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By Brittany Roos at 10:47 am, Dec 09, 2022

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public Service Commission, on its own motion, seeking to amend Title 291, Chapter 4, Railroad Rules and Regulations in its entirety.	))))))	Rule and Regulation No. 209

UNION PACIFIC RAILROAD COMPANY'S COMMENTS
IN REPLY TO THE NEBRASKA PUBLIC SERVICE COMMISSION'S ORDER
OPENING DOCKET, RELEASING PROPOSED RULES, AND SEEKING COMMENT

Union Pacific Railroad Company ("Union Pacific") submits the following comments responsive to the Nebraska Public Service Commission's ("Commission") Order Opening Docket, Releasing Proposed Rules, and Seeking Comment entered on November 8, 2022.

Comments

Union Pacific has not identified any significant concerns to be addressed with the Commission. Union Pacific notes that the immediate reporting requirements outlined in 291 NAC 4, §003.01(A) are different than federal law; however, Union Pacific acknowledges that the proposed Rule conforms with Nebraska law, and the Commission has limited discretion to modify the reporting requirements. In addition, Union Pacific respectfully submits the proposed change to 291 NAC 4, §003.01(A) shown in redline on page 11 of Exhibit A attached hereto for the Commission's consideration. The proposed change will ensure that the reporting requirement in Rule 3 is uniformly applicable to both employees and independent contractors working on behalf of the railroad.

Conclusion

Union Pacific appreciates the opportunity to provide comment and looks forward to continuing to be involved with this proceeding and with the Commission.

Dated this 8th day of December 2022.

Respectfully,

Kelli O'Brien
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