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July 14, 2003

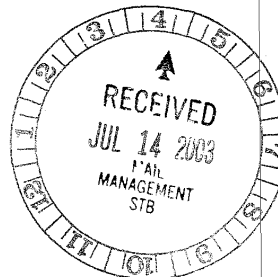
Via Hand Delivery

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K St. N.W.
Washington, D.C. 20423

ENTERED
Office of Proceedings

JUL 14 2003

Part of
Public Record



RE: STB Docket No. 42071, *Otter Tail Power Company v. The Burlington Northern and Santa Fe Railway Company*

Dear Secretary Williams:

Please find enclosed for filing the original and ten (10) copies of Errata to Complainant Otter Tail Power Company's Opening Evidence (Public Version) in the above referenced proceeding.

An extra copy of this filing is enclosed for stamping and returning to our offices.

Should you have any questions regarding the foregoing, please do not hesitate to contact the undersigned.

Sincerely,

Nicholas J. DiMichael
Counsel for Complainant

cc: Counsel for Defendant

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BEFORE THE
SURFACE TRANSPORTATION BOARD

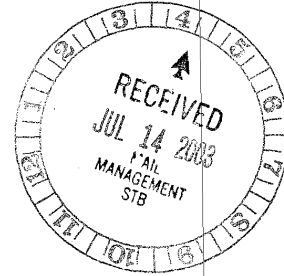
OTTER TAIL POWER COMPANY

Complainant,

v.

THE BURLINGTON NORTHERN AND
SANTA FE RAILWAY COMPANY,

Defendant.



Docket No. 42071

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Office of Proceedings

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ERRATA TO COMPLAINANT OTTER TAIL POWER
COMPANY'S OPENING EVIDENCE

Otter Tail Power Company ("Otter Tail") submits the following errata to Parts I, II-A, II-B, III-A, III-B, III-C, III-D, III-F, III-H and IV of its Opening Evidence filed in this proceeding on June 13, 2003.

1. Part I Errata

Otter Tail identified the following typographical errors in Part I.

1. Page 13, Footnote 38 - replace "Brekenridge" with "Breckenridge".
2. Page 19, Line 1 - replace "wuld" with "would".

2. Part II-A Errata

Otter Tail identified the following typographical error in Part II-A.

1. Page 16, Line 8 - replace "Forsyth" with "Forsyth".
2. Page 14, Line 9 - replace "T&O Summary Opening.123" with "T&O Otter Tail Opening.123".
3. Page 29, Footnote 36, Line 1 - replace "Loco Maint Open.123" with "Loco Maint OTP.123".
4. Page 30, Footnote 37, Line 1 - replace "BNSF System Loco Age.123" with "BNSF System Avg Loco Age.123".
5. Page 34, Footnote 49, Line 1 - Replace "Open-Loading Crew Wages.xls" with "Open-Avg Loading Crew Wages.xls".

Otter Tail uncovered a mileage problem. The line haul miles from Belle Ayr should be increased by 0.9 miles to account for the proper division of ownership location.

3. Part II-B Errata

Otter Tail identified the following typographical error in Part II-B.

1. Page 5, Line 14 - replace "dependa" with "depends".

4. Part III-A Errata

Otter Tail identified a page missing from the workpapers filed in support of Part III-A. Please insert the attached page 1815A between pages 1815 and 1816 in Volume III, 3 of 6.

Otter Tail identified the following typographical errors in Part III-A

1. Page 20, Line 3 - replace "Otter Tail Railroad Traffic Forecast.xls" with "Otter Tail Railroad Coal Traffic Forecast.xls".
2. Exhibit III-A-2, page 2, footnote for Column (1) - replace "recieing" with "receiving".

5. Part III-B Errata

Otter Tail identified the following typographical errors in Part III-B.

