BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION

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| CITY OF FIFE,  Petitioner,  v.  UNION PACIFIC RAILROAD,  Respondent. | )))))))))) | Docket No. TR-100098  TESTIMONY OF SIMON HJELM |

**Q. PLEASE STATE YOUR NAME, TITLE AND PLACE OF BUSINESS.**

My name is Simon Hjelm. I am a Manager-Resource Planning for Union Pacific Railroad Company (UP) in Omaha, Nebraska. In that position, I am the manager of regional capacity planning for the Western Region of UP.

**Q. BRIEFLY DESCRIBE YOUR EDUCATIONAL BACKGROUND.**

I received a B.S. from Iowa State University in 2002, with dual majors in finance and marketing. I am currently working on my M.B.A. at the University of Nebraska-Omaha.

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**Q. PLEASE BRIEFLY DESCRIBE YOUR RAILROAD BACKGROUND AND EXPERIENCE.**

I started with UP in July 2002 in the corporate audit department. After three years, I came to Network Planning, where I have held several positions involving capacity simulations, and the evaluation of commercial facility investments. I have been in my current position since August 2010.

**Q. WHAT ARE YOUR PRESENT DUTIES AND RESPONSIBILITIES AS THEY RELATE TO THIS PROCEEDING?**

In my current position, I am accountable for developing strategies and capacity infrastructure solutions to accommodate company improvement initiatives, enable more efficient operations and facilitate opportunities for growth. I run computer simulations to identify best operating practices and necessary infrastructure to expedite service and efficiently handle increased traffic.

**Q. HAVE YOU DETERMINED WHETHER ANY INFRASTRUCTURE CHANGES WILL BE NEEDED IN THE FIFE, WASHINGTON, AREA?**

Yes. My projections are that UP will need to extend a siding from its Fife Yard to the east, past the location of the proposed 54th Avenue East pedestrian crossing, to accommodate expected traffic growth out of the Port of Seattle and Port of Tacoma and traffic in the Pacific Northwest corridor. Our intent is to do design and permitting on such a siding extension within the next 12-18 months so that we can potentially start construction of the siding extension by 2012 or 2013.

**Q. WOULD AN AT-GRADE PEDESTRIAN CROSSING IN THE PROPOSED LOCATION BE COMPATIBLE WITH THE SIDING EXTENSION THAT YOU HAVE DESCRIBED?**

No. At-grade pedestrian crossings should not be sited in areas that will be regularly blocked by standing trains. There is too great a temptation for pedestrians to try to climb through a stopped train. This is extremely dangerous as the train could move unexpectedly. An at-grade pedestrian crossing should not be authorized in an area where a siding track is proposed for installation.

**DECLARATION**

I, Simon Hjelm, declare under penalty of perjury under the laws of the State of Washington that the foregoing TESTIMONY OF SIMON HJELM is true and correct to the best of my knowledge and belief.

DATED this 18th day of January, 2011.

*/s/ Simon Hjelm*

Simon Hjelm