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November 4, 2002

**By Hand**

The Honorable Vernon A. Williams  
Secretary  
Surface Transportation Board  
1925 K Street, N.W.  
Suite 700  
Washington, DC 20423



Re: Carolina Power & Light Company v. Norfolk Southern Railway  
Company, STB Docket No. 42072

Dear Secretary Williams:

Enclosed please find, for the Board's convenience in reviewing NS' Reply evidence in the above-captioned maximum rate reasonableness proceeding, sixteen copies of an index of more specific page references to workpapers previously filed in support of NS' Reply evidence. NS is not submitting any new or additional evidence, but simply providing more specific workpaper page references (the corresponding references in NS' Reply narrative were more general) to facilitate the Board's review of NS' Reply filing and supporting workpapers filed on October 11, 2002.

If you have any questions regarding this index, please contact the undersigned counsel.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul Hemmersbaugh".  
G. Paul Moates  
Paul A. Hemmersbaugh

cc: C. Michael Loftus

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**Specific Workpaper Page Citations For Sections III-A, III-B, III-C, III-F and Appendix D of the NS Reply Filing v. CP&L**

| Page     | Footnote                                                                     | Cite                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------|------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| III-A    |                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| III-A-12 | end of first paragraph                                                       | WP-III-A-2753-2754                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| III-A-18 | 13                                                                           | WP-III-A-3308-3312                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| III-A-19 | 14                                                                           | WP-III-A1319-1374, WP-III-A-2924-2925 and WP-III-A-2783                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| III-A-22 | 16                                                                           | WP-III-A-1136                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| III-A-24 | 17                                                                           | WP-III-A-3063-3181                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| III-A-24 | 18                                                                           | WP-III-A-2768-2772                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| III-A-24 | 19                                                                           | <u>See</u> Appendix D, Sansom CPL Capacity Factor Discussion.pdf and WP-III-A-2768-2772                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| III-A-25 | 20                                                                           | <u>But see</u> Utilities Annual plans (including capacity plans) for Duke at WP-III-A-3244-3304 (specifically 3267-8), CPL WP-III-A-3167-3243 (specifically 3195-3196), VA Power WP-III-A-2798-2814 (specifically 2809) and GA Power announcement at WP-III-A-2815; cf. NS Reply App. D-9, ft. 8 and 9 for other limitations to installing new capacity at Virginia Power's Clover plant and Georgia Power's Wansley plant                                                                                                                                                                                                                                                                                                                      |
| III-A-25 | 21                                                                           | WP-III-A-2815                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| III-A-27 | 22                                                                           | <u>See</u> CP&L's Open. electronic workpaper Piedmont RR Coal Traffic Forecast.xls at worksheet Coal Forecast By Calendar Year for coal movements equal to Lake and River have all been redefined as Utility coal in column B.<br>WP-III-A-2795-2797<br>WP-III-A-1210<br>WP-III-A-2794<br>WP-III-A-3382<br>WP-III-2784-2785 and WP-III-A-2798-2814<br>WP-III-A-3307<br>Eva Plant Specific Forecast.xls<br><u>See</u> forecast escalation.xls WP-III-A-1417-1591, 1749-1783 and 2756-60, SMSARRO4.xls forecast escalation.xls at worksheets export and refund for NS's supporting analysis and Acci-Res-Pay History Sept 2002coal.xls for NS' domestic and export coal refunds through September 2002<br>NS Contract Information CPL Revised.xls |
| III-A-30 | 25                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| III-A-32 | 26                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| III-A-32 | 27                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| III-A-35 | 29                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| III-A-35 | 30                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| III-A-36 | 31                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| III-A-40 | 40                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| III-A-42 | 44                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| III-A-62 | 55                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| III-A-62 | end of second sentence in paragraph titled "Rail-Direct Served Destinations" | Forecast Escalation.xls at worksheets contracts, export and River_Lake and WP-III-A-1-1056, WP-III-A-1315-1427                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| III-A70  | 62                                                                           | <u>See</u> forecast escalation.xls at worksheet titled ExpCts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| III-A-71 | 63                                                                           | WP-III-A-3383-3384, WP-III-A-1061-1070                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Page         | Footnote                  | Cite                                                                                |
|--------------|---------------------------|-------------------------------------------------------------------------------------|
| III-A-73     | 66                        | See DRITransportationRate Forecast.xls and Rate & Forecast Comparison Graphs NS.xls |
| <b>III-B</b> |                           |                                                                                     |
| III-B-7      | 2                         | III-F-Construction Total CPL.xls                                                    |
| III-B-16     | 10                        | WP-III-B-0025-0026 and WP-III-B-0067-0089                                           |
| III-B-18     | 13                        | <u>Compare CP&amp;L WP CPL 01856-01878 with NS Reply WP-III-B-0021</u>              |
| III-B-19     | 14                        | <u>Compare CP&amp;L WP CPL 01897-01908 with NS Reply WP-III-B-0021</u>              |
| III-B-20     | 15                        | WP-III-B-0090-0091                                                                  |
| III-B-27     | 19                        | WP-III-B-0005-0007                                                                  |
| III-B-27     | 20                        | WP-III-B-0006                                                                       |
| III-B-27     | 21                        | WP-III-B-0006                                                                       |
| III-B-28     | 22                        | WP-III-B-0006                                                                       |
| III-B-30     | 23                        | WP-III-B-0007-0008                                                                  |
| III-B-31     | 24                        | WP-III-B-0008-0009                                                                  |
| III-B-32     | 26                        | WP-III-B-0008-0010                                                                  |
| III-B-34     | 27                        | WP-III-B-0012-0013                                                                  |
| <b>III-C</b> |                           |                                                                                     |
| III-C-23     | 25                        | WP-III-C-0002-0011                                                                  |
| III-C-27     | 28                        | WP-III-C-0061-00062                                                                 |
| III-C-29     | 30                        | WP-III-C-0019-0021                                                                  |
| III-C-29     | 31                        | WP-III-C-0019-0021                                                                  |
| III-C-39     | 35                        | WP-III-C-0016                                                                       |
| <b>III-F</b> |                           |                                                                                     |
| III-F-15     |                           | III F 2 Grading.xls                                                                 |
| III-F-16     | end of first paragraph    | III F 2 Grading.xls                                                                 |
| III-F-17     | end of full paragraph     | WP-III-F-0112-0183                                                                  |
| III-F-19     | end of first paragraph    | WP-III-F-0244-0284                                                                  |
| III-F-19     | first sentence            | III F 2 Grading.xls                                                                 |
| III-F-20     | end of first paragraph    | WP-III-F-0185-0198                                                                  |
| III-F-20     | end of first paragraph    | WP-III-F-0313-0314                                                                  |
| III-F-20     | 16                        | WP-III-F-0064-0068                                                                  |
| III-F-22     | end of first paragraph    | WP-III-F-0068                                                                       |
| III-F-22     | middle of page            | WP-III-F-0065                                                                       |
| III-F-23     | end of first paragraph    | WP-III-F-0065                                                                       |
| III-F-24     | end of first paragraph    | WP-III-F-0064                                                                       |
| III-F-26     | second paragraph          | WP-III-F-0184-0284                                                                  |
| III-F-27     | 19                        | WP-III-F-0066-0068                                                                  |
| III-F-28     | second paragraph          | WP-III-F-0205-0206 and WP-III-F-979-981                                             |
| III-F-35     | 25                        | WP-III-F-0208                                                                       |
| III-F-38     | 27                        | III F 2 Culverts Unit Cost.xls                                                      |
| III-F-41     | middle of first paragraph | WP-III-F-0098-0099                                                                  |
| III-F-41     | second paragraph          |                                                                                     |

