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January 5, 2026

Danielle Gosselin  
Director  
Office of Environmental Analysis  
Surface Transportation Board  
395 E Street, SW  
Washington, DC 20423

## **Re: Docket No. FD 36873, Response to Information Request No. 2**

Dear Ms. Gosselin:

I am writing on behalf of Union Pacific Railroad Company (UP) to respond to the Office of Environmental Analysis's (OEA) Information Request No. 2. The substantive answers to OEA's requests are included in the accompanying tables. The respondents are submitting both PDF and Excel versions of the Master Segment Table (Master Segment Tables for Req2 Items.xlsx). This letter supplements those tables by explaining how they were prepared.

UP developed this data package in cooperation with its co-applicant, Norfolk Southern Corporation and Norfolk Southern Railway Company (NS).

The accompanying Master Segment Table includes all segments assessed in response to this data request.

**A. REQUEST:** Provide the increases in trains per day and annual gross ton miles from organic growth for each rail segment and rail yard submitted in Items A1, A2, and A3 as part of Response to Information Request No. 1.

**A. RESPONSE:** UP and NS are supplementing data in the previously provided tables, from Information Request No. 1, with five years of organic growth calculated on the baseline. The organic growth rates are based on long-term standalone revenue growth assumptions for volume by each railroad and are the same rates used in the Request No.1 submittal. The Transaction Growth, as provided in the Response to Information Request No. 1, has not changed and includes five years of organic growth on the incremental growth from the transaction and assumes all incremental Transaction Growth happens in the first year. For Items A1 and A2, increases in passenger trains per day previously shown in the Transaction Growth and footnoted (4) as not transaction related growth are

## COVINGTON

now reflected in Baseline Organic Growth as they are associated with agreements that predate the transaction.

Year five volumes have been updated to include Baseline Organic Growth. The Percentage Transaction Change (where applicable) has been updated in the data tables to represent the Transaction Growth compared to the Baseline inclusive of five years of organic growth (Baseline Organic Growth). Previously the percentage change compared Transaction Growth to the Baseline. The data table changes for Items A1 and A2 are reflective of annual trains per day and gross ton miles, and for Item A3 the changes are based on carloads per day. The column headers reflecting this updated data are in red font.

The Request for Information No. 2 did not specifically ask for baseline organic growth on Item A4 in the Response to Request for Information No. 1; however, UP and NS calculated the Transaction Growth the same in the Response to Information Request No. 1 for Item A4 as for Items A1, A2, and A3. Therefore, UP and NS are supplementing the previously provided tables with five years of organic growth calculated on the baseline for a non-transaction comparison. The same methodology was used for Item A4 as Items A1, A2, and A3. The data table changes for Items A4 are reflective of trucks per day. The column headers reflecting this updated data are in red font.

**B. REQUEST:** Provide the increases in hazardous material carloads for organic growth for each rail segment submitted in Item F as part of Response to Information Request No. 1.

**B. RESPONSE:** UP and NS are supplementing data in the previously provided tables, provided in response to Information Request No. 1, with five years of organic growth on both the baseline and the incremental Transaction Growth for rail segments that have transaction related growth in hazardous material carloads. The organic growth rates are based on long-term standalone revenue growth assumptions for volume by each railroad and are the same rates used in the Information Request No.1 submittal. Year five volumes have been updated to include Baseline Organic Growth and organic growth on the incremental Transaction Growth. The column headers reflecting this updated data are in red font.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Thomas Brugato