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March 22, 2004



ENTERED
Office of Proceedings

Via HAND DELIVERY

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, NW
Washington, DC 20423

MAR 22 2004

Per
Public Record

PUBLIC VERSION

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

Dear Secretary Williams:

Enclosed for filing in the above-captioned matter are the original and ten copies of the The Burlington Northern and Santa Fe Railway Company's Errata filing. This filing consists of a single volume containing the Errata Narrative and Attachments. BNSF is also filing three copies of a CD containing an electronic version of the Errata Narrative and Attachments. BNSF is filing a Highly Confidential version of this Errata under a separate cover letter.

Please date stamp the extra copy of this cover letter and return it to the messenger who delivered this filing.

Sincerely,

Samuel M. Sipe, Jr.

Enclosures

cc: Counsel for Complainant

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**BEFORE THE SURFACE
TRANSPORTATION BOARD**

OTTER TAIL POWER COMPANY,

Complainant,

v.

**THE BURLINGTON NORTHERN AND
SANTA FE RAILWAY COMPANY,**

Defendants.



Docket No. 42071

**ENTERED
Office of Proceedings**

MAR 23 2004

**Part of
Public Record**

**ERRATA TO THE OCTOBER 8, 2003 REPLY EVIDENCE OF THE BURLINGTON
NORTHERN AND SANTA FE RAILWAY COMPANY**

The Burlington Northern and Santa Fe Railway Company ("BNSF") submits this Errata filing to correct errors in the Reply evidence filed in this proceeding on October 8, 2003. The specific errors BNSF identified are described below, as are the changes BNSF has made to correct these errors. Included with this Errata filing are the following:

- Revised Reply Exhibits, including revised track schematics and a revised DCF analysis (Attachments 1 and 2);
- Revised BNSF Reply hardcopy workpapers reflecting corrections described in this Errata (Attachments 3 and 4);
- A CD containing revised BNSF Reply electronic workpapers reflecting the changes described below.

This filing also includes an index of the electronic workpapers submitted with the October 8, 2003 Reply filing (Attachment 5), and an index of the revised electronic workpapers submitted with this Errata filing (Attachment 6). For the convenience of the Board, BNSF has also included copies of all electronic and hardcopy workpapers (Attachment 9) that BNSF provided in response to Otter Tail's workpaper requests. Indexes of these workpapers have been included with these materials at the end of this filing (Attachments 7 and 8).

BNSF is filing Supplemental Reply evidence in this proceeding under separate cover today. That filing is a response to the Supplemental Opening evidence filed by Otter Tail on January 9, 2004. BNSF's Supplemental Reply evidence is based on a different traffic configuration than that of the Reply evidence submitted by BNSF on October 8, 2003, and the Supplemental Reply evidence describes the effect of these different traffic group assumptions on SAC revenues and costs. The corrections to the errors described in this Errata have been applied to BNSF's Supplemental Reply evidence.

The specific errata changes that BNSF is making to its October 8, 2003 Reply are described below. Most of these errata changes are minor and have little effect on the SAC results. The SAC results corresponding to BNSF's October 8, 2003 Reply evidence, as modified by this Errata, are set out in Exhibit III.H-1 (Attachment 2).

Section III.A

BNSF identified the following mistaken workpaper citation in Section III.A of its Reply Narrative. The support for BNSF Reply Table III.A-3 on page III.A-30 of the Narrative is found in BNSF Reply electronic workpaper "Detailed Calculation of OTP's Mileage Calc.xls," rather than the electronic workpaper that was referenced in the Reply Narrative ("Summary of Coal Move Miles.xls").

Section III.B

In reviewing BNSF Reply track schematics in Reply Exhibit III.B-1, BNSF Engineering Consultants discovered that the milepost locations for sidings on its Reply schematics differed from the sidings mileposts contained in the RTC model as a result of the assumption of a 15-foot clearance point at the end of the turnout curve, rather than the 14-foot clearance point used in the model. BNSF's track charts were adjusted to correspond to the inputs to the RTC model and, as a result, each end of a siding or double track segment was reduced by .03 miles, and the milepost location of the turnout has been adjusted. The revised total track mile count for the OTRR is 1,768 miles; the total number of route miles has remained the same. The revised breakdown of track miles is contained in Errata electronic workpaper "III B Miles Table_Errata.xls." The reduction in track miles is factored into the total construction costs as restated in BNSF Errata electronic workpaper "III F OTRR Construction_Errata.xls." Errata Exhibit III.B-1, which contains the revised track schematics for the OTRR, is included with this filing as Attachment 1.

Section III.D

BNSF identified the following errors in Section III.D. First, the operating ratios in Figure III.D.3-5 on page III.D-64 of the Reply Narrative should be revised to show 26.7% for OTRR (OTP), 79.0% for UP, and 79.7% for IC. Second, the revenue per employee amount in the text and in Figure III.D.3-6 on page III.D-65 of the Reply Narrative should be revised to show \$970.9 in thousands for OTRR (OTP). Third, BNSF's annual cost for ditching in the text at page III.D-194 should be revised to show { }.

BNSF's estimate of bridge contract maintenance costs for the OTRR at page III.D-192 of the October 8, 2003 Reply Narrative was incorrectly based on Otter Tail's estimate of

approximately 50,000 linear feet of bridges set forth in its Opening evidence. It should have been based instead on BNSF's Engineering Consultants' estimate of 69,455 linear feet of bridges, as set forth in BNSF Reply electronic workpaper, "III F OTRR Construction.xls," worksheet "Bridge." Mr. Albin's corrected estimate of the total bridge maintenance contract costs is { }, which includes { } for concrete repairs, { } for underwater inspection for scour of the substructure, and { } for steel repairs. These changes are reflected in Errata electronic workpaper "III D 4 Maintenance of Way_Errata.xls" and Errata workpaper BNSF.RP.ER.WP.III.D.4-0001 (Attachment 3).

BNSF has also corrected Reply electronic workpaper "III D 4 Maintenance of Way.xls" worksheet "Ton Specific" to reflect the final gross tons determined by BNSF engineering witnesses, and has corrected the by-segment quantities for "Set-outs" and "Other Miles" which were inadvertently shifted into the wrong spreadsheet row. These corrections are included in electronic workpapers "III D 4 Maintenance of Way_Errata.xls" and "III D 4 Average GTMs_Errata.xls."

The OTRR operating expenses calculated in BNSF Reply electronic workpaper "OPR_EXP.xls," worksheet "Summary" contained several errors. First, annual G&A expenses were slightly overstated due to inclusion of an incorrect calculation of annual training expenses. Second, F-150 truck costs were double-counted, resulting in a slight overstatement in annual material and supply expenses. Third, the totals in the operating managers section failed to include the figures in the expenses for the VP of Transportation and his or her assistant, resulting in an understatement of material and supply, operating managers, and G&A expenses. Fourth, an incorrect base mileage amount was used in calculating SD40-2 maintenance costs, which overstated locomotive maintenance expenses. Fifth, BNSF failed to develop locomotive

maintenance costs for SD40-2 locomotives based on the contractual minimum of 10,000 miles per locomotive per month. This fifth error offsets the overstatement of costs resulting from the use of the incorrect base SD40-2 mileage amount and resulted in a net understatement of locomotive maintenance costs. Finally, base-year insurance expenses were understated because the insurance ratio was not applied to OTRR start-up and training expenses. Cumulatively, the errors above resulted in an understatement operating expenses in the amount of \$2.7 million in year 1 and approximately \$700,000 annually after year 1. Recalculated operating expenses are contained in BNSF Errata electronic workpapers, "Revised Locomaint_Otter Tail_errata.xls" and "OPR_EXP_Errata.xls."

Section III.F

BNSF has identified the following errors in Section III.F of its Reply evidence. First, the unit cost for electric locks contained in Reply Exhibit III.F-1 is incorrect; BNSF accepted Otter Tail's cost assumptions for electric locks, as noted in the Narrative at page III.F-155. Second, several turnouts have been incorrectly identified as line turnouts, rather than turnouts located in yards. Additionally, the total quantity of crossings and culverts did not reflect double tracking along the Glendive to Fargo line. The unit cost for defective equipment detectors (DEDs) contained in Exhibit III.F-1 is also incorrect, as BNSF accepted Otter Tail's costs for DEDs. BNSF Errata electronic workpapers "III F 8 Crossings_Errata.xls" and "III F OTRR Construction_Errata.xls" reflect these corrections.

BNSF has also discovered that several minor components used in determining engineering expenses were incorrect, including the quantities for bridges, culverts, acreages and excavation; additionally, the location factor was not applied to several costs taken from RS

Means. The correct quantities appear in electronic workpaper “III F 10 Engineering_Errata.xls” and are included in construction total costs, as restated in “III F OTRR Construction_Errata.xls.”

Additionally, an in-depth audit of the bridge costs submitted by BNSF in Section III.F.5 of its Reply evidence revealed several errors. As a result, BNSF has regenerated Reply workpapers pertaining to bridges, and includes the following revised electronic workpapers with this filing: “III F 5 Bridge Substructure_Errata.xls,” “III F 5 Bridge Superstructure_Errata.xls,” “III F 5 Bridge Unit Costs_Errata.xls,” and “III F 5 Bridge_Errata.xls.” The cells that have been changed to account for the errors below are highlighted in the electronic workpapers. The BNSF Reply electronic workpaper containing total construction costs (“III F OTRR Construction.xls”) has been recalculated and is included as “III F OTRR Construction_Errata.xls.”

Several errors contained in BNSF’s bridge data were caused by BNSF’s Engineering Consultants’ failure to detect embedded formulas contained in the Otter Tail spreadsheets, which became inapplicable due to changes in BNSF’s costing methodology. Otter Tail designed an average bridge for each bridge category and developed, from the costs of that average bridge, a per linear foot unit cost that was applied to the total feet of all bridges in that particular category. BNSF’s Engineering Consultants instead focused on the individual structural components of a bridge, and determined weighted averages for span length and for pier and abutment height. This change in methodology required adjustments to the Otter Tail’s spreadsheets which contained embedded formulas that were no longer applicable in light of the different costing methodology adopted by BNSF’s expert witnesses. The failure to detect these embedded formulas resulted in the following errors:

- Otter Tail used cubic feet as the input measure for average bridge component quantities and used an embedded formula for the conversion to cubic yards. BNSF Engineering Consultants computed quantities in cubic yards, and did not detect or remove the conversion factor from the spreadsheet before plugging in their quantities in cubic yards

(with the exception of Class 1). The internal conversion factor has been removed from BNSF Errata electronic workpaper "III F 5 Bridge Unit Costs_Errata.xls."

- The incorrect quantities for abutments and cofferdams were included in BNSF inventory because the Otter Tail spreadsheet contained undetected inherent multipliers based on single or double track assumptions. BNSF witnesses have corrected this error in electronic workpaper "III F 5 Bridge_Errata.xls."
- With the exception of Class 1 where it included no riprap, Otter Tail included the amount of riprap needed for a single average bridge, and BNSF Engineering Consultants inadvertently did not substitute the amount of riprap required for constructing all the bridges in a particular class. The correct amount of riprap appears in "III F 5 Bridge Unit Costs_Errata.xls."
- BNSF witnesses overstated the required quantity of piles as a result of an embedded formula that multiplied the total number of piles as determined by BNSF by the number of piles Otter Tail had specified for the average bridge in that class. The correct number of piles has been included in "III F 5 Bridge Unit Costs_Errata.xls."

The following errors in BNSF's Reply evidence on bridge construction were also identified:

- BNSF's Reply specifications for Class 1 superstructure included a prestressed concrete slab, eliminating the need for Otter Tail's separate concrete quantity, which BNSF witnesses inadvertently did not remove from the spreadsheet. The additional concrete quantity has been removed in electronic workpaper "III F 5 Bridge Superstructure_Errata.xls."
- In order to account for several unusually large or complex bridges present on the OTRR line that did not properly fit into Otter Tail's general bridge classes, BNSF Engineering Consultants separated out those bridges for separate costing, and re-figured the design calculations and drawings for the general bridge classes. Inadvertently, the Class 3 pier quantities spreadsheet was not updated with these changes. BNSF Errata electronic workpaper "III F 5 Bridge Substructure_Errata.xls" contains the corrected quantities.
- Classes 2, 2 Special, and 3 Special abutment quantities had not been updated to match BSNF's alterations to the design calculations and drawings contained in its Reply evidence; this change has a reciprocal effect on the amount of reinforced steel required. Electronic workpaper "III F 5 Bridge Substructure_Errata.xls" contains these updated quantities.
- The pier protection nose calculation inadvertently did not include the height of the column. The correct volume has been included in Errata electronic workpaper "III F 5 Bridge Substructure_Errata.xls."
- The winter concrete quantities used in determining bridge costs inadvertently referenced the wrong spreadsheet cell. Additionally, the amount of winter concrete designated for

pier protection has been placed in its own separate category for clarification purposes. These changes have been included in "III F 5 Bridge Unit Costs_Errata.xls."

- In attempting to apply Otter Tail's location factors, BNSF inadvertently applied incorrect factors to the unit costs for several materials. The correct location factors have been developed and applied to the unit costs contained in Errata workpaper, "III F 5 Bridge Unit Costs_Errata.xls."
- The final versions of several drawings submitted with BNSF's Reply evidence had not been updated to reflect the final computations and Narrative. The updated versions of these drawings have been included as BNSF.RP.ER.WP.III.F-0001 to 0004 (Attachment 4).

Section III.H

BNSF identified an error in the discounted cash flow ("DCF") model used to determine the SAC results for the OTRR. Specifically, when BNSF modified the DCF submitted by OTRR to change the inflation indexes in "Table B: Other Inflation Indexes" to the historical AAR indexes relied on by the Board in prior SAC proceedings, it inadvertently overwrote spreadsheet cells referenced by "Table F: Present Value of Replacement Costs". As a result, the replacement costs calculated in Table F were based on an incorrect asset specific inflation rates. Corrections to the formulas in Table F are reflected in the electronic workpaper "EXHIBIT-III-H-1 BNSF_ERRATA.123."

The total Stand-Alone Cost for the OTRR, based on restated investment and operating costs, has been determined after incorporating the changes described above. The following table summarizes these results. The full results of the SAC analysis are contained in Errata Exhibit III.H-1 (Attachment 2).