|               |                              |                                                                 |
|---------------|------------------------------|-----------------------------------------------------------------|
| III-F-42      | third paragraph              | III F 2 Culverts Unit Cost.xls                                  |
| III-F-42      | last paragraph               | WP-III-F-0093-0094                                              |
| III-F-43      | end of first paragraph       | III F 2 Culverts CPL.xls                                        |
| III-F-44      | middle of page               | III F 2 Culverts CPL.xls, WP-III-F-66, WP-III-F-69, WP-III-F-74 |
| III-F-44      | third paragraph              | III F 2 Culverts CPL.xls and III F 2 Culverts Unit Cost.xls     |
| III-F-45      | end of first paragraph       | III F 2 Culverts CPL.xls and III F 2 Stream Diversion Costs.xls |
| III-F-50      | 33                           | WP-III-F-0214-0217                                              |
| III-F-52      | end of first paragraph       | III F 2 Water Trucks.xls                                        |
| III-F-55      | end of first paragraph       | WP-III-F-0069-0079                                              |
| III-F-55      | end of page                  | WP-III-F-0069 and WP-III-F-0073                                 |
| III-F-56      | first paragraph              | III F 2 Slope Drains.xls                                        |
| III-F-61      | middle of first paragraph    | WP-III-F-0300                                                   |
| III-F-61      | end of first paragraph       | WP-III-F-0301 and III F - Construction Total CPL.xls            |
| III-F-62      | end of second paragraph      | WP-III-F-0302-0305                                              |
| III-F-65      | second paragraph             | WP-III-F-0110-0111                                              |
| III-F-68      | end of page                  | WP-III-F-0982-0992                                              |
| III-F-72      | 48                           | WP-III-F-0090-0092                                              |
| III-F-72      | end of first paragraph       | WP-III-F-0982-0992                                              |
| III-F-72      | 49                           | WP-III-F-0106-0107                                              |
| III-F-73      | end of second paragraph      | WP-III-F-0306-0307                                              |
| III-F-75      | 51                           | WP-III-F-0982-0992                                              |
| III-F-76      | 54                           | WP-III-F-0101-0104                                              |
| III-F-77      | end of first paragraph       | WP-III-F-0313-0314                                              |
| III-F-77      | 56                           | III F - Construction Total CPL.xls                              |
| III-F-83      | end of second paragraph      | <u>See, e.g., WP-III-F-0556-0559</u>                            |
| III-F-85      | end of second paragraph      | <u>See, e.g., WP-III-F-0556-0559</u>                            |
| III-F-86      | end of second paragraph      | <u>See, e.g., WP-III-F-0556-0559</u>                            |
| III-F-87      | end of first paragraph       | <u>See, e.g., WP-III-F-0551-0555</u>                            |
| III-F-88      | end of first paragraph       | III F - Construction Total CPL.xls                              |
| III-F-89      | second paragraph             | WP-III-F-0316-0401                                              |
| III-F-90      | end of first paragraph       | WP-III-F-0316-0401                                              |
| III-F-90      | end of third paragraph       | WP-III-F-0316-0401                                              |
| III-F-91      | end of second paragraph      | III F - Construction Total CPL.xls                              |
| III-F-94      | third paragraph              | WP-III-F-0900-0909                                              |
| III-F-116     | second full sentence of page | WP-III-F-0910-0911                                              |
| III-F-118     | 72                           | WP-III-F-0938                                                   |
| III-F-119     | 73                           | WP-III-F-0112-0183                                              |
| III-F-119     | 75                           | III F 9 Mobilization.xls                                        |
| III-F-128     | end of first paragraph       | III F 9 Mobilization.xls                                        |
| III-F-132     | second paragraph             | WP-III-F-0956                                                   |
| III-F-133     | 84                           | WP-III-F-0990-0991                                              |
| III-F-137-138 | 87                           | WP-III-F-1014-1016                                              |
| III-F-141     | 89                           | WP-III-F-0979-0981                                              |
| III-F-142     | 90                           |                                                                 |

