

PUBLIC VERSION

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

**SEMINOLE ELECTRIC COOPERATIVE,
INC.**

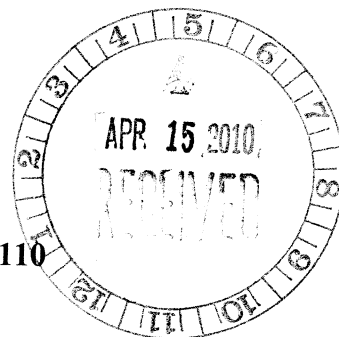
Complainant,

v.

CSX TRANSPORTATION, INC.

Defendant.

Docket No. 42110



REBUTTAL EVIDENCE OF COMPLAINANT SEMINOLE ELECTRIC COOPERATIVE, INC.

EXHIBITS

SEMINOLE ELECTRIC
COOPERATIVE, INC.

ENTERED
Office of Proceedings

APR 15 2010

Part of
Public Record

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Dated: April 15, 2010

Attorneys & Practitioners

LIST OF REBUTTAL EXHIBITS

EXHIBIT

I-

TITLE

- 1 CSXT Data Problems that Impacted SECI's Preparation of Opening Evidence

EXHIBIT

II-A-

- 1 Estimated Jurisdictional Threshold and Rate to Variable Cost Ratio – 1Q09
- 2 Estimated Jurisdictional Threshold and Rate to Variable Cost Ratio – 2Q09
- 3 Estimated Jurisdictional Threshold and Rate to Variable Cost Ratio – 3Q09
- 4 Estimated Jurisdictional Threshold and Rate to Variable Cost Ratio – 4Q09

EXHIBIT

II-B-

- 1 Analysis of Report by Energy Ventures Analysis: "Evaluation of Economic Options to Deliver Coal and Petroleum Coke to Seminole Generating Station"
- 2 Rebuttal to Report by Energy Ventures Analysis: Evaluation of Economic Options to Deliver Coal and Petroleum Coke to Seminole Generating Station

EXHIBIT

III-A-

- 1 Seminole Stand-Alone Railroad Traffic Forecast
- 2 Seminole Stand-Alone Railroad Revenue Forecast
- 3 Evaluation of 170 Coal Reroutes Identified in CSXT Reply

- 4 Evaluation of 13 General Freight Reroutes Identified in CSXT Reply

**EXHIBIT
III-B-**

- 1 Review of CSXT Interchange Locations and Railroad Additions in
CSXT Reply Exhibit III-B-3
- 2 SFRR Stick Diagrams

**EXHIBIT
III-C-**

- 1 SFRR RTC Modeling Period Train List
- 2 RTC System Diagram
- 3 CSXT and SFRR Train Transit Times – Hours

**EXHIBIT
III-H-**

- 1 Summary of SAC Results
- 2 Rebuttal SFRR Maximum Markup Methodology Revenue to
Variable Cost Ratios

Covers +

for to

25 cm

com in the 25 cm

Public

REBUTTAL EXHIBIT I-1
REDACTED

II Market Dominance

Estimated Jurisdictional Threshold and Rate to Variable Cost Ratio -- IQ09
(Based On STB CSXT 2008 URCS - Private Cars)

A. <u>Movement Parameters</u> (1)	<u>Dotiki, KY</u> (2)	<u>Patiki, IL</u> (3)	<u>Warrior, KY</u> (Cardinal 9)	<u>Elk Creek, KY</u> (Cimarron)	<u>Gibcoal, IN</u> (6)	<u>Charleston, SC</u>		<u>Robinson Run, WV</u> (Consol 95)	<u>Bailey, PA</u> (10)
						(Coal) (7)	(Pet Coke) (8)		
1. Railroad	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT
2. Miles	849.8	911.3	835.0	832.0	904.0	316.7	316.7	1,113.8	1,188.4
3. Shipment Type	Local	Local	Local	Local	Local	Local	Local	Local	Local
4. Cars per Train	98.6	97.7	99.5	99.6	98.6	98.6	98.6	98.6	98.6
5. Car Type	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola
6. Car Ownership	Private	Private	Private	Private	Private	Private	Private	Private	Private
7. Tons per Car	119.6	118.3	120.4	119.4	119.5	119.5	119.5	119.5	119.5
8. Commodity	Coal	Coal	Coal	Coal	Coal	Coal	Pet Coke	Coal	Coal
9. Movement Type	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train
B. <u>Variable Cost and Jurisdictional Threshold</u>									
10. Phase III Cost Base Year 2008 1/	\$12.50	\$13.42	\$12.25	\$12.24	\$13.26	\$5.03	\$5.04	\$16.20	\$17.24
11. Index to IQ09	0.91089	0.91089	0.91089	0.91089	0.91089	0.91089	0.91089	0.91089	0.91089
12. Phase III Cost IQ09 2/	\$11.38	\$12.22	\$11.16	\$11.15	\$12.08	\$4.58	\$4.59	\$14.75	\$15.71
13. Jurisdictional Threshold 3/	\$20.48	\$22.00	\$20.09	\$20.07	\$21.74	\$8.24	\$8.26	\$26.55	\$28.28
C. <u>Rate and Rate to Variable Cost Ratio</u>									
14. Rate Per Ton in Private Cars	\$40.39	\$42.78	\$40.43	\$40.42	\$43.49	\$28.01	\$28.01	\$47.98	\$49.80
15. Rate To Variable Cost Ratio 4/	3.55	3.50	3.62	3.63	3.60	6.12	6.10	3.25	3.17

1/ 2008 CSXT URCS Phase III Variable Cost Per Ton.
2/ Line 10 x Line 11.
3/ Line 12 x 1.80.
4/ Line 14 ÷ Line 12.

Estimated Jurisdictional Threshold and Rate to Variable Cost Ratio -- 1Q09
(Based On STB CSXT 2008 URCS - Railroad Cars)

A. Movement Parameters (1)	Dotiki, KY (2)		Warrior, KY (Cardinal 9) (4)		Elk Creek, KY (Cimarron) (5)		Gibco, IN (6)		Charleston, SC (Coal) (7)		Robinson Run, WV (Consol 95) (9)		Bailey, PA (10)	
	CSXT	Local	CSXT	Local	CSXT	Local	CSXT	Local	CSXT	Local	CSXT	Local	CSXT	Local
1. Railroad														
2. Miles	849.8		835.0		832.0		904.0		316.7		1,113.8		1,188.4	
3. Shipment Type	Local		Local		Local		Local		Local		Local		Local	
4. Cars per Train	98.6		99.5		99.6		98.6		98.6		98.6		98.6	
5. Car Type	Rotary Gondola		Rotary Gondola		Rotary Gondola		Rotary Gondola		Rotary Gondola		Rotary Gondola		Rotary Gondola	
6. Car Ownership	Railroad		Railroad		Railroad		Railroad		Railroad		Railroad		Railroad	
7. Tons per Car	119.6		120.4		119.4		119.5		119.5		119.5		119.5	
8. Commodity	Coal		Coal		Coal		Coal		Coal		Coal		Coal	
9. Movement Type	Unit Train		Unit Train		Unit Train		Unit Train		Unit Train		Unit Train		Unit Train	
B. Variable Cost and Jurisdictional Threshold														
10. Phase III Cost Base Year 2008 1/	\$13.11		\$12.86		\$12.85		\$13.90		\$5.36		\$16.95		\$18.04	
11. Index to 1Q09	0.91089		0.91089		0.91089		0.91089		0.91089		0.91089		0.91089	
12. Phase III Cost 1Q09 2/	\$11.94		\$11.71		\$11.70		\$12.66		\$4.88		\$15.44		\$16.43	
13. Jurisdictional Threshold 3/	\$21.49		\$21.08		\$21.06		\$22.79		\$8.78		\$27.79		\$29.57	
C. Rate and Rate to Variable Cost Ratio														
14. Rate Per Ton in Railroad Cars	\$41.68		\$41.68		\$41.68		\$44.93		\$28.48		\$49.71		\$51.66	
15. Rate To Variable Cost Ratio 4/	3.49		3.56		3.56		3.55		5.84		3.22		3.14	

1/ 2008 CSXT URCS Phase III Variable Cost Per Ton
2/ Line 10 x Line 11.
3/ Line 12 x 1.80.
4/ Line 14 ÷ Line 12.

Estimated Jurisdictional Threshold and Rate to Variable Cost Ratio -- 2Q09
(Based On STB CSXT 2008 URCS - Private Cars)

A.	<u>Movement Parameters</u> (1)	<u>Dotiki, KY</u> (2)	<u>Patiki, IL</u> (Epworth) (3)	<u>Warrior, KY</u> (Cardinal) (4)	<u>Elk Creek, KY</u> (Cimarron) (5)	<u>Gibco, IN</u> (6)	<u>Charleston, SC</u>		<u>Robinson Run, WV</u> (Consol) (9)	<u>Bailey, PA</u> (10)
							<u>(Coal)</u> (7)	<u>(Pet Coke)</u> (8)		
	1. Railroad	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT
	2. Miles	849.8	911.3	835.0	832.0	904.0	316.7	316.7	1,113.8	1,188.4
	3. Shipment Type	Local	Local	Local	Local	Local	Local	Local	Local	Local
	4. Cars per Train	98.6	97.7	99.5	99.6	98.6	98.6	98.6	98.6	98.6
	5. Car Type	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola
	6. Car Ownership	Private	Private	Private	Private	Private	Private	Private	Private	Private
	7. Tons per Car	119.6	118.3	120.4	119.4	119.5	119.5	119.5	119.5	119.5
	8. Commodity	Coal	Coal	Coal	Coal	Coal	Coal	Pet Coke	Coal	Coal
	9. Movement Type	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train
B. <u>Variable Cost and Jurisdictional Threshold</u>										
	10. Phase III Cost Base Year 2008 1/	\$12.50	\$13.42	\$12.25	\$12.24	\$13.26	\$5.03	\$5.04	\$16.20	\$17.24
	11. Index to 2Q09	0.91137	0.91137	0.91137	0.91137	0.91137	0.91137	0.91137	0.91137	0.91137
	12. Phase III Cost 2Q09 2/	\$11.39	\$12.23	\$11.17	\$11.16	\$12.08	\$4.58	\$4.59	\$14.76	\$15.72
	13. Jurisdictional Threshold 3/	\$20.50	\$22.01	\$20.11	\$20.09	\$21.74	\$8.24	\$8.26	\$26.57	\$28.30
C. <u>Rate and Rate to Variable Cost Ratio</u>										
	14. Rate Per Ton in Private Cars	\$40.39	\$42.78	\$40.43	\$40.42	\$43.49	\$28.01	\$28.01	\$47.98	\$49.80
	15. Rate To Variable Cost Ratio 4/	3.55	3.50	3.62	3.62	3.60	6.12	6.10	3.25	3.17

1/ 2008 CSXT URCS Phase III Variable Cost Per Ton.
2/ Line 10 x Line 11.
3/ Line 12 x 1.80.
4/ Line 14 ÷ Line 12.

Estimated Jurisdictional Threshold and Rate to Variable Cost Ratio -- 2Q09
(Based On STB CSXT 2008 URCS - Railroad Cars)

A. Movement Parameters (1)	Dotiki, KY (2)	Pattiki, IL (Epworth) (3)	Warrior, KY (Cardinal 9) (4)	Elk Creek, KY (Cimarron) (5)	Gibcoak, IN (6)	Charleston, SC		Robinson Run, WV (Consol 9S) (9)	Bailey, PA (10)
						(Coal) (7)	(Pet Coke) (8)		
1. Railroad	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT
2. Miles	849.8	911.3	835.0	832.0	904.0	316.7	316.7	1,113.8	1,188.4
3. Shipment Type	Local	Local	Local	Local	Local	Local	Local	Local	Local
4. Cars per Train	98.6	97.7	99.5	99.6	98.6	98.6	98.6	98.6	98.6
5. Car Type	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola
6. Car Ownership	Railroad	Railroad	Railroad	Railroad	Railroad	Railroad	Private	Private	Private
7. Tons per Car	119.6	118.3	120.4	119.4	119.5	119.5	119.5	119.5	119.5
8. Commodity	Coal	Coal	Coal	Coal	Coal	Coal	Pet Coke	Coal	Coal
9. Movement Type	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train
B. Variable Cost and Jurisdictional Threshold									
10. Phase III Cost Base Year 2008 1/	\$13.11	\$14.07	\$12.86	\$12.85	\$13.90	\$5.36	\$5.37	\$16.95	\$18.04
11. Index to 2Q09	0.91137	0.91137	0.91137	0.91137	0.91137	0.91137	0.91137	0.91137	0.91137
12. Phase III Cost 2Q09 2/	\$11.95	\$12.82	\$11.72	\$11.71	\$12.67	\$4.89	\$4.90	\$15.45	\$16.44
13. Jurisdictional Threshold 3/	\$21.51	\$23.08	\$21.10	\$21.08	\$22.81	\$8.80	\$8.82	\$27.81	\$29.59
C. Rate and Rate to Variable Cost Ratio									
14. Rate Per Ton in Railroad Cars	\$41.68	\$44.18	\$41.68	\$41.68	\$44.93	\$28.48	\$28.48	\$49.71	\$51.66
15. Rate To Variable Cost Ratio 4/	3.49	3.45	3.56	3.56	3.55	5.82	5.81	3.22	3.14

1/ 2008 CSXT URCS Phase III Variable Cost Per Ton.
2/ Line 10 x Line 11.
3/ Line 12 x 1.80.
4/ Line 14 ÷ Line 12.

