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**PUBLIC VERSION
HIGHLY CONFIDENTIAL AND CONFIDENTIAL MATERIAL REDACTED**

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

**PUBLIC SERVICE COMPANY OF COLORADO
D/B/A XCEL ENERGY,**

Complainant,

v.

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

Defendant.

Docket No. 42057



ENTERED
Office of Proceedings

APR 05 2004

Part of
Public Record

**ATTACHMENTS TO
COMPLAINANT'S POST-ARGUMENT BRIEF**

Bruce A. Colt, Esq.
Senior Attorney
XCEL ENERGY
800 Nicollet Mall, Suite 2900
Minneapolis, MN 55402
(612) 215-4587

Thomas W. Wilcox, Esq.
David E. Benz, Esq.
Michael H. Higgins, Esq.
THOMPSON HINE LLP
1920 N Street, N.W., Suite 800
Washington, DC 20036
(202) 331-8800

Attorneys for Complainant

April 5, 2004

IMPACT ON THEORETICAL CAPACITY FROM ADDITION OF TRAINS EXCLUDED BY BNSF FROM WCC TRAFFIC GROUP

Line Segment (1)	Longest Single Track To/From Mileposts (2)	Segment Miles (3)	Minutes Per Train (4)	Maximum Trains Per Day (5)	Peak Day Trains BNSF RTC (6)	(Loaded & Empty) Adjusted (7)	Percent Capacity BNSF RTC (8)	Adjusted (9)
1 Eagle Butte - Bill	25.1 to 38.9	13.8	35	65				
2 Bill - Wendover	119.8 to 133.0	7.6	22	106				
3 Wendover - Northport	34.1 to 44.4	10.3	28	83				
4 Northport - Pawnee	45.1 to 58.9	13.8	35	65				

Sources:

Column (2) & Column (3): BNSF Reply, Exhibit III-F-4.
Column (4): [Column (3) / 50 MPH] + [Column (3) / 60 MPH] + 5 minutes for acceleration or deceleration.
Column (5): 1440 minutes per day / Column (4) x 2 directions x 80% Efficiency rating for CTC territory.
Column (6): BNSF Reply electronic worksheet "simulation_WCC_5_count.xls."
Column (7)

Column (8): Column (6) / Column (5).
Column (9): Column (7) / Column (5).

REDACTED

WCC Specific Productivity Input Index

	Annual Operating Expenses <u>1/</u> (Nominal \$) <u>2/</u>	Annual Depreciation <u>2/</u> (Nominal \$) <u>3/</u>	Interest Charges <u>3/</u> (Nominal \$) <u>4/</u>	Contingent Interest <u>4/</u> (Nominal \$) <u>5/</u>	Total Adjusted Expenses <u>5/</u> (Nominal \$) <u>6/</u>	Rail Cost Deflator <u>6/</u> (7)	Total Adjusted Expenses (2001 \$) <u>7/</u> (8)	Input Index <u>8/</u> (9)
1. 2001	\$105,174,046	\$23,461,766	\$29,067,737	\$0	\$157,703,550			
2. 2002	108,169,304	23,092,119	27,938,426	0	\$159,199,849			
3. 2003	123,173,256	24,574,189	28,962,283	0	\$176,709,727			
4. 2004	125,310,053	24,964,814	28,581,193	0	\$178,856,060			
5. 2005	129,180,221	25,570,190	28,346,222	0	\$183,096,633			
6. 2006	133,074,998	25,283,118	28,071,599	0	\$186,429,715			
7. 2007	138,782,620	25,908,855	27,634,436	0	\$192,325,911			
8. 2008	142,538,649	26,491,794	27,009,909	0	\$196,040,353			
9. 2009	146,639,131	27,094,480	26,251,796	0	\$199,985,407			
10. 2010	133,831,694	24,630,421	22,520,719	0	\$180,982,834			
11. 2011	154,902,206	28,355,159	24,260,664	0	\$207,518,029			
12. 2012	158,899,135	29,007,328	22,983,575	0	\$210,890,038			
13. 2013	162,961,296	29,674,496	21,490,540	0	\$214,126,333			
14. 2014	166,751,169	30,357,010	19,757,592	0	\$216,865,771			
15. 2015	171,217,460	31,055,221	17,758,272	0	\$220,030,953			
16. 2016	175,851,250	31,769,491	15,463,379	0	\$223,084,121			
17. 2017	179,965,286	32,500,189	12,840,683	0	\$225,306,158			
18. 2018	184,654,569	33,247,694	9,854,619	0	\$227,756,882			
19. 2019	189,333,698	34,012,391	6,465,943	0	\$229,812,032			
20. 2020	194,064,482	34,794,676	2,631,356	0	\$231,490,513			

