

211830

-PUBLIC VERSION-



BEFORE THE
SURFACE TRANSPORTATION BOARD

AEP TEXAS NORTH COMPANY	)	
	)	
Complainant,	)	
	)	
v.	)	Docket No. 41191 (Sub-No. 1)
	)	
THE BURLINGTON NORTHERN AND	)	ENTERED
SANTA FE RAILWAY COMPANY	)	Office of Proceedings
	)	AUG 18 2004
	)	
Defendant.	)	Part of Public Record

**ERRATA TO REBUTTAL EVIDENCE OF COMPLAINANT
AEP TEXAS NORTH COMPANY**

AEP Texas North Company ("AEP Texas") submits the following errata to its Rebuttal Evidence filed in this proceeding on July 27, 2004.

Narrative

Page	Line(s)/Location	Change
I-17	Line 10	Strike "II." and insert "pp."
I-41	Line 14	Insert "[sic]" between "is" and "was"
I-41	Insert after block quote	<i>See U.S. ex. rel. Louisville Cement Co. v. I.C.C.</i> , 246 U.S. 638, 642 (1918)

II-A-19	Line 2	Strike “continuing”
II-A-60	Line 6	Strike “counsel” and insert “itself”
II-A-72	Line 24	Strike “lower fees and” and insert “locomotives used in”
II-A-101	Line 21	Strike “agreement” and insert “argument”
II-A-151	Line 7	Strike “inputting” and insert “imputation”
II-A-151	Line 8	Strike “our” and insert “one”
III-A-54	Fn. 62	Strike “connects” and insert “corrects”
III-B-34	Line 8	Strike “869” and insert “860”
III-D-15	Line 10	Strike “Amarillo” and insert “Alliance”
III-D-53	Line 6	Strike “Manager” and insert “Director”
III-D-174	Line 15	Insert “wood” between “new” and “tie”
III-D-194	Line 3	Strike “170” and insert “165”; strike “its” and insert “his”
III-D-194	Line 5	Strike “North Platte” and insert “O’Fallons”; Strike “70” and insert “41”
III-D-194	Line 6	Strike “O’Fallons” and insert “South Morrill”
III-D-194	Line 9	Strike “70” and insert “45”

III-D-196	Line 13	Strike "AEP Texas will require" and insert "The TNR will not require separate"
III-D-207	Line 8	Strike "53.7" and insert "56.6"
III-D-207	Line 9	Strike "27.9" and insert "29.8"
III-F-1	Table III-F-5	Corrected Table is enclosed.
III-F-93	Line 2	Insert "not" between "are" and "shown"
III-F-96	Line 18	Strike "eight" and insert "12" and strike "12" and insert "eight" to read "AEP Texas used 12 inches of subballast and eight inches of ballast ..."
III-F-100	Line 12	Strike "eight" and insert "12" and strike "12" and insert "eight" to read "12 inches of subballast and eight inches of ballast..."
III-F-118	Line 19	Strike "with" and insert "which"
III-F-205	Line 9	Strike "county" and insert "soils map"
III-F-217	Fn. 12, last three lines	Should be indented as part of the above quote
III-H-8 to III-H-9	Table III-H-4	Corrected Table is enclosed.
III-H-11	Table III-H-5	Corrected Table is enclosed.

Exhibits

The following corrected Rebuttal Exhibits are submitted herewith: III-F-14, III-H-3, and III-H-4. These replacement Exhibits reflect the corrections in the electronic workpapers described *infra*. In addition, AEP Texas is submitting Exhibit II-A-152 supporting its 2Q04 Rebuttal variable cost calculations for movements from the Rawhide Mine. This exhibit was inadvertently omitted from AEP Texas' Rebuttal filing.

Electronic Workpapers

The electronic workpapers have been corrected as follows:

1. Adjusted the overhead bridge quantities to properly reflect the quantity of such bridges as described in the Rebuttal Narrative at III-F-189, n.11.
2. Adjusted the unit costs for track installation to reflect the Means-adjusted costs used by BNSF in Reply and noted in AEP Texas Rebuttal Narrative at III-F-120, n.9.
3. Corrected the mobilization percentages and applicability as described AEP Texas Rebuttal Narrative at III-F-192.
4. Corrected a linking problem that caused the quantity of FED1s to be overstated in cell D114 of tab "Totals" of "IIIFTTotal.xls."
5. Corrected linking errors in "SpotMaint.xls." that caused Excel to look for Opening spreadsheets rather than Rebuttal spreadsheets, and corrected an improper link to the CTC costs in "IIIFTTotal.xls."
6. Corrected "SpotMaint.xls" bridge and culvert inspection costs to reflect AEP Texas' rebuttal quantities for those items.
7. Corrected a linking error in "TNR_OP_EXP_Rebut.XLS" that caused Excel to look for Opening IT spreadsheets rather than Rebuttal spreadsheets.

8. Corrected "TNR_OP_EXP_Rebut.XLS" to reflect the additional Manager of Safety position added by AEP Texas.
9. Corrected the automobile expense calculations in "TNR_OP_EXP_Rebut.XLS" to reflect the current cost of capital.
10. Updated the DCF and alternative rate reduction methodology electronic workpapers to reflect the above changes.

AEP Texas has included "VC AEPTX Rebuttal 2003 with 2Q04 Rawhide.123" and "BN 03 INDX 2q04.XLS," which were inadvertently omitted from its Rebuttal variable cost electronic workpapers. AEP Texas has also included electronic versions of the Rebuttal Narrative sections which incorporate the corrections described *supra*.

Respectfully submitted,

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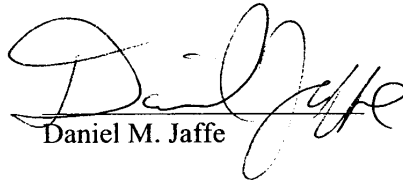
Dated: August 17, 2004

Attorneys and Practitioners

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of August, 2004, I served five copies of the Errata to Rebuttal Evidence of Complainant AEP Texas North Company by hand upon counsel for Defendant, as follows:

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