Estimated Jurisdictional Threshold and Rate to Variable Cost Ratio -- 3Q09
(Based On STB CSXT 2008 URCS - Private Cars)

A. Movement Parameters (1)	Dotiki, KY (2)		Pattiki, IL (Epworth) (3)		Warrior, KY (Cardinal 9) (4)		Elk Creek, KY (Cimarron) (5)		Gibco, IN (6)		Charleston, SC (Coal) (7)		Robinson Run, WV (Consol 95) (9)		Bailey, PA (10)	
	CSXT	Local	CSXT	Local	CSXT	Local	CSXT	Local	CSXT	Local	CSXT	Local	CSXT	Local	CSXT	Local
1. Railroad																
2. Miles	849.8		911.3		835.0		832.0		904.0		316.7		1,113.8		1,188.4	
3. Shipment Type		Local		Local		Local		Local		Local		Local		Local		Local
4. Cars per Train	98.6		97.7		99.5		99.6		98.6		98.6		98.6		98.6	
5. Car Type	Rotary Gondola		Rotary Gondola		Rotary Gondola		Rotary Gondola		Rotary Gondola		Rotary Gondola		Rotary Gondola		Rotary Gondola	
6. Car Ownership	Private		Private		Private		Private		Private		Private		Private		Private	
7. Tons per Car	119.6		118.3		120.4		119.4		119.5		119.5		119.5		119.5	
8. Commodity	Coal		Coal		Coal		Coal		Coal		Coal		Coal		Coal	
9. Movement Type	Unit Train		Unit Train		Unit Train		Unit Train		Unit Train		Unit Train		Unit Train		Unit Train	
B. Variable Cost and Jurisdictional Threshold																
10. Phase III Cost Base Year 2008 1/	\$12.50		\$13.42		\$12.25		\$12.24		\$13.26		\$5.03		\$16.20		\$17.24	
11. Index to 3Q09	0.93267		0.93267		0.93267		0.93267		0.93267		0.93267		0.93267		0.93267	
12. Phase III Cost 3Q09 2/	\$11.65		\$12.51		\$11.43		\$11.42		\$12.37		\$4.69		\$15.11		\$16.08	
13. Jurisdictional Threshold 3/	\$20.97		\$22.52		\$20.57		\$20.56		\$22.27		\$8.44		\$27.20		\$28.94	
C. Rate and Rate to Variable Cost Ratio																
14. Rate Per Ton in Private Cars	\$40.39		\$42.78		\$40.43		\$40.42		\$43.49		\$28.01		\$47.98		\$49.80	
15. Rate To Variable Cost Ratio 4/	3.47		3.42		3.54		3.54		3.52		5.97		3.18		3.10	

1/ 2008 CSXT URCS Phase III Variable Cost Per Ton.
2/ Line 10 x Line 11.
3/ Line 12 x 1.80.
4/ Line 14 ÷ Line 12.

A.	Movement Parameters (1)	Dotiki, KY (2)	Pattiki, IL (Egworth) (3)	Warrior, KY (Cardinal 9) (4)	Elk Creek, KY (Cimarron) (5)	Gibcoai, IN (6)	Charleston, SC (Coal) (7)	Charleston, SC (Pet Coke) (8)	Robinson Run, WV (Consol 95) (9)	Bailey, PA (10) CSXT
1.	Railroad	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT	CSXT
2.	Miles	849.8	911.3	835.0	832.0	904.0	316.7	316.7	1,113.8	1,188.4
3.	Shipment Type	Local	Local	Local	Local	Local	Local	Local	Local	Local
4.	Cars per Train	98.6	97.7	99.5	99.6	98.6	98.6	98.6	98.6	98.6
5.	Car Type	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola
6.	Car Ownership	Railroad	Railroad	Railroad	Railroad	Railroad	Railroad	Railroad	Railroad	Railroad
7.	Tons per Car	119.6	118.3	120.4	119.4	119.5	119.5	119.5	119.5	119.5
8.	Commodity	Coal	Coal	Coal	Coal	Coal	Coal	Pet Coke	Coal	Coal
9.	Movement Type	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train
B. <u>Variable Cost and Jurisdictional Threshold</u>										
10.	Phase III Cost Base Year 2008 1/	\$13.11	\$14.07	\$12.86	\$12.85	\$13.90	\$5.36	\$5.37	\$16.95	\$18.04
11.	Index to 3Q09	0.93267	0.93267	0.93267	0.93267	0.93267	0.93267	0.93267	0.93267	0.93267
12.	Phase III Cost 3Q09 2/	\$12.23	\$13.12	\$11.99	\$11.98	\$12.97	\$5.00	\$5.01	\$15.81	\$16.82
13.	Jurisdictional Threshold 3/	\$22.01	\$23.62	\$21.58	\$21.56	\$23.35	\$9.00	\$9.02	\$28.46	\$30.28
C. <u>Rate and Rate to Variable Cost Ratio</u>										
14.	Rate Per Ton in Railroad Cars	\$41.68	\$44.18	\$41.68	\$41.68	\$44.93	\$28.48	\$28.48	\$49.71	\$51.66
15.	Rate To Variable Cost Ratio 4/	3.41	3.37	3.48	3.48	3.46	5.70	5.68	3.14	3.07
1/ 2008 CSXT URCS Phase III Variable Cost Per Ton. 2/ Line 10 x Line 11. 3/ Line 12 x Line 180. 4/ Line 14 ÷ Line 12.										

Estimated Jurisdictional Threshold and Rate to Variable Cost Ratio -- 4Q09
(Based On STB CSXT 2008 URCS - Private Cars)

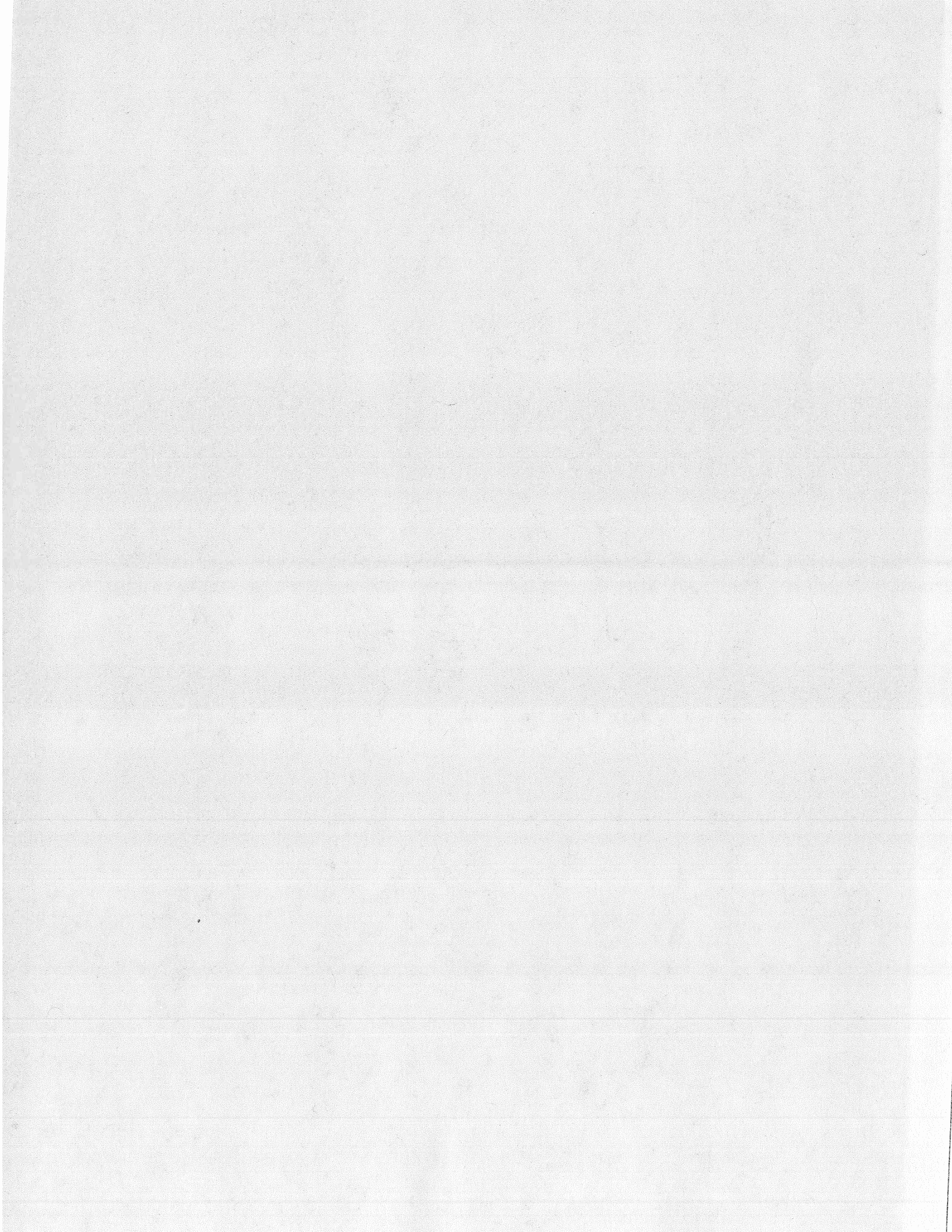
A.	<u>Movement Parameters</u> (1)	<u>Dotiki, KY</u> (2)		<u>Warrior, KY</u> (Cardinal 9) (4)		<u>Elk Creek, KY</u> (Cimarron) (5)		<u>Gibcoak, IN</u> (6)		<u>Charleston, SC</u> (Coal) (7)		<u>Robinson Run, WV</u> (Consol 95) (9)		<u>Bailey, PA</u> (10)	
		CSXT	Local	CSXT	Local	CSXT	Local	CSXT	Local	CSXT	Local	CSXT	Local	CSXT	Local
1.	Railroad														
2.	Miles	849.8		911.3		832.0		904.0		316.7		1,113.8		1,188.4	
3.	Shipment Type		Local		Local		Local		Local		Local		Local		Local
4.	Cars per Train	98.6		97.7		99.5		98.6		98.6		98.6		98.6	
5.	Car Type	Rotary Gondola		Rotary Gondola		Rotary Gondola		Rotary Gondola		Rotary Gondola		Rotary Gondola		Rotary Gondola	
6.	Car Ownership	Private		Private		Private		Private		Private		Private		Private	
7.	Tons per Car	119.6		118.3		119.4		119.5		119.5		119.5		119.5	
8.	Commodity	Coal		Coal		Coal		Coal		Coal		Coal		Coal	
9.	Movement Type	Unit Train		Unit Train		Unit Train		Unit Train		Unit Train		Unit Train		Unit Train	
<u>B. Variable Cost and Jurisdictional Threshold</u>															
10.	Phase III Cost Base Year 2008 1/	\$12.50		\$13.42		\$12.25		\$13.26		\$5.03		\$16.20		\$17.24	
11.	Index to 4Q09	0.94454		0.94454		0.94454		0.94454		0.94454		0.94454		0.94454	
12.	Phase III Cost 4Q09 2/	\$11.80		\$12.67		\$11.56		\$12.52		\$4.75		\$15.30		\$16.29	
13.	Jurisdictional Threshold 3/	\$21.24		\$22.81		\$20.83		\$22.54		\$8.55		\$27.54		\$29.32	
<u>C. Rate and Rate to Variable Cost Ratio</u>															
14.	Rate Per Ton in Private Cars	\$40.39		\$42.78		\$40.43		\$43.49		\$28.01		\$47.98		\$49.80	
15.	Rate To Variable Cost Ratio 4/	3.42		3.38		3.49		3.47		5.90		3.14		3.06	

1/ 2008 CSXT URCS Phase III Variable Cost Per Ton.
2/ Line 10 x Line 11.
3/ Line 12 x 1.80.
4/ Line 14 ÷ Line 12.

Estimated Jurisdictional Threshold and Rate to Variable Cost Ratio -- 4Q09
(Based On STB CSXT 2008 URCS - Railroad Cars)

A.	Movement Parameters (1)	Dotiki, KY	Patiki, IL	Warrior, KY	Elk Creek, KY	Charleston, SC		Robinson Run, WV		Bailey, PA
		(2) CSXT	(3) CSXT	(4) CSXT	(5) CSXT	(6) CSXT	(7) CSXT	(8) CSXT	(9) CSXT	(10) CSXT
1.	Railroad									
2.	Miles	849.8	911.3	835.0	832.0	904.0	316.7	316.7	1,113.8	1,188.4
3.	Shipment Type	Local	Local	Local	Local	Local	Local	Local	Local	Local
4.	Cars per Train	98.6	97.7	99.5	99.6	98.6	98.6	98.6	98.6	98.6
5.	Car Type	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola	Rotary Gondola
6.	Car Ownership	Railroad	Railroad	Railroad	Railroad	Railroad	Railroad	Railroad	Railroad	Railroad
7.	Tons per Car	119.6	118.3	120.4	119.4	119.5	119.5	119.5	119.5	119.5
8.	Commodity	Coal	Coal	Coal	Coal	Coal	Coal	Pet Coke	Coal	Coal
9.	Movement Type	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train	Unit Train
B. <u>Variable Cost and Jurisdictional Threshold</u>										
10.	Phase III Cost Base Year 2008 1/	\$13.11	\$14.07	\$12.86	\$12.85	\$13.90	\$5.36	\$5.37	\$16.95	\$18.04
11.	Index to 4Q09	0.94454	0.94454	0.94454	0.94454	0.94454	0.94454	0.94454	0.94454	0.94454
12.	Phase III Cost 4Q09 2/	\$12.38	\$13.29	\$12.14	\$12.13	\$13.13	\$5.06	\$5.08	\$16.01	\$17.04
13.	Jurisdictional Threshold 3/	\$22.28	\$23.92	\$21.85	\$21.83	\$23.63	\$9.11	\$9.14	\$28.82	\$30.67
C. <u>Rate and Rate to Variable Cost Ratio</u>										
14.	Rate Per Ton in Railroad Cars	\$41.68	\$44.18	\$41.68	\$41.68	\$44.93	\$28.48	\$28.48	\$49.71	\$51.66
15.	Rate To Variable Cost Ratio 4/	3.37	3.32	3.43	3.44	3.42	5.63	5.61	3.10	3.03
1/ 2008 CSXT URCS Phase III Variable Cost Per Ton.										
2/ Line 10 x Line 11.										
3/ Line 12 x 1.80.										
4/ Line 14 ÷ Line 12.										

1/ 2008 CSXT URCS Phase III Variable Cost Per Ton.
2/ Line 10 x Line 11.
3/ Line 12 x 1.80.
4/ Line 14 ÷ Line 12.