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- 1/ Xcel Rebuttal electronic file "Exhibit-III-H-3, 123," Table K in nominal dollars.
- 2/ Xcel Rebuttal electronic file "Exhibit-III-H-3, 123," Table C Column (10) divided by Table C Column (3) adjusted for allocation of Engineering investment in nominal dollars.
- 3/ Xcel Rebuttal electronic file "Exhibit-III-H-3, 123," Table E in nominal dollars.
- 4/ The WCC does not have any contingent interest.
- 5/ Sum of Columns (2) to (5)
- 6/ Forecasted cumulative change in the RCAF-U used as a surrogate for the forecasted change in the railroad cost recovery index.
- 7/ Column (6) ÷ Column (7)
- 8/ Current Year Column (8) ÷ Previous Year Column (8)

WCC Specific Productivity Output Index

	<u>Year</u> (1)	<u>Total SAC Net Ton-Miles</u> <u>1/</u> (2)	<u>Output Index</u> <u>2/</u> (3)
1.	2001	26,425,654,233	---
2.	2002	28,478,709,993	1.078
3.	2003	30,994,627,860	1.088
4.	2004	30,968,368,347	0.999
5.	2005	31,190,137,128	1.007
6.	2006	31,402,362,854	1.007
7.	2007	32,079,852,623	1.022
8.	2008	32,372,790,104	1.009
9.	2009	32,598,209,096	1.007
10.	2010	32,742,087,551	1.004
11.	2011	32,920,197,773	1.005
12.	2012	33,014,023,031	1.003
13.	2013	33,100,971,697	1.003
14.	2014	33,070,564,309	0.999
15.	2015	33,231,975,624	1.005
16.	2016	33,387,610,325	1.005
17.	2017	33,342,534,612	0.999
18.	2018	33,469,794,105	1.004
19.	2019	33,577,286,721	1.003
20.	2020	33,668,752,312	1.003

1/ Xcel Rebuttal electronic file "WCC Traffic_Xcel Rebuttal.xls."

2/ Current Year Column (2) ÷ Previous Year Column (2)

REDACTED

Docket No. 42057 - Attach. No. 2
to Xcel's Post Argument Brief
April 5, 2004
Page 3 of 5

WCC Specific Annual Productivity Change

	<u>Year</u>	<u>Output</u> <u>Index 1/</u>	<u>Input</u> <u>Index 2/</u>	<u>Productivity</u> <u>Change 3/</u>	<u>Multi-Year</u> <u>Average 4/</u>
	(1)	(2)	(3)	(4)	(5)
1.	2001	---			
2.	2002	1.078			
3.	2003	1.088			
4.	2004	0.999			
5.	2005	1.007			
6.	2006	1.007			
7.	2007	1.022			
8.	2008	1.009			
9.	2009	1.007			
10.	2010	1.004			
11.	2011	1.005			
12.	2012	1.003			
13.	2013	1.003			
14.	2014	0.999			
15.	2015	1.005			
16.	2016	1.005			
17.	2017	0.999			
18.	2018	1.004			
19.	2019	1.003			
20.	2020	1.003			

1/ Page 1 of 5

2/ Page 2 of 5

3/ Column (2) ÷ Column (3)

4/ Year 2002 is equal to annual change between 2001 and 2002. Year 2003 equal to the geometric average of change between 2001 and 2003. Year 2004 equal to the geometric average of changes between 2001 and 2004. Year 2005 equal to the geometric average of changes between 2001 and 2005. Year 2006 and thereafter are equal to five year rolling geometric average.

