



# ASSOCIATION OF AMERICAN RAILROADS

**Michael J. Rush**  
Sr. Vice President  
Safety and Operations

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Via Email: [LPT.RFI.2015@hq.doe.gov](mailto:LPT.RFI.2015@hq.doe.gov)

Ms. Alice Lippert  
Office of Electricity Delivery and Energy Reliability  
U.S. Department of Energy  
Forrestal Building  
Room 1E-078  
1000 Independence Avenue, S.W.  
Washington, DC 20585

Re: Transformer Reserve

Dear Ms. Lippert:

In response to the Department of Energy's (DOE) Request for Information (RFI) on the design and implementation of a National Power Transformer Reserve Program, the Association of American Railroads (AAR)<sup>1</sup> submits comments as an interested party. AAR's members are quite familiar with the area of concern under section 8 of the RFI entitled, "Transport and Deployment." The railroad industry has been working with the Edison Electrical Institute (EEI) to ensure a readiness to transport Large Power Transformers (LPT) to areas of need during a crisis situation.

The railroad industry has extensive experience in moving excessive dimensional transformers from one facility to another. Railroads provide these services to electrical utilities for replacement and upgrades, operations that often involve multiple rail lines and coordination among different carriers. As a result, the railroads are well prepared to transport LPTs in emergency circumstances.

Cooperation with EEI on contingency preparations has been ongoing for more than a year. To enhance the railroads' readiness to transport LPTs in emergency circumstances, EEI and the

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<sup>1</sup> AAR is a trade association whose membership includes freight railroads that operate 83% of the line-haul mileage, employ 95% of the works, and account for 97% of the freight revenues of all railroads in the United States; and passenger railroads that operate intercity passenger trains and provide commuter rail service.

seven Class 1 railroads are meeting to review routes for LPT transport and procedures for emergency situations. Furthermore, each year railroads test their security plans and preparedness to handle varied threats and security-related contingencies in an industry-wide exercise. For the October 2014 exercise, AAR coordinated with EEI to integrate realistic scenarios for the transportation of LPTs across regions in emergency situations affording short notice. Feedback from the exercise has been used in the continuing consultations with EEI. For this year's exercise, scheduled for October, AAR and EEI are again working together to include scenarios positing intentional destruction or damage of electrical transformers, prompting the need for rail transport of LPTs in emergency conditions.

Section 8 asks about specialized transport infrastructure needed for the shipment of LPTs in the event of an emergency. First, there is the type of railcar needed to haul LPTs. The railroad industry has a fleet of railcars that can be used to transport LPTs.

Second, right-of-way clearance limits need to be taken into account. Railroads have "clearance" offices that select routes that will accommodate loads such as LPTs that have special clearance requirements.

Section 8 also asks about delivery time. AAR anticipates it will be 3 to 5 days from the occurrence of an incident or event requiring movement of LPTs before the LPTs are ready to be moved. This lead time will allow railroads ample time to dispatch the necessary railcars and analyze route options. Ultimately, the principal factor in the time required for LPT transport will be the distance from the storage location to the destination utility

Thank you for the opportunity to provide input on the railroads' readiness to transport LPTs.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Rush". The signature is written in a cursive, flowing style.

Michael J. Rush