

-PUBLIC VERSION-

210356

**BEFORE THE
SURFACE TRANSPORTATION BOARD**



AEP TEXAS NORTH COMPANY)

Complainant,)

v.)

Docket No. 41191 (Sub-No. 1)

THE BURLINGTON NORTHERN AND)
SANTA FE RAILWAY COMPANY)

Defendant.)

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

AEP Texas North Company submits the following errata to its Opening
Evidence filed in this proceeding on March 1, 2004.

Narrative

Page	Line(s)/Location	Change
I-24	Line 19 (last line)	Strike "23-29" and insert "1-2"
I-25	Lines 4-5	Strike "Parts III-D and III-E, and in the workpapers supporting those Parts." and insert "Part III-D and in the workpapers supporting that Part."

I-29	Line 7	Strike "1192" and insert "1168.5"
II-A-2	Footnote 1, Line 6	Strike "AEP-Tex Open To 1Q04.123 " and insert "T&O AEP-Tex Open.123 "
II-A-27	Line 7	Strike "Open-Avg Road Crew Wages, 2002.xls" and insert "Open-Road Crew Wages, 2002.xls"
II-A-27	Line 7	Strike "Open-Avg Road Crew Wages, 2003.xls" and insert "Open-Road Crew Wages, 2003.xls"
II-A-40	Footnote 38, Line 3	Strike "cycl3 time 00.xls" and insert "cycle time 00.xls"
II-A-40	Footnote 38, Line 3	Strike "cycl3 time 01.xls" and insert "cycle time 01.xls"
II-A-40	Footnote 38, Line 3	Strike "cycl3 time 02.xls" and insert "cycle time 02.xls"
II-A-40	Footnote 38, Line 3	Strike "cycl3 time 03.xls" and insert "cycle time 03.xls"
III-A-17	Line 4	Strike "bnsfsactrx01 summary 1.xls" and insert "bngfsactrx01summary1.xls"
III-A-17	Line 5	Strike "bnsfforecast.xls" and insert "bngfforecast.xls"

III-A-20	Between lines 2 and 3 of Table III-A-3	Insert new line "Reno to Black Thunder Jct." under Segment column and insert "{ }" under Net Tons (Millions) column
III-B-9	Line 8	Strike "Sterling" and insert "Denver"
III-B-10	Line 8	Delete "and random failures"
III-B-20	Table III-B-3, Line 3	Strike "754.81" and insert "754.61"
III-B-20	Table III-B-3, line 2	Strike "367.37" and insert "791.47"
III-B-20	Table III-B-3, line 7	Strike "1,253.82" and insert "1,677.92"
III-B-22 to III-B-23	Line 18 (III-B-22) to Line 1 (III-B-23)	Delete the sentence which begins "The loaded train interchange tracks"
III-B-23	Line 1	Delete "other"
III-C-2	Table III-C-1, footnote 2, line 5	Strike "TNR Coal Traf and Rev.xls" and insert "TNR Coal Traf and Rev 0100-0603.xls"
III-C-18	Line 12	Strike "(3)" and insert "(2)"
III-C-19	Line 3	Strike "(4)" and insert "(3)"
III-C-19	Line 7	Insert "helper" after "five" to read "five helper sets"
III-C-24	Line 18	Strike "2002" and insert "2020"
III-C-24	Line 20	Strike "III-C-6" and insert "III-C-7"

III-C-25	Line 2	Strike "Simulation Trains - peak wk.xls" and insert "Simulations Trains -peak calc.xls"
III-C-29	Line 5	Strike "at these mine" and insert "at each of these mines"
III-C-32	Line 11	Strike "plants; crews on" and insert "plant; the crew on a"
III-C-37	Line 14	Delete "both on the Campbell Branch and"
III-C-37	Line 15	Strike "Thus helpers will be added to such a train at the mine" and insert "Helpers will be added to such a train at Donkey Creek"
III-D-13	Table III-D-2, FN 1, Line 3	Insert "Asst." before "MTO position at"
III-D-34	Line 10	Delete "it provides no railcars,"
III-D-34	Line 11	Insert "and railcars" after "locomotives"
III-D-34	Line 15	Strike "18" and insert "21"
III-D-37	Line 12	Delete "be"
III-D-45	Line 10	Insert "as" after "Reistrup served"
III-D-51	Line 3	Strike "four" and insert "five"
III-D-51	Table III-D-6	Strike "\$3,779,046" and insert "\$3,778,597"
III-D-51	Table III-D-6	Strike "\$4,026,983" and insert "\$4,026,534"