1. Page 3, Line 6 - replace "constrcution" with "construction".
2. Page 10, Footnote 7 - replace "Fork" with "Fort".

6. Part III-C Errata

Otter Tail uncovered a problem with the string program analysis it submitted as one of its verifications of the feasibility of the OTRR's track configuration to accommodate its 2021 peak day traffic and to develop peak-year operating statistics. Otter Tail discovered that the string diagram program contained a problem in the program's initial setup phase that caused the program to not properly read the grades and curves information contained in the file "GRADES.DBF." To correct this problem, Otter Tail has removed the asterisk at the beginning of Line 785, and removed Line 786 from the string diagram program.¹

Otter Tail identified that it inadvertently switched the maximum train speeds allowed for coal and non-coal trains as they operate over the OTRR, i.e., coal train speeds were assigned to non-coal trains and non-coal trains speeds were assigned to coal trains.

Otter Tail discovered that it included the crew change, train inspection and railcar switching times – columns labeled "crew" and "mtcrew" in Otter Tail's Opening electronic file "ROUTE.DBF" – at the station before, instead of at, the Glendive Yard.² Otter Tail found that it incorrectly assigned

^{1/} Line 785 currently states "(*INDEX ON ALLTRIM(CENDCUM) TO MPI)" and Line 786 states (INDEX ON ENDCUM TO MPI).

^{2/} Otter Tail included these yard times at Sequence Numbers 105 and 106 of the WCC route instead of Sequence Numbers 106 and 107, which demarcate the Glendive Yard.

two (2) hours of yard time to Westbound non-coal trains and 30 minutes to Eastbound non-coal trains at the Glendive Yard instead of the correct one (1) hour of yard time for Westbound non-coal trains and 15 minutes for Eastbound non-coal trains as indicated in Otter Tail's Opening Evidence at page III-C-1. Otter Tail found that non-coal trains traveling between Fargo, ND and Snowden, MT were being improperly delayed in the Glendive Yard. To rectify this improper delay, Otter Tail adjusted the electronic file "PKTRNS.DBF" to reflect the Snowden to Fargo trains moving in two parts. The first part of the movement shows the trains moving between Fargo and Glendive utilizing their OTRR train numbers. The second part of the movement shows the trains moving between Glendive and Snowden utilizing their OTRR train numbers with the letter "A" appended to the end of the train number.

Otter Tail identified that it was imputing the number of locomotives used on coal trains to non-coal trains operating over the OTRR. To correct for this improper imputation, Otter Tail separated in the "ROUTE.DBF" file the number of locomotives used on coal trains and non-coal trains as they operate over the OTRR system. Otter Tail also identified in the "ROUTE.DBF" file that helper locomotives (Column "hlocos") that should operate through Sequence Number 46 were unintentionally stopped at Sequence Number 44.

Otter Tail identified that equations used to determine train acceleration and braking times were incorrectly stated in the string diagram program and that the rolling resistance equations of the acceleration and braking times routines were applied to the wrong equation coefficients.

Otter Tail identified that it was inadvertently imputing incorrect train weights to trains traversing the OTRR system. Specifically, the string diagram model was imputing train weights for loaded unit coal trains on to non-coal trains and to empty unit coal trains moving in the system's prevailing direction, and imputing empty unit coal train weights on to non-coal trains and loaded unit coal trains moving in the non-prevailing direction.³ To correct this imputation, Otter Tail has adjusted the string diagram program to differentiate between coal and non-coal trains operating on the OTRR, and also has added the field "TRNWT" in the file "PKTRNS.DBF" to show the loaded weight of each train in tons. Otter Tail also adjusted the fields "TCARS" and "CARS" in the "PKTRNS.DBF" file to reflect, in the case of coal trains, the number of cars on the train, and the number "0", respectively. In the case of non-coal trains, the fields "CARS" and "TCARS" reflect the number of loaded and empty cars on a train, respectively.

Otter Tail adjusted Lines 1353, 2133, 2285 and 3784 of its string diagram model to remove a double recordation of time that occurs as trains moving to Snowden move past Sequence Number 104 on the Otter Tail route. Otter Tail adjusted the string diagram program to reflect a differentiation between spur time calculations for coal and non-coal trains,⁴ and removed from the string diagram program extraneous lines of code marked with asterisks ("*").⁵

^{3/} The prevailing directions of the OTRR are north from Converse to Donkey Creek, WY, northwest from Donkey Creek to Moran Junction, MT, northeast from Moran Junction to Glendive, MT, east from Glendive to Fargo, ND, southeast from Fargo to Benson, MN, west from Benson to Big Stone City, SD, and north from Glendive to Snowden, MT.