Errata Table III.H-1
Revised Summary of Stand-Alone Cost Results - OTRR
(All Figures in Millions of Dollars)

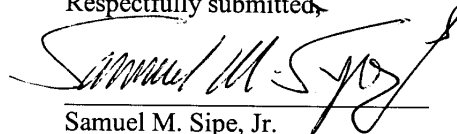
Year	Annual Revenue	Stand-Alone Cost	Difference
2002	\$499.4	\$930.6	(\$431.3)
2003	\$498.2	\$921.1	(\$422.9)
2004	\$500.3	\$943.1	(\$442.8)
2005	\$500.8	\$967.6	(\$466.7)
2006	\$515.6	\$999.2	(\$483.6)
2007	\$511.8	\$1,021.9	(\$510.1)
2008	\$526.7	\$1,041.5	(\$514.8)
2009	\$539.8	\$1,059.6	(\$519.8)
2010	\$556.3	\$1,080.6	(\$524.2)
2011	\$567.5	\$1,099.2	(\$531.6)
2012	\$572.6	\$1,116.9	(\$544.3)
2013	\$581.1	\$1,134.8	(\$553.8)
2014	\$585.3	\$1,153.4	(\$568.1)
2015	\$594.2	\$1,172.3	(\$578.2)
2016	\$603.4	\$1,191.9	(\$588.5)
2017	\$612.7	\$1,212.0	(\$599.3)
2018	\$621.9	\$1,232.3	(\$610.4)
2019	\$631.4	\$1,253.2	(\$621.8)
2020	\$641.2	\$1,274.7	(\$633.5)
2021	\$649.9	\$1,296.2	(\$646.2)

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March 22, 2004

Respectfully submitted,

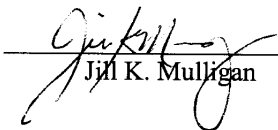


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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by messenger on
this 22nd day of March, 2004 upon the following counsel for the Otter Tail Power Company:

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Jeffrey O. Moreno
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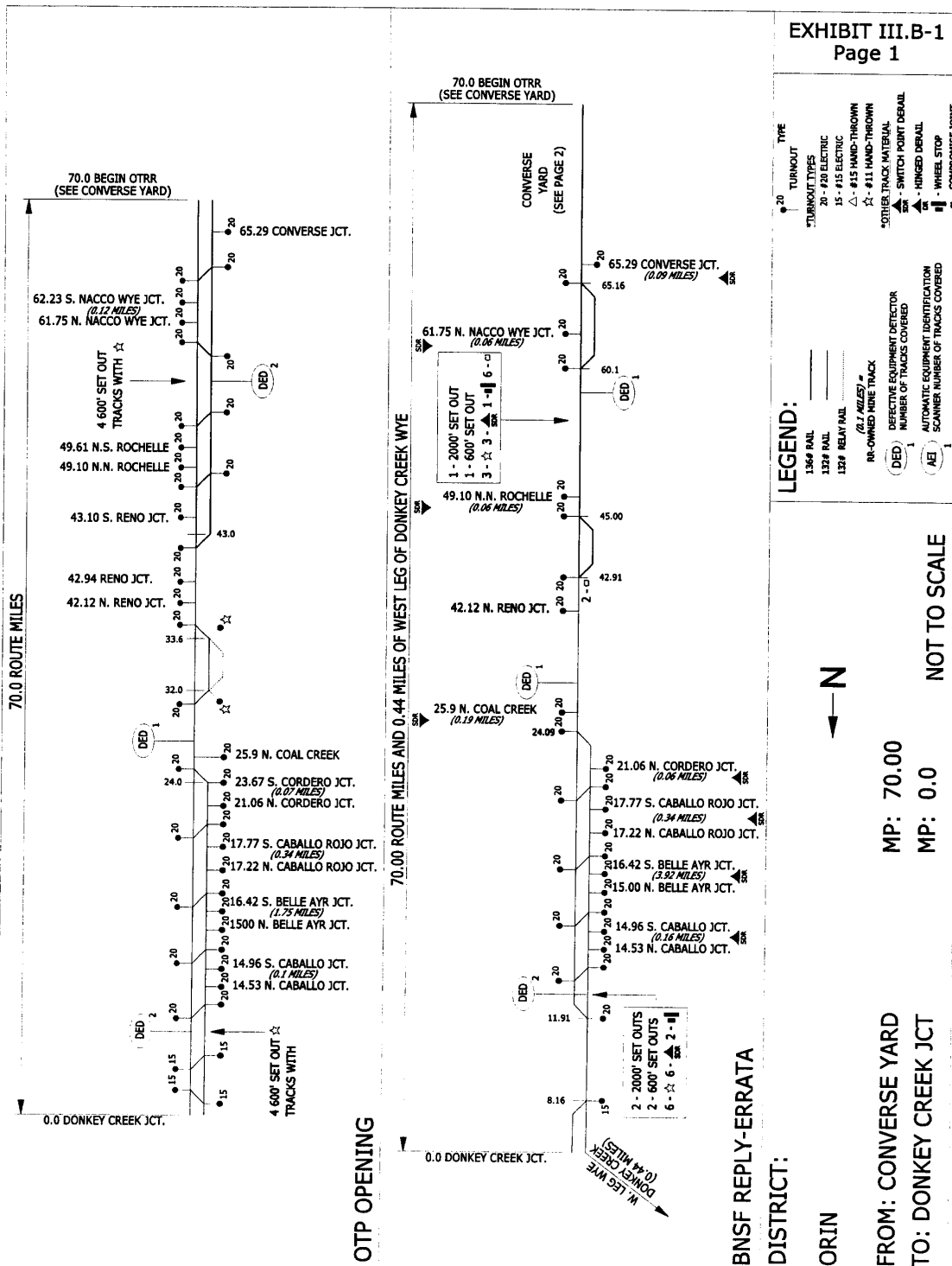

Jill K. Mulligan

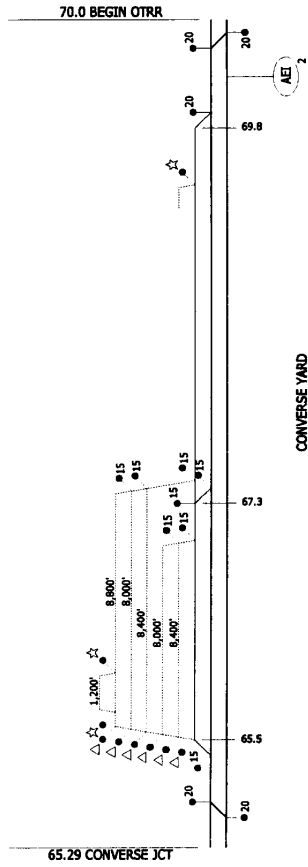
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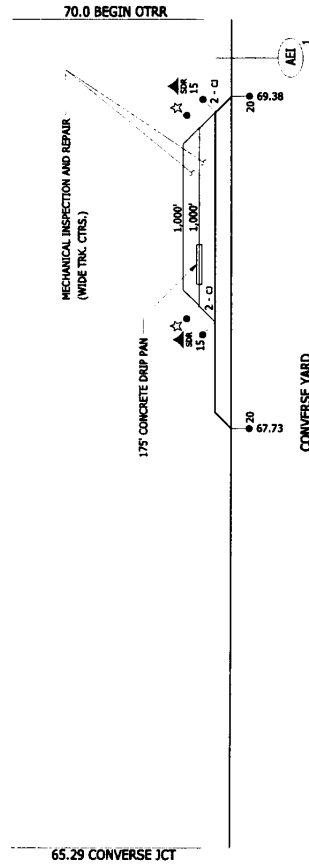
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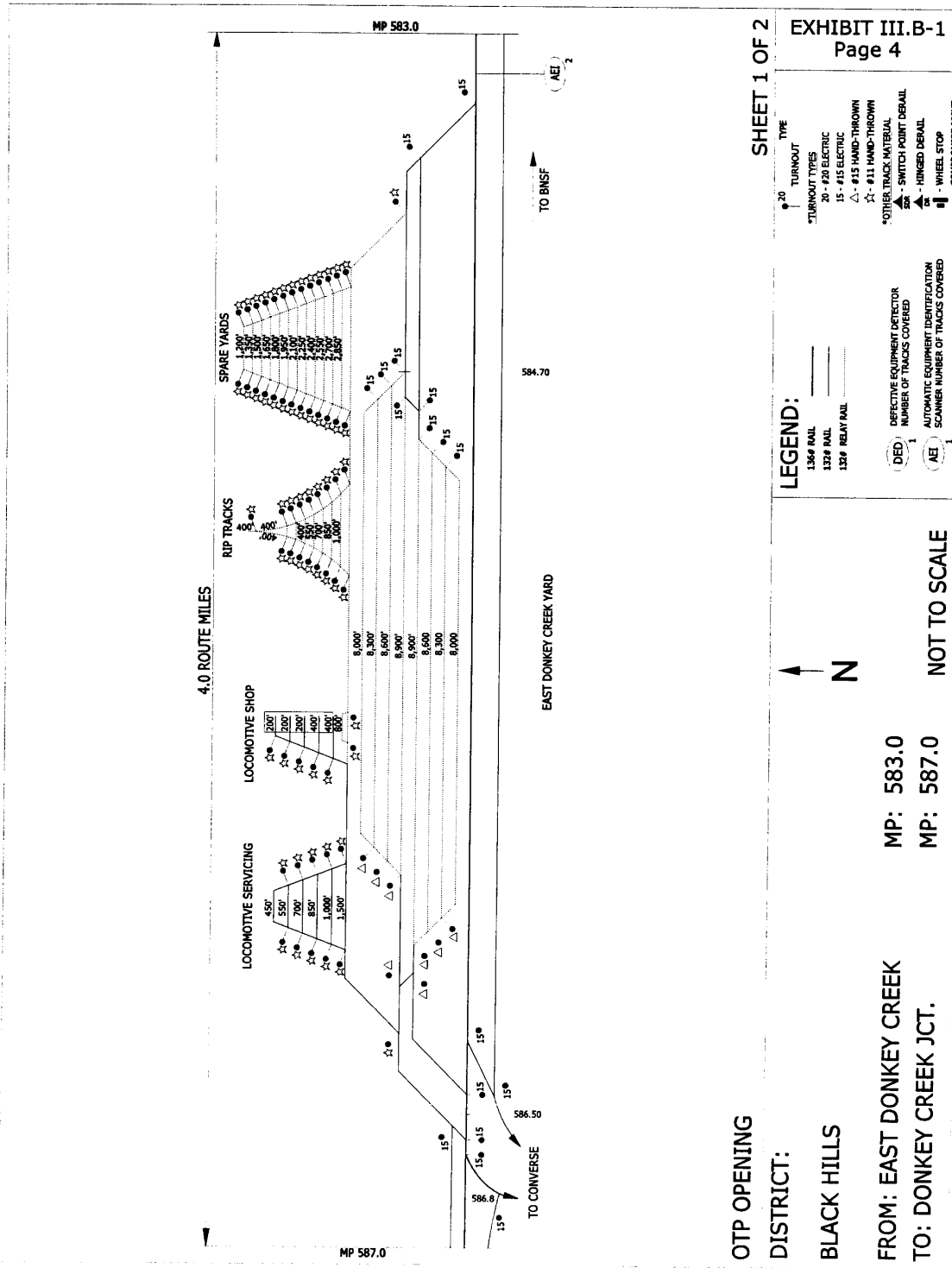
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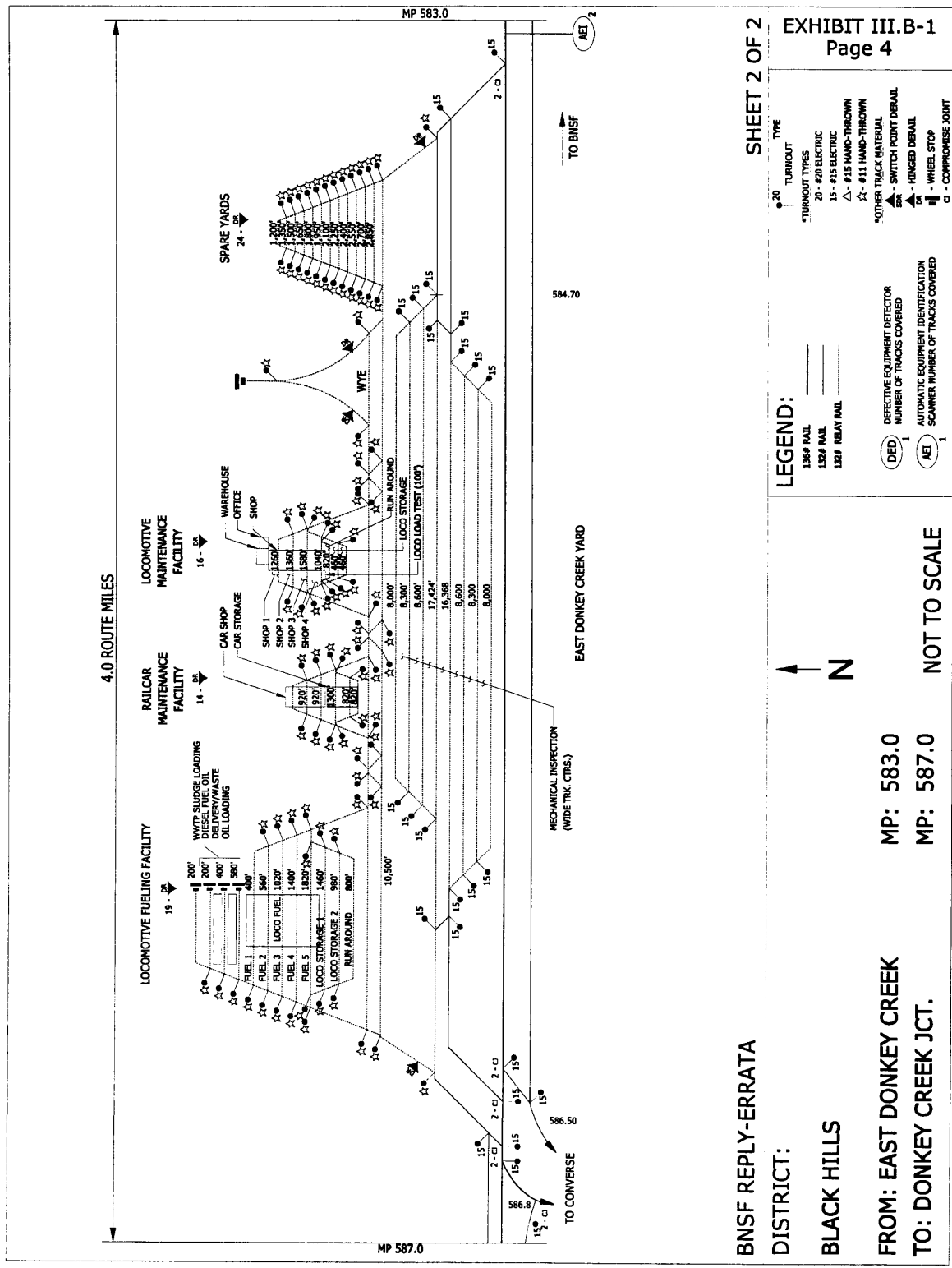
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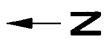
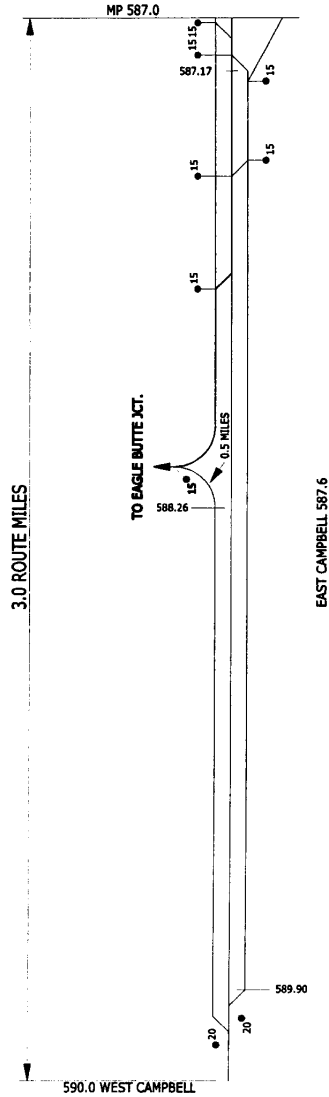
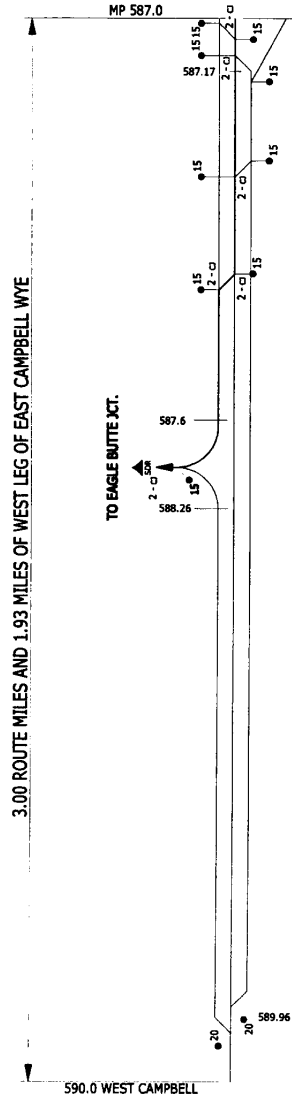