REBUTTAL EXHIBIT II-B-1
REDACTED

REBUTTAL EXHIBIT II-B-2
REDACTED

**III-A Stand-Alone
Traffic Group**

REBUTTAL EXHIBIT III-A-1
REDACTED

REBUTTAL EXHIBIT III-A-2
REDACTED

**REBUTTAL EXHIBIT III-A-3
REDACTED**

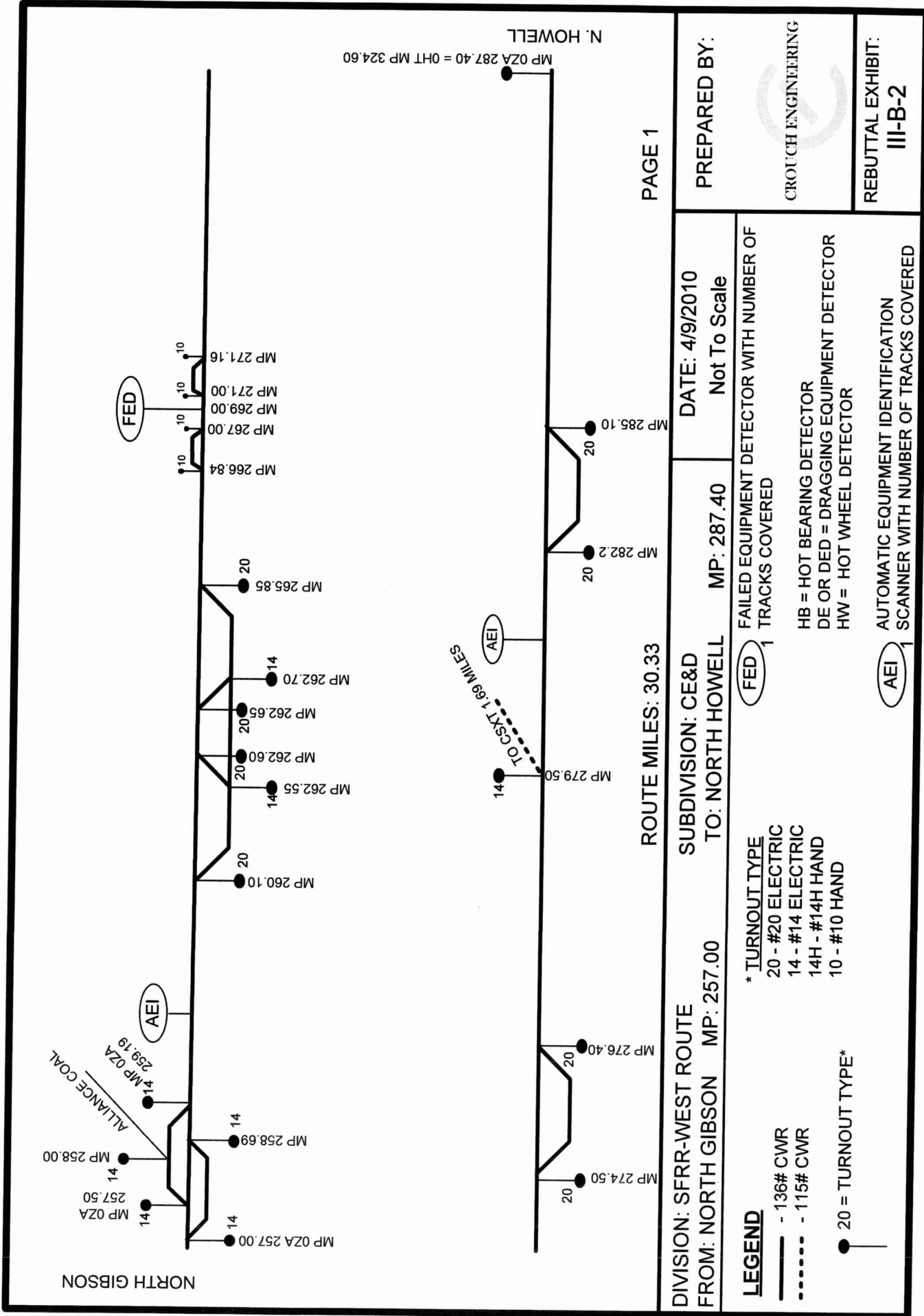
**REBUTTAL EXHIBIT III-A-4
REDACTED**

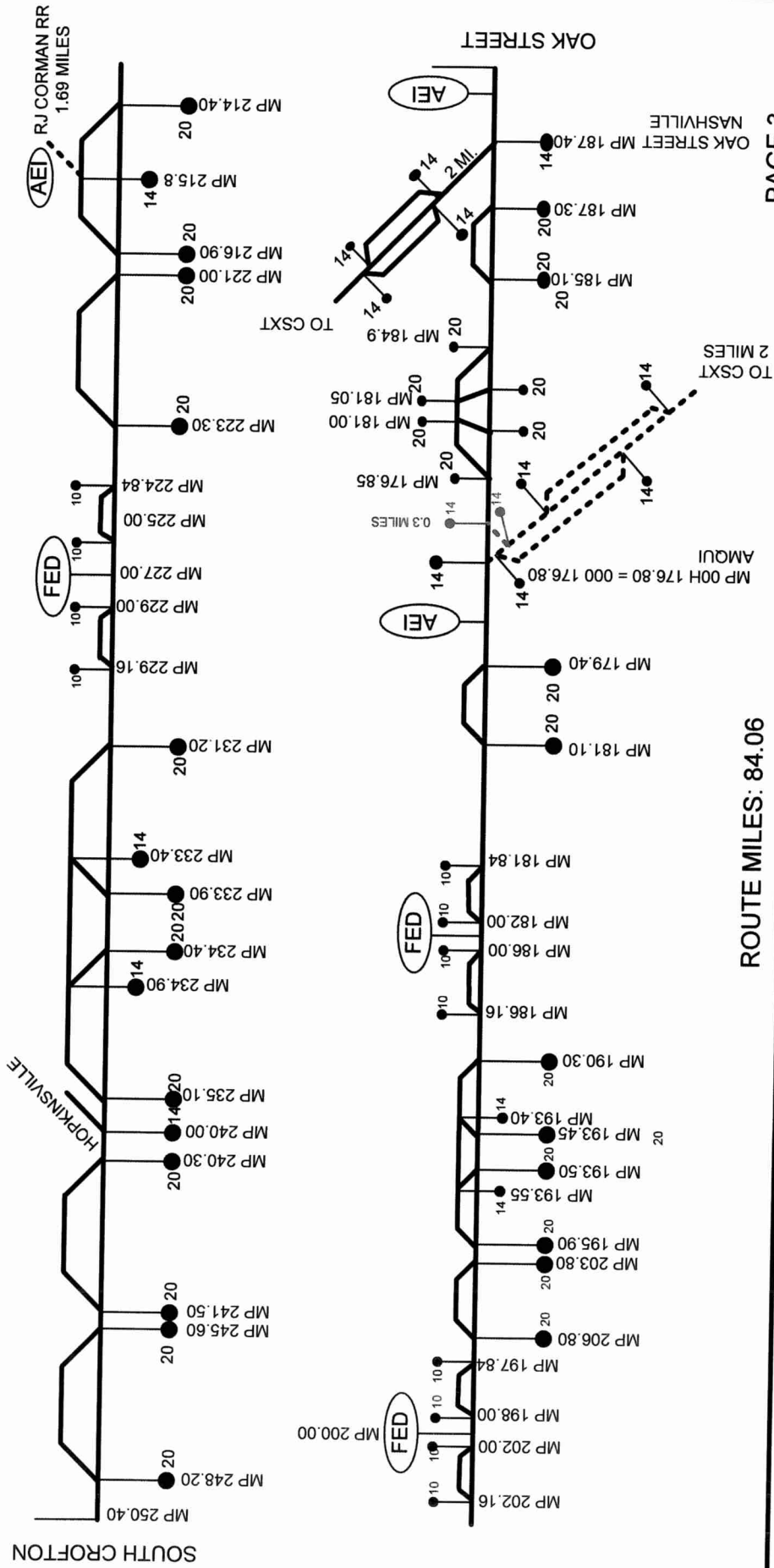
REVIEW OF CSXT INTERCHANGE LOCATION AND RAILROAD ADDITIONS IN CSXT REPLY EXHIBIT III-B-3

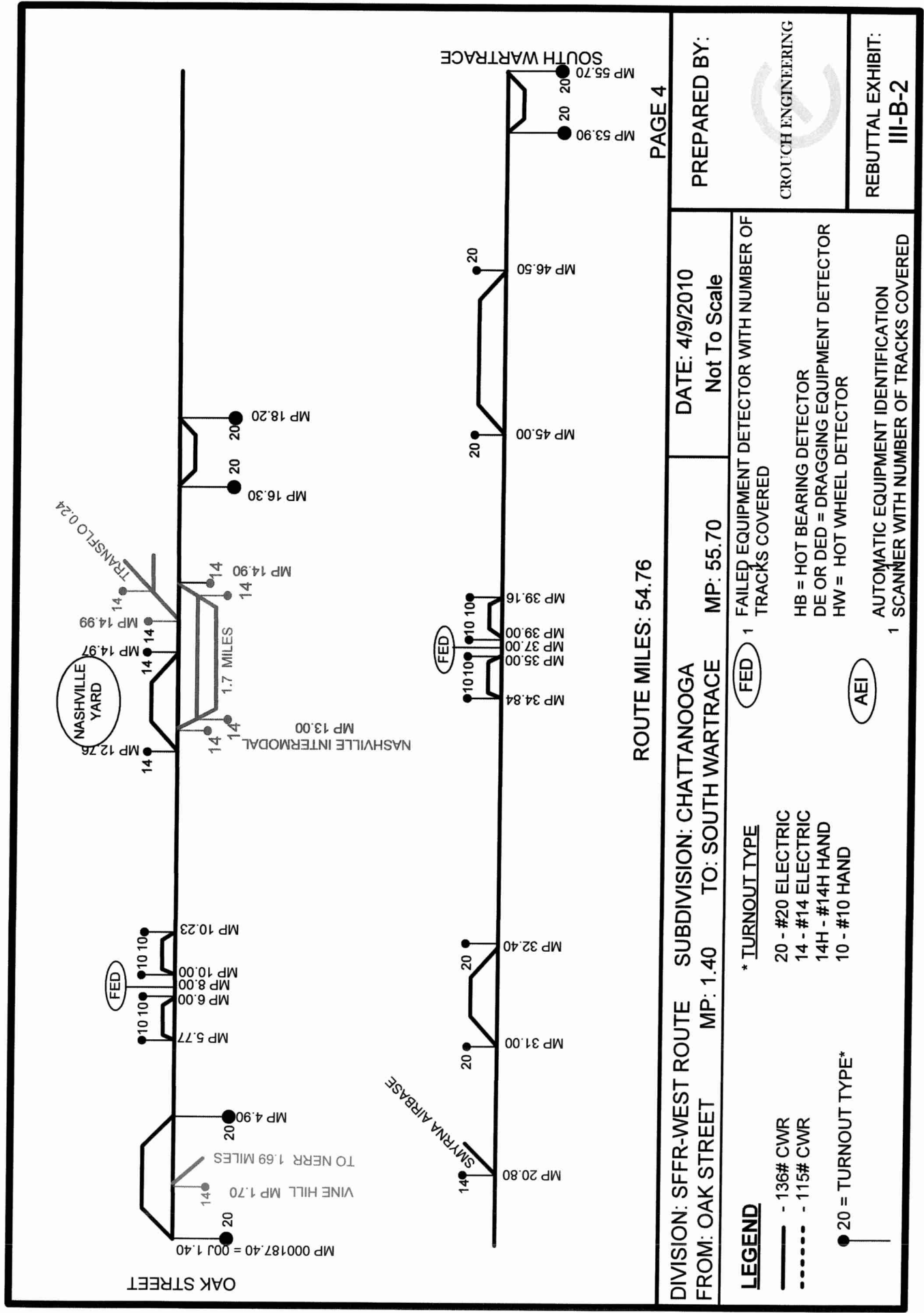
Interchange Location (1)	Railroad (2)	Agree (3)	Disagree (4)	SFRR Location (5)	SFRR Annual General Freight Carloads (2008)			Comments (9)
					Received (6)	Delivered (7)	Total (8)	
A. EXISTING SFRR INTERCHANGES								
1. Nashville, TN	Nashville & Western RR	X		1/	26	188	214	
2. Demmler, PA	McKeesport Connecting RR	X		1/	0	105	105	
3. Jacksonville, FL	Norfolk Southern	X		1/	38	106	144	
4. Jacksonville, FL	South Central Florida Express		X	---	---	---	---	SCFE does not physically get to Jacksonville, FL. Any traffic originating or terminating on SCFE would be interchanged with CSXT at Jacksonville.
5. Jacksonville, FL	Talleyrand Terminal RR Co.	X		1/	202	2,551	2,753	
6. Princeton, IN	Norfolk Southern	X		1/	4,230	0	4,230	
7. Atkinson (Madisonville), KY	CSXT		X	---	---	---	---	In CSXT's (and SECT's) ATC calculations, all movements with an on-SARR or off-SARR of Madisonville, KY show Madisonville, KY as the CSXT origin or destination. This means that there are no movements that originated or terminated elsewhere on CSXT and there is no need for an interchange between the SFRR and CSXT at
8. Savannah, GA	Golden Isles Terminal RR	X		1/	0	1,349	1,349	
9. Savannah, GA	Norfolk Southern	X		1/	0	453	453	
10. Rocky Mount, NC	Nash County RR	X		1/	61	2	63	
11. Evansville, IN	Indiana Southern RR	X		1/	575	69	644	
12. Evansville, IN	Indiana Southwestern Rwy	X		1/	0	48	48	
13. Martinsburg, WV	CSXT	X		1/	0	886	886	
14. Doswell, VA	CSXT		X	---	---	---	---	The SFRR interchanges with the Buckingham Branch RR ("BB") at Doswell, VA. The CSXT system map shows the rail line from Doswell, VA to Gordonsville, VA as the BB and it is labeled as a regional connection with no CSXT trackage rights. Therefore, any traffic originating or terminating on that line is handled by the BB. No interchange with CSXT is necessary.
15. S. End Brown ST. (Richmond), VA	Norfolk Southern	X		1/	318	0	318	

B. NEW SFRR INTERCHANGES								
16. Cordele, GA	Heart of Georgia RR	X		2/	189	0	189	
17. Hopewell, VA	Norfolk Southern	X		3/	0	33	33	
18. Lumberport, WV	CSXT		X	---	---	---	---	Lumberport, WV is the same location as Haywood, WV where the SFRR already interchanges traffic with CSXT.
19. North Charleston, SC	Port Terminal RR of SC	X		4/	0	309	309	
20. Vine Hill, TN	Nashville & Eastern RR	X		5/	0	186	186	
21. Waterford, AL	Wiregrass Central RR		X	---	---	---	---	Waterford, AL is more than 200 miles from the route of the SFRR
22. Wilson, NC	Carolina Coastal Rwy	X		6/	388	35	423	
23. Wilson, NC	Norfolk Southern	X		6/	2	23	25	