|           |                             |                    |
|-----------|-----------------------------|--------------------|
| III-F-144 | middle of page              | WP-III-F-0982-0992 |
| III-F-145 | 92                          | WP-III-F-0997-1000 |
| III-F-147 | 93                          | WP-III-F-1001-1004 |
| III-F-149 | 94                          | WP-III-F-1007-1008 |
| III-F-149 | middle of first paragraph   | WP-III-F-1006      |
| III-F-149 | last paragraph              | WP-III-F-1009-1010 |
| III-F-150 | first paragraph             | WP-III-F-1011-1013 |
| III-F-150 | second paragraph            | WP-III-F-1014-1016 |
| III-F-150 | third paragraph             | WP-III-F-1017-1022 |
| III-F-151 | end of second paragraph     | WP-III-F-1017-1022 |
| III-F-154 | last line of last paragraph | WP-III-F-1023-1035 |

# Appendix D

## Footnote

## Cite

|           |                         |                                        |
|-----------|-------------------------|----------------------------------------|
| App. D-6  | 3                       | CP&L Open, III-A coal forecast.xls     |
| App. D-6  | 4                       | WP-III-A-2768-2772, WP-III-A-3063-3181 |
| App. D-7  | end of second paragraph | WP-III-A-2755                          |
| App. D-7  | 5                       | WP-III-A-3063-3181                     |
| App. D-7  | 6                       | WP-III-A-2768-2772                     |
| App. D-9  | 10                      | WP-III-A-2809                          |
| App. D-10 | 11                      | WP-III-2784-2785                       |

end of paragraph titled "Mr. Dean's Error as to Mine Origins"

|           |                    |
|-----------|--------------------|
| App. D-11 | WP-III-A-3382      |
| App. D-14 | 16                 |
| App. D-17 | 22                 |
|           | WP-III-A-2795-2797 |
|           | WP-III-A-2794      |