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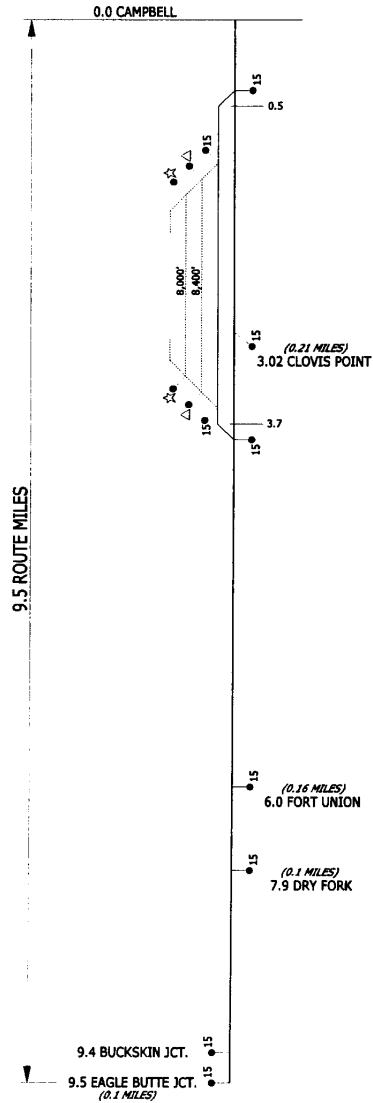
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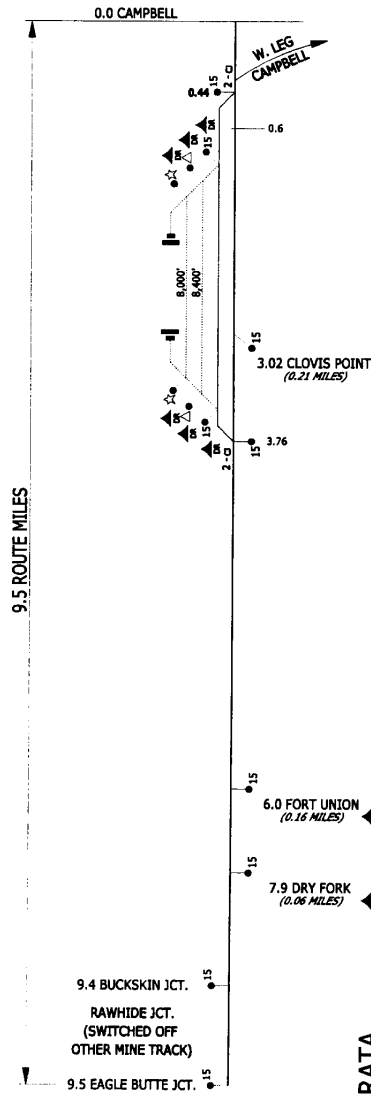
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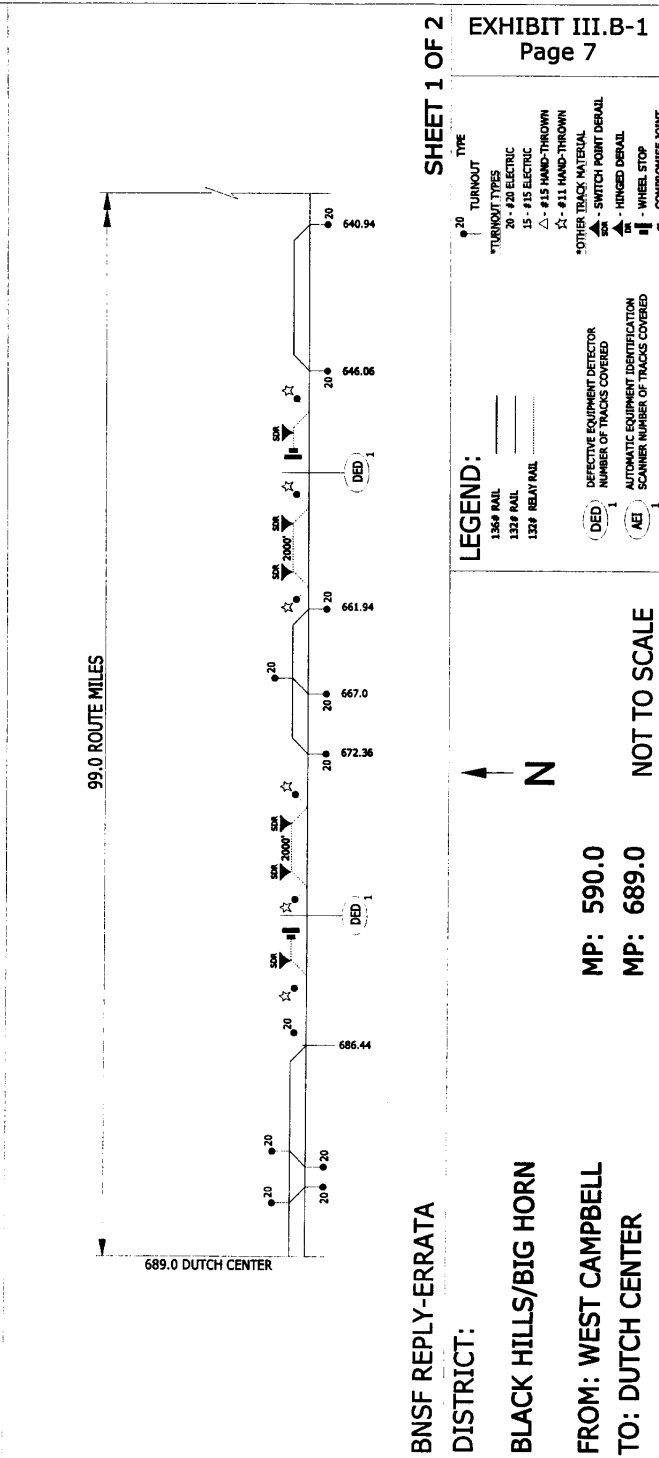
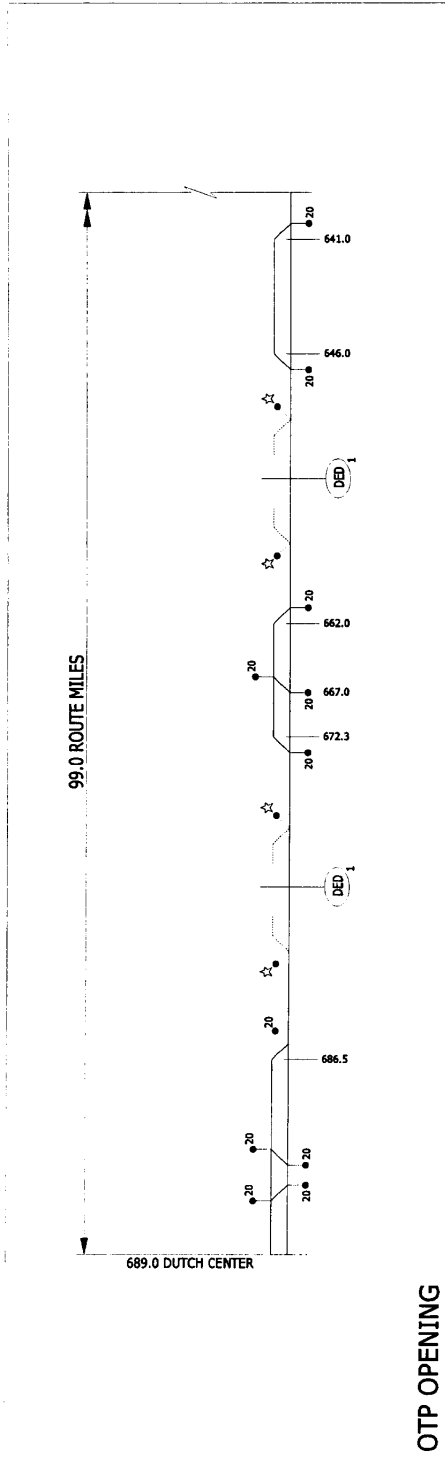
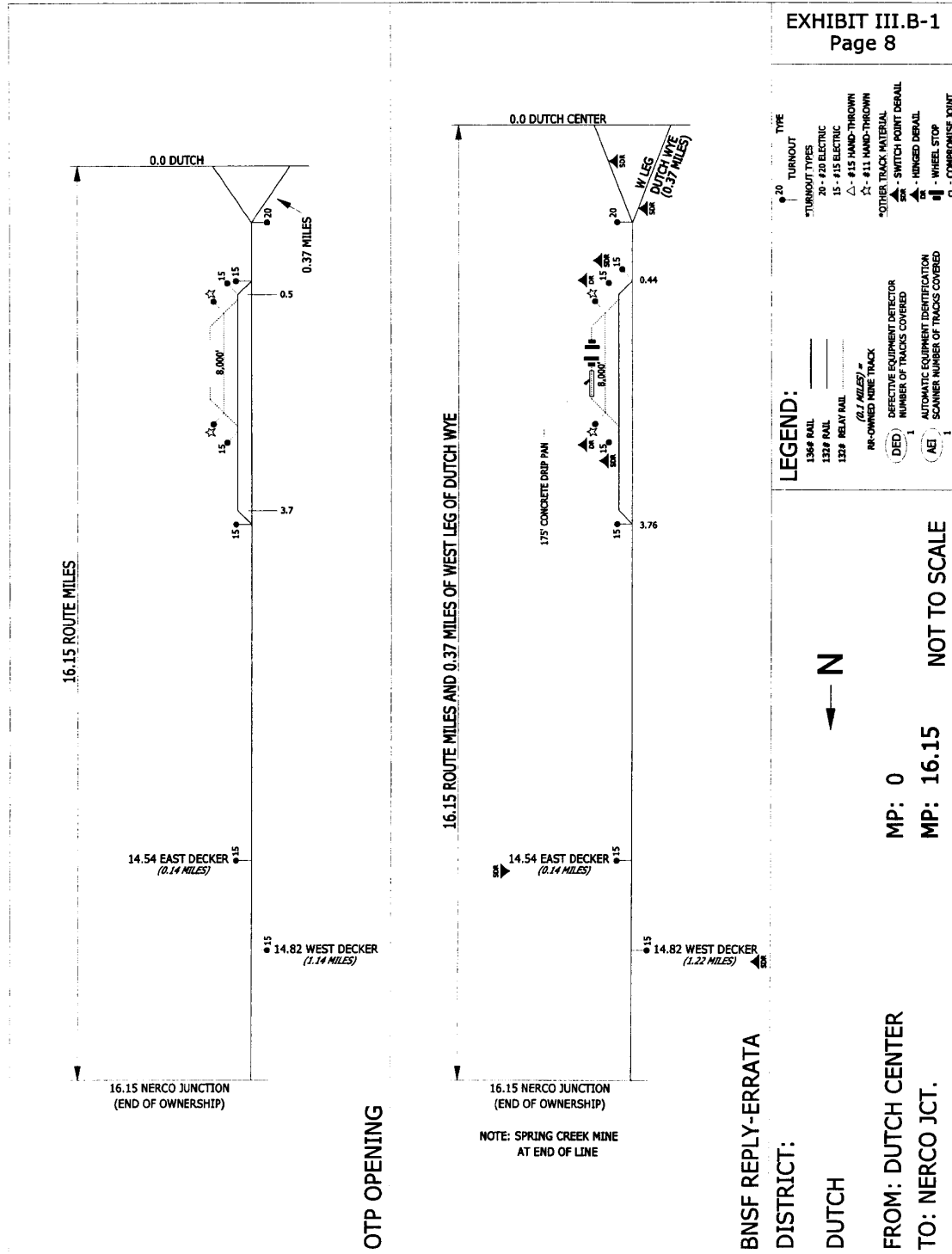
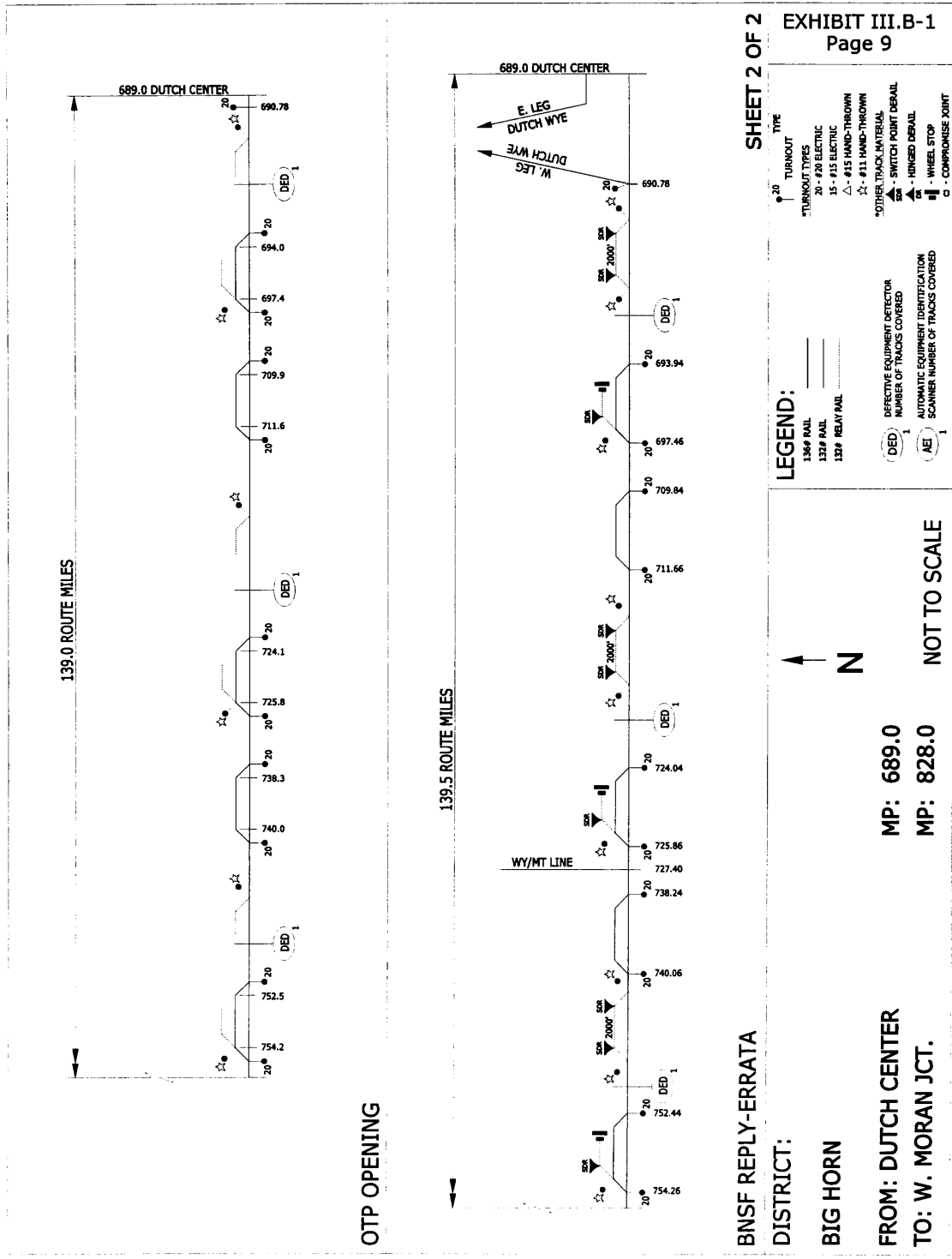