- 1/ Add to existing SFRR interchange location identified in Column (1)
- 2/ Add interchange at Cordele, GA (MP ANB 694.3 on the Fitzgerald Subdivision)
- 3/ Add interchange at Hopewell, VA on the Richmond Branch (MP SAC 23.3 on the Hopewell Subdivision)
- 4/ Add interchange at N. Charleston, SC (MP 00A 388.0 on the Charleston Subdivision)
- 5/ Add interchange at Vine Hill, TN (MP 001 1.7 on the Nashville Terminal Subdivision)
- 6/ Add interchange at Wilson, NC (MP 00A 136.0 on the South End Subdivision)



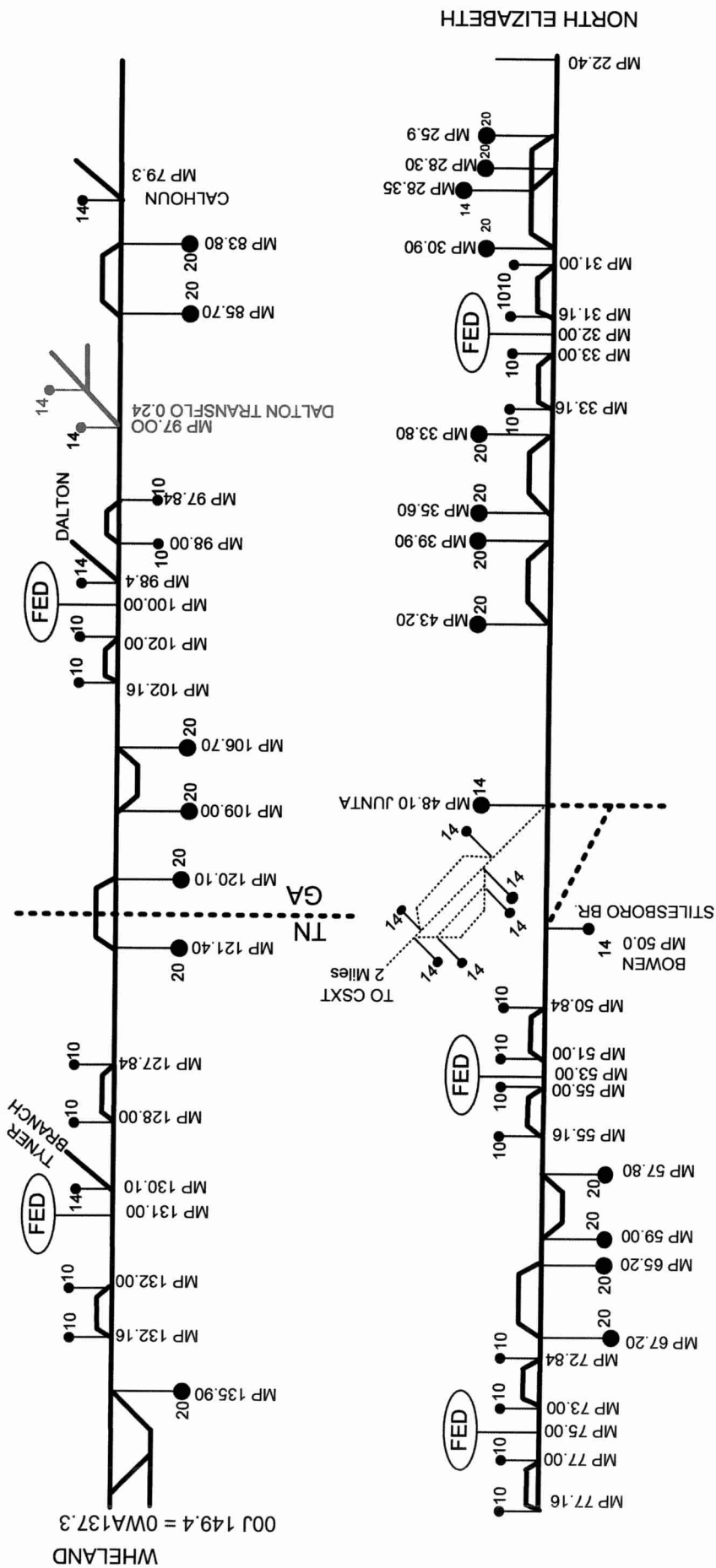




PREPARED BY:

CROUCH ENGINEERING

REBUTTAL EXHIBIT:
III-B-2



ROUTE MILES: 111.33

PAGE 6

DIVISION: SFFR-WEST ROUTE

SUBDIVISION: W&A

DATE: 4/9/2010

FROM: WHELAND

MP: 1373

SUBDIVISION: W&A
TO: NORTH ELIZABETH

MD: 33 40

Net To Cost

LEGEND

* TURNOUT TYPE[illegible]

— -136# CWR

20 - #20 ELECTRIC

----- 115# CWR

14 - #14 ELECTRIC

14H - #14H HAND

DE OR DED = DRAGGING EQUIPMENT DETECTOR

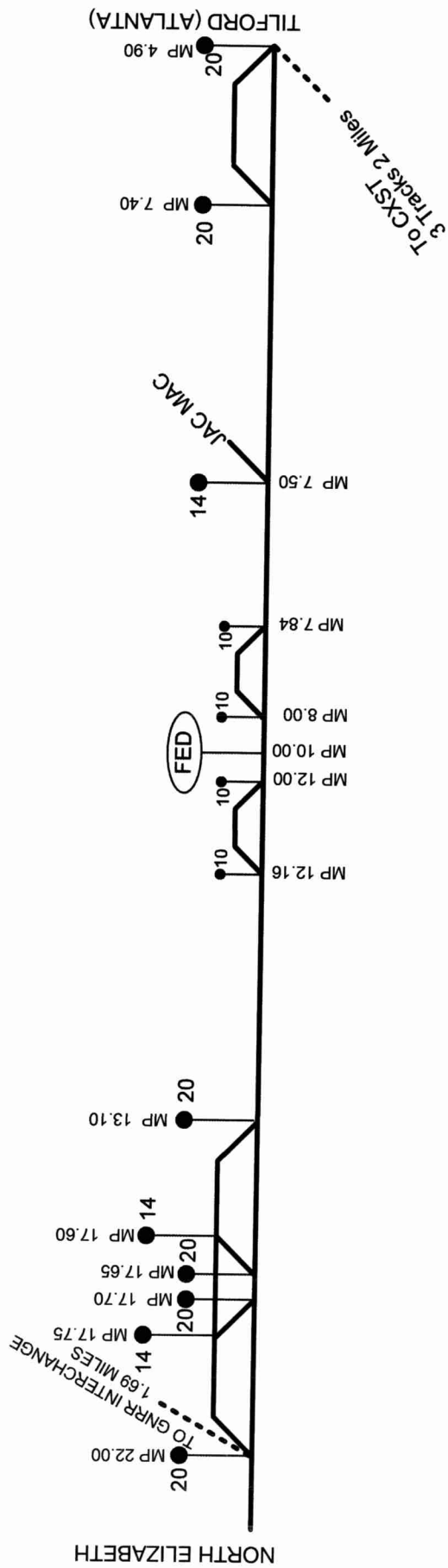
● 20 = TURNOUT TYPE*

HW = HOT WHEEL DETECTOR

AEI 1 AUTOMATIC EQUIPMENT IDENTIFICATION
SCANNER WITH NUMBER OF TRACKS COVERED

REBUTTAL EXHIBIT:

III-B-2



PAGE 7

ROUTE MILES: 17.31

DIVISION: SFRR-WEST ROUTE
FROM: NORTH ELIZABETH

SUBDIVISION: ATLANTA
MP: 22.40 TO: TILFORD

DATE: 4/9/2010
Not To Scale

PREPARED BY:

LEGEND

— - 136# CWR
- - - - - 115# CWR

● 20 = TURNOUT TYPE*

* TURNOUT TYPE
20 - #20 ELECTRIC
14 - #14 ELECTRIC
14H - #14H HAND
10 - #10 HAND

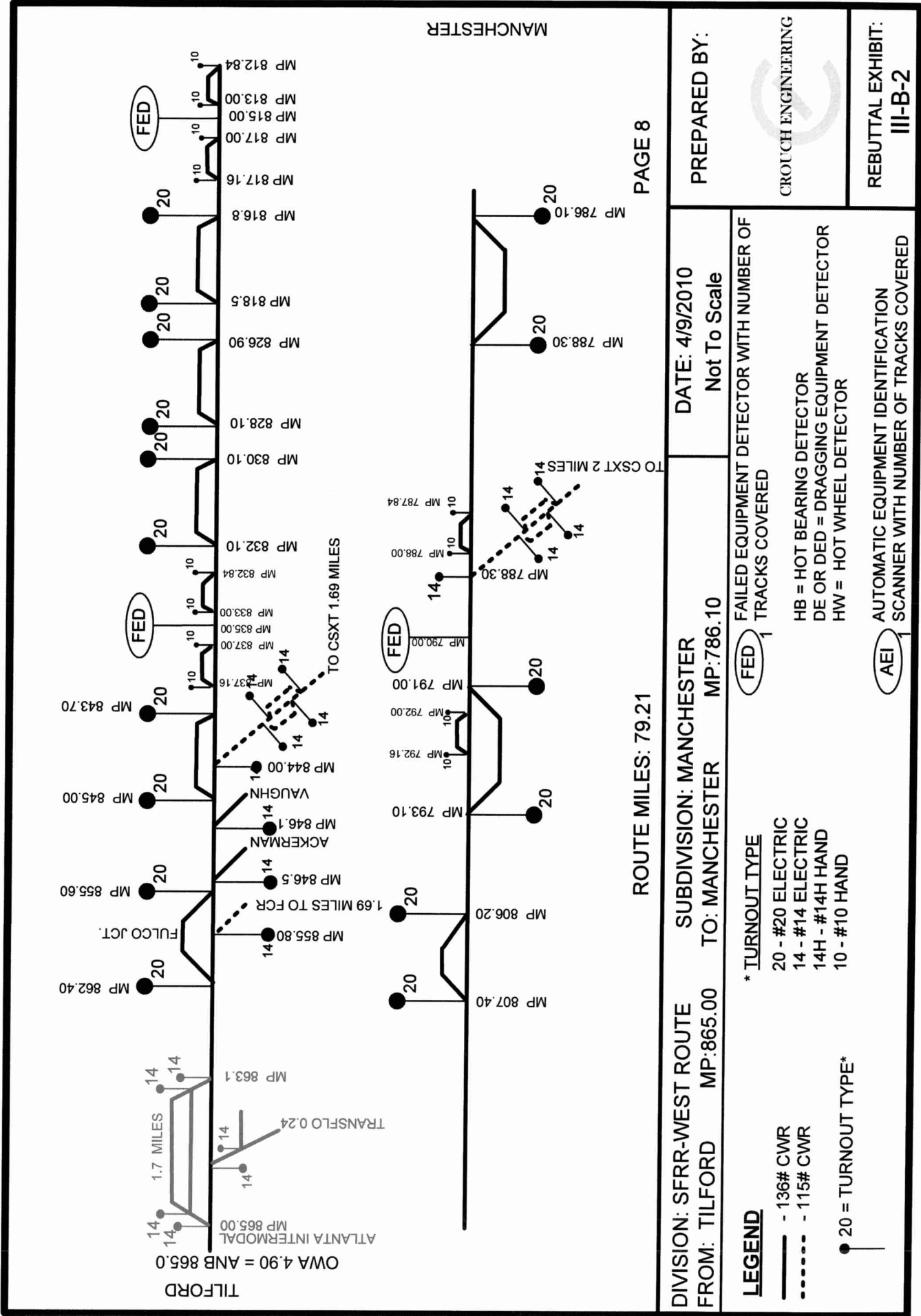
FAILED EQUIPMENT DETECTOR WITH NUMBER OF TRACKS COVERED
(FED) 1

HB = HOT BEARING DETECTOR
DE OR DED = DRAGGING EQUIPMENT DETECTOR
HW = HOT WHEEL DETECTOR

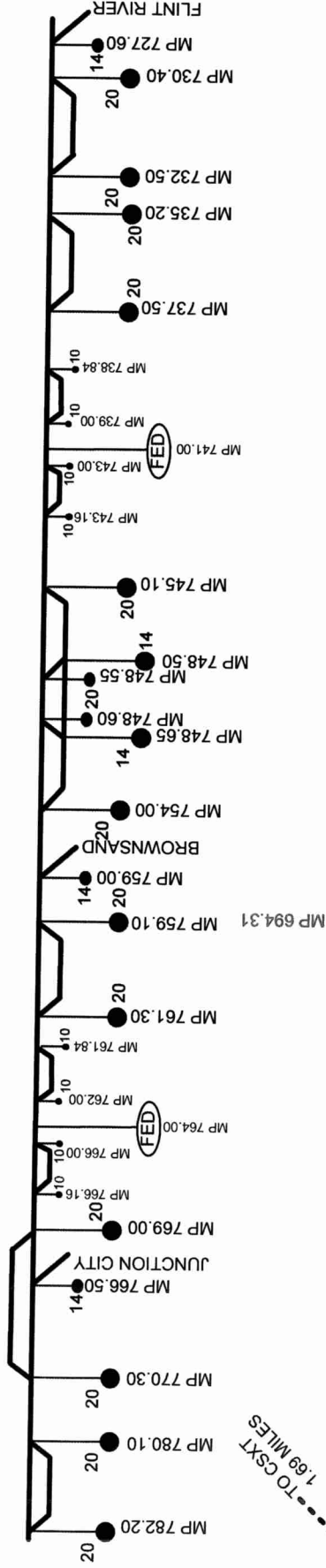
AUTOMATIC EQUIPMENT IDENTIFICATION
(AEI) 1 SCANNER WITH NUMBER OF TRACKS COVERED