^{4/} Spur time calculations, as reflected by the variable "SPUR TIME" in the string program model, account for time trains spend on system loading and unloading spurs. Because non-coal trains do not use these spurs, it is necessary to differentiate between coal and non-coal trains.

^{5/} The Visual FoxPro software used by the string diagram model does not read or utilize any line of code beginning with an asterisk.

The compact disk submitted herewith contains the revised string chart program, the revised file “PKTRNS.DBF”, and the revised file “ROUTE.DBF” located in the folder “OTRR_STRING_Errata.ZIP”. Otter Tail is also submitting replacement Attachment A to Exhibit III-C-2 containing revised string diagrams for the OTRR for the peak traffic day of October 18, 2021. The revised Attachment A should be substituted for the version of the Attachment included with Otter Tail’s Opening Evidence.

The revised string diagram analysis for the OTRR’s peak day of October 18, 2021, results in revised 2002 operating statistics (service units) for the OTRR. The revised 2002 operating statistics are shown in a replacement version of Exhibit III-C-1, included on the attached CD in the electronic file “Exhibit__III-C-1.123”. Exhibit III-C-1 should be substituted for the version of Exhibit III-C-1 included with Otter Tail’s Opening Evidence.

Otter Tail identified the following typographical errors in Part III-C.

1. Page 16, Line 1 - replaces “six (6)” with “four (4)”.
2. Page 16, Lines 2-3 - replace “Two will be stationed at Donkey Creek, two at Glendive and two will be available for work train service over the system.” with “Two will be stationed at Donkey Cree, and two will be stationed at Glendive.”
3. Page 22, Footnote 33, Line 4 - replace “Crew CalculationforOtterTail Open.xls” with “Crew Calculation for OttRR Open.xls”.
4. Page 25, Line 3 of Footnote 39 - replace “in” with “is”.
5. Exhibit III-C-2, page 2, line 14 - replace “diagramming” with “diagraming”.

7. Part III-D Errata

Several pages are missing from the workpapers filed in support of Part III-D. The attached pages 2961A through 2961O should be inserted between pages 2961 and 2962 in Volume III, 4 of

6. The electronic file "OTRR Cell Phones & Pagers.xls" was inadvertently excluded from Otter Tails Opening Workpapers. A copy of this file is herewith included on the accompanying compact disk.

Otter Tail identified the following typographical errors in Part III-D.

1. Page 5, Footnote for Line 2 in Table III-D-1 - replace "qand" with "and".
2. Page 7, Line 1 - replace "OTRR. Only" with "OTRR, only".
3. Page 12, Footnotes 16 and 17, Lines 1, respectively - replace "Transportation Department Personnel.123" with "OTRR Transportation Department Personnel.123".
4. Page 16, Footnote 20 - replace "Construtive" with "Constructive".
5. Page 22, Line 8 - replace "Subdividison" with "Subdivision".
6. Page 22, Line 18 - replace "Subsdvision" with "Subdivision".
7. Page 24, Line 18 - "Transportation Department Personnel.123" with "OTRR Transportation Department Personnel.123".
8. Page 34, Line 5 - replace "OTtRR" with "OTRR".
9. Page 35, Line 15 - replace "te" with "the".
10. Page 36, Line 2 - replace "technician" with "technician".
11. Page 48, Footnote 43, Line 1 - replace "OTRR-IT Capital Budget.xls" with "OTRR - Capital Budget.xls".
12. Page 49, Footnote 46, Line 2 - replace "OTRR-IT Capital Budget.xls" with "OTRR - Capital Budget.xls".
13. Page 52, Line 2 - replace "Optumum" with "Optimum".
14. Page 54, Line 4 - replace "extentions" with "extensions".
15. Page 55, Footnote 58, Line 1 - replace "OTRR IT Operating Budget.xls" with "OTRR-Operating Budget.xls".
16. Page 64, Heading 10 - replace "EXENSES" with "EXPENSES".

