S.C. § 24308(e) – CSX
TRANSPORTATION, INC. AND NORFOLK SOUTHERN
CORPORATION**

**ERRATA TO CSX TRANSPORTATION, INC.’S AND NORFOLK SOUTHERN
RAILWAY COMPANY’S SUPPLEMENTAL EVIDENCE**

CSXT and NSR respectfully submit this Errata to their Supplemental Evidence submission on July 27, 2022.¹ This filing is necessitated by an error in one of the workpapers associated with the RTC Supplemental Model and Report that Amtrak identified in an email dated August 15, 2022.

Table 3-7 of the RTC Supplemental Report was inadvertently omitted from the RTC workpapers served on July 27, 2022.² The values in Table 3-7 in the RTC Supplemental Report are also incorrect.³ CSXT and NSR are providing Amtrak, the Port, and the Board a revised RTC workpaper with a corrected Table 3-7.⁴ CSXT

¹ All acronyms and short forms have the same meaning they had in CSXT’s and NSR’s Opening Evidence, Rebuttal Evidence, and Supplemental Evidence.

² See RTC Supplemental Report, Workpaper “Length Analysis.xlsx,” Tab “FREIGHT.”

³ RTC Supplemental Report at 26 (§ 3.5).

⁴ See RTC Supplemental Report, Workpaper “Length Analysis Revised.xlsx,” Tab “FREIGHT,” Columns AX–BH.

PUBLIC VERSION

and NSR note that all of the data underlying the corrected Table 3-7 was provided in the original RTC workpapers provided on July 27, 2022.

The revised workpaper necessitates minor changes to the RTC Supplemental Report and CSXT and NSR's Supplemental Evidence. CSXT and NSR are providing a revised page 26 of the RTC Supplemental Report containing the corrected Table 3-7, which is attached as Exhibit A. CSXT and NSR submit a related correction to the following text on page 24 of the RTC Supplemental Report:

Original Text: "As compared to the **2019 Passenger Case**, CSXT through trains would experience an increase in delay of 4.8% and a slight decrease in speed of 0.5% when shorter freight trains are operated on the corridor."⁵

Revised Text: "As compared to the **2019 Passenger Case**, CSXT through trains would experience an increase in delay of 2.4% and no change in speed when shorter freight trains are operated on the corridor."

CSXT and NSR also submit the following correction to footnote 122 of their Supplemental Evidence:

Original Text: "RTC Supplemental Report at 25–26, Tables 3-6, 3-7 (§ 3.5) (depicting CSXT local train delay further increasing by 3.8% and speed decreasing by an additional 0.7% compared to the original 2021 Gulf Coast RTC Model)."⁶

Revised Text: "RTC Supplemental Report at 25–26, Tables 3-6, 3-7 (§ 3.5) (depicting CSXT local train delay further increasing by 1.8% and speed decreasing by an additional 0.4% compared to the original 2021 Gulf Coast RTC Model)."

⁵ RTC Supplemental Report at 24 (§ 3.5).

⁶ CSXT-NSR Supplemental Evidence at 40–41 n.122.

PUBLIC VERSION

Attached as Exhibit B is a verification from the RTC Modelers that none of the corrections to the RTC workpaper or the RTC Supplemental Report alter their expert analysis, opinions, and conclusions.

* * *

With this Errata, CSXT and NSR are also providing a RTC .exe file through ShareFile along with the revised RTC workpaper described above. The RTC .exe file may make it easier for the Board and other parties to review the RTC Supplemental Model. CSXT and NSR have asked Amtrak to provide the same for its RTC model.

Respectfully submitted,

/s/ William A. Mullins

William A. Mullins
Crystal M. Zorbaugh
BAKER AND MILLER PLLC
2401 Pennsylvania Avenue
Suite 300
Washington, DC 20037
(202) 663-7823
wmullins@bakerandmiller.com
czorbaugh@bakerandmiller.com

*Counsel for Norfolk Southern Railway
Company*

/s/ Matthew J. Warren

Raymond A. Atkins
Matthew J. Warren
SIDLEY AUSTIN LLP
1501 K Street, NW
Washington, DC 20005
(202) 736-8000
ratkins@sidley.com
mjwarren@sidley.com

Counsel for CSX Transportation, Inc.

