

Exhibit No. ____ (KH-22)
Docket TR-100098
Witness: Kathy Hunter

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

CITY OF FIFE,

Petitioner,

v.

UNION PACIFIC RAILROAD,

Respondent.

DOCKET TR-100098

EXHIBIT TO REBUTTAL TESTIMONY OF

Kathy Hunter

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

UTC Staff Data Request Nos. 1-3 and Union Pacific's Responses Thereto

January 19, 2011

Docket TR-100098
UTC Staff Data Request Nos. 1 - 17 to Union Pacific Railroad
September 9, 2010
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UTC STAFF DATA REQUEST NO. 1:

Please provide copies of any and all data requests submitted to you by any party to this proceeding and your corresponding responses to those data requests.

UTC STAFF DATA REQUEST NO. 2:

How far, in feet, is the existing 54th Avenue East grade crossing from the eastern boundary of the Fife Yard?

UTC STAFF DATA REQUEST NO. 3:

Over the last 12 months, how many times has Union Pacific Railroad stopped a train on the tracks over the existing 54th Avenue East grade crossing to set out cars at the Fife Yard, as described in the testimony of Union Pacific Railroad witness Pete Nielsen?

September 30, 2010

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Re: TR-100098 – UTC Interrogatories to UP
Our File No. UNI 45-4

Dear Fronda:

Please excuse my lack of formality in responding to the UTC staff's interrogatories. This is the only way I can get the information I have to you today.

In response to the staff's questions:

1. No other party served Union Pacific (UP) with discovery requests.
2. It is 2827 feet from the point of switch at the north (compass east) end of Fife Yard to the south (compass west) edge of 54th Avenue East. This distance was measured off using a track wheel.
3. I have previously sent you data on five trains covering about a one-month period. Some of the data gave arrival and departure times. Other data provided information on cars in the train and which cars were blocked for which destinations. Attached is a spreadsheet that compiles information on arrival times and train lengths for the IDUSE between August 25 and September 22, the IG4SE between August 26 and September 25, the IBASE between August 26 and September 25, the MHKFI between August 22 and September 21, and the MPTFI between August 21 and September 20, 2010. The information on this spreadsheet shows that 96 of the 120 trains shown would have had to stop over the crossing before yarding their train or performing their setout. A sketch depicting the position of the IDUSE of August 21, 2010, right before it made its setout of Tacoma cars is attached. To determine whether a train making a setout would block 54th Avenue, we look at the length of the train (in this case 7,507 feet), deduct the length of the cars behind the Tacoma setout (2,207 feet), and see whether the length of the train to the north (compass east) of the switch is more or less than 2827 feet.