



Total Petrochemicals & Refining USA, Inc.
Corporate Headquarters

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Ms. Cynthia T. Brown
Chief, Section of Administration
Attn: Docket No. EP 742
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

**RE: Docket No. EP 742 – Notice of Intent to Participate in Public Listening Session
Regarding CSX Transportation Inc.'s Rail Service Issues – Written Testimony**

Dear Ms. Brown:

Pursuant to the decision served in the referenced proceeding on August 24, 2017, Total Petrochemicals & Refining USA, Inc. (TPRI) hereby provides notice of its intent to participate in the public listening session scheduled for October 11, 2017 through written testimony submitted herein.

TPRI is a U.S.-based producer of petrochemicals (including polypropylene, polyethylene, styrene and polystyrene), base chemicals and transportation fuels with production facilities located mainly in Texas and Louisiana. TPRI is one of the U.S. based subsidiaries of the TOTAL Group of companies, the world's fourth-largest international oil and gas major, with operations in more than 130 countries spanning all aspects of the petroleum industry.

Over the years, TPRI has built some of the world's most competitive manufacturing sites in the Gulf Coast Region of the United States, including the largest styrenics and second largest polypropylene facilities in the world. The success of our sites depends on an efficient, safe, and cost effective transportation and distribution network.

TPRI produces over 9 billion pounds of product each year, most of which are delivered to our customers via rail transportation. Of the volume moving by rail, 4.5 billion pounds is comprised of plastic pellets, a non-hazardous commodity. TPRI also ships via rail, materials such as styrene monomer, aromatic solvents and various oils, which are classified as hazardous materials by the United States Department of Transportation.

Recent service failures by the CSXT Railroad have had a severe impact on our business to customers in the North and East where there are little alternative rail options. To add confusion to the situation, in an apparent attempt to relieve congestion on the CSXT rail lines, we have seen loaded rail cars travel into our customers' local area, and then move hundreds of miles away, before returning back to the same area. The effect on dwell time and average speed with these moves may appear to be positive for CSXT, but we are left unable to meet our customers' needs or explain it.

Average (full trip) transit times since January involving the CSXT have increased 25% with no warning by the CSXT. Variability has increased 9% for those same shipments. Among our top ten customers captive to the CSXT, transit times have increased 39% and variability 50%. For one key customer, transit times have increased 69% and variability 150%.

It is fairly apparent that we, and our customers, are at the complete mercy of the CSXT while they experiment on service changes. Even a mode change to the more costly alternative of using bulk trucking has proven not to be a viable option given that industry is experiencing challenges due to driver shortages and regulation changes. Competitive switching might have allowed us some ability to react and adjust, but is apparently not available at this time.

We hope that the Surface Transportation Board will take whatever steps necessary to compel the CSXT to act responsibly in reacting to its customers' needs, up to and including considering enabling competitive switching from CSXT lines as a true deliverable towards that end.

Respectfully submitted,



Paul H. Colonna

Vice President Polymers Americas