III-D-65	Line 20	Strike " <i>infra</i> " and insert " <i>supra</i> "
III-D-103	Line 2	Strike "grinding.pdf" and insert "rail grinding.pdf"
III-F-1	Table III-F-1/Item 1 under the Investment column	Strike "89" and insert "89.5"
III-F-1	Table III-F-1/Item 4 under the Investment column	Strike "1079.7" and insert "1066.5"
III-F-1	Table III-F-1/Item 9 under the Investment column	Strike "\$ 2,112.2" and insert \$ 2,099.5"
III-F-1	Table III-F-1/Item 11 under the Investment column	Strike "137.6" and insert "136.7"
III-F-1	Table III-F-1/Item 12 under the Investment column	Strike "202.3" and insert "201.0"
III-F-1	Table III-F-1/Item 14 under the Investment column	Strike "2,462.9" and insert "\$ 2,448.0"
III-F-12	Line 12	Strike "705" and insert "755"
III-F-16	Line 1	Strike "III F 2B Earthwork Cost.xls" and insert "TNR EARTHWORK COSTS.xls"
III-F-31	Line 10	Strike "Reistup" and Insert "Reistrup"
III-F-68	Line 1	Strike "Culvert inventory and Costing.xls" and insert "'TNR Culverts.xls,' tab 'length & size of culverts'"
III-F-72	Line 4	Insert "with" between "main track" and "the costs"

III-H-8	Table III-H-1, Column (6), Line Jacobs Ranch Mine, 2Q00	Strike "\$10.59" and insert "\$10.98"
III-H-9	Table III-H-1, Column (4), Line North Rochelle Mine, 3Q02	Strike "\$11.23" and insert "\$12.33"
III-H-9	Table III-H-1, Column (6), Line North Rochelle Mine, 3Q02	Strike "11.23" and insert "\$12.33"

Exhibits

Please remove the following pages from the Exhibits and replace with the corresponding pages attached hereto.

Exhibit III-F-2, page 20 of 255
Exhibit III-F-2, page 46 of 255
Exhibit III-F-2, page 47 of 255

Electronic Workpapers

The CD-ROM enclosed with this filing contains the following corrected electronic workpapers:

TNR Operating Statistics.xls
TNR Car Costs.xls
TNR_OP_EXP.xls
Land_Summary.xls.
Ballast subballast.xls
Mobilization.xls
IIIFTtotal.xls
Exhibit III-H-1SP.xls (change in column heading only to match
version in printed exhibits)

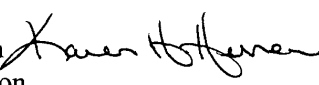
The enclosed CD-ROM also includes certain electronic workpaper files that were inadvertently omitted from AEP Texas Opening electronic workpapers:

Report TNR 2-25B stats.xls

TNR 2-25B.DEBUG
TNR 2-25B.LOG
TNR 2-25B.REPORT
TNR 2-25B.SUMMARY
Yardcomputations.xls
TNRR Culvert.xls
Microwave Site (Shelp).xls
resources agreement.pdf

Respectfully submitted,
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Dated: March 19, 2004

Attorneys and Practitioners

Members of L.E. Peabody & Associates, Inc. and Stone Consulting & Design, Inc. provided easement data and rail maps, respectively.

ACQUISITION PRICE ESTIMATE

Land adjacent to the right-of-way throughout the SARR system is suited for a variety of uses. Each county's "val. section" is classified according to the land identifications outlined above.

As an example, a single rural mile section contains 12.12 acres calculated as follows: 5,280 linear feet by 100 feet wide equals 528,000 square feet. Dividing the total square feet by the number of square feet in an acre (43,560) equals 12.12 acres. The adjacent or nearby sale analogues (price per acre) are compared to the area within the right-of-way "val. section" to provide a cost estimate to acquire that section of the line. In some rail segments, we were instructed to use a right-of-way width of 150 feet due to slope and drainage requirements.

RAIL YARDS

The SARR design requires rail yards in addition to the narrow rights-of-way for maintenance and storage facilities. Acreages and locations for the yards were provided by L.E. Peabody. Land acquisition costs for the various yards are found at the end of the right-of-way tabulations. Two rail yards are required to maintain and service the rolling stock of the TNR. One is in Alliance, Nebraska (257.58 acres), and a second is in Las Animas, Colorado (15.85 acres).