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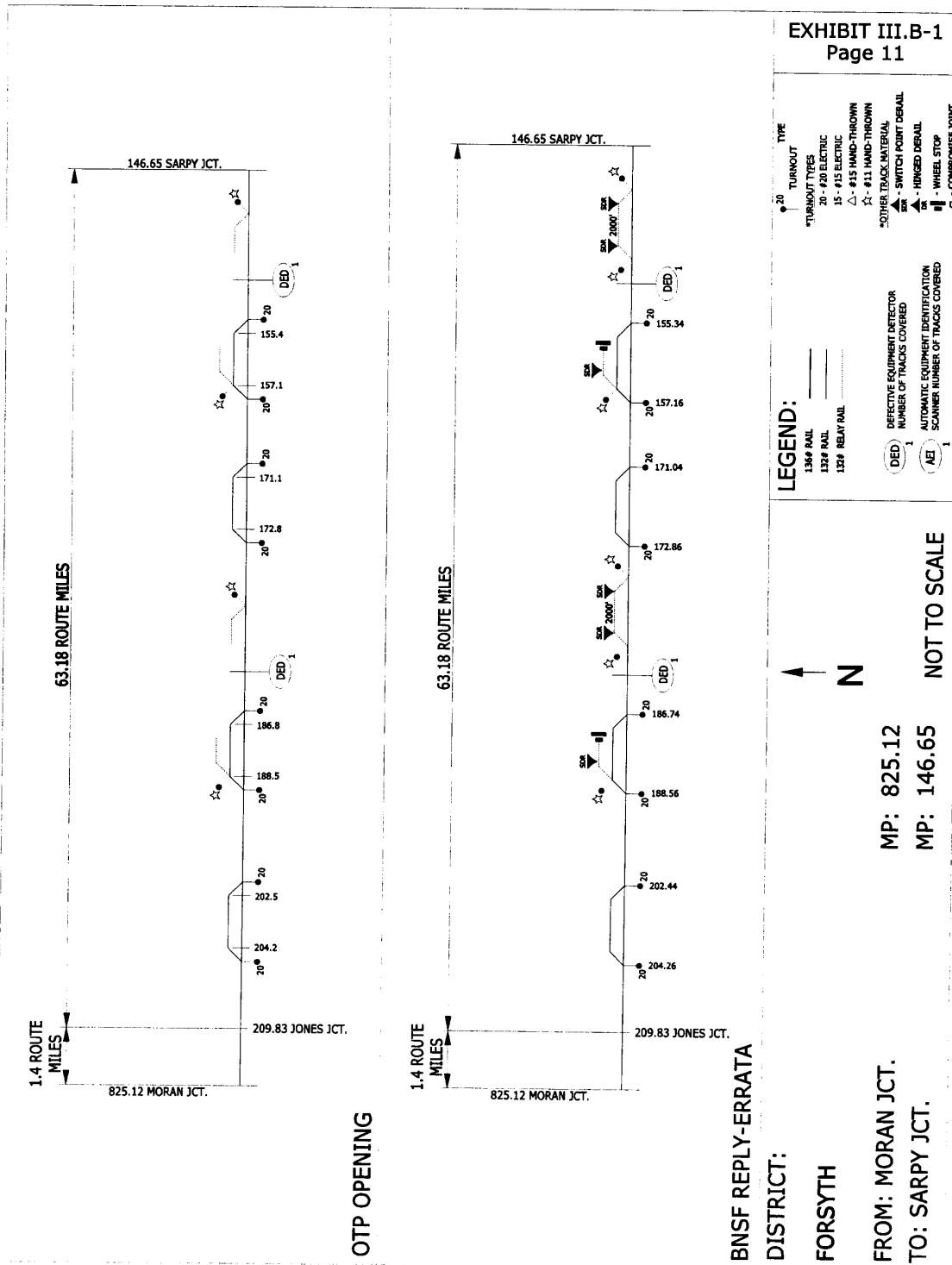
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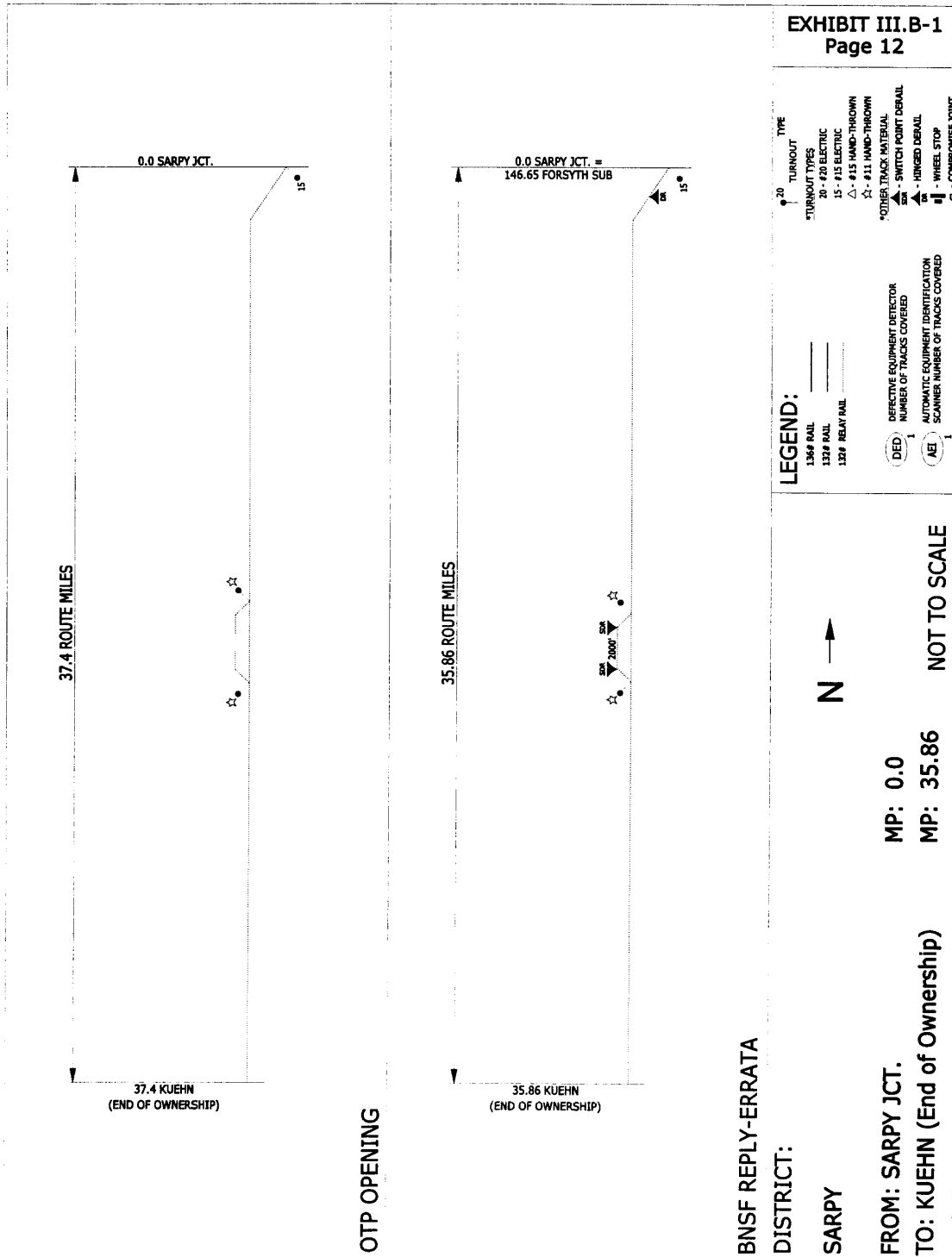
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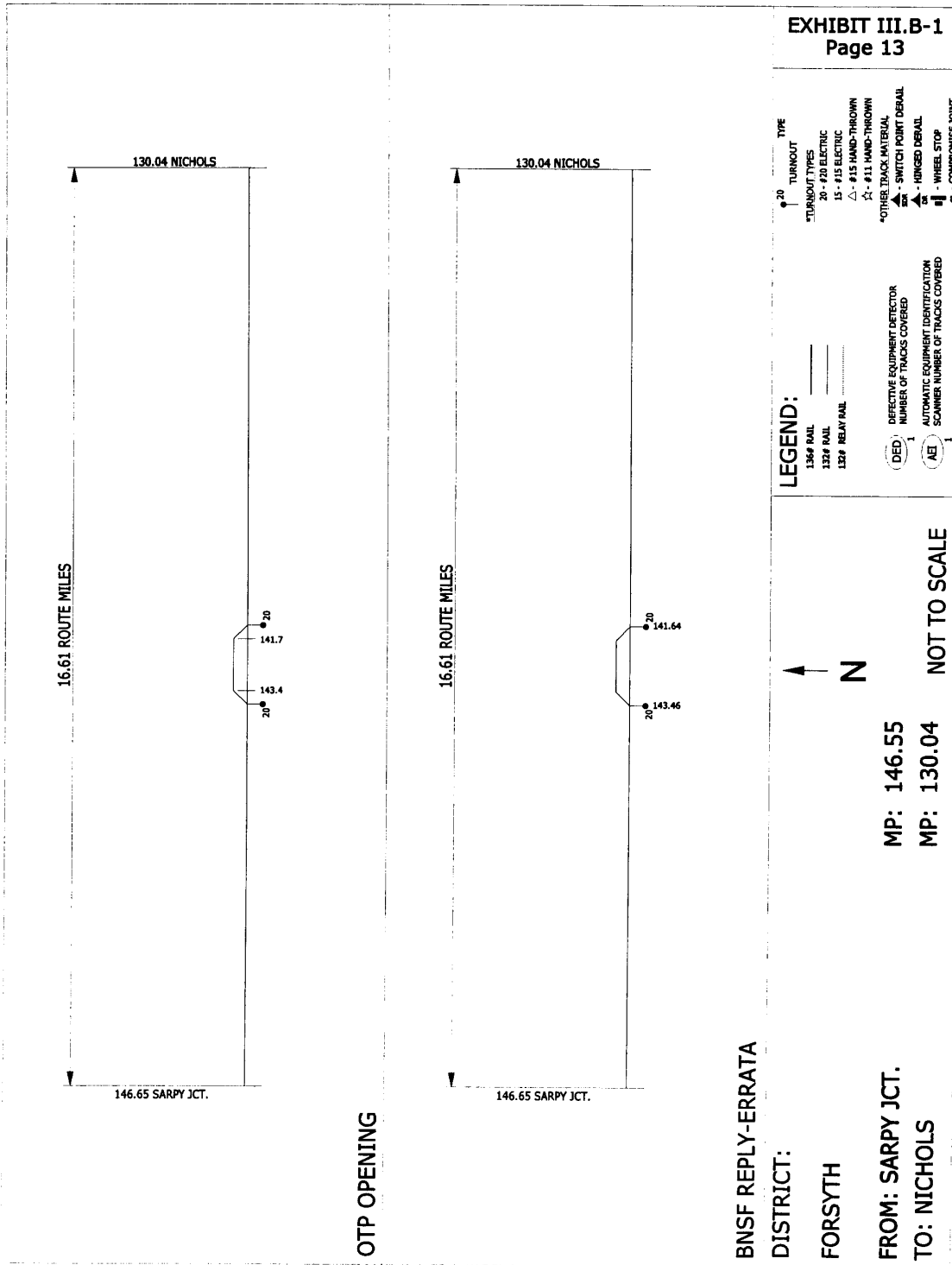
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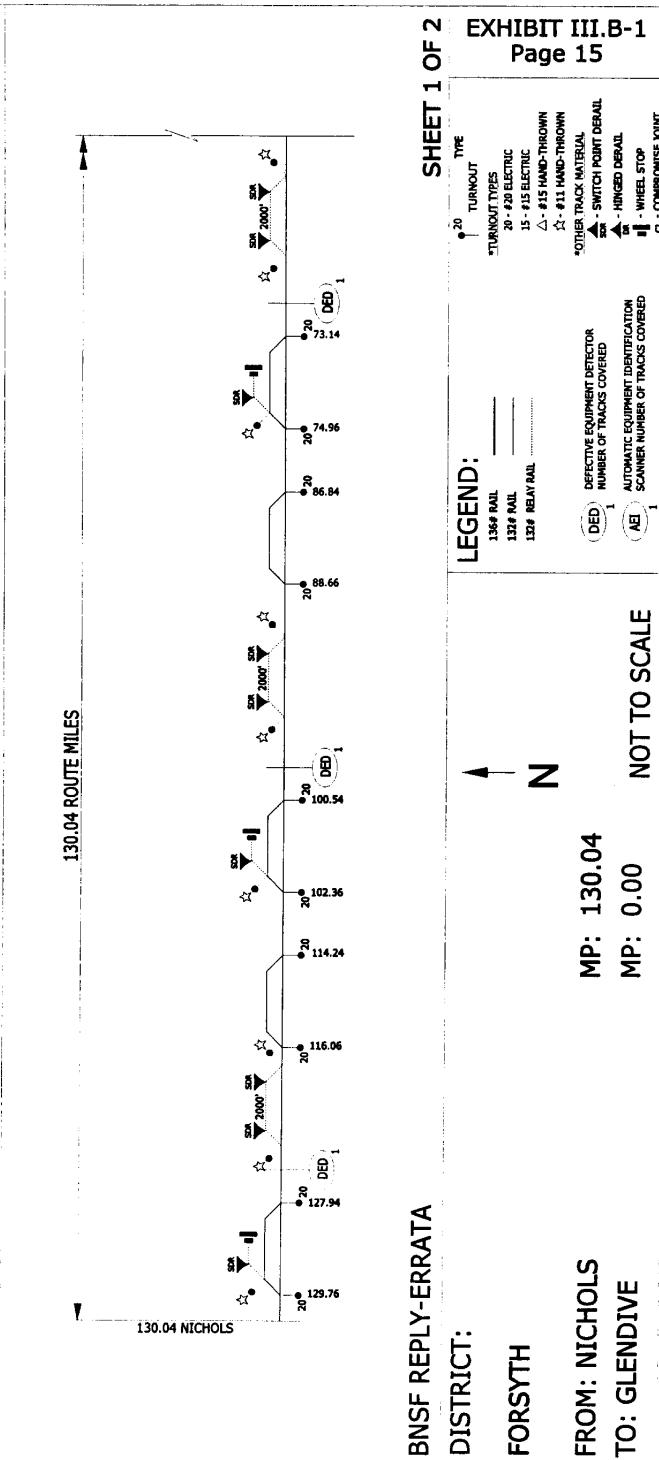
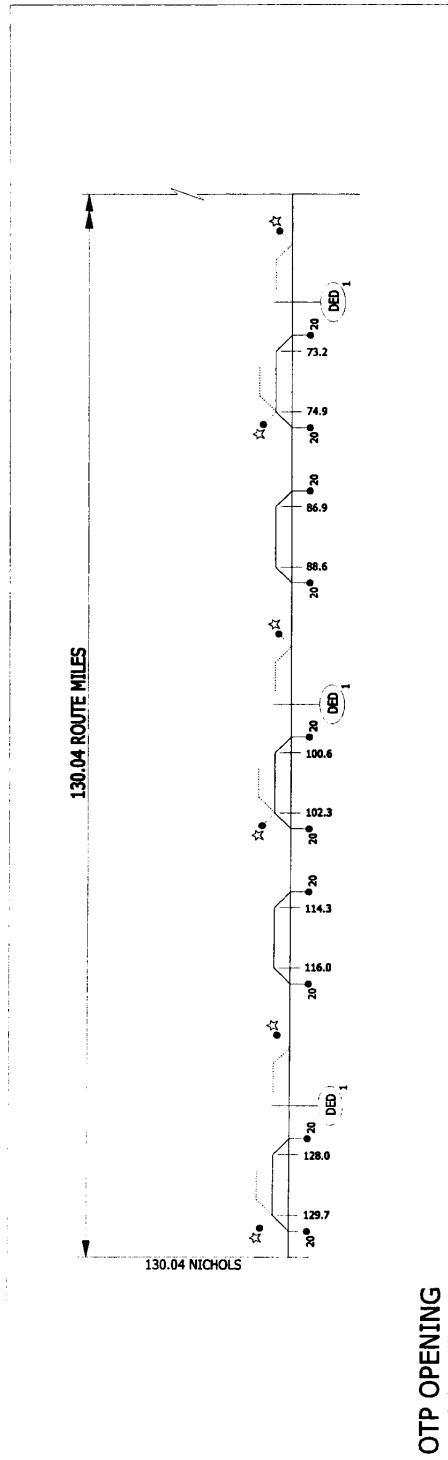
- TURNOUT
- TURNOUT TYPES
- 20 - #20 ELECTRIC
- 15 - #15 ELECTRIC
- △ - #15 HAND-THROWN
- ☆ - #11 HAND-THROWN
- *OTHER TRACK MATERIAL
- SW - SWITCH POINT DEBRIL
- SW - HINGED DEBRIL
- SW - WHEEL STOP
- SW - COMPROMISE JOINT
- DEFECTIVE EQUIPMENT DETECTOR
- NUMBER OF TRACKS COVERED
- 1
- AEI
- 1
- 136# RAIL
- 132# RAIL
- 132# RELAY RAIL