Based on the revised operating statistics from the replacement Exhibit III-C-1, Otter Tail revised the operating expenses related to the number of operating personnel, crew taxi trips, overnight crew stays, locomotives and railcars, and also revised the capital expense related to the crew management system included with OTRR's Information Technology capital budget. These

revised operating costs are included in the file "Otter Tail_Opr_Exp.123" contained on the CD submitted with this filing, and the revised Information Technology costs are explained and reflected in the files "OTRR-Crew "Management.doc" and "OTRR-Capital Budget.xls" also contained in the submitted CD.

In Volume III, 5 of 6, replace original workpaper page 3389 with the enclosed replacement page 3389.

8. Part III-F Errata

Otter Tail identified changes in the calculation in the amount of investment needed for the OTRR. The investment put forth in Otter Tail's Opening Evidence does not include the amount of investment needed to access the Coal Creek mine and the Fort Union mine in its Opening Evidence. Both mines are located in Wyoming's Powder River Basin. The net effect is additional investment for one turnout and 330 feet of track to access Coal Creek and for one turnout and 313 feet of track to access Fort Union.

Otter Tail identified investment required for additional track and turnouts along the line segments between Fargo, ND and Glendive, MT and between Glendive and Snowden, MT, resulting from the corrections made to the string diagram model in Part III-C. Specifically, Otter Tail added additional track and turnouts between E. Beach and W. Sentinel Butte (MP 166.8 to MP174.8), E. Sentinel Butte and W. Rider (MP 165.1 to MP157.1), E. Rider to W. Sully Springs (MP 155.4 to MP 147.4), E. Sully Springs and W. Fryberg (MP 145.7 to MP137.7), E. Fryberg to MP 128.0 (MP 136.0 to MP 128.0), E. Lyons to W. Mandan (MP 9.9 to MP 1.9), E. Mandan to Bismark (MP 0.2 to MP 0.0 and MP 200.2 to MP 192.3), Pierce to W. Burleigh (MP 190.6 to MP 182.6), N. Berea

to S. Berea (MP 72.0 to 64.0), Peak to W. Koldock (MP 62.3 to MP 54.3), E. Koldock to W. Buffalo (MP 52.6 to MP 44.6), W. Snowden Yard to W. Sidney (MP 58.5 to MP 76.7), E. Dickinson to MP 98.9 (MP 98.9 to 106.9) and W. Taylor to MP 97.2 (MP 89.2 to 97.2). The net effect is additional investment for 28 turnouts and 122.2 miles of track.

Otter Tail is submitting replacement Exhibits III-F-1, 2, 3, 6, 11, 13 and 14. These exhibits should be substituted for the versions included with Otter Tail's Opening Evidence. Electronic versions are included on the CD submitted with this filing.

Otter Tail identified the following typographical errors in Part III-F.

1. Page 41, Footnote 115, Lines 1 and 2 - replace "OTRR Microwave Network.xls" with "Ottetail Microwave and LMR Backbone Network Cost Finalv6.xls".
2. Page 45, Footnote 125, Line 1 - replace "OTRR Crossings.xls" with "OTRR FRA Crossing.xls".
3. Exhibit III-F-8, page 1, Footnote 11 - replace "juntion" with "junction".

9. Part III-H Errata

A revised DCF Model (Exhibit III-H-1) incorporating the changes outlined above is included on the CD submitted with this filing in the electronic file "Exhibit-III-H-1.123".

Otter Tail identified the following typographical errors in Part III-H.

1. Page 1, Line 14 - replace "indicies" with "indices".
2. Page 3, Line 7 - replace "were" with "was".

10. Part IV Errata

Otter Tail identified the following typographical errors in Part IV.

1. Page 11, Line 23 - replace "Municiple" with "Municipal".
2. Page 12, Line 1 - replace "Corportation" with "Corporation".
3. Page 12, Line 5 - replace "Arizonia" with "Arizona".
4. Page 12, Line 21 - replace "serivce" with "service".
5. Page 14, Line 7 - replace "Transportion" with "Transportation".

Respectfully submitted,



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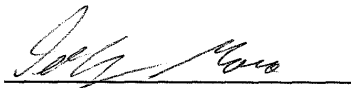
July 14, 2003

EXHIBITS
REDACTED

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of July, 2003, I served a copy of Complainant's Opening Evidence-Errata by hand delivery to counsel for Defendant at the following address:

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