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Docket No. 42057 - Attach. No. 2
to Xcel's Post Argument Brief
April 5, 2004
Page 4 of 5

Development of Rail Cost Adjustment Factor Adjusted For WCC Specific Productivity

<u>Quarter</u> (1)	<u>Historic and DRI/WEFA Forecast 1/</u>			<u>WCC Productivity Percent 2/</u> (5)	<u>WCC PAF 3/</u> (6)	<u>WCC RCAF-A 4/</u> (7)	<u>Change In Avg. WCC Rev/Ton 5/</u> (8)
	<u>STB RCAF-U</u> (2)	<u>STB PAF</u> (3)	<u>STB RCAF-A</u> (4)				
1. 1Q2001				0.00%	1.818		1.0000
2. 2Q2001				0.00%	1.818		1.0000
3. 3Q2001				0.00%	1.818		1.0000
4. 4Q2001				0.00%	1.818		1.0000
5. 1Q2002				1.25%	1.841		0.9999
6. 2Q2002				1.25%	1.864		0.9999
7. 3Q2002				1.25%	1.887		0.9998
8. 4Q2002				1.25%	1.910		0.9998
9. 1Q2003				1.16%	1.932		0.9862
10. 2Q2003				1.16%	1.955		0.9728
11. 3Q2003				1.16%	1.977		0.9595
12. 4Q2003				1.16%	2.000		0.9465
13. 1Q2004				0.79%	2.016		0.9512
14. 2Q2004				0.79%	2.032		0.9560
15. 3Q2004				0.79%	2.048		0.9608
16. 4Q2004				0.79%	2.064		0.9657
17. 1Q2005				0.64%	2.078		0.9654
18. 2Q2005				0.64%	2.091		0.9652
19. 3Q2005				0.64%	2.105		0.9649
20. 4Q2005				0.64%	2.118		0.9647
21. 1Q2006				0.59%	2.131		0.9710
22. 2Q2006				0.59%	2.143		0.9774
23. 3Q2006				0.59%	2.156		0.9838
24. 4Q2006				0.59%	2.168		0.9903
25. 1Q2007				0.41%	2.177		0.9914
26. 2Q2007				0.41%	2.186		0.9926
27. 3Q2007				0.41%	2.195		0.9938
28. 4Q2007				0.41%	2.204		0.9950
29. 1Q2008				0.26%	2.210		0.9957
30. 2Q2008				0.26%	2.216		0.9964
31. 3Q2008				0.26%	2.222		0.9972
32. 4Q2008				0.26%	2.228		0.9979
33. 1Q2009				0.30%	2.234		1.0019
34. 2Q2009				0.30%	2.241		1.0059
35. 3Q2009				0.30%	2.247		1.0099
36. 4Q2009				0.30%	2.254		1.0140
37. 1Q2010				0.30%	2.261		1.0138
38. 2Q2010				0.30%	2.268		1.0136
39. 3Q2010				0.30%	2.274		1.0134
40. 4Q2010				0.30%	2.281		1.0132
41. 1Q2011				0.27%	2.288		1.0170
42. 2Q2011				0.27%	2.294		1.0208
43. 3Q2011				0.27%	2.300		1.0247
44. 4Q2011				0.27%	2.306		1.0285
45. 1Q2012				0.25%	2.312		1.0328
46. 2Q2012				0.25%	2.318		1.0371
47. 3Q2012				0.25%	2.324		1.0414
48. 4Q2012				0.25%	2.329		1.0458