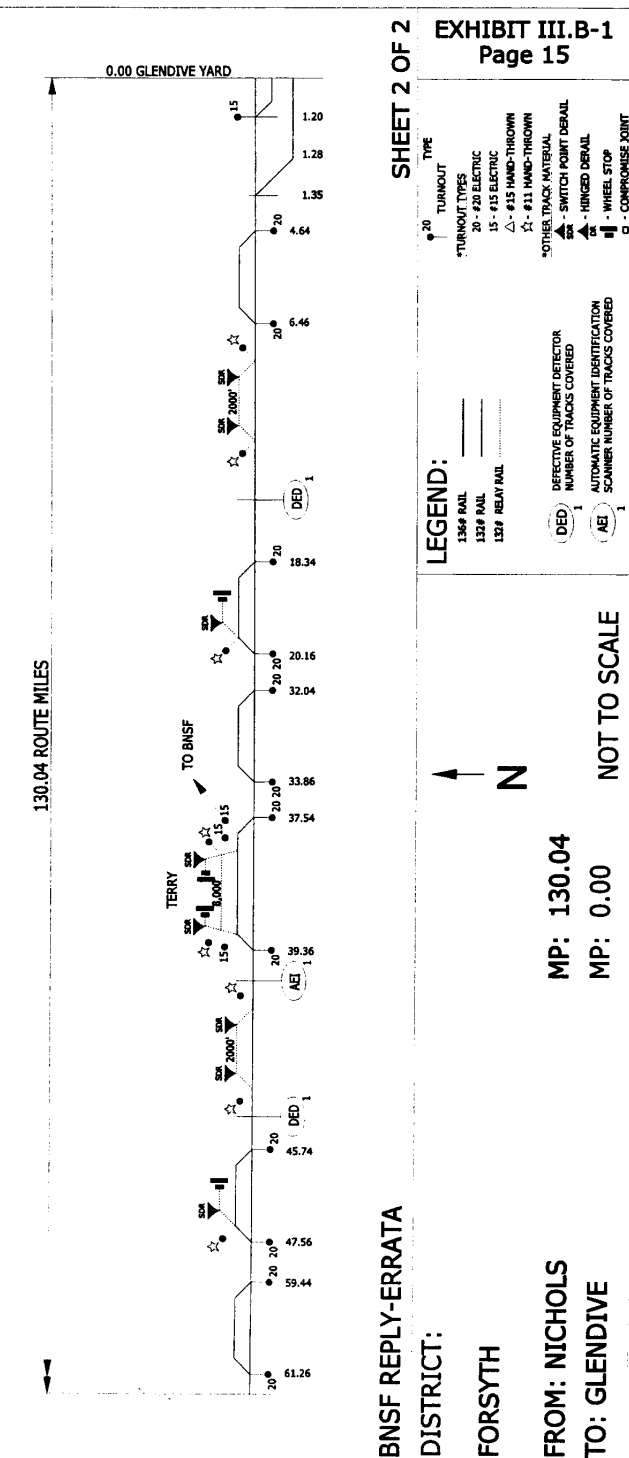
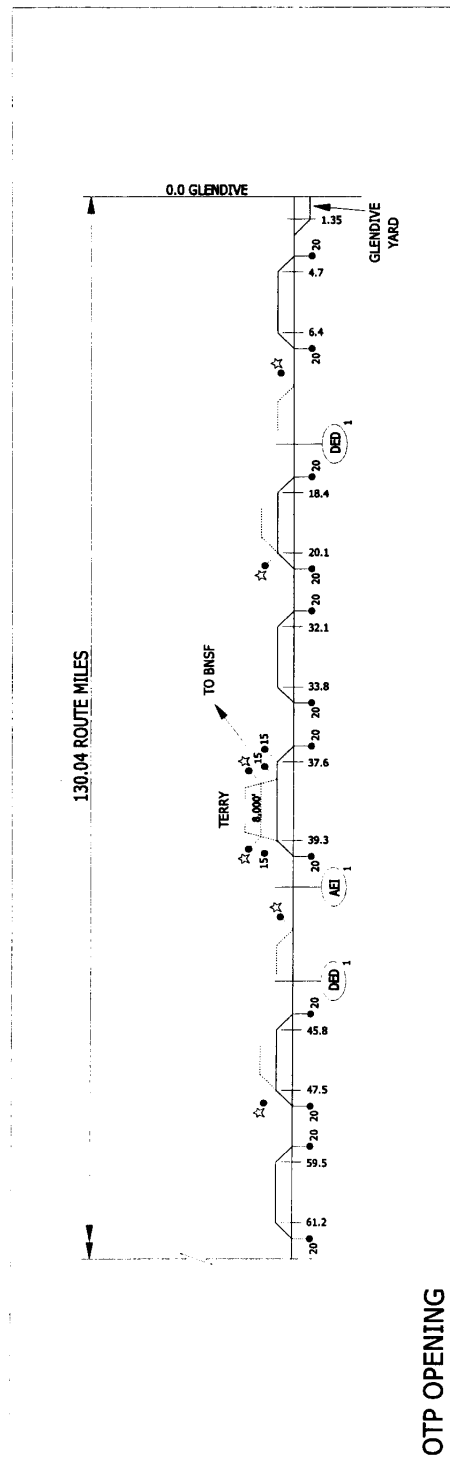
EXHIBIT III.B-1
Page 11

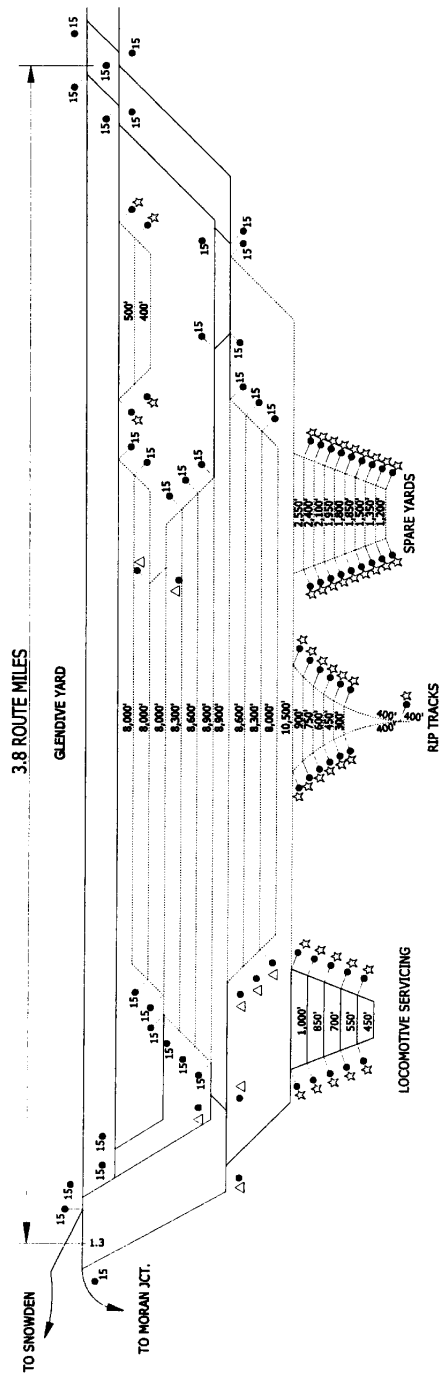












OTP OPENING
DISTRICT:

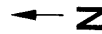
GLENDIVE YARD

SHEET 1 OF 2

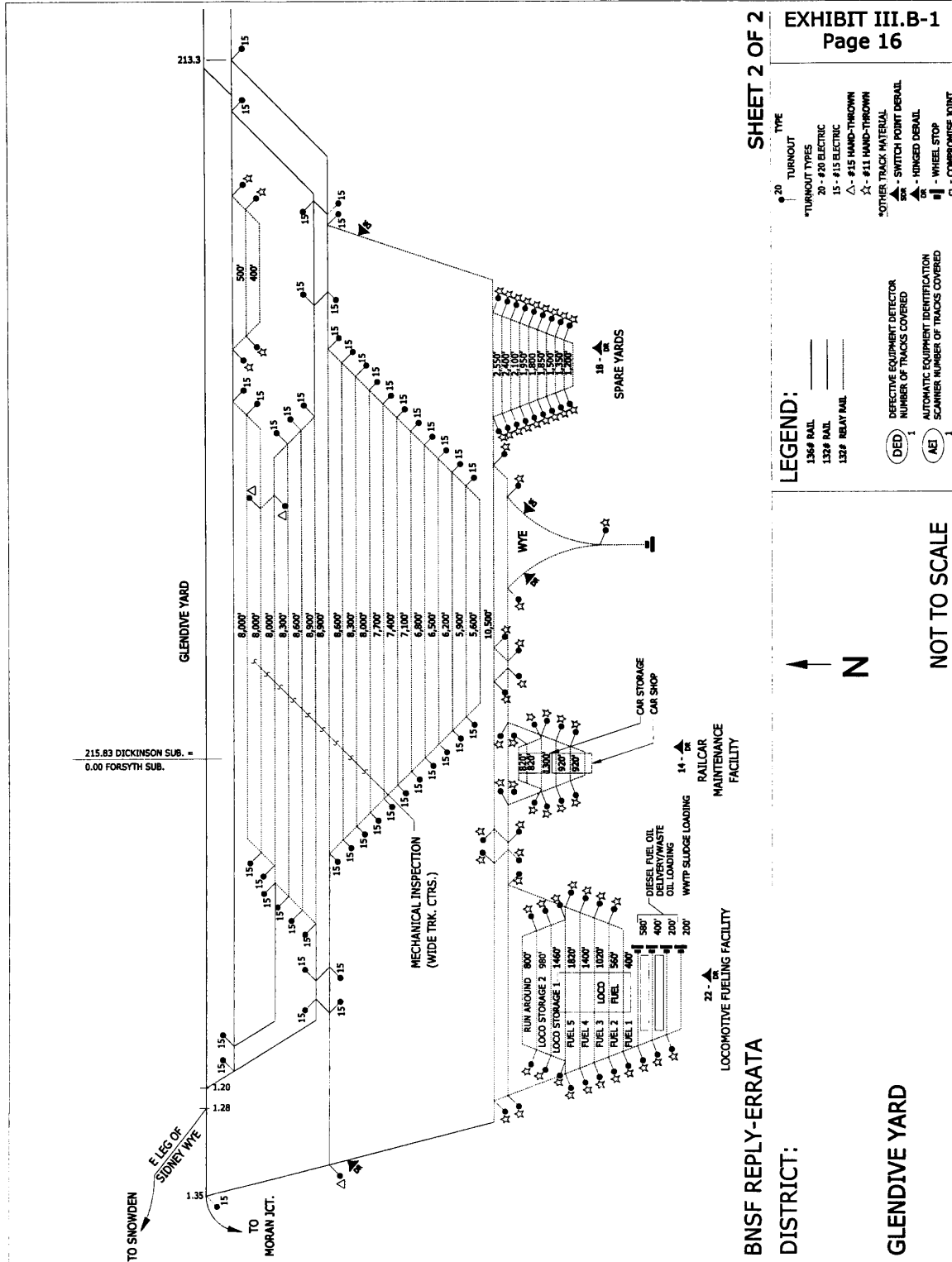
EXHIBIT III.B-1
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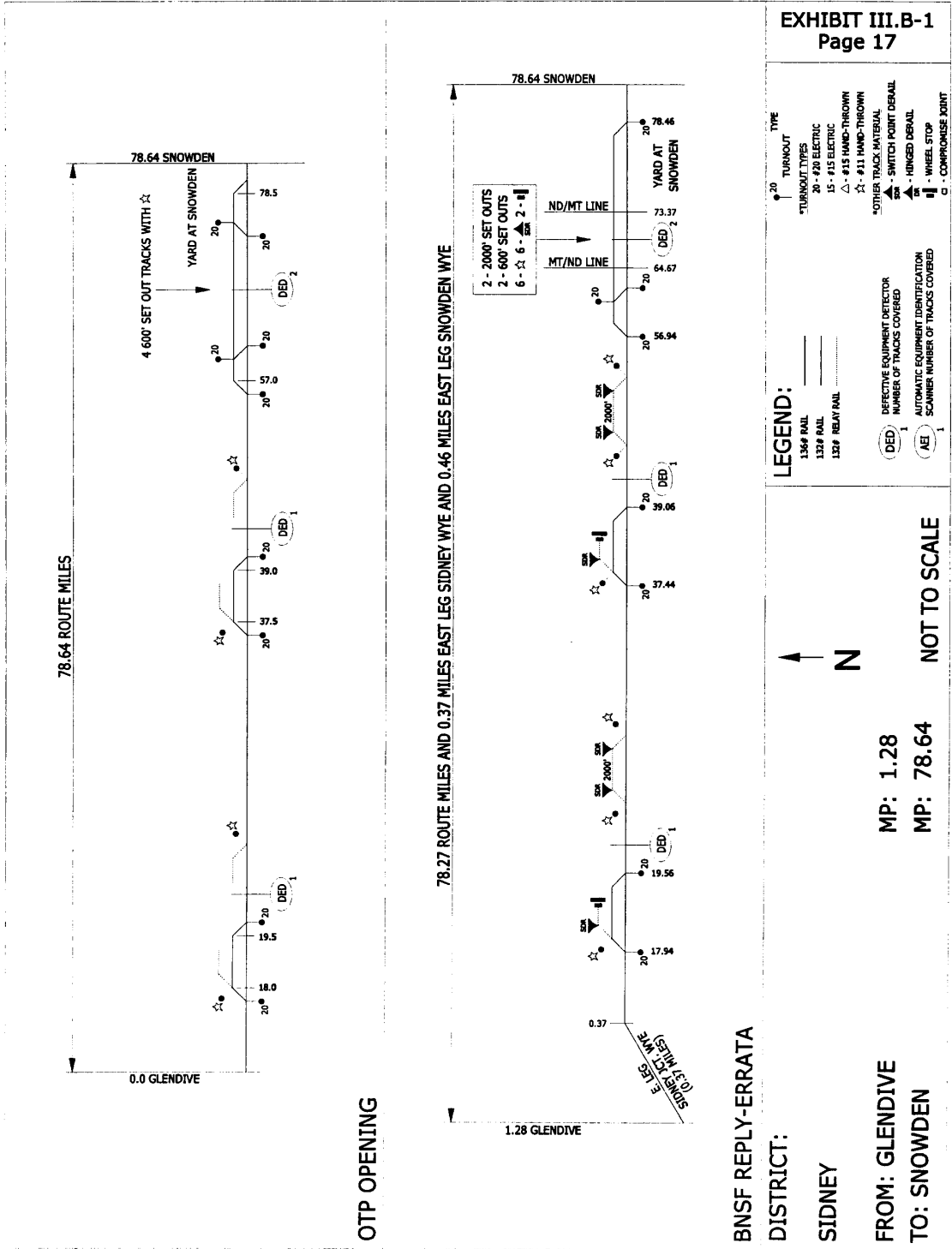
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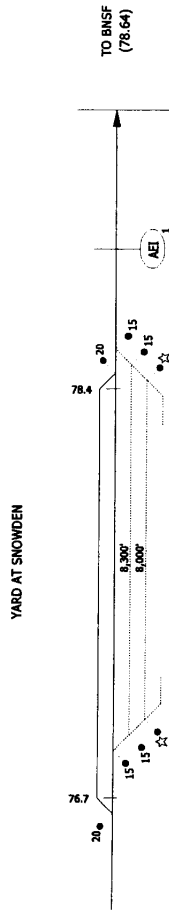
TYPE	TURNOUT
TURNOUT TYPES	20 - #20 ELECTRIC
	15 - #15 ELECTRIC
	△ - #15 HAND-THROWN
	☆ - #11 HAND-THROWN
	△ - OTHER TRACK MATERIAL
	▲ - SWITCH POINT DETAIL
	▲ - HINGED DETAIL
	■ - WHEEL STOP
	□ - COMPROMISE JOINT
DEFECTIVE EQUIPMENT DETECTOR NUMBER OF TRACKS COVERED	DED 1
AUTOMATIC EQUIPMENT IDENTIFICATION SCANNER NUMBER OF TRACKS COVERED	AEI 1



