

Request No. 2: All three-year hiring plans referred to in the December 13, 2022 hearing, from January 1, 2015, to present. Provide each plan as it existed when originally produced (i.e., before any monthly adjustments).

Union Pacific's Response

Union Pacific completes a Long-Range Planning (“LRP”) process every 12 to 18 months. This process attempts to forecast carloads for the next three to five years and how those carloads will traverse Union Pacific's network. Historically, Union Pacific has not addressed train, engine, and yard (“TE&Y”) employee hiring in its LRP process because of the potential variability in the planning assumptions more than twelve months out. Union Pacific has planned and continues to plan for TE&Y hiring in its Annual Operating Plan (“AOP”) process. However, as part of Union Pacific's LRP process culminating in April 2022, Union Pacific developed a preliminary, system-wide projection of the total number of TE&Y employees that it will need to hire through 2026 given the business planning assumptions and carload forecast. Union Pacific addressed TE&Y employee hiring in its April 2022 LRP to provide perspective on potential TE&Y hiring needs going forward.

Union Pacific is producing documents from its AOPs from 2015 to present showing Union Pacific's annual hiring plan as it existed when originally produced. Union Pacific is also producing a document showing its preliminary, system-wide three-year hiring projection from its April 2022 LRP as it existed when originally produced.