REDACTED

Docket No. 42057 - Attach. No. 2
to Xcel's Post Argument Brief
April 5, 2004
Page 5 of 5

Development of Rail Cost Adjustment Factor Adjusted For WCC Specific Productivity

<u>Quarter</u> (1)	<u>Historic and DRI/WEFA Forecast 1/</u>			<u>WCC Productivity Percent 2/</u> (5)	<u>WCC PAF 3/</u> (6)	<u>WCC RCAF-A 4/</u> (7)	<u>Change In Avg. WCC Rev/Ton 5/</u> (8)
	<u>STB RCAF-U</u> (2)	<u>STB PAF</u> (3)	<u>STB RCAF-A</u> (4)				
49. 1Q2013				0.24%	2.335		1.0466
50. 2Q2013				0.24%	2.340		1.0475
51. 3Q2013				0.24%	2.346		1.0483
52. 4Q2013				0.24%	2.352		1.0492
53. 1Q2014				0.24%	2.357		1.0530
54. 2Q2014				0.24%	2.363		1.0568
55. 3Q2014				0.24%	2.368		1.0607
56. 4Q2014				0.24%	2.374		1.0645
57. 1Q2015				0.26%	2.380		1.0692
58. 2Q2015				0.26%	2.386		1.0738
59. 3Q2015				0.26%	2.392		1.0785
60. 4Q2015				0.26%	2.398		1.0832
61. 1Q2016				0.28%	2.405		1.0878
62. 2Q2016				0.28%	2.412		1.0924
63. 3Q2016				0.28%	2.418		1.0971
64. 4Q2016				0.28%	2.425		1.1017
65. 1Q2017				0.29%	2.432		1.1052
66. 2Q2017				0.29%	2.439		1.1086
67. 3Q2017				0.29%	2.446		1.1121
68. 4Q2017				0.29%	2.453		1.1156
69. 1Q2018				0.32%	2.461		1.1204
70. 2Q2018				0.32%	2.469		1.1252
71. 3Q2018				0.32%	2.476		1.1300
72. 4Q2018				0.32%	2.484		1.1348
73. 1Q2019				0.36%	2.493		1.1399
74. 2Q2019				0.36%	2.502		1.1450
75. 3Q2019				0.36%	2.511		1.1501
76. 4Q2019				0.36%	2.520		1.1552
77. 1Q2020				0.38%	2.529		1.1604
78. 2Q2020				0.38%	2.539		1.1655
79. 3Q2020				0.38%	2.549		1.1707
80. 4Q2020				0.38%	2.558		1.1759

1/ Historic RCAF data is used through 1Q 2004. DRI-WEFA forecast data as used in Xcel Rebuttal evidence is used thereafter.