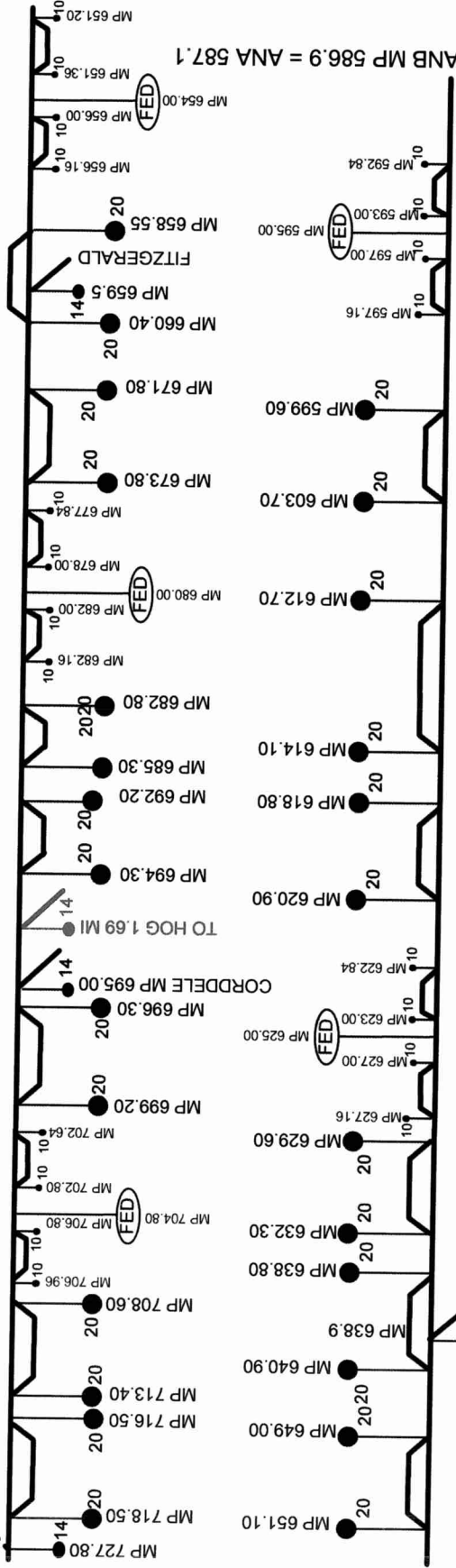
REBUTTAL EXHIBIT:
III-B-2



MANCHESTER



TO CSXT
1.69 MILES



WAYCROSS

PAGE 9

ROUTE MILES: 199.06

DIVISION: SFRW-WEST ROUTE

SUBDIVISION: FITZGERALD

FROM: MANCHESTER MP: 786.10

TO: WAYCROSS MP: 586.9

DATE: 4/9/2010

Not To Scale

PREPARED BY:

LEGEND

— 136# CWR
- - - 115# CWR

*** TURNOUT TYPE**

20 - #20 ELECTRIC
14 - #14 ELECTRIC
14H - #14H HAND
10 - #10 HAND

FAILED EQUIPMENT DETECTOR WITH NUMBER OF TRACKS COVERED

FED 1

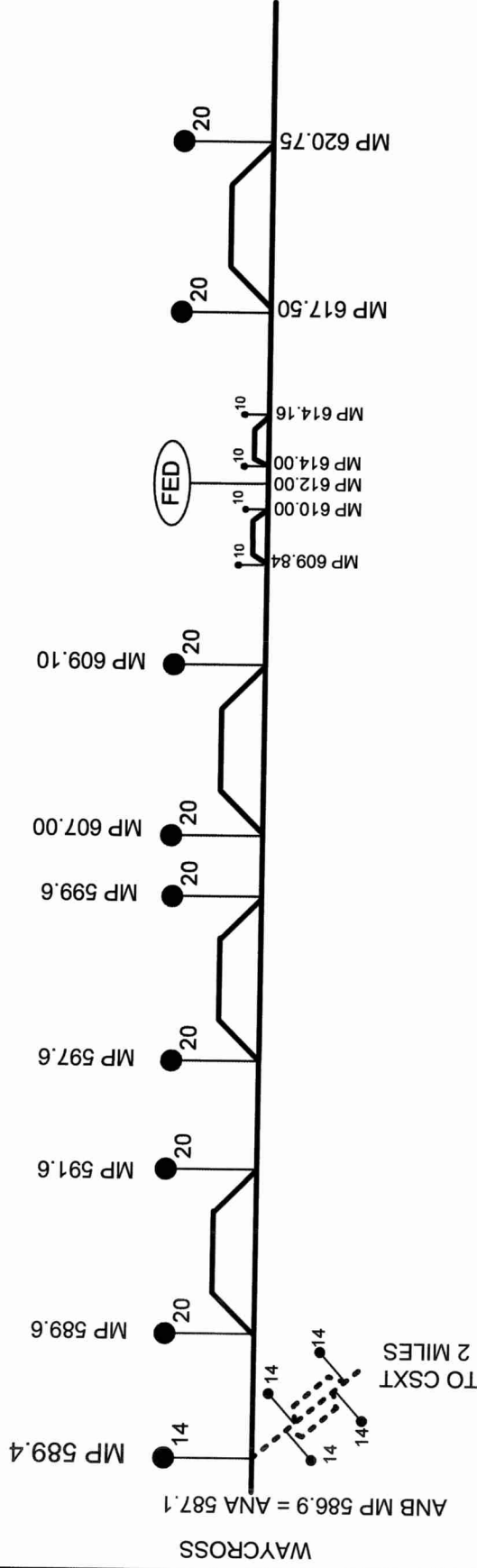
HB = HOT BEARING DETECTOR
DE OR DED = DRAGGING EQUIPMENT DETECTOR
HW = HOT WHEEL DETECTOR

● 20 = TURNOUT TYPE*

AEI 1
AUTOMATIC EQUIPMENT IDENTIFICATION
SCANNER WITH NUMBER OF TRACKS COVERED

REBUTTAL EXHIBIT:
III-B-2

CROUCH ENGINEERING

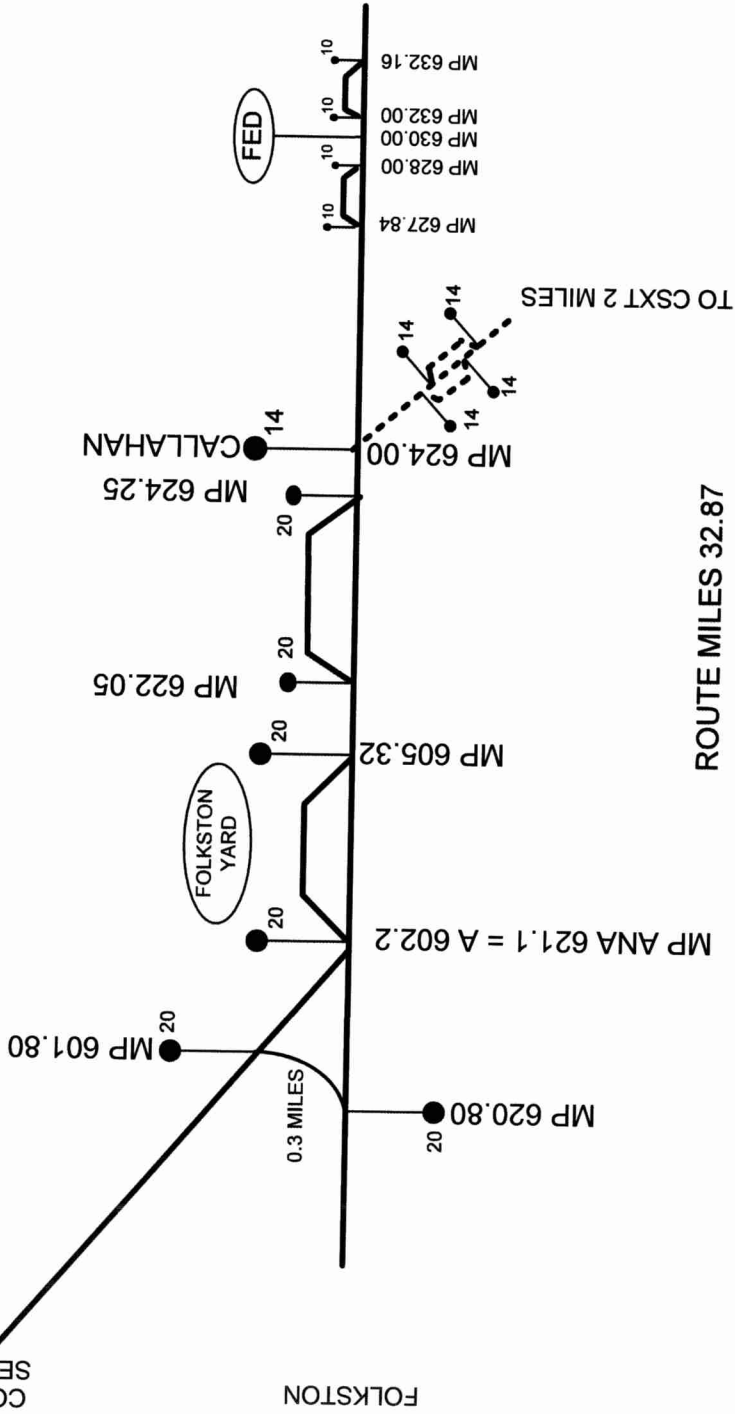


ROUTE MILES: 33.98

PAGE 10

DIVISION: SFRR-WEST ROUTE SUBDIVISION: JESUP FROM: WAYCROSS MP: 587.04 TO: FOLKSTON MP: ANA 621.10		DATE: 4/9/2010 Not To Scale	PREPARED BY: CROUCH ENGINEERING	REBUTTAL EXHIBIT: III-B-2
LEGEND - 136# CWR - 115# CWR 20 = TURNOUT TYPE*		FAILED EQUIPMENT DETECTOR WITH NUMBER OF TRACKS COVERED (FED) 1 HB = HOT BEARING DETECTOR DE OR DED = DRAGGING EQUIPMENT DETECTOR HW = HOT WHEEL DETECTOR AUTOMATIC EQUIPMENT IDENTIFICATION (AEI) 1 SCANNER WITH NUMBER OF TRACKS COVERED		

EAST ROUTE
CONVERGENCE
SEE SHEET 27



ROUTE MILES 32.87

PAGE 11

DIVISION: SFRR-WEST ROUTE SUBDIVISION: NAHUNTA
FROM: FOLKSTON MP: ANA 621.1 TO: DINSMORE MP: 635.20

DATE: 4/9/2010
Not To Scale

LEGEND

— 136# CWR
- - - 115# CWR

● 20 = TURNOUT TYPE*

*** TURNOUT TYPE**

20 - #20 ELECTRIC
14 - #14 ELECTRIC
14H - #14H HAND
10 - #10 HAND

FED 1 FAILED EQUIPMENT DETECTOR WITH NUMBER OF TRACKS COVERED

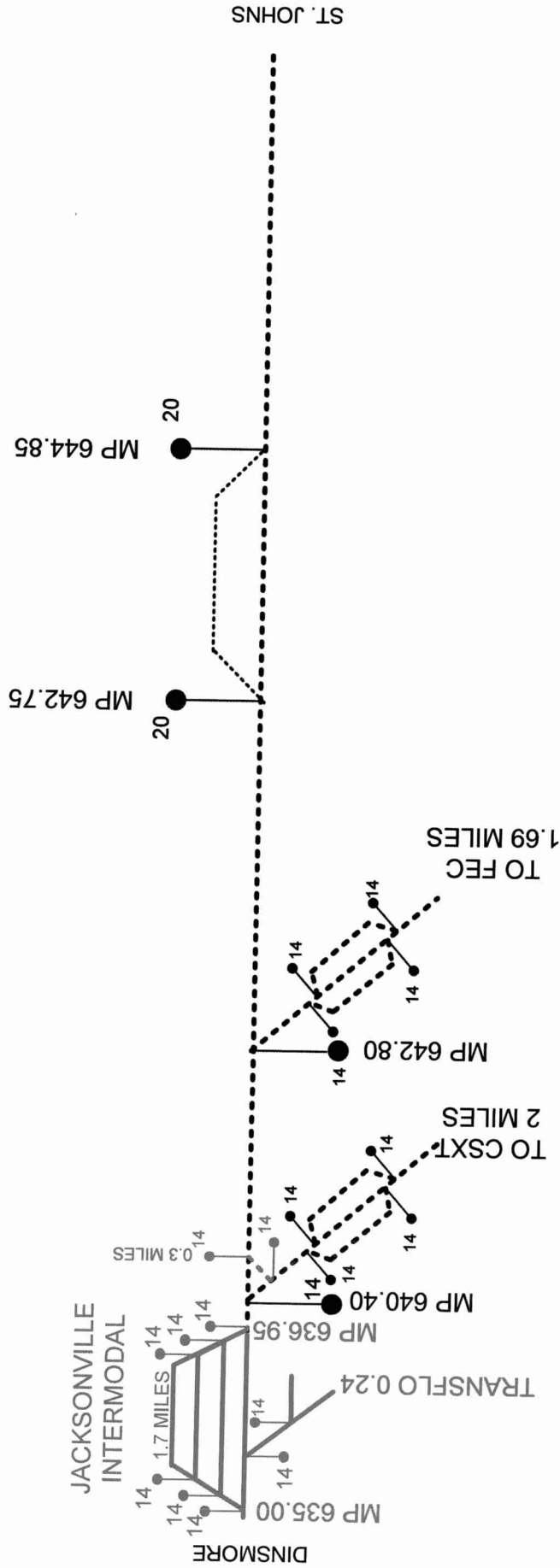
HB = HOT BEARING DETECTOR
DE OR DED = DRAGGING EQUIPMENT DETECTOR
HW = HOT WHEEL DETECTOR

AEI 1 AUTOMATIC EQUIPMENT IDENTIFICATION SCANNER WITH NUMBER OF TRACKS COVERED

PREPARED BY:

CROUCH ENGINEERING

REBUTTAL EXHIBIT:
III-B-2



ROUTE MILES: 11.90

PAGE 12

DIVISION: SFFR-WEST ROUTE SUBDIVISION: JACKSONVILLE TERMINAL
 FROM: DINSMORE MP: 635.20 TO: ST. JOHNS MP: 648.20

DATE: 4/9/2010
 Not To Scale

LEGEND

— 136# CWR
 - - - 115# CWR

● 20 = TURNOUT TYPE*

* TURNOUT TYPE
 20 - #20 ELECTRIC
 14 - #14 ELECTRIC
 14H - #14H HAND
 10 - #10 HAND

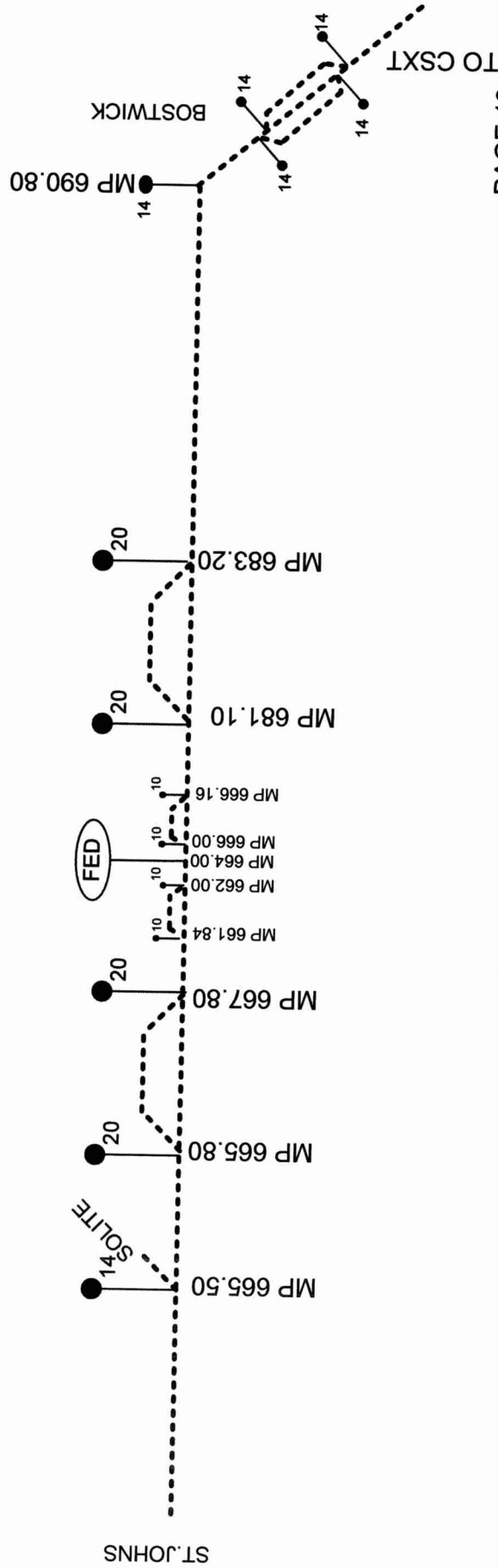
(FED) 1 FAILED EQUIPMENT DETECTOR WITH NUMBER OF TRACKS COVERED

HB = HOT BEARING DETECTOR
 DE OR DED = DRAGGING EQUIPMENT DETECTOR
 HW = HOT WHEEL DETECTOR

(AEI) 1 AUTOMATIC EQUIPMENT IDENTIFICATION SCANNER WITH NUMBER OF TRACKS COVERED

CROUCH ENGINEERING

REBUTTAL EXHIBIT:
 III-B-2



ROUTE MILES: 42.21

PAGE 13

DIVISION: SFFR-WEST ROUTE SUBDIVISION: SANFORD

DIVISION: SFFR-WEST ROUTE
FROM: ST. JOHNS MP: 648.20

DATE: 4/9/2010

Not To Scale

PREPARED BY:

— - 136# CWR
- - - 115# CWR

— -136# CWR

----- 115# CWR

● 20 = TURNOUT TYPE*

* TURNOUT TYPE

20 - #20 ELECTRIC

14 - #14 ELECTRIC

14H - #14H HAND

10 - #10 HAND

[illegible]

HB = HOT BEARING DETECTOR

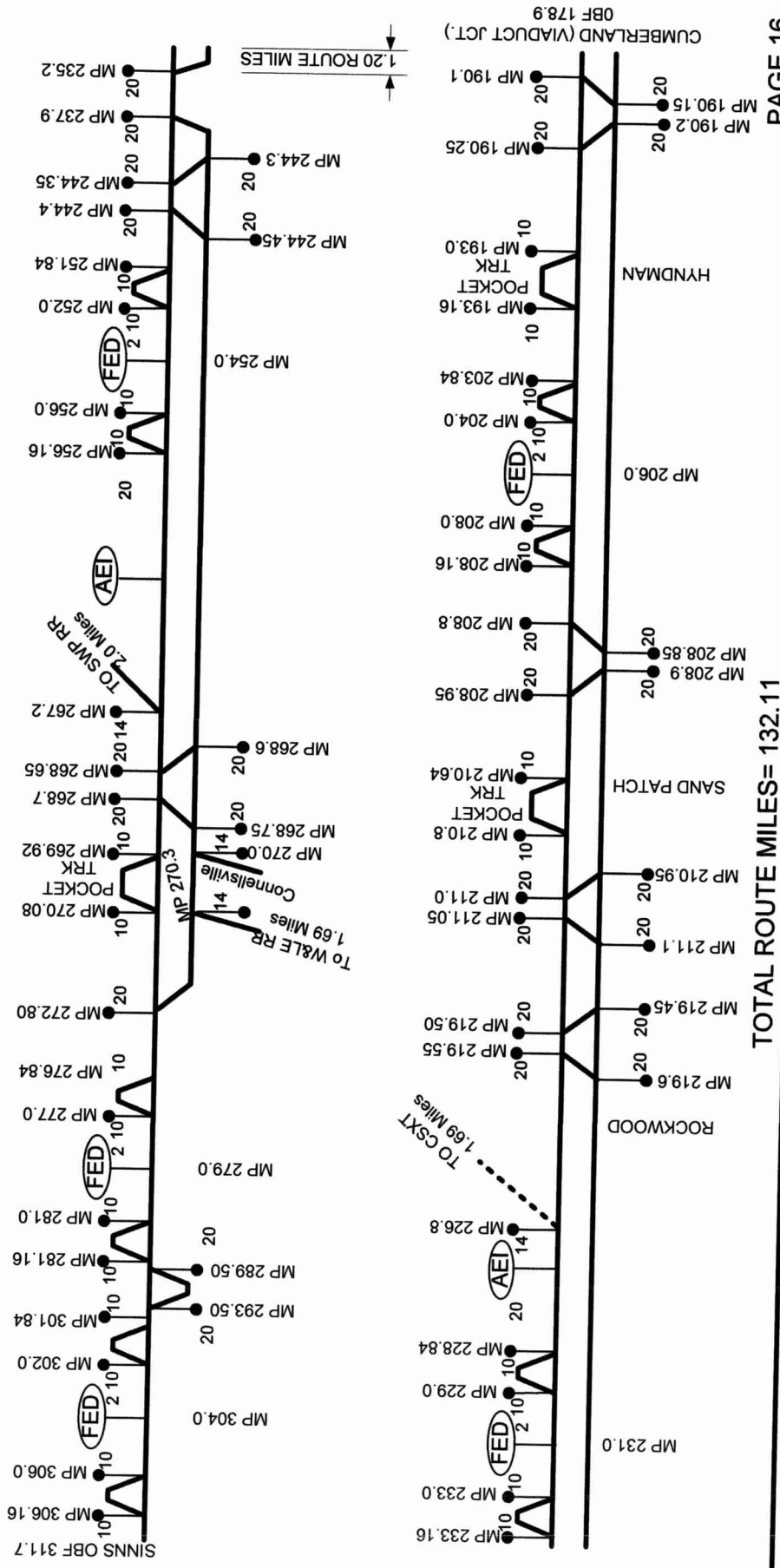
DE OR DED = DRAGGING EQUIPMENT DETECTOR

HW = HOT WHEEL DETECTOR

AEI AUTOMATIC EQUIPMENT IDENTIFICATION
SCANNER WITH NUMBER OF TRACKS COVERED

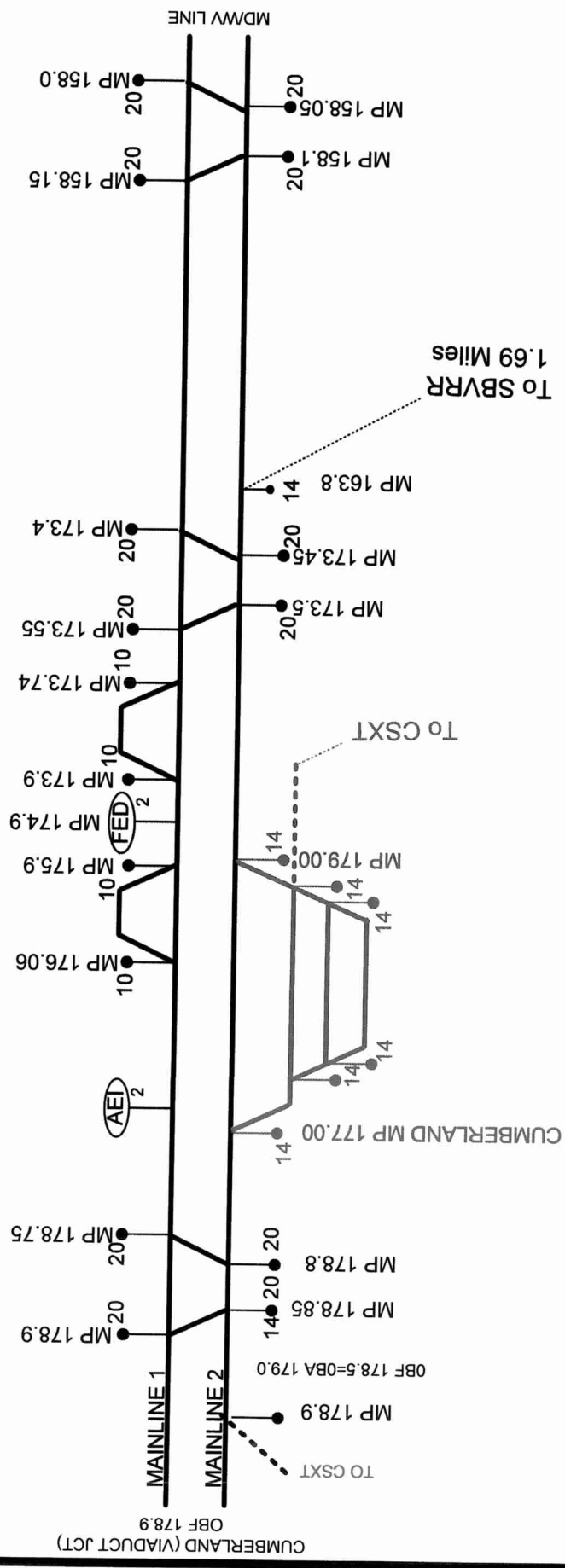
CROUCH ENGINEERING

**REBUTTAL EXHIBIT:
III-B-2**



TOTAL ROUTE MILES= 132.11

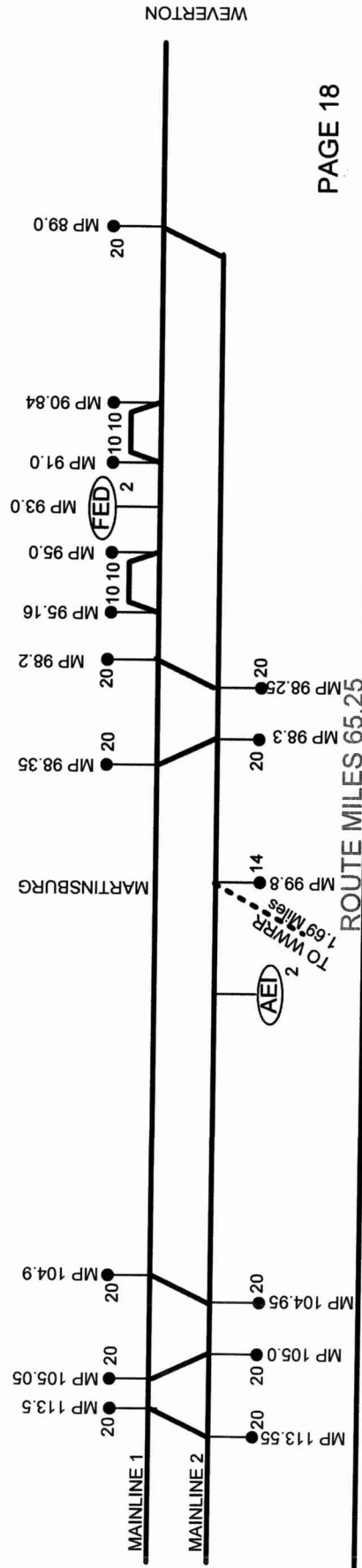
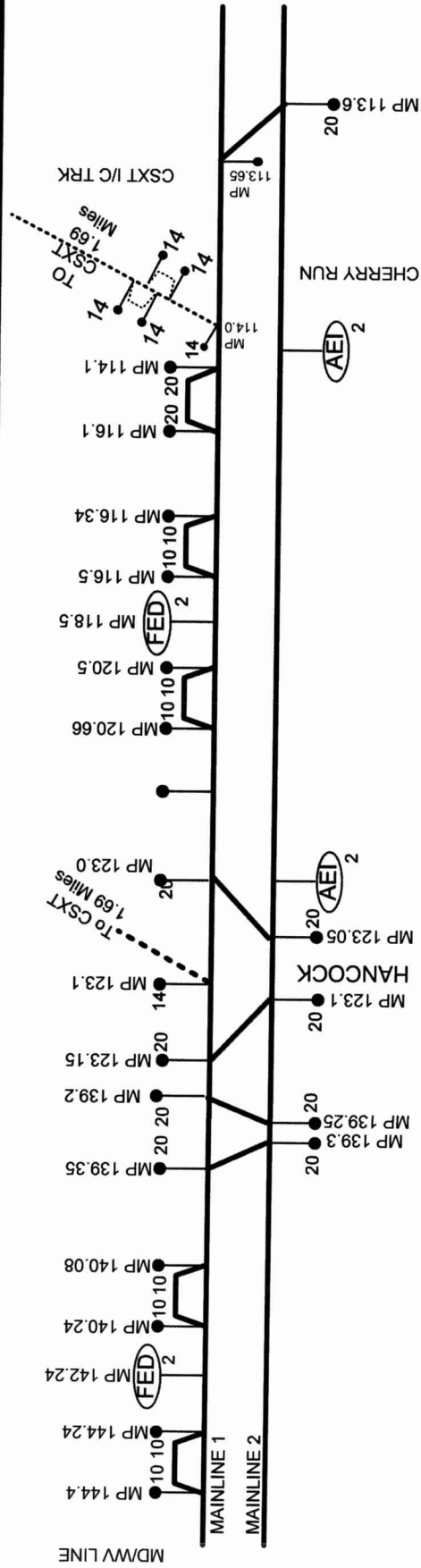
DIVISION: SFRR-EAST ROUTE SUBDIVISION: BF KEYSTONE FROM: SINNS MP: 0BF 311.7 TO: CUMBERLAND(VIADUCT JCT.) MP: 0BF 178.9		DATE: 4/9/2010 Not To Scale	PREPARED BY: 	REBUTTAL EXHIBIT: III-B-2
LEGEND - 136# CWR - 115# CWR * TURNOUT TYPE 20 - #20 ELECTRIC 14 - #14 ELECTRIC 14H - #14H HAND 10 - #10 HAND 20 = TURNOUT TYPE*		FAILED EQUIPMENT DETECTOR WITH NUMBER OF TRACKS COVERED (FED) 1 HB = HOT BEARING DETECTOR DE OR DED = DRAGGING EQUIPMENT DETECTOR HW = HOT WHEEL DETECTOR AEI 1 AUTOMATIC EQUIPMENT IDENTIFICATION SCANNER WITH NUMBER OF TRACKS COVERED		