COUNTY DESCRIPTIONS

The following sections contain descriptions of those counties through which the TNR travels from Campbell County, Wyoming, at the north to Wilbarger County, Texas, at the south. All population figures reported in the descriptions were obtained from the U.S. Census Bureau Web site ("<http://factfinder.census.gov>") and reflect 2000 data.

WYOMING

CAMPBELL COUNTY - SOUTHERN LEG

The following description relates to TNR's leg heading directly south from Gillette toward Converse County. The ROW inspections were completed by Oakleigh J. Thorne.

Traveling south on Rt. 59 from I-90 between Gillette and Wyodak in Campbell County (population 33,698), the landscape consists mainly of ranches and non-irrigated grasslands as far as the eye can see. Buffalo and antelope farms abound, as well as sporadic cattle farms. The ranches typically have no houses on them; most are vacant. When there is housing, it consists of modest structures. Also present in the county are oil fields and trucking businesses.

Pic 1 and Pic 2 were taken at the northernmost point of the right-of-way (hereinafter "ROW"). The photos were taken from American Road just north of its intersection with Rt. 14

There is virtually no development in Wilbarger County until the town of Vernon (population 11,660). The ROW enters the town just west of the intersection of Rt. 283 and Rt. 70. Pic 160 (looking west) was taken at the ROW's crossing at Rt. 283. Pic 161 was taken at the same location looking east. Both sides of the tracks are bordered by grain elevators, storage facilities and rail-related uses.

Traveling southeast on Rt. 70/287, the ROW is on the north side of the highway. The land is vacant with an occasional industrial facility. After the intersection of Routes 70, 183 and 287, the tracks become co-terminus with the highway. Again, the land is vacant with an occasional industrial building or grain storage facility.

Pic 162 and Pic 163 were taken at County Road 111N at the edge of Oklaunion (population unavailable). Pic 162 looks west toward Vernon, and Pic 163 looks east toward the Rt. 433 intersection and cross-over to the AEP Power Plant. The land on the north side of the tracks is a mix of tillable land and grassland. Cotton farms and tillable lands are on the south side of Rt. 70.

We visited the AEP Texas (American Electric Power) plant (a/k/a the Oklaunion Power Station) and inspected the property with Brent (Donald B.) Perkins. The plant is located at the end of Farm Road 3430 (which is accessible from Farm Road 433 East off of Rt. 283). The ROW enters the plant from its northeast corner.

Pic 158 (looking northeast) and Pic 159 (looking southwest) were taken at the edge of AEP's property. As shown, vacant land abounds in all directions.

To inspect Oklaunion, we exited Rt. 70 at the 145 Loop Road. The final photograph was taken at the intersection of 145 Loop Road and Rt. 404 in Oklaunion. Pic 164 looks west toward the Rt. 70/287/183 overpass. The land along the ROW is vacant with the exception of a few low-income houses. Oklaunion is a tiny town consisting of manufactured homes in poor condition.

LAND ACQUISITION PRICE ESTIMATE

Based upon our recent inspection of the property and the investigation and analysis undertaken, and given a range of possible costs, subject to the stated assumptions and limiting conditions, it is our opinion that the estimated and most probable retrospective cost to acquire the right-of-way, easements, yards and side tracks for the SARR identified as "Texas and Northern Railroad," including land owned in fee and easements, in its assumed undeveloped condition (vacant right-of-way), on or about July 1, 2000, was \$89,532,362.91 or rounded to **\$89,500,000**. The final mile, acreage, and cost estimate calculations follow at the end of this report.

