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Ms. Cynthia Brown, Chief
Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street SW
Washington, DC 20423

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RE: Docket No. EP 770 (Sub No. 1), Urgent Issues in Freight Rail Service

Dear Ms. Brown:

Pursuant to the Board's May 6 and October 28 decisions in the above-referenced proceeding, BNSF respectfully submits this update on the status of our service recovery plan filed on May 20, 2022, as modified in accordance with the Board's June 16, 2022 decision. The data in this report reflects BNSF's service performance during the week ending August 18. Last week BNSF achieved target for nine of our twelve KPIs and was within 5% of target for one of the remaining KPIs. The following chart reflects our performance against our KPIs over the past eight weeks:

	26	27	28	29	30	31	32	33	8 Week Avg
Train Speed	101%	104%	104%	100%	100%	99%	100%	101%	101%
Dwell	96%	95%	111%	98%	96%	99%	98%	100%	99%
Trains Holding	137%	131%	155%	145%	126%	128%	133%	148%	138%
Local Service	100%	98%	99%	100%	100%	99%	101%	100%	99%
Overall OTP	112%	114%	118%	113%	111%	109%	113%	117%	113%
Intermodal OTP	114%	109%	117%	112%	111%	110%	117%	120%	114%
Coal OTP	101%	110%	108%	109%	105%	101%	104%	107%	106%
Merch OTP	103%	109%	113%	105%	102%	99%	95%	98%	103%
Grain OTP	112%	102%	118%	99%	101%	88%	98%	107%	103%
Crude OTP	74%	93%	92%	80%	80%	81%	84%	86%	84%
Auto OTP	112%	114%	112%	113%	113%	105%	114%	116%	112%
Ethanol OTP	70%	105%	94%	72%	56%	81%	59%	76%	77%

Extreme Weather Preparedness and Response on the BNSF Network

Parts of the western United States continue to grapple with the effects of Tropical Storm Hilary, which has led to record-breaking rainfall in Southern California, Nevada, Montana, Idaho, and Oregon. Additionally, BNSF service has been affected by a number of major wildfires that continue to burn in the Pacific Northwest. As the Board is actively monitoring rail service disruptions caused by Tropical Storm Hilary,¹ we wanted to provide an update on our response to these events as well as an overview of our efforts to prepare for and respond to other extreme weather scenarios.

For any weather event on our network, our planning focuses on two major touchstones: first, to ensure the safety of our employees and our operation; and second, to mitigate the impact the event has on our service to our customers. BNSF receives real-time weather monitoring compiled from numerous distinct sources, which is used to generate sophisticated weather models that can provide forecasts tailored for our network down to the milepost-level. When we become aware of a forecasted event that is likely to impact our network, our first task is to minimize employee exposure to the event by re-routing or holding trains from the affected area and pausing maintenance work in the area. As this is happening, BNSF pre-positions the necessary personnel and resources at safe strategic points to assess damage and begin restoration work once it is safe to do so. At the service design level, our team works to identify alternative routing and blocking to either keep volume moving around the event or move freight through an affected area once service is restored in the safest and most efficient manner possible. This work can include rerouting traffic with the help of other railroads (or receiving reroute traffic from another railroad) where it is logical to do so. Below are some specific variations and examples of these processes.

Flood Preparedness

A major tropical storm hitting the southwest United States is a rare occurrence, but heavy rains and flooding are examples of extreme weather that BNSF can expect to contend with, particularly along the Gulf Coast and the Mississippi and Missouri Rivers and their tributaries across the Midwest. As such, BNSF has a well-established playbook for responding to these weather events and that playbook has served us well in responding to Tropical Storm Hilary.

BNSF launched its recovery effort Thursday afternoon when we first became aware of the storm's likely path. From a service recovery perspective, the primary challenge of a flooding event is track washouts. Thus, a key aspect of our plan is having the materials at hand to reconstruct roadbed and rebuild track after flood waters recede. By mid-afternoon Friday, BNSF had five ballast trains en route to staging locations on both sides of the forecasted affected area so that restoration efforts could immediately begin from either direction. In addition to these trains, additional ballast cars were loaded and staged in northern California and