ROUTE MILES 28.77

PAGE 17

DIVISION: SFRR-EAST ROUTE SUBDIVISION: CUMBERLAND TERMINAL FROM: CUMBERLAND/VIADUCT JCT. MP: OBF 178.9 TO: MDWV LINE MP: OBA144.5		4/9/2010 Not To Scale
LEGEND — - 136# CWR - - - - - 115# CWR ● 20 = TURNOUT TYPE*		FAILED EQUIPMENT DETECTOR WITH NUMBER OF TRACKS COVERED (FED) 1 HB = HOT BEARING DETECTOR DE OR DED = DRAGGING EQUIPMENT DETECTOR HW = HOT WHEEL DETECTOR AUTOMATIC EQUIPMENT IDENTIFICATION (AEI) 1 SCANNER WITH NUMBER OF TRACKS COVERED
PREPARED BY: CROUCH ENGINEERING		REBUTTAL EXHIBIT: III-B-2



PAGE 18

DIVISION: SFRR-EAST ROUTE SUBDIVISION: CUMBERLAND
 FROM: MDMV LINE MP:0BA 144.5 TO: WEVERTON MP:0BA 78.8

PREPARED BY:

CROUCH ENGINEERING

**REBUTTAL EXHIBIT:
III-B-2**

NO.	DATE	DESCRIPTION	FAILED EQUIPMENT DETECTOR WITH NUMBER OF TRACKS COVERED
1	10/10/2018	10/10/2018	10/10/2018
2	10/10/2018	10/10/2018	10/10/2018
3	10/10/2018	10/10/2018	10/10/2018
4	10/10/2018	10/10/2018	10/10/2018
5	10/10/2018	10/10/2018	10/10/2018
6	10/10/2018	10/10/2018	10/10/2018
7	10/10/2018	10/10/2018	10/10/2018
8	10/10/2018	10/10/2018	10/10/2018
9	10/10/2018	10/10/2018	10/10/2018
10	10/10/2018	10/10/2018	10/10/2018
11	10/10/2018	10/10/2018	10/10/2018
12	10/10/2018	10/10/2018	10/10/2018
13	10/10/2018	10/10/2018	10/10/2018
14	10/10/2018	10/10/2018	10/10/2018
15	10/10/2018	10/10/2018	10/10/2018
16	10/10/2018	10/10/2018	10/10/2018
17	10/10/2018	10/10/2018	10/10/2018
18	10/10/2018	10/10/2018	10/10/2018
19	10/10/2018	10/10/2018	10/10/2018
20	10/10/2018	10/10/2018	10/10/2018
21	10/10/2018	10/10/2018	10/10/2018
22	10/10/2018	10/10/2018	10/10/2018
23	10/10/2018	10/10/2018	10/10/2018
24	10/10/2018	10/10/2018	10/10/2018
25	10/10/2018	10/10/2018	10/10/2018
26	10/10/2018	10/10/2018	10/10/2018
27	10/10/2018	10/10/2018	10/10/2018
28	10/10/2018	10/10/2018	10/10/2018
29	10/10/2018	10/10/2018	10/10/2018
30	10/10/2018	10/10/2018	10/10/2018
31	10/10/2018	10/10/2018	10/10/2018
32	10/10/2018	10/10/2018	10/10/2018
33	10/10/2018	10/10/2018	10/10/2018
34	10/10/2018	10/10/2018	10/10/2018
35	10/10/2018	10/10/2018	10/10/2018
36	10/10/2018	10/10/2018	10/10/2018
37	10/10/2018	10/10/2018	10/10/2018
38	10/10/2018	10/10/2018	10/10/2018
39	10/10/2018	10/10/2018	10/10/2018
40	10/10/2018	10/10/2018	10/10/2018
41	10/10/2018	10/10/2018	10/10/2018
42	10/10/2018	10/10/2018	10/10/2018
43	10/10/2018	10/10/2018	10/10/2018
44	10/10/2018	10/10/2018	10/10/2018
45	10/10/2018	10/10/2018	10/10/2018
46	10/10/2018	10/10/2018	10/10/2018
47	10/10/2018	10/10/2018	10/10/2018
48	10/10/2018	10/10/2018	10/10/2018
49	10/10/2018	10/10/2018	10/10/2018
50	10/10/2018	10/10/2018	10/10/2018
51	10/10/2018	10/10/2018	10/10/2018
52	10/10/2018	10/10/2018	10/10/2018
53	10/10/2018	10/10/2018	10/10/2018
54	10/10/2018	10/10/2018	10/10/2018
55	10/10/2018	10/10/2018	10/10/2018
56	10/10/2018	10/10/2018	10/10/2018
57	10/10/2018	10/10/2018	10/10/2018
58	10/10/2018	10/10/2018	10/10/2018
59	10/10/2018	10/10/2018	10/10/2018
60	10/10/2018	10/10/2018	10/10/2018
61	10/10/2018	10/10/2018	10/10/2018
62	10/10/2018	10/10/2018	10/10/2018
63	10/10/2018	10/10/2018	10/10/2018
64	10/10/2018	10/10/2018	10/10/2018
65			

FED

* TURNOUT TYPE
20 - #20 ELECTRIC
14 - #14 ELECTRIC
14H - #14H HAND
10 - #10 HAND

— -136# CWR
- - - -115# CWR

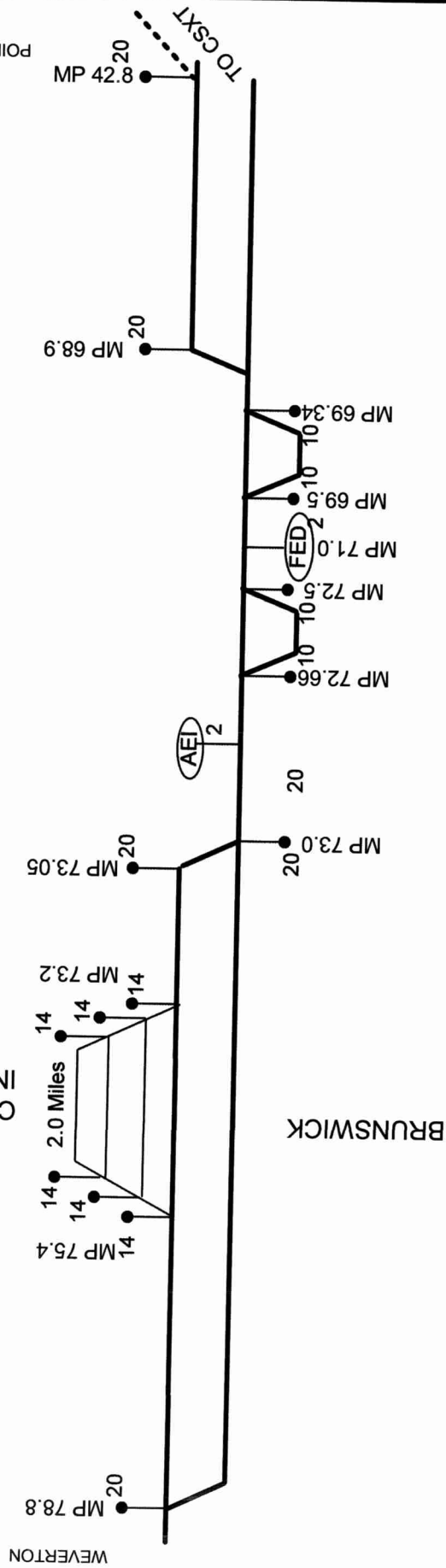
●20 = TURNOUT TYPE*

HB = HOT BEARING DETECTOR
DE OR DED = DRAGGING EQUIPMENT DETECTOR
HW = HOT WHEEL DETECTOR

AEI 1
AUTOMATIC EQUIPMENT IDENTIFICATION
SCANNER WITH NUMBER OF TRACKS COVERED

AUTOMATIC EQUIPMENT IDENTIFICATION

CSXT INTERCHANGE

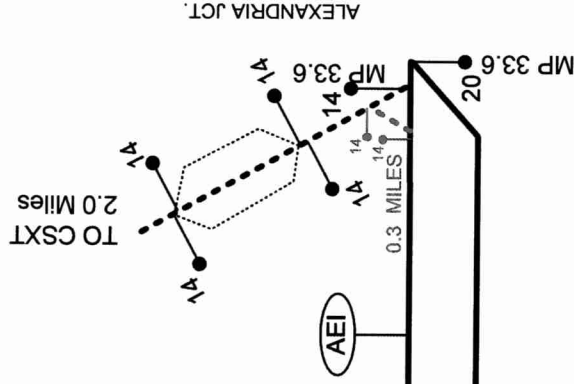


ROUTE MILES 10.23

PAGE 19

DIVISION: SFRR-EAST ROUTE FROM: WEVERTON MP: 78.8 TO: POINT OF ROCKS MP: 42.8		SUBDIVISION: BA METROPOLITAN NORTH DATE: 4/9/2010 Not To Scale
LEGEND - 136# CWR - 115# CWR - 20 = TURNOUT TYPE*		* TURNOUT TYPE 20 - #20 ELECTRIC 14 - #14 ELECTRIC 14H - #14H HAND 10 - #10 HAND
FAILED EQUIPMENT DETECTOR WITH NUMBER OF TRACKS COVERED (FED) 1		HB = HOT BEARING DETECTOR DE OR DED = DRAGGING EQUIPMENT DETECTOR HW = HOT WHEEL DETECTOR
AUTOMATIC EQUIPMENT IDENTIFICATION (AEI) 1 SCANNER WITH NUMBER OF TRACKS COVERED		REBUTTAL EXHIBIT: III-B-2
PREPARED BY: CROUCH ENGINEERING		

F TOWER DC BA 1.0=BAA 37.0



MAINLINE 1

MAINLINE 2

ROUTE MILES 3.42

PAGE 21

DIVISION: SFRR-EAST ROUTE SUBDIVISION: BAA CAPITAL
FROM: F TOWER DC MP: BAA 37.00 TO: ALEXANDRIA JCT. MP: BAA 33.60

DATE: 4/9/2010

Not To Scale

PREPARED BY:

CROUCH ENGINEERING

REBUTTAL EXHIBIT:
III-B-2

LEGEND

— - 136# CWR
- - - - - 115# CWR

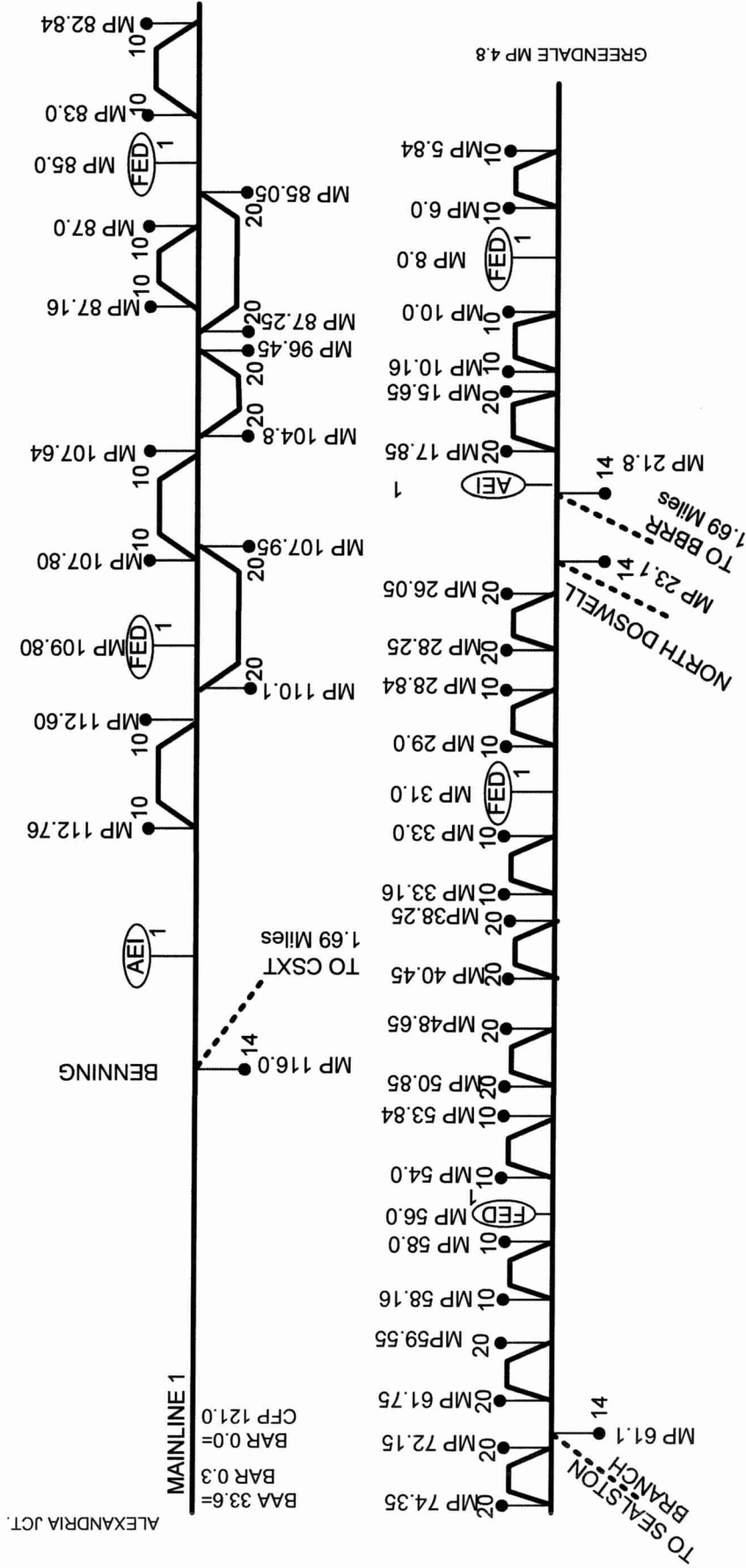
• 20 = TURNOUT TYPE*

* TURNOUT TYPE
20 - #20 ELECTRIC
14 - #14 ELECTRIC
14H - #14H HAND
10 - #10 HAND

(FED) 1 FAILED EQUIPMENT DETECTOR WITH NUMBER OF TRACKS COVERED

HB = HOT BEARING DETECTOR
DE OR DED = DRAGGING EQUIPMENT DETECTOR
HW = HOT WHEEL DETECTOR

(AEI) 1 AUTOMATIC EQUIPMENT IDENTIFICATION SCANNER WITH NUMBER OF TRACKS COVERED



PAGE 22

PREPARED BY:

CROUCH ENGINEERING

**REBUTTAL EXHIBIT:
III-B-2**

DATE: 4/9/2010
Not To Scale

DIVISION: SFRR-EAST ROUTE SUBDIVISION: RF&P
FROM: ALEXANDRIA JCT. MP: BAA 33.6 TO: GREENDALE

[illegible]

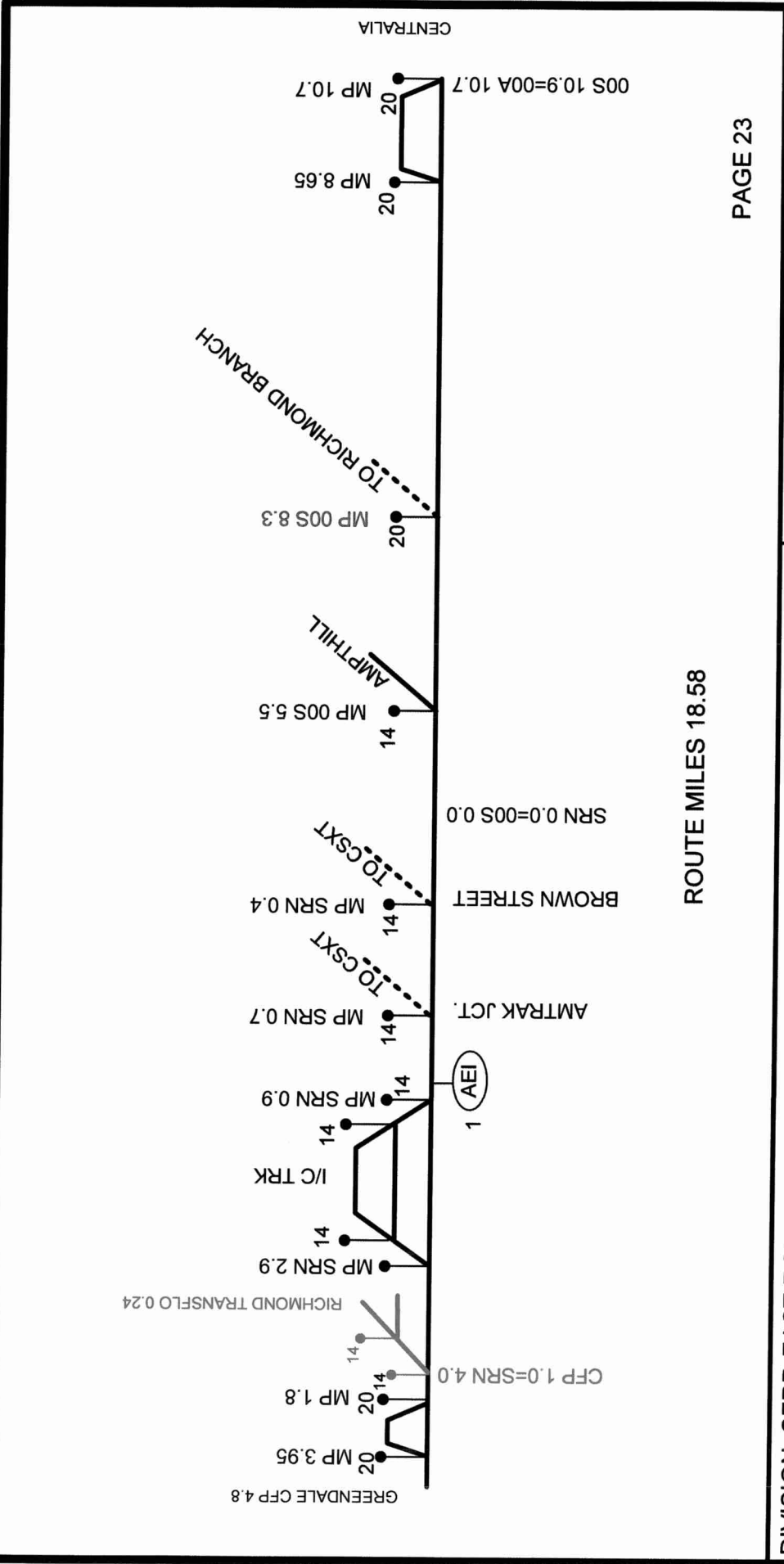
* TURNOUT TYPE
20 - #20 ELECTRIC
14 - #14 ELECTRIC
14H - #14H HAND
10 - #10 HAND

— - 136# CWR
- - - - 115# CWR

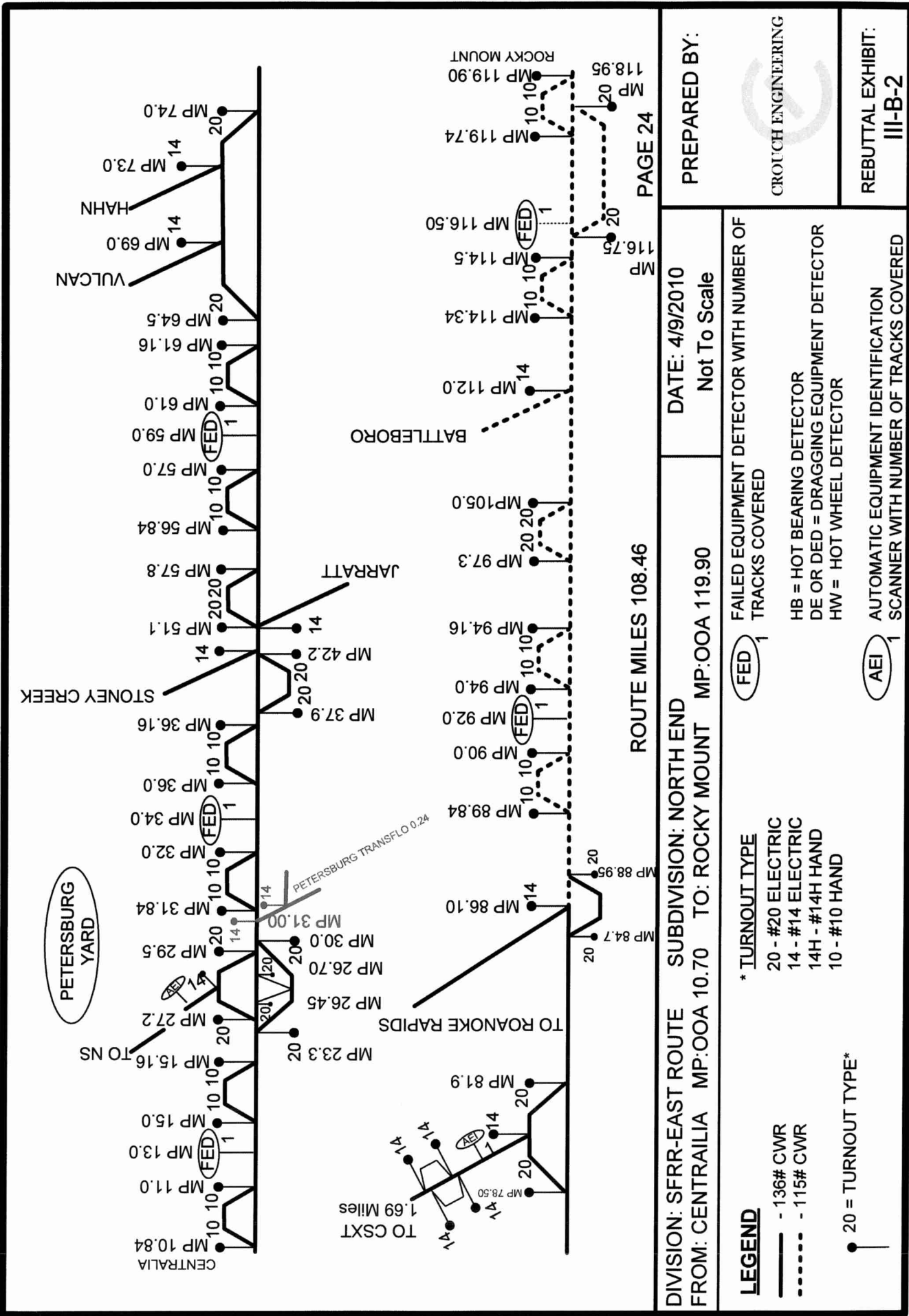
● 20 = TURNOUT TYPE*

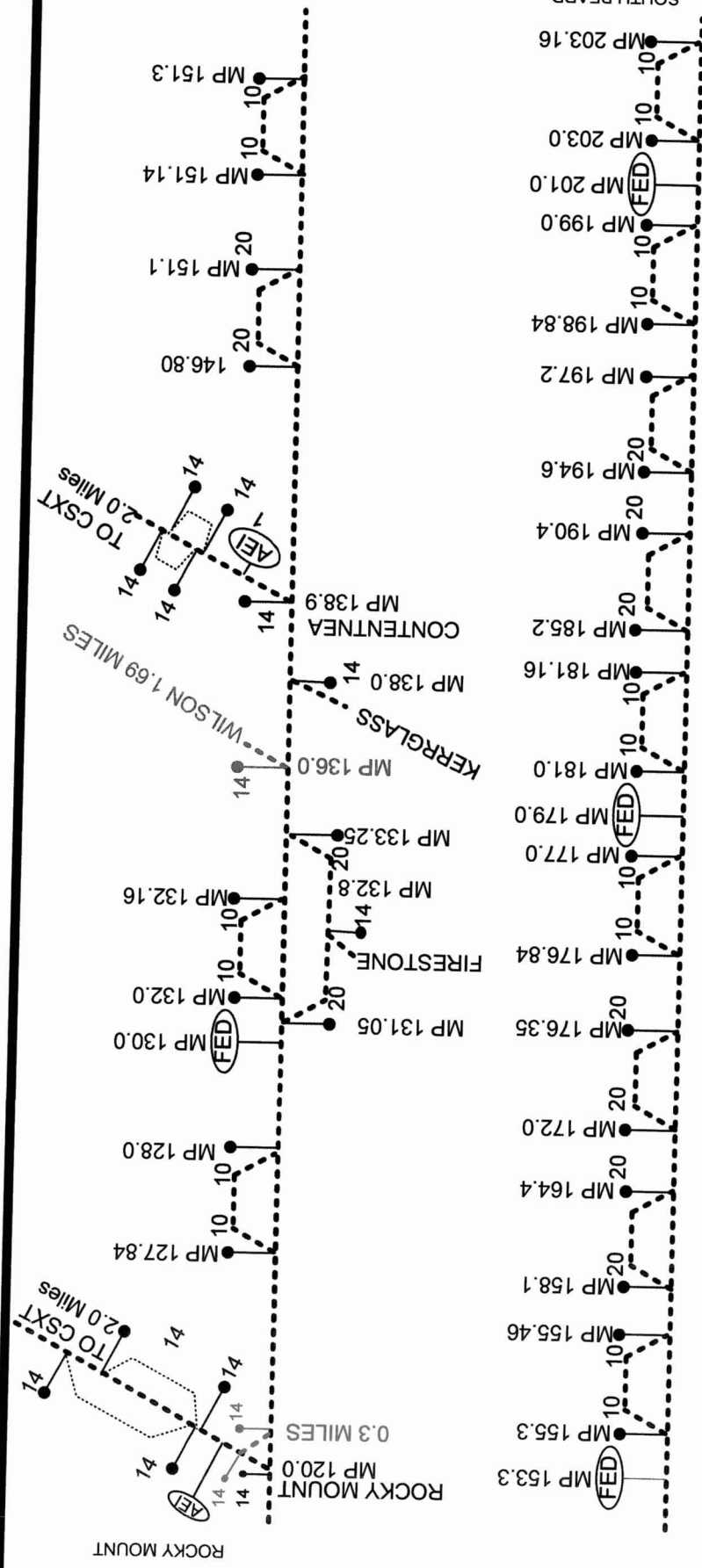
HB = HOT BEARING DETECTOR
DE OR DED = DRAGGING EQUIPMENT DETECTOR
HW = HOT WHEEL DETECTOR

AUTOMATIC EQUIPMENT IDENTIFICATION SCANNER WITH NUMBER OF TRACKS COVERED



DIVISION: SFRR-EAST ROUTE SUBDIVISION: RICHMOND TERMINAL/BELLWOOD FROM: GREENDALE MP: CFP 4.8 TO: CENTRALIA MP: 00A 10.70		DATE: 4/9/2010 Not To Scale	PREPARED BY: CROUCH ENGINEERING	REBUTTAL EXHIBIT: III-B-2
* TURNOUT TYPE 20 - #20 ELECTRIC 14 - #14 ELECTRIC 14H - #14H HAND 10 - #10 HAND		FAILED EQUIPMENT DETECTOR WITH NUMBER OF TRACKS COVERED HB = HOT BEARING DETECTOR DE OR DED = DRAGGING EQUIPMENT DETECTOR HW = HOT WHEEL DETECTOR		
20 = TURNOUT TYPE*		AUTOMATIC EQUIPMENT IDENTIFICATION SCANNER WITH NUMBER OF TRACKS COVERED		





ROUTE MILES 83.85

DIVISION: SFRR-EAST ROUTE SUBDIVISION: A SOUTH END FROM: ROCKY MOUNT MP:A 119.90 TO: SOUTH BEARD MP:A 204.1		DATE: 4/9/2010 Not To Scale	PREPARED BY: CROUCH ENGINEERING	REBUTTAL EXHIBIT: III-B-2
LEGEND — 136# CWR - - - 115# CWR • 20 = TURNOUT TYPE*		FAILED EQUIPMENT DETECTOR WITH NUMBER OF TRACKS COVERED (FED) 1 HB = HOT BEARING DETECTOR DE OR DED = DRAGGING EQUIPMENT DETECTOR HW = HOT WHEEL DETECTOR (AEI) 1 AUTOMATIC EQUIPMENT IDENTIFICATION SCANNER WITH NUMBER OF TRACKS COVERED		