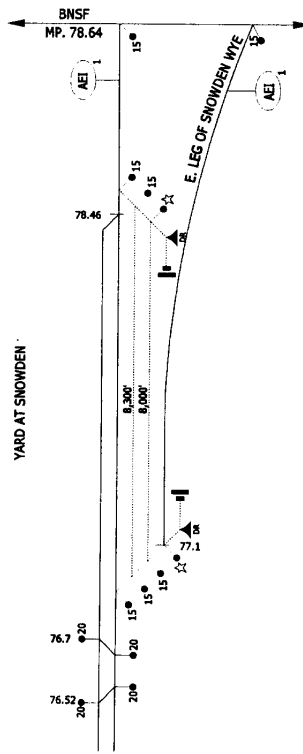
NOT TO SCALE







OTP OPENING



YARD AT SNOWDEN

BNSF REPLY-ERRATA

DISTRICT:

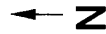
SIDNEY

SNOWDEN YARD

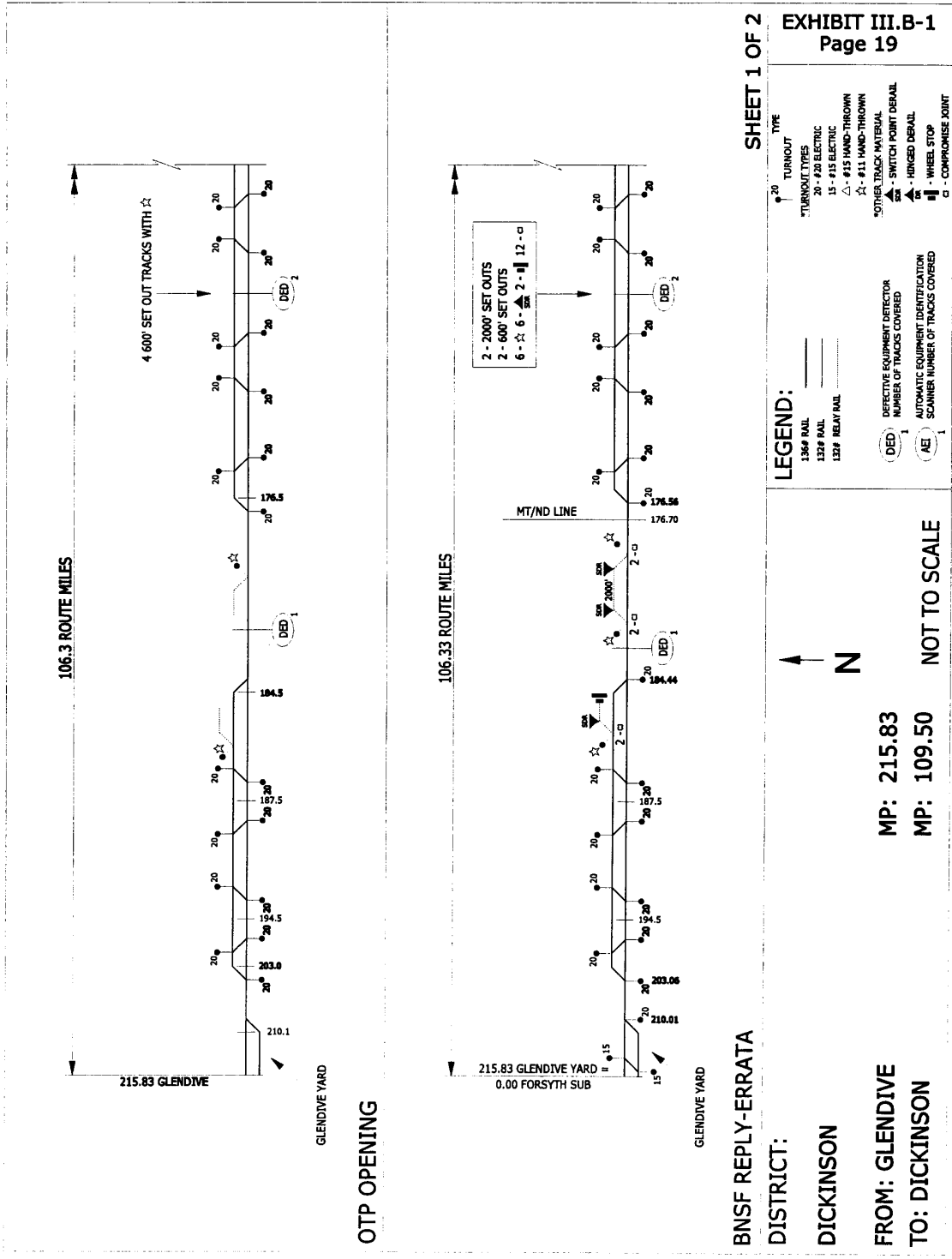
EXHIBIT III.B-1
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TYPE	TURNOUT
TURNOUT TYPES	
20 - #20 ELECTRIC	
15 - #15 ELECTRIC	
15 - #15 HAND-THROWN	
15 - #11 HAND-THROWN	
OTHER TRACK MATERIAL	
SWITCH POINT DETAIL	
HINGED DETAIL	
WHEEL STOP	
COMPROMISE JOINT	

LEGEND:	
136# RAIL	
132# RAIL	
132# RELAY RAIL	
DEFECTIVE EQUIPMENT DETECTOR	
NUMBER OF TRACKS COVERED	
1	
AUTOMATIC EQUIPMENT IDENTIFICATION	
SCANNER NUMBER OF TRACKS COVERED	
1	



NOT TO SCALE

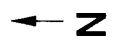


SHEET 1 OF 2

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LEGEND:

- TURNOUT
- TURNOUT TYPES
 - 20 - #20 ELECTRIC
 - 15 - #15 ELECTRIC
 - △ - #15 HAND-THROWN
 - ☆ - #11 HAND-THROWN
- OTHER TRACK MATERIAL
 - SW - SWITCH POINT DETAIL
 - SA - HINGED DETAIL
 - W - WHEEL STOP
 - - COMPROMISE JOINT
- DEFECTIVE EQUIPMENT DETECTOR
 - DEED 1
- NUMBER OF TRACKS COVERED
- AUTOMATIC EQUIPMENT IDENTIFICATION
 - AEI 1
- SCANNER NUMBER OF TRACKS COVERED



NOT TO SCALE

BNSF REPLY-ERRATA

DISTRICT:

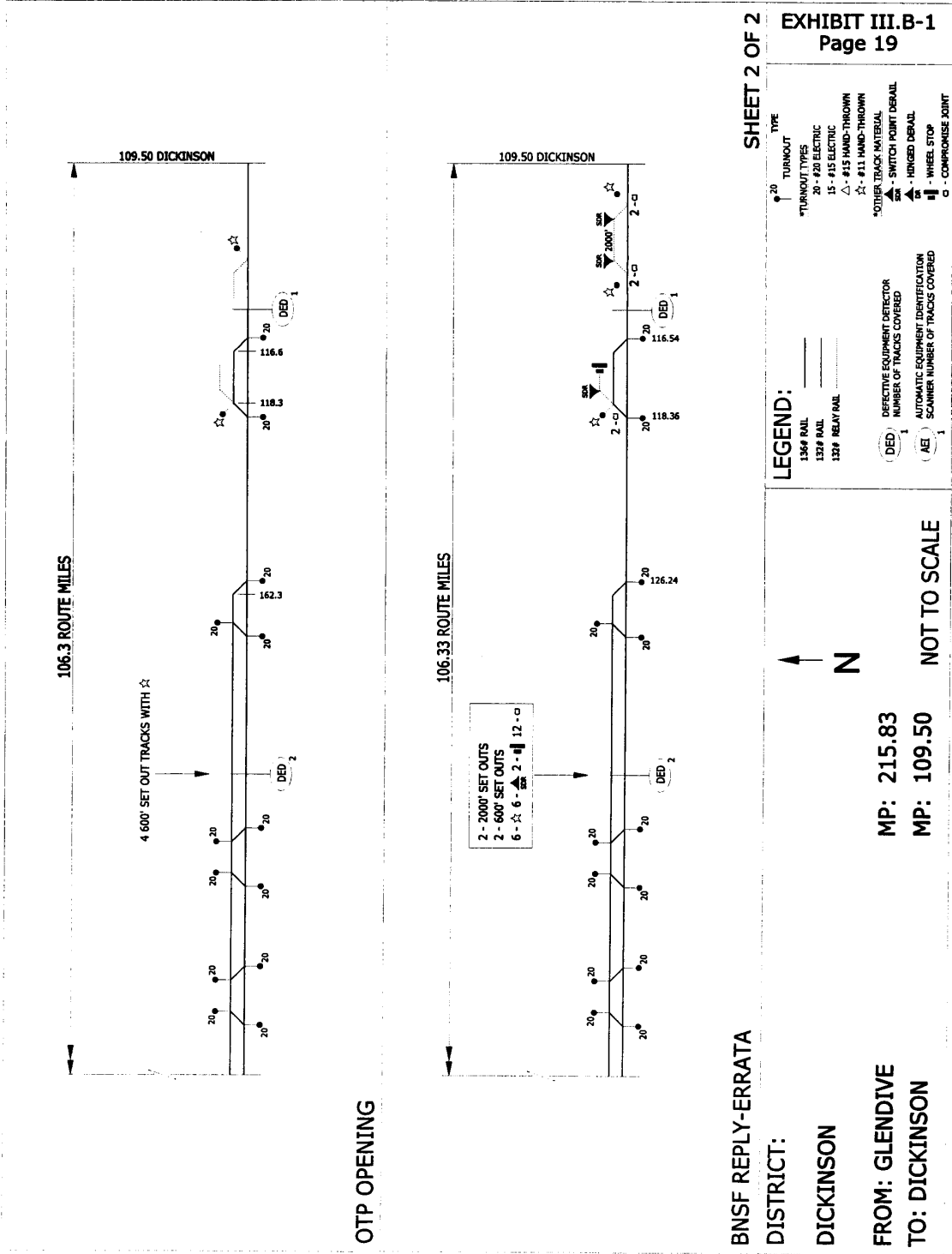
DICKINSON

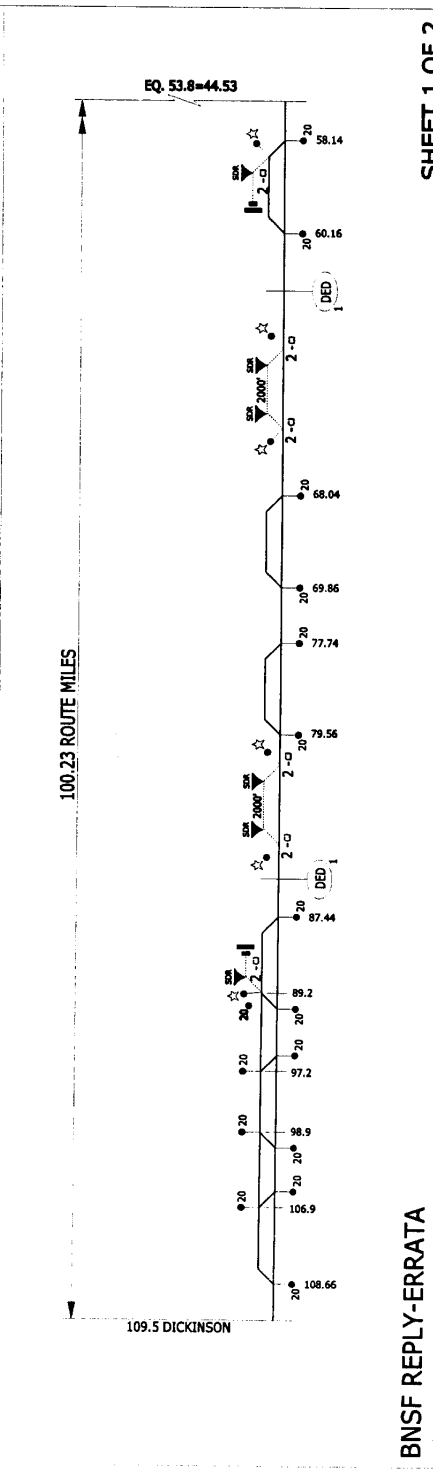
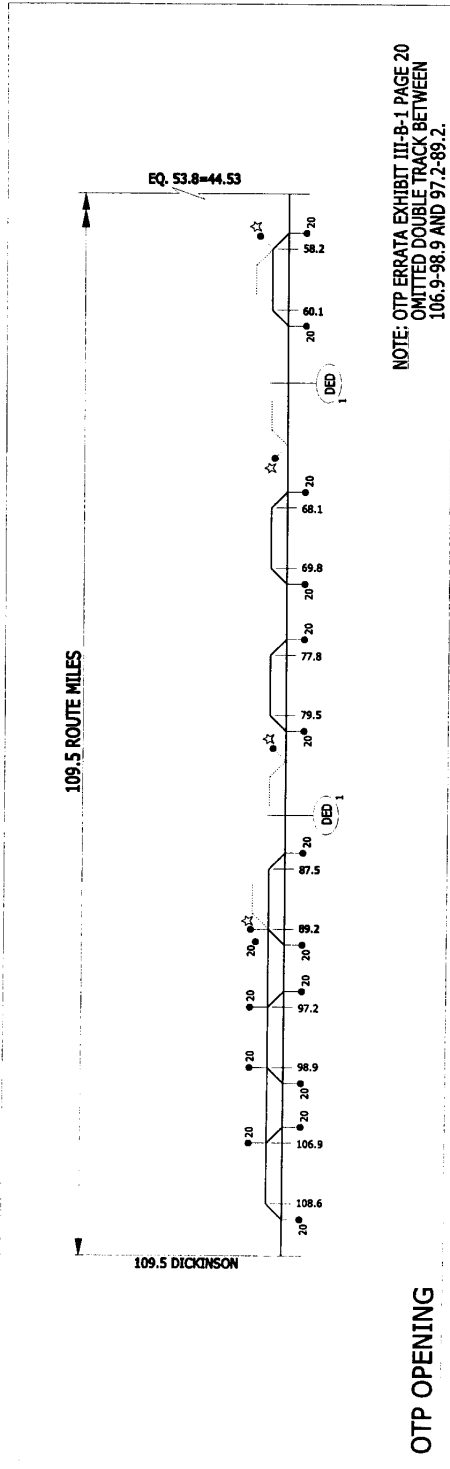
FROM: GLENDIVE