Dated: August 16, 2022

PUBLIC VERSION

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of August 2022, a copy of the foregoing Errata to CSX Transportation, Inc.'s and Norfolk Southern Railway Company's Supplemental Evidence was served by email or first-class mail on the service list for Finance Docket No. 36496.

/s/ Matthew J. Warren

Matthew J. Warren
SIDLEY AUSTIN LLP

PUBLIC VERSION

Table 3-7: Changes in Freight Train Operating Performance between 2019 Passenger Case and 2019 Passenger Case With Adjusted Train Lengths

	TRAIN PROFILE	% CHANGE IN DELAY/100	% CHANGE IN SPEED	% CHANGE IN VARIABILITY
CSXT Local Trains	CSXT 1	-1.7%	0.3%	-11.3%
	CSXT 2	-3.0%	0.8%	9.2%
	CSXT 3	1.8%	0.0%	7.3%
	CSXT 4	16.5%	-3.3%	39.6%
	CSXT 5	-5.1%	0.9%	-3.3%
	TASD	14.6%	-4.4%	7.1%
	CSXT LOCAL TOTAL	1.8%	-0.4%	
CSXT Through Trains	CSXT A	-2.3%	-0.1%	-1.6%
	CSXT B	16.2%	-3.6%	29.9%
	CSXT C	18.1%	-3.5%	16.1%
	CSXT D	20.1%	-3.5%	22.9%
	CSXT E	-11.8%	8.8%	4.8%
	CSXT F	-13.5%	4.0%	-4.1%
	CSXT G	7.2%	-1.1%	0.7%
	CSXT H	-3.2%	0.3%	12.8%
	COAL	10.3%	-2.5%	31.8%
	CSXT THROUGH TOTAL	2.4%	0.0%	

3.6 2039 Reduced Train Lengths

In the 2039 case, the majority of freight trains are greater than the 7,500-foot length limit. This requires significant assumed changes in operations to avoid having trains longer than the sidings. To study the potential changes to the freight traffic by reducing train lengths, the following changes were included in the **2039 Passenger Case**:

- 1) 850 feet, or roughly 15 cars, were shifted from CSXT C {{Redacted}} onto CSXT E {{Redacted}};
- 2) 760 feet, or roughly 13 cars, were shifted from CSXT H {{Redacted}} onto CSXT E {{Redacted}};
- 3) 300 feet, or roughly 5 cars, were shifted from CSXT D {{Redacted}} onto CSXT F {{Redacted}};
- 4) CSXT E {{Redacted}} was split between two trains of 5,140 feet and 5,140 feet. The length included the 850 feet from CSXT C {{Redacted}} and 750 feet from CSXT H {{Redacted}}. CSXT E had three locomotives in the 2039 Base Case, so an additional locomotive was required to power the second train to maintain track speed;
- 5) CSXT F {{Redacted}} is cut in half into two trains of 5,950 feet. The length includes the 100 feet from CSXT D {{Redacted}}; CSXT F {{Redacted}} has four locomotives in the 2039 Base Case, so no additional locomotives are required;

PUBLIC VERSION

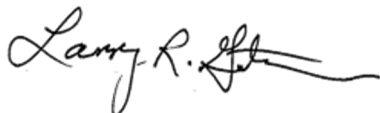
EXHIBIT B

Verification of L. Guthrie and M. Dinger

PUBLIC VERSION

Verification

None of the corrections to the RTC Supplemental Report and workpaper described in the Errata to CSX Transportation, Inc.'s and Norfolk Southern Railway Company's Supplemental Evidence changes our expert opinion, conclusions, or any other part of the content or analysis provided in the RTC Supplemental Report dated July 27, 2022.



Larry Guthrie

DATE 08/16/2022



Mark H. Dingler, PE

DATE 08/16/2022