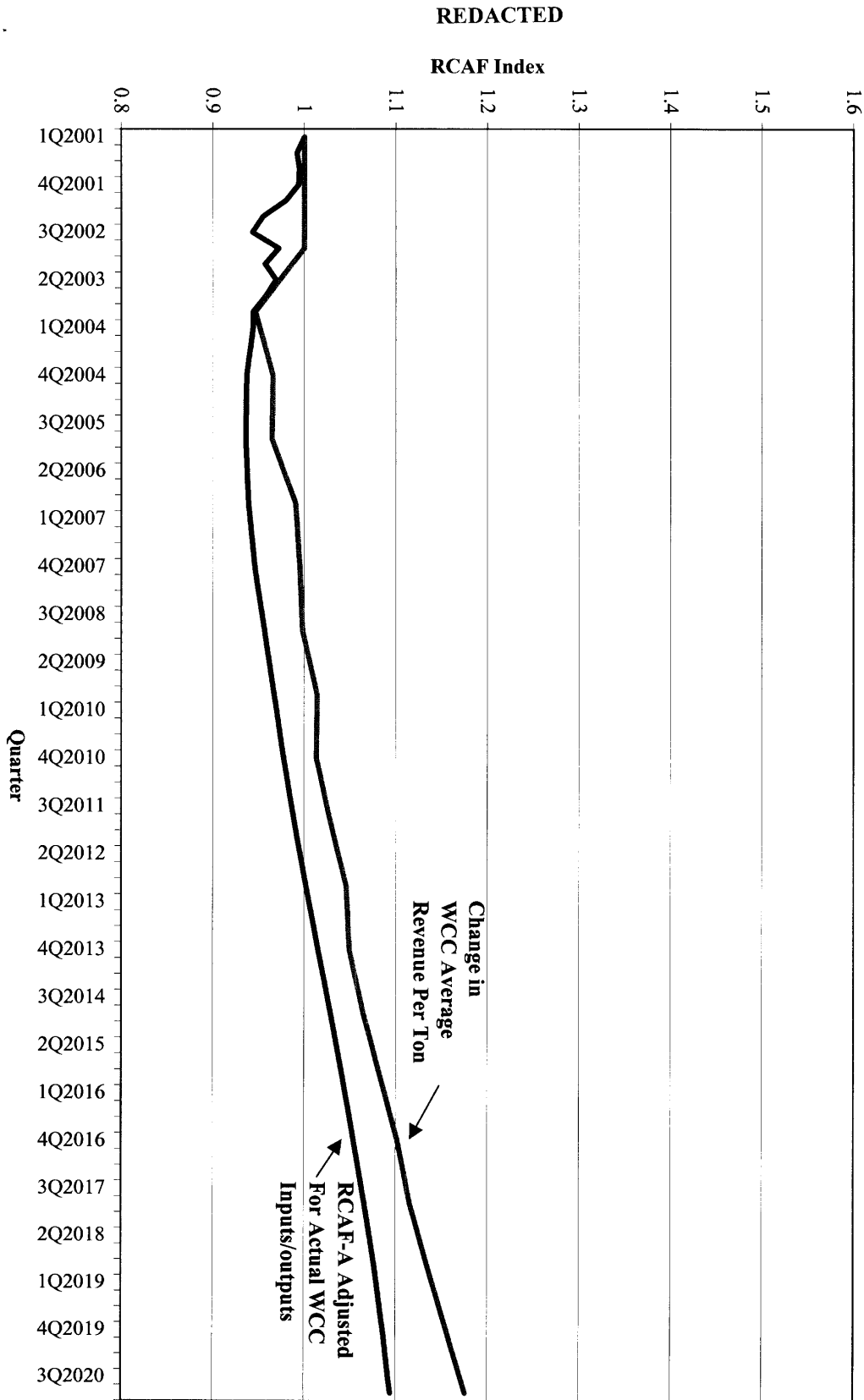
2/ [(Page 3, Column (5))²⁵] -1 for each year.

3/ Line 1 historic data. Line 2 through 83, [1 + Current Column (5)] x Previous Column (6).

4/ Column (2) ÷ Column (6)

5/ Xcel Rebuttal electronic file "WCC Traffic_Xcel Rebuttal.xls."