TO: DICKINSON

MP: 215.83

MP: 109.50





BNSF REPLY-ERRATA

DISTRICT:

DICKINSON

FROM: DICKINSON

TO: MANDAN

MP: 109.5

MP: 0.0

NOT TO SCALE

↑ N

LEGEND:

136F RAIL

132F RAIL

132F RELAY RAIL

DEFECTIVE EQUIPMENT DETECTOR
NUMBER OF TRACKS COVERED

AUTOMATIC EQUIPMENT IDENTIFICATION
SCANNER NUMBER OF TRACKS COVERED

TURNOUT

20 - #20 ELECTRIC

15 - #15 ELECTRIC

△ - #15 HAND-THROWN

☆ - #11 HAND-THROWN

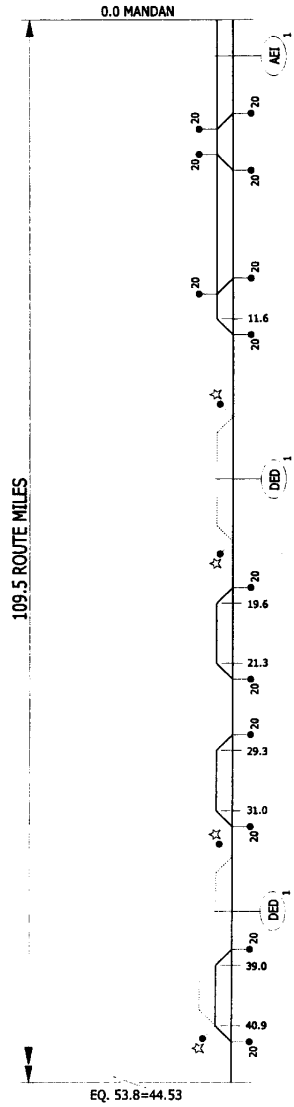
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SWITCH POINT DEBALL

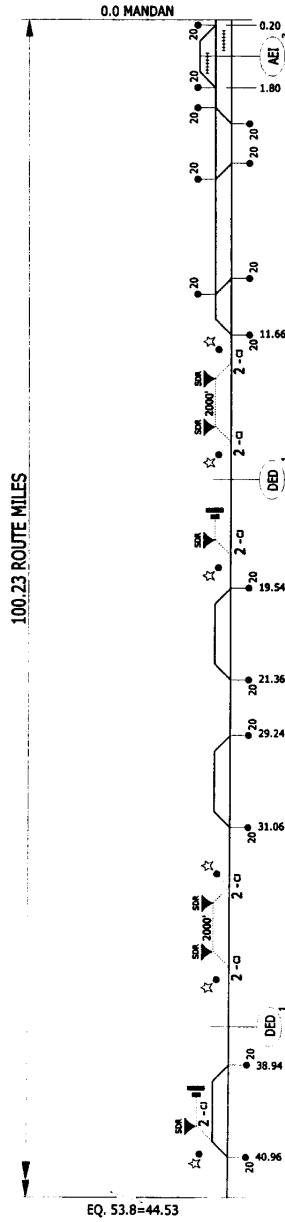
HINGED DEBALL

WHEEL STOP

COMPROMISE JOINT



OTP OPENING



BNSF REPLY-ERRATA

DISTRICT:

DICKINSON

FROM: DICKINSON

TO: MANDAN

MP: 109.5

MP: 0.0

NOT TO SCALE

LEGEND:

- 136# RAIL
- 132# RAIL
- 132# REAR RAIL
- RUE RACS

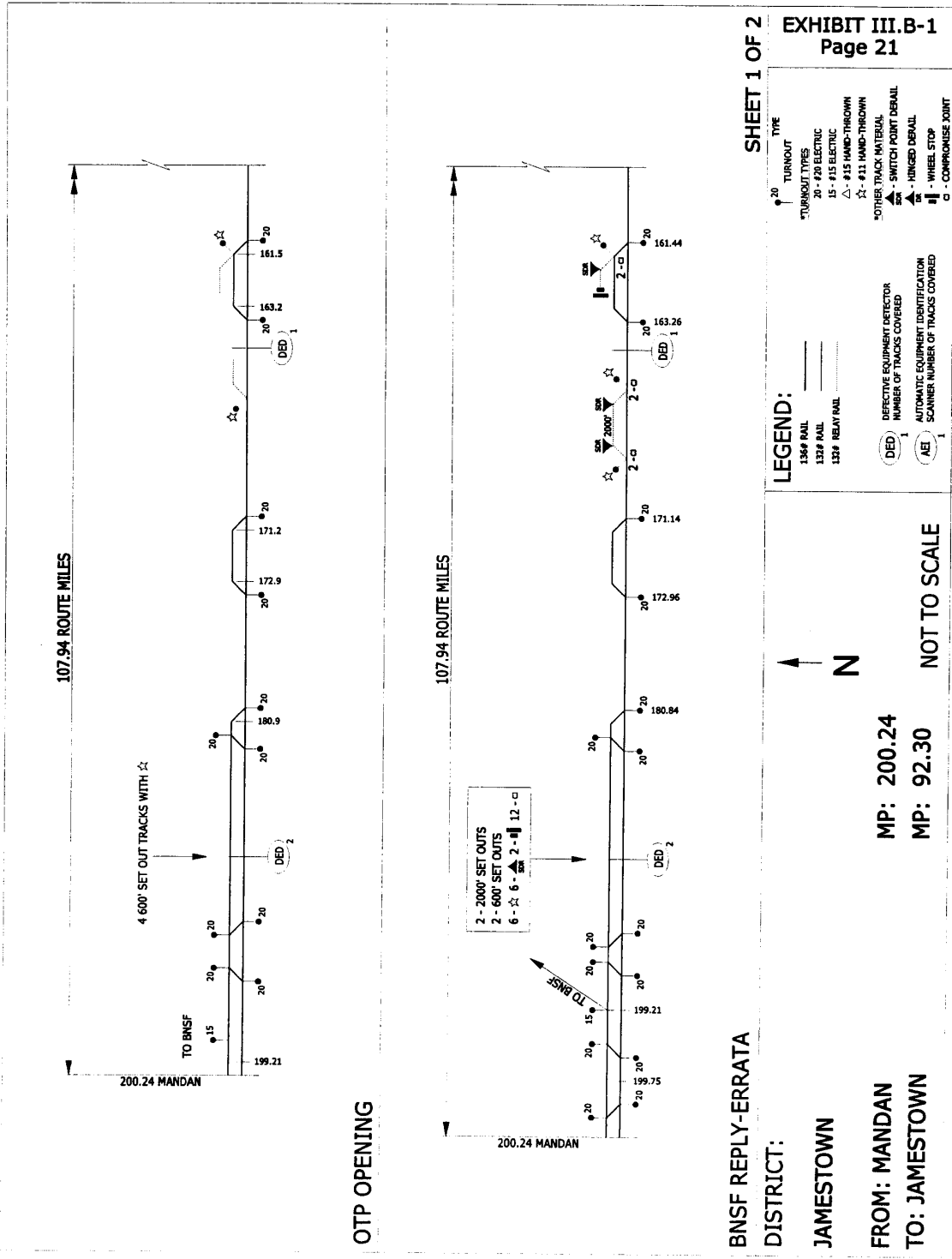
- (DEB) DEFECTIVE EQUIPMENT DETECTOR
NUMBER OF TRACKS COVERED
- (AEI) AUTOMATIC EQUIPMENT IDENTIFICATION
SCANNER NUMBER OF TRACKS COVERED

TURNOUT

- *TURNOUT TYPES
- 20 - #12 ELECTRIC
- 15 - #15 ELECTRIC
- △ - #15 HAND-THROWN
- ☆ - #11 HAND-THROWN
- *OTHER TRACK MATERIAL
- △ - SWITCH POINT DETAIL
- ▲ - HINGED DETAIL
- - WHEEL STOP
- - COMPROMISE JOINT

SHEET 2 OF 2

EXHIBIT III.B-1
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OTP OPENING

BNSF REPLY-ERRATA

DISTRICT:

JAMESTOWN

FROM: MANDAN

TO: JAMESTOWN

MP: 200.24

MP: 92.30

NOT TO SCALE

SHEET 1 OF 2

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LEGEND:

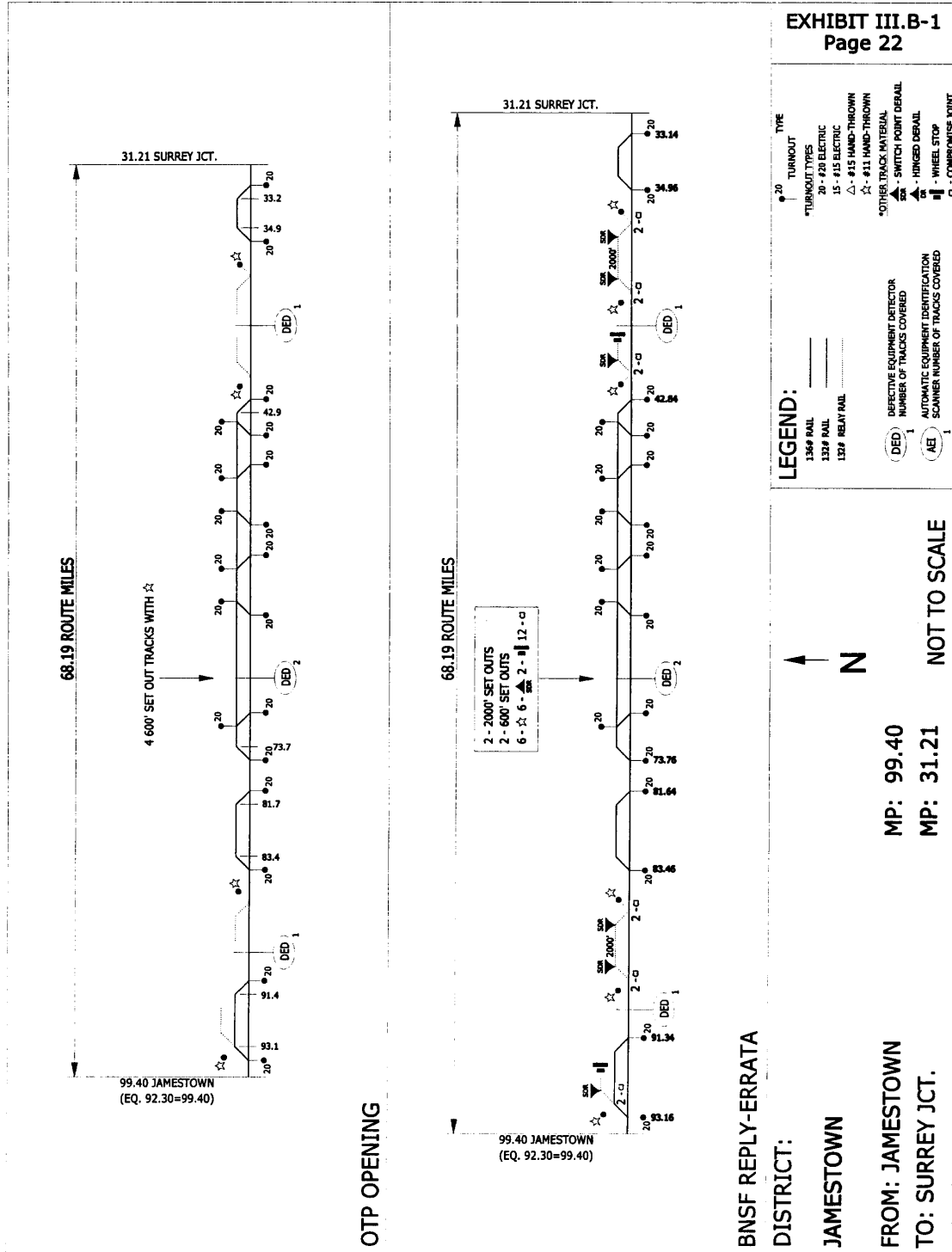
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132# RAIL	TURNOUT TYPES	20	20 - #20 ELECTRIC
132# RAIL	15 - #15 ELECTRIC	15	15 - #15 ELECTRIC
132# RAIL	15 - #15 HAND-THROWN	15	15 - #15 HAND-THROWN
	☆ - #11 HAND-THROWN	☆	☆ - #11 HAND-THROWN
	☆ - OTHER TRACK MATERIAL	☆	☆ - OTHER TRACK MATERIAL
	SWITCH POINT DETAIL	SW	SW - SWITCH POINT DETAIL
	HINGED DETAIL	HD	HD - HINGED DETAIL
	WHEEL STOP	WS	WS - WHEEL STOP
	COMPROMISE JOINT	CJ	CJ - COMPROMISE JOINT