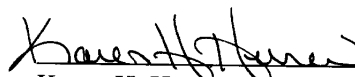
TNR							
County	TNR Miles	Feet	ROW	ROW (FT)	Acres	\$/Ac	Total
Wyoming							
Campbell	54.03	285,278.40	100.00	28,527,840.00	672.71	\$145	\$97,246
Converse	2.60	13,728.00	100.00	1,372,800.00	31.52	\$160	\$5,043
Crook	17.30	91,344.00	100.00	9,134,400.00	211.20	\$163	\$34,521
Weston	62.55	330,264.00	100.00	33,026,400.00	761.19	\$327	\$248,804
Wyoming Total	136.48	720,614.40		72,061,440.00	1676.62	\$230	\$385,614
South Dakota							
Custer	6.00	31,680.00	100.00	3,168,000.00	74.23	\$185	\$13,733
Fall River	42.87	226,353.60	100.00	22,635,360.00	522.63	\$187	\$97,673
South Dakota Total	48.87	258,033.60		25,803,360.00	596.86	\$187	\$111,406
Nebraska							
Box Butte	41.98	221,654.40	100.00	22,165,440.00	770.42	\$1,559	\$1,201,017
Cheyenne	33.73	178,094.40	100.00	17,809,440.00	404.95	\$411	\$166,515
Dawes	33.29	175,771.20	100.00	17,577,120.00	406.52	\$419	\$170,246
Morrill	48.02	253,545.60	100.00	25,354,560.00	583.55	\$483	\$282,126
Sioux	15.56	82,156.80	100.00	8,215,680.00	188.61	\$200	\$37,722
Nebraska Total	172.58	911,222.40		91,122,240.00	2354.05	\$789	\$1,857,626
Colorado							
Adams	19.76	104,324.76	75.00	7,824,356.95	206.66	\$67,520	\$13,953,725
Arapahoe	9.73	51,374.40	75.00	3,853,080.00	44.24	\$107,580	\$4,759,350
Baca	59.53	314,302.91	100.00	31,430,291.06	726.08	\$500	\$363,040
Bent	45.80	241,832.86	100.00	24,183,286.42	572.50	\$763	\$436,825
Denver	14.46	76,373.62	75.00	5,728,021.20	130.64	\$316,072	\$41,563,525
Douglas	37.43	197,616.56	95.00	18,773,573.04	451.88	\$14,525	\$6,563,713
El Paso	48.57	256,449.60	87.50	22,439,340.00	476.47	\$27,444	\$13,076,085
Logan	24.62	129,993.60	100.00	12,999,360.00	301.42	\$400	\$120,568
Morgan	42.94	226,723.20	100.00	22,672,320.00	519.54	\$500	\$259,693
Otero	39.54	208,790.35	100.00	20,879,035.40	480.77	\$443	\$213,109
Pueblo	54.67	288,657.07	87.50	25,257,493.80	652.44	\$5,366	\$3,501,076
Washington	0.16	844.80	100.00	84,480.00	1.94	\$450	\$873
Weld	35.69	188,464.69	100.00	18,846,468.76	434.11	\$505	\$219,365
Colorado Total	432.91	2,285,748.42		214,971,106.64	4998.69	\$17,008	\$85,030,946
Oklahoma							
Cimarron	42.87	226,353.60	100.00	22,635,360.00	412.14	\$685	\$282,165
Oklahoma Total	42.87	226,353.60	100.00	22,635,360.00	412.14	\$685	\$282,165
Texas							
Armstrong	32.01	169,012.80	100.00	16,901,280.00	389.50	\$322	\$125,250
Carson	0.62	3,273.60	100.00	327,360.00	7.52	\$300	\$2,256
Childress	27.77	146,625.60	100.00	14,662,560.00	338.10	\$289	\$97,730
Dallam	6.99	36,907.20	100.00	3,690,720.00	86.23	\$350	\$30,181
Donley	37.74	199,267.20	100.00	19,926,720.00	458.96	\$286	\$131,264
Hall	17.20	90,816.00	100.00	9,081,600.00	209.98	\$304	\$63,769
Hardeman	30.92	163,257.60	100.00	16,325,760.00	376.28	\$404	\$151,941
Moore	32.17	169,857.60	100.00	16,985,760.00	392.95	\$382	\$149,917
Potter	47.97	253,281.60	87.50	22,162,140.00	572.55	\$1,466	\$839,260
Sherman	27.57	145,569.60	100.00	14,556,960.00	335.68	\$350	\$117,488
Wilbarger	21.25	112,200.00	100.00	11,220,000.00	260.57	\$409	\$106,449
Texas Total	282.21	1,490,068.80		145,840,860.00	3428.32	\$530	\$1,815,504
Total Land Purchase	1,115.92	5,892,041.22			13,466.68	\$19,428	\$89,483,260.61
Total Easements	62.52				755.42	\$65	\$49,102.30
TOTAL LAND COST	1,178.44						\$89,532,362.91

Exhibit III-F-2
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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of March, 2004, I served a copy of the foregoing Errata to Opening Evidence of Complainant AEP Texas North Company by hand upon counsel for Defendant, as follows:

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