Rail Cost Adjustment Factor Adjusted For WCC Productivity



EIA Forecast of Future Coal Transportation Productivity

	<u>Year</u>	<u>EIA Unadjusted</u> <u>Coal Productivity</u> <u>Percentage 1/</u>	<u>Standard Error of</u> <u>EIA Coal Productivity</u> <u>Percentage 1/</u>	<u>EIA</u> <u>Productivity</u> <u>Parameter 1/</u>	<u>EIA Adjusted</u> <u>Coal Productivity</u> <u>Percentage 2/</u>
	(1)	(2)	(3)	(4)	(5)
1.	2001	2.15%	0.35%	-2	1.46%
2.	2002	2.15%	0.35%	-2	1.46%
3.	2003	2.15%	0.35%	-3	1.11%
4.	2004	2.08%	0.33%	-2	1.42%
5.	2005	2.08%	0.33%	-2	1.42%
6.	2006	2.08%	0.33%	-2	1.42%
7.	2007	2.08%	0.33%	-2	1.42%
8.	2008	2.08%	0.33%	-2	1.42%
9.	2009	2.08%	0.33%	-2	1.42%
10.	2010	2.08%	0.33%	-2	1.42%
11.	2011	2.08%	0.33%	-2	1.42%
12.	2012	2.08%	0.33%	-2	1.42%
13.	2013	2.08%	0.33%	-2	1.42%
14.	2014	2.08%	0.33%	-2	1.42%
15.	2015	2.08%	0.33%	-2	1.42%
16.	2016	2.08%	0.33%	-2	1.42%
17.	2017	2.08%	0.33%	-2	1.42%
18.	2018	2.08%	0.33%	-2	1.42%
19.	2019	2.08%	0.33%	-2	1.42%
20.	2020	2.08%	0.33%	-2	1.42%

1/ Source: Energy Information Administration

2/ Column (2) + [Column (3) x Column (4)]

Note: The EIA develops its unadjusted coal productivity percentage and its standard error of coal productivity percentage using a log linear regression model. The EIA productivity factor is a user defined variable used to reflect changes in future productivity.

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Docket No. 42057 - Attach. No. 4
to Xcel's Post Argument Brief
April 5, 2004
Page 2 of 3

Development of Rail Cost Adjustment Factor Utilizing EIA Forecast of Coal Traffic Productivity

<u>Quarter</u> (1)	<u>Historic and DRI/WEFA Forecast 1/</u>			<u>EIA Coal Productivity Percent 2/</u> (5)	<u>EIA PAF 3/</u> (6)	<u>EIA RCAF-A 4/</u> (7)
	<u>STB RCAF-U</u> (2)	<u>STB PAF</u> (3)	<u>STB RCAF-A</u> (4)			
1. 1Q2001				0.36%	1.8180	
2. 2Q2001				0.36%	1.8246	
3. 3Q2001				0.36%	1.8312	
4. 4Q2001				0.36%	1.8379	
5. 1Q2002				0.36%	1.8445	
6. 2Q2002				0.36%	1.8512	
7. 3Q2002				0.36%	1.8579	
8. 4Q2002				0.36%	1.8647	
9. 1Q2003				0.28%	1.8699	
10. 2Q2003				0.28%	1.8750	
11. 3Q2003				0.28%	1.8802	
12. 4Q2003				0.28%	1.8854	
13. 1Q2004				0.35%	1.8921	
14. 2Q2004				0.35%	1.8988	
15. 3Q2004				0.35%	1.9055	
16. 4Q2004				0.35%	1.9122	
17. 1Q2005				0.35%	1.9190	
18. 2Q2005				0.35%	1.9257	
19. 3Q2005				0.35%	1.9325	
20. 4Q2005				0.35%	1.9394	
21. 1Q2006				0.35%	1.9462	
22. 2Q2006				0.35%	1.9531	
23. 3Q2006				0.35%	1.9600	
24. 4Q2006				0.35%	1.9669	
25. 1Q2007				0.35%	1.9739	
26. 2Q2007				0.35%	1.9808	
27. 3Q2007				0.35%	1.9878	
28. 4Q2007				0.35%	1.9948	
29. 1Q2008				0.35%	2.0019	
30. 2Q2008				0.35%	2.0090	
31. 3Q2008				0.35%	2.0160	
32. 4Q2008				0.35%	2.0232	
33. 1Q2009				0.35%	2.0303	
34. 2Q2009				0.35%	2.0375	
35. 3Q2009				0.35%	2.0447	
36. 4Q2009				0.35%	2.0519	
37. 1Q2010				0.35%	2.0591	
38. 2Q2010				0.35%	2.0664	
39. 3Q2010				0.35%	2.0737	
40. 4Q2010				0.35%	2.0810	
41. 1Q2011				0.35%	2.0884	
42. 2Q2011				0.35%	2.0957	
43. 3Q2011				0.35%	2.1031	
44. 4Q2011				0.35%	2.1106	
45. 1Q2012				0.35%	2.1180	
46. 2Q2012				0.35%	2.1255	
47. 3Q2012				0.35%	2.1330	
48. 4Q2012				0.35%	2.1405	
49. 1Q2013				0.35%	2.1481	

