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March 22, 2004

Via HAND DELIVERY

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

ENTERED
Office of Proceedings

MAR 22 2004

Part of
Public Record



Re: **STB Docket No. 42057, *Public Service Company of Colorado d/b/a Xcel Energy v. The Burlington Northern and Santa Fe Railway Company***

Dear Secretary Williams:

Enclosed for filing are the original and ten copies of exhibits used by counsel for The Burlington Northern and Santa Fe Railway Company in the March 18, 2004 oral argument in the above-referenced proceeding. Please note that this filing includes color documents.

Please date stamp the extra copy of this filing and return it with our messenger. If you have any questions regarding this matter, please contact the undersigned.

Sincerely,

Anthony J. LaRocca

Enclosures

cc: Counsel for Complainant

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Office of Proceedings

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Public Record

- 1 -

WASHINGTON

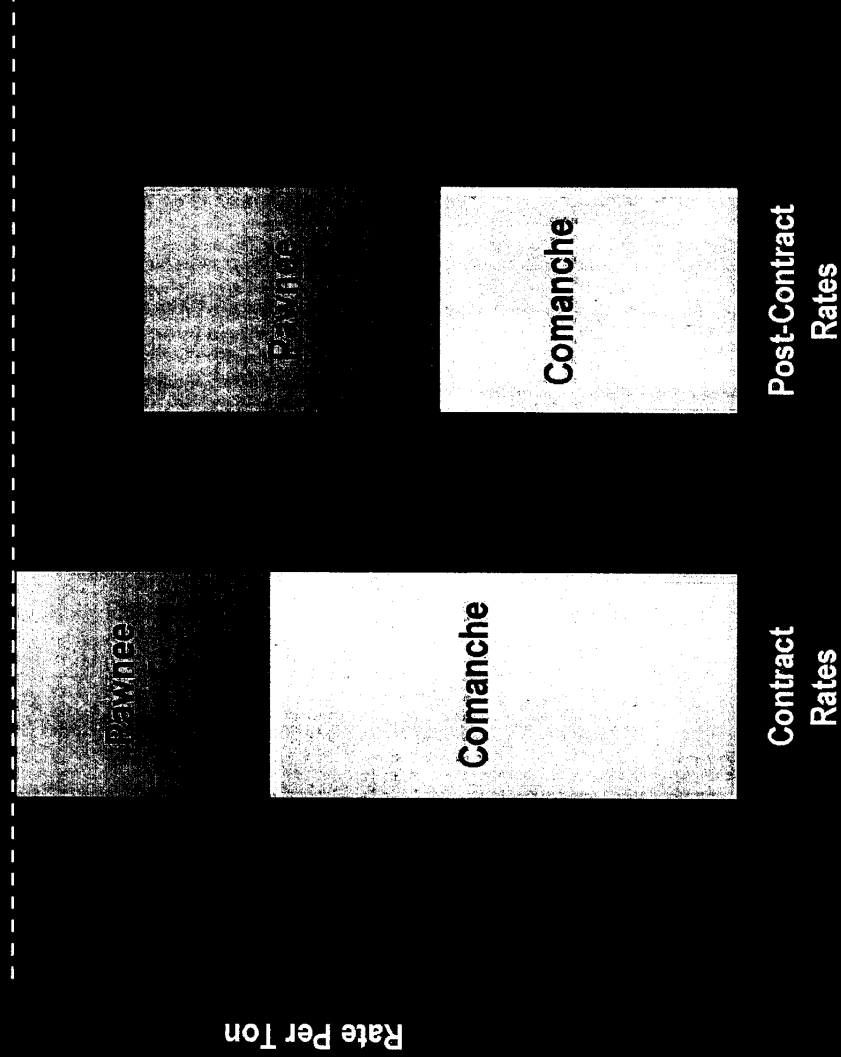
PHOENIX

LOS ANGELES

LONDON

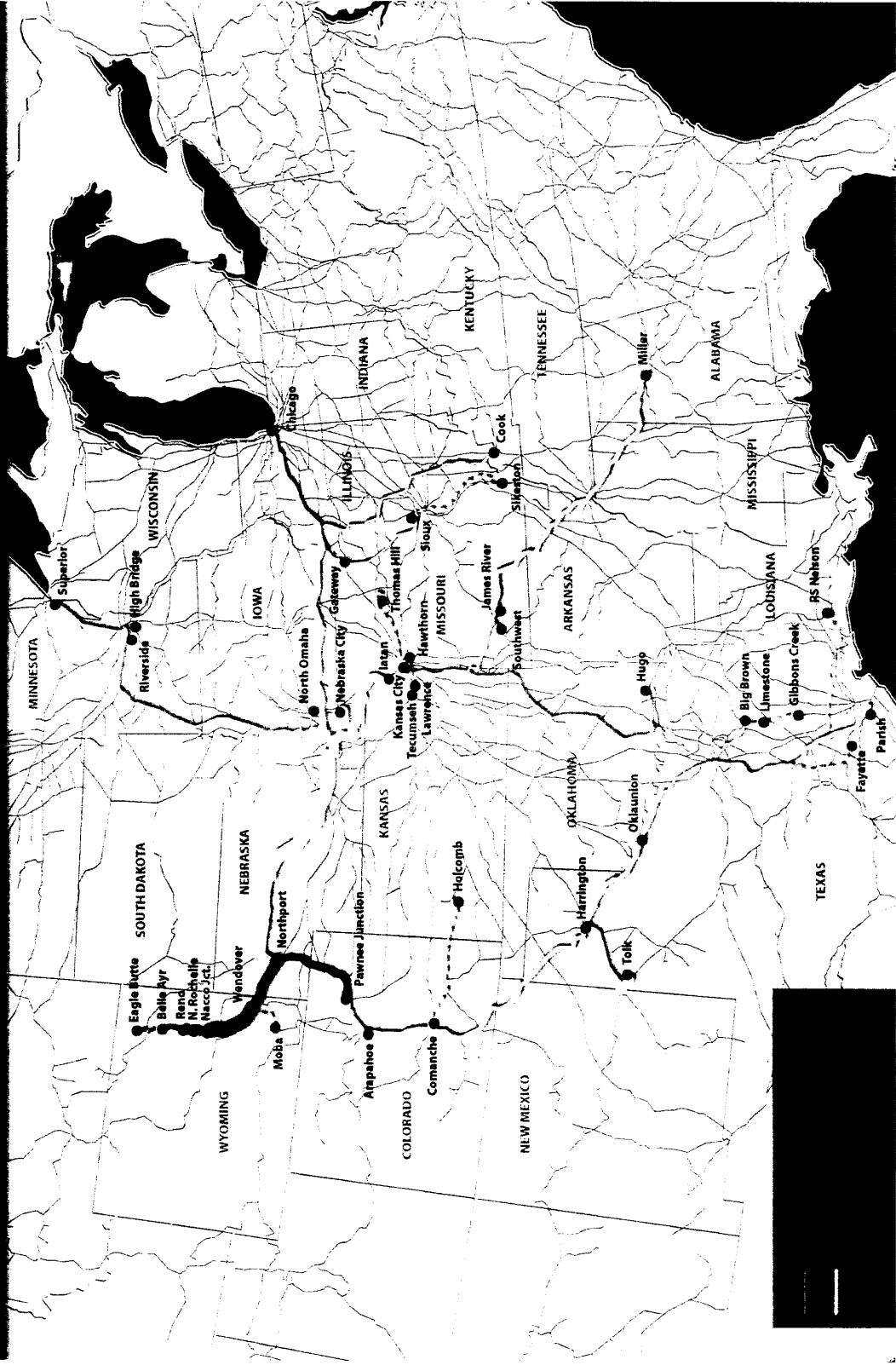
BRUSSELS

Rate Comparison Contract and Post-Contract



*Actual rates/ton not shown due to confidentiality

Xcel's SARR Includes Only A Small Portion of Facilities Needed For Cross-over Movements



