

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

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RAILROAD COST OF
CAPITAL — 2024

STB Docket No. EP 558 (Sub-No. 28)

REQUEST FOR EXTENSION OF TIME

By a decision served on January 10, 2025, the Surface Transportation Board (“Board”), instituted a proceeding to determine the railroad industry’s cost of capital for 2024. The Board’s decision set a March 14, 2025 deadline for the railroads’ opening comments. This deadline is notably earlier than in past years. Indeed, it is approximately a month or more ahead of the deadlines set in previous years.¹

Securing the data underlying the cost of capital filing on this significantly expedited schedule is proving challenging. Moreover, once the data is received, the Association of American Railroads (“AAR”) will be rushed to finalize the filing. In order to ensure a high-quality work product, AAR respectfully requests that the Board extend the filing deadlines for all comments by 31 days, which will bring the deadlines more in line with dates from prior years.² This would adjust the filing deadlines as follows:

¹ For example, in 2024, the deadline for railroad opening comments was April 23. See Railroad Cost of Capital—2023, EP 558 (Sub-No.27) (Feb. 20, 2024). Similarly, in 2023, the deadline for railroad opening comments was April 11. See Railroad Cost of Capital—2022, EP 558 (Sub-No.26) (Feb. 7, 2023).

² In each case, an extension of 30 days would result in a Sunday deadline.

1. Statements of the railroads due by Monday, April 14, 2025.
2. Statements of other interested parties due by Monday, May 5, 2025.
3. Rebuttal statements of the railroads due by Monday, May 26, 2025.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "K. Kirmayer", is positioned below the "Respectfully submitted," text.

Kathryn D. Kirmayer
J. Frederick Miller Jr.
Amber L. McDonald
Association of American
Railroads 425 Third Street, SW,
Suite 1000
Washington, DC 20024
(202) 639-2100

*Counsel for the Association of
America Railroads*

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