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Docket No. 42057 - Attach. No. 4
to Xcel's Post Argument Brief
April 5, 2004
Page 3 of 3

Development of Rail Cost Adjustment Factor Utilizing EIA Forecast of Coal Traffic Productivity

Quarter (1)	Historic and DRI/WEFA Forecast ^{1/}			EIA Coal Productivity Percent ^{2/} (5)	EIA PAF ^{3/} (6)	EIA RCAF-A ^{4/} (7)
	STB RCAF-U (2)	STB PAF (3)	STB RCAF-A (4)			
50. 2Q2013				0.35%	2.1557	
51. 3Q2013				0.35%	2.1633	
52. 4Q2013				0.35%	2.1709	
53. 1Q2014				0.35%	2.1786	
54. 2Q2014				0.35%	2.1863	
55. 3Q2014				0.35%	2.1940	
56. 4Q2014				0.35%	2.2018	
57. 1Q2015				0.35%	2.2095	
58. 2Q2015				0.35%	2.2173	
59. 3Q2015				0.35%	2.2252	
60. 4Q2015				0.35%	2.2330	
61. 1Q2016				0.35%	2.2409	
62. 2Q2016				0.35%	2.2488	
63. 3Q2016				0.35%	2.2568	
64. 4Q2016				0.35%	2.2647	
65. 1Q2017				0.35%	2.2727	
66. 2Q2017				0.35%	2.2808	
67. 3Q2017				0.35%	2.2888	
68. 4Q2017				0.35%	2.2969	
69. 1Q2018				0.35%	2.3050	
70. 2Q2018				0.35%	2.3131	
71. 3Q2018				0.35%	2.3213	
72. 4Q2018				0.35%	2.3295	
73. 1Q2019				0.35%	2.3377	
74. 2Q2019				0.35%	2.3460	
75. 3Q2019				0.35%	2.3543	
76. 4Q2019				0.35%	2.3626	
77. 1Q2020				0.35%	2.3709	
78. 2Q2020				0.35%	2.3793	
79. 3Q2020				0.35%	2.3877	
80. 4Q2020				0.35%	2.3961	

^{1/} Historic RCAF data is used through 1Q 2004. DRI-WEFA forecast data, as used in Xcel Rebuttal evidence, is used thereafter.