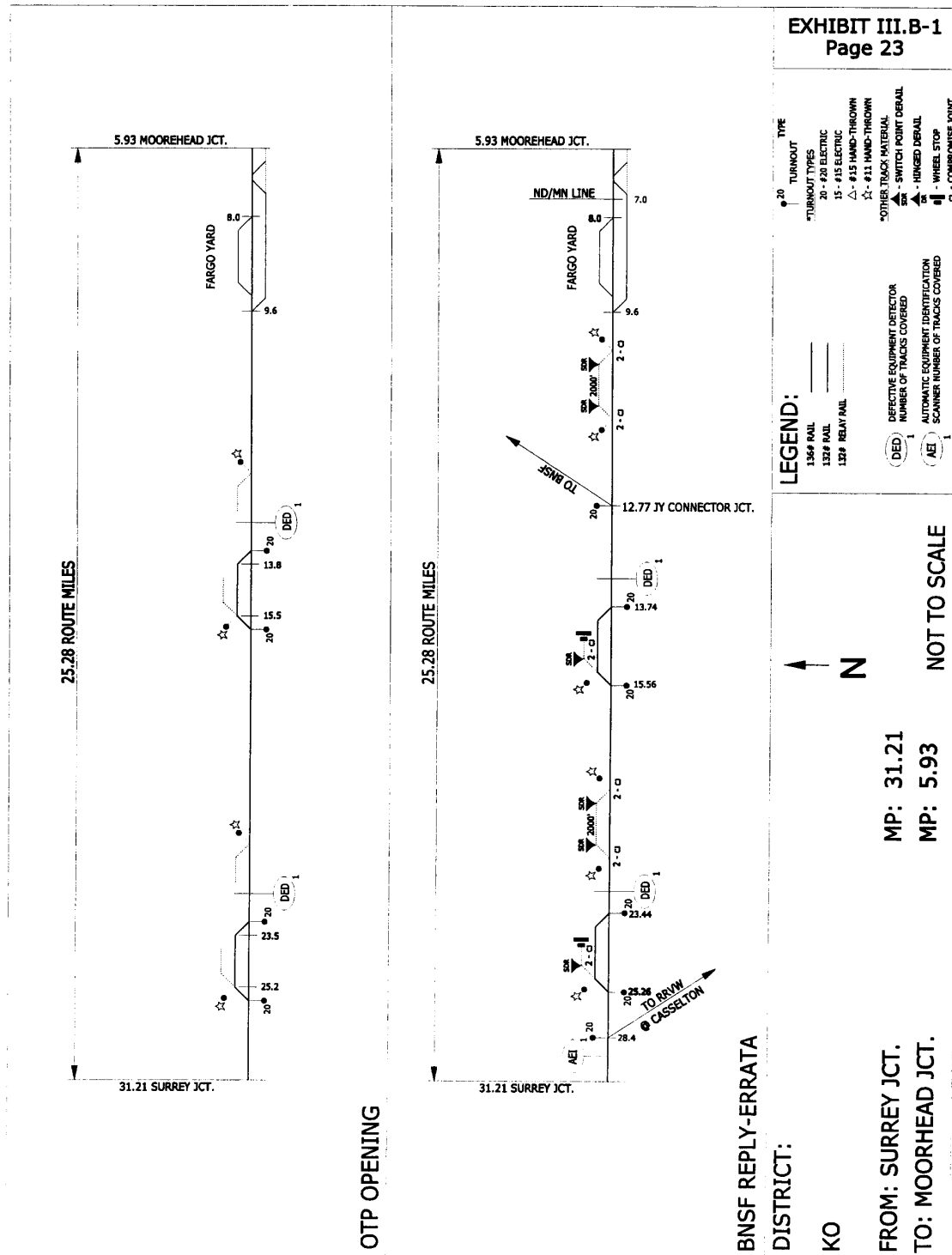
DEFECTIVE EQUIPMENT DETECTOR
NUMBER OF TRACKS COVERED

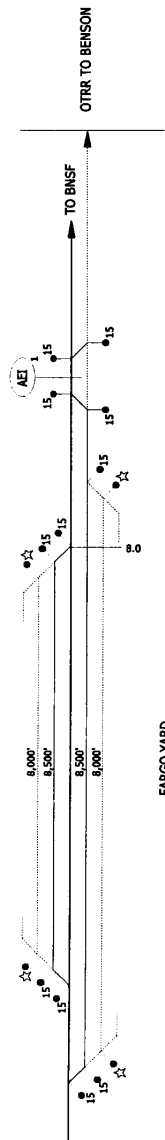
AUTOMATIC EQUIPMENT IDENTIFICATION
SCANNER NUMBER OF TRACKS COVERED

DED 1
AEI 1

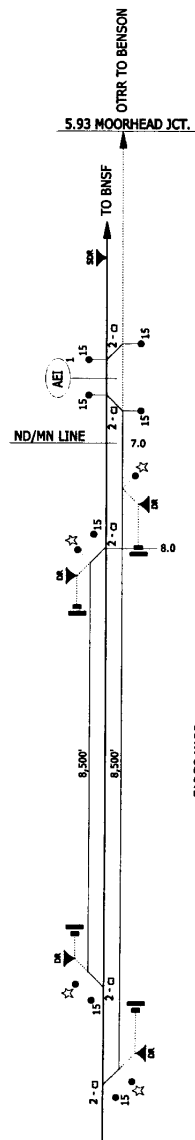
EXHIBIT III.B-1
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OTP OPENING



BNSF REPLY-ERRATA

DISTRICT:

KO

FARGO YARD

LEGEND:

136# RAIL
137# RAIL
137# RELAY RAIL

TYPE
TURNOUT

***TURNOUT TYPES**
20 - #20 ELECTRIC
15 - #15 ELECTRIC
△ - #15 HAND-TH
☆ - #11 HAND-TH

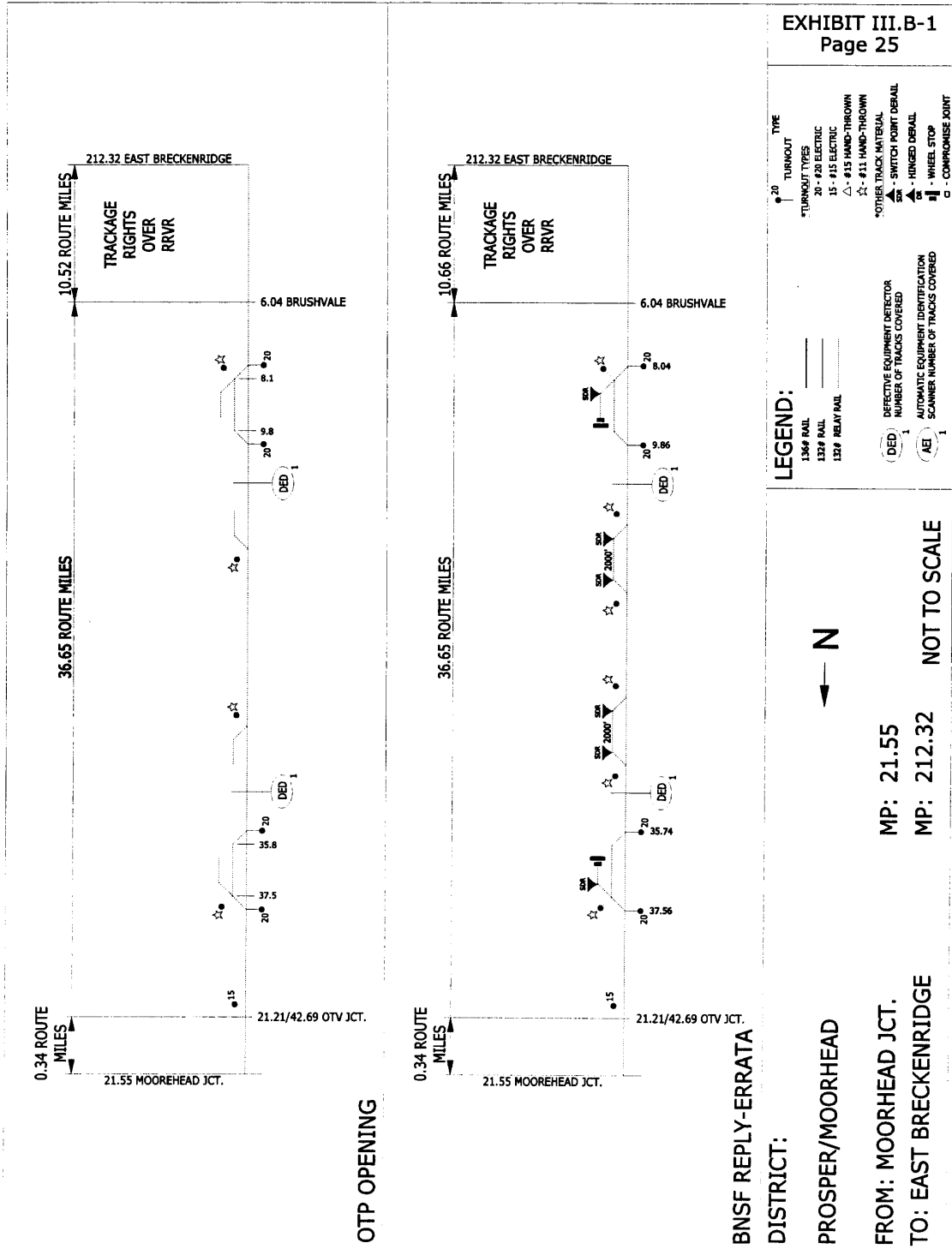
***OTHER TRACK MATERIAL**

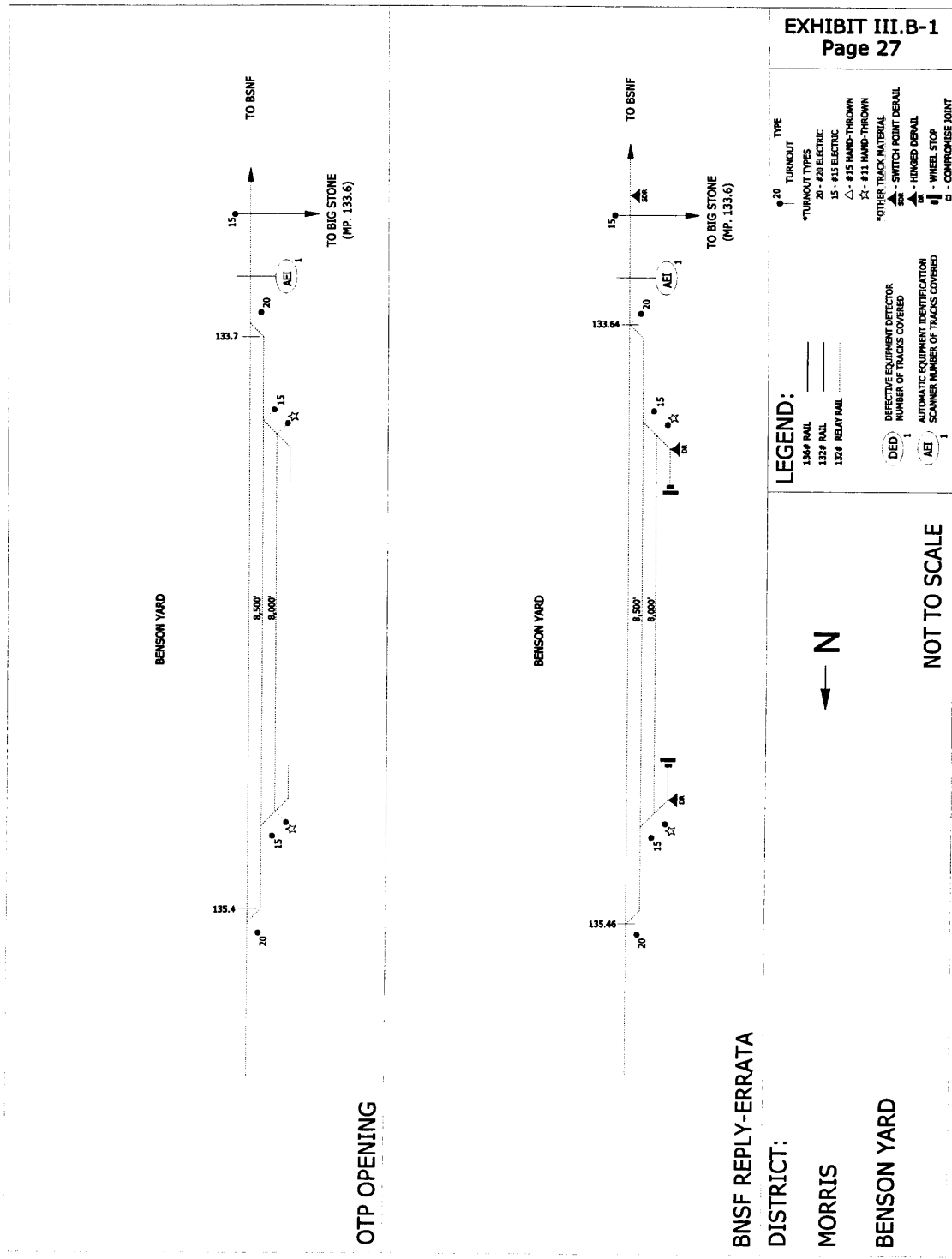
DEFECTIVE EQUIPMENT DETECTOR
NUMBER OF TRACKS COVERED

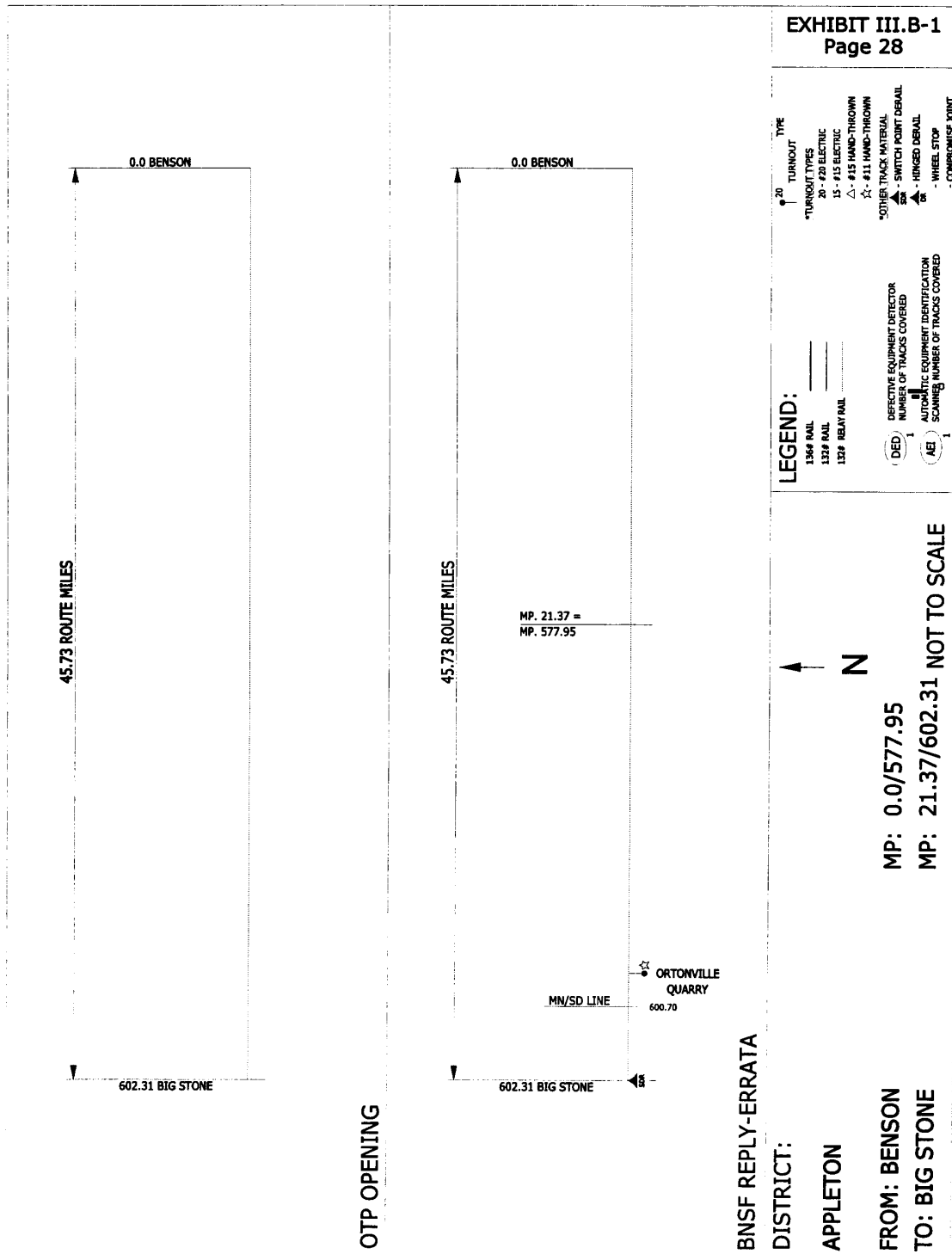
DED¹ AEI

NOT TO SCALE

→ Z







**Attachments 2 Through 10 Have Been
Redacted**