DARA Is A Superior Approach To Revenue Allocation
Than MMP/MSP

DARA Distinguishes Between Attributable And
Unattributable Costs

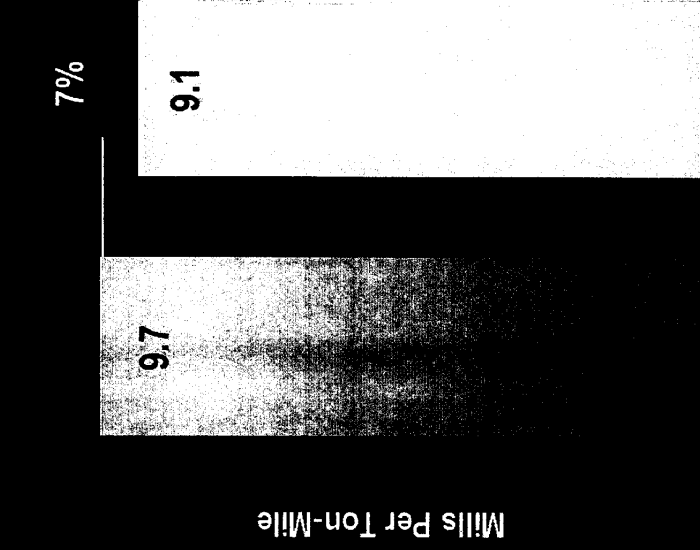
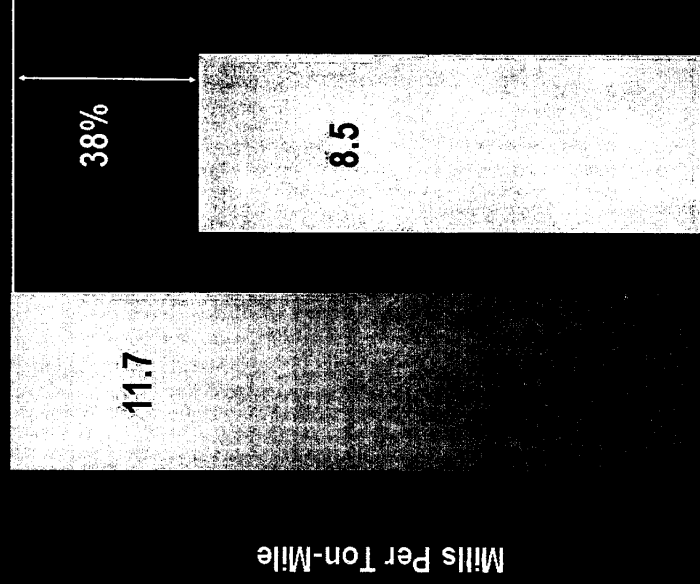
DARA More Precisely Develops The Costs Of
Originating And Terminating Traffic

DARA Takes Account Of Economies Of Density

Comparison of Cross-Over Traffic Revenue Allocations to WCC and Residual BNSF under MMP and DARA

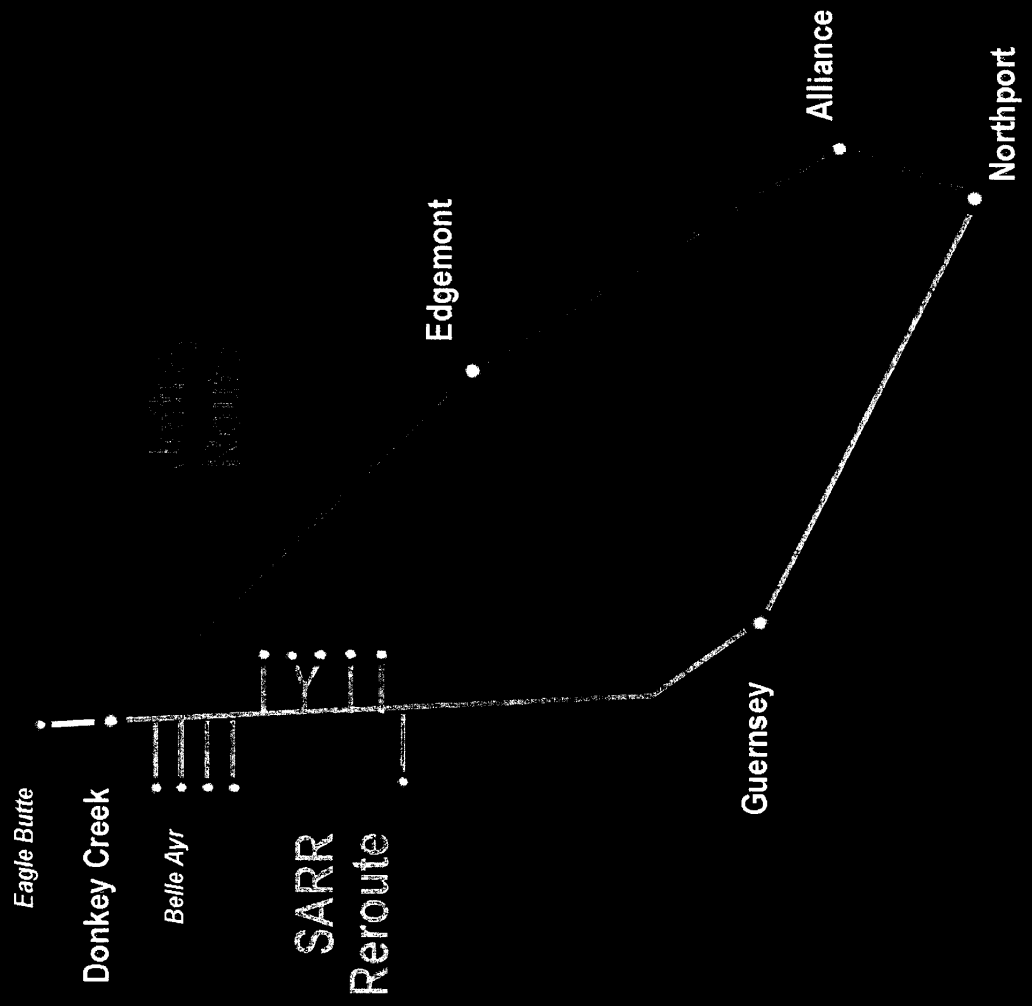
MMP (XCEL)

DARA (BNSF)



* Data from BNSF Reply narrative page III.A-71, Table III.A-9

BNSF's Jeffrey Route and SARR Reroute



Jeffrey Traffic Should Be Excluded

Jeffrey Does Not Use The SARR Route

SARR Route Is Less Efficient

Longer Transit Times

Contract Requirements

The String Program Is Akin To Junk Science

Failed To Model Peak Traffic

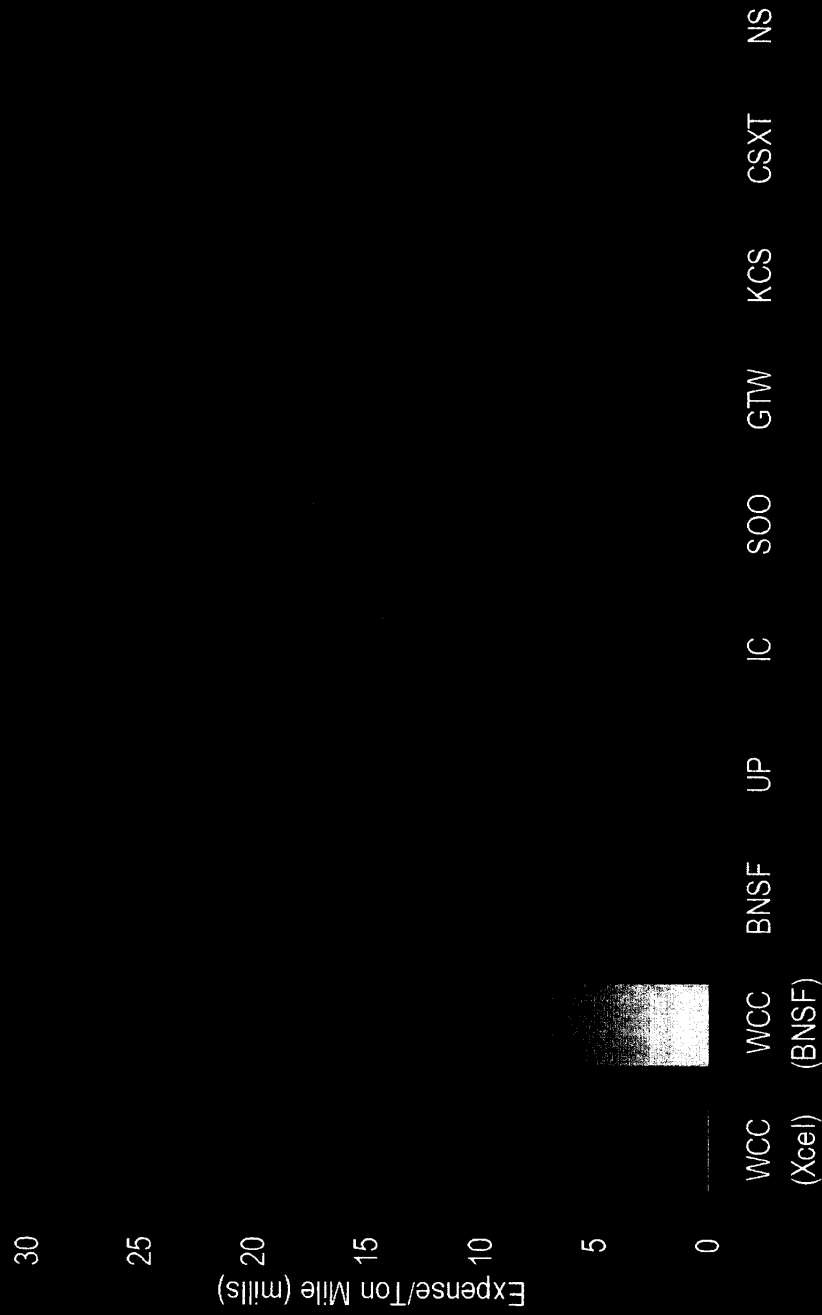
Did Not Model Continuously Cycling
Unit Train Operations

Failed To Detect Overloaded Sidings

Xcel's Attempts To Correct Errors In The String
Program Produced New Errors

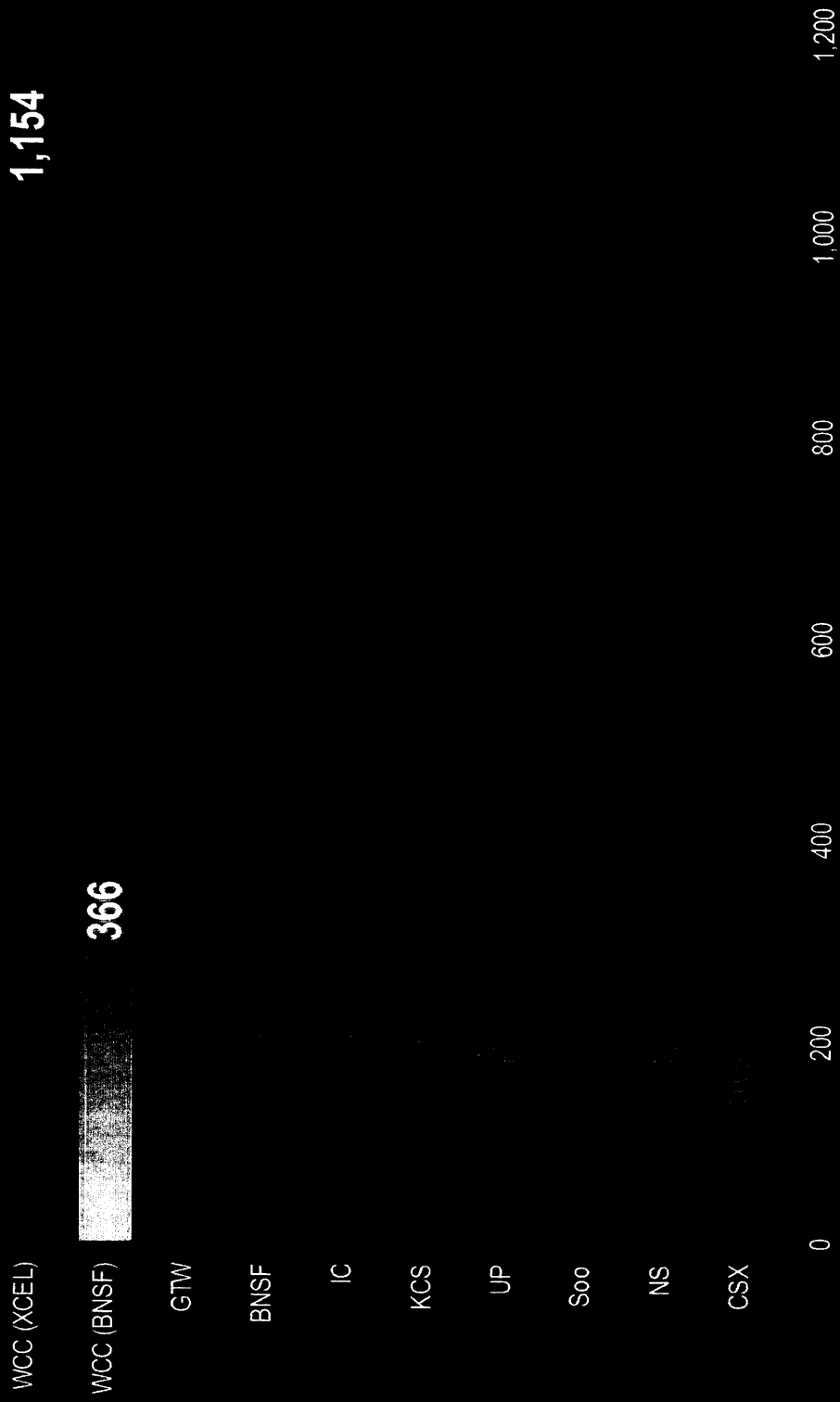
No Evidence of Real World Application, Unlike RTC

2001 Operating Expense Per Ton Mile (mills) Class I Railroads



* The Source for Class I data is *Analysis of Class I Railroads 2001*

2001 Operating Revenue Per Employee



Revenues (000s)
 * The source for Class I data is Railroad Ten Year Trends at 34, 93.