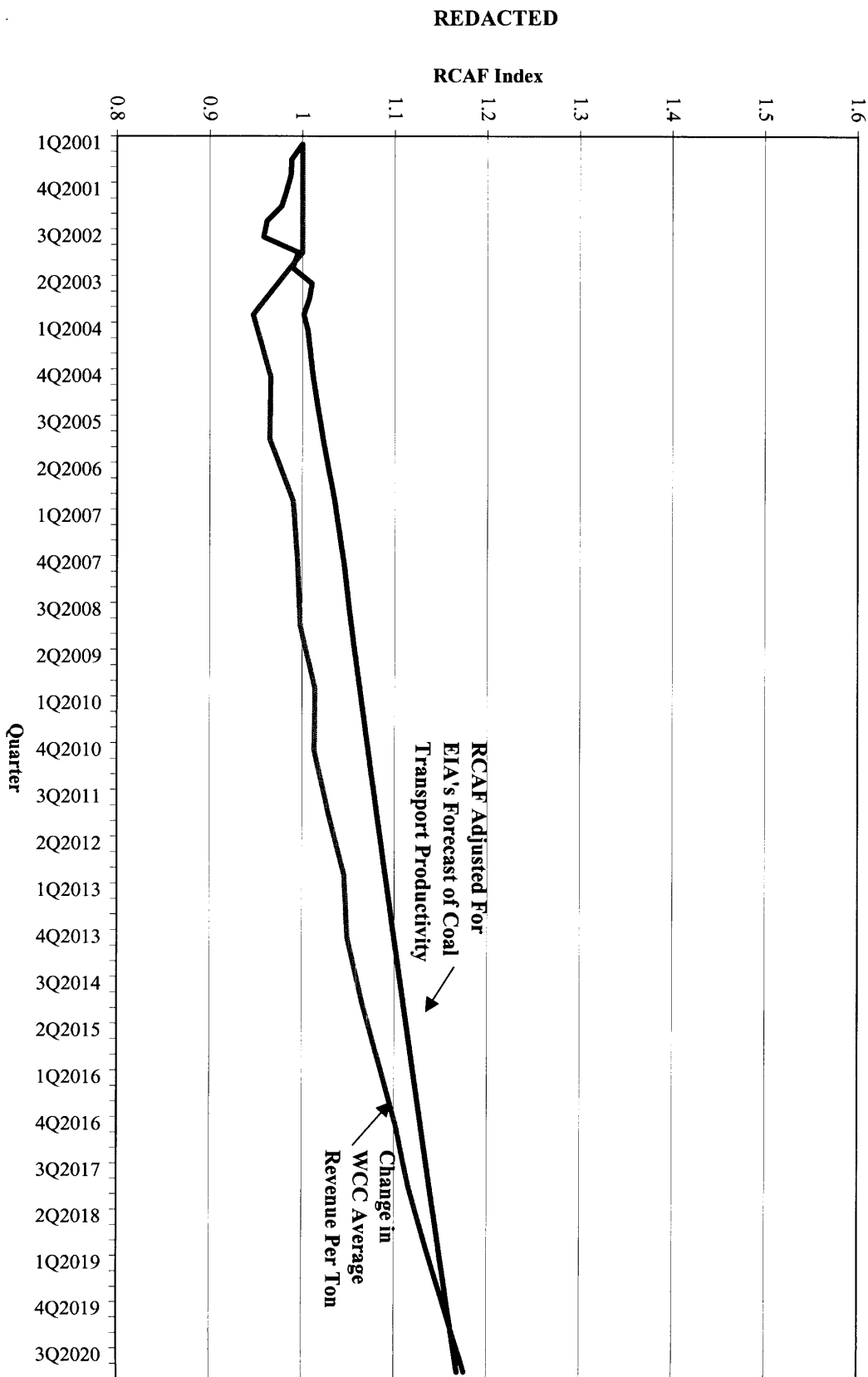
^{2/} EIA forecast of coal traffic productivity.

^{3/} Line 1 historic data. Line 2 through 83, [1 + Current Column (5)] x Previous Column (6).

^{4/} Column (2) ÷ Column (6)

Rail Cost Adjustment Factor Adjusted For The EIA's Forecast of Coal Transportation Productivity

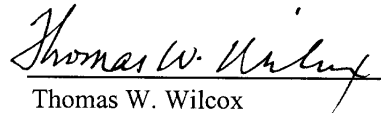
Docket No. 42057 - Attach. No. 5
to Xcel's Post Argument Brief
April 5, 2004
Page 1 of 1



CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of April, 2004, I served a copy of the Attachments to Complainant's Post-Argument Brief (Public Version) by hand delivery to counsel for Defendant at the following address:

Samuel M. Sipe, Jr., Esq.
Anthony J. LaRocca, Esq.
Cynthia L. Quarterman, Esq.
Brooke L. Gaede, Esq.
Steptoe & Johnson
1330 Connecticut Avenue, NW
Washington, DC 20036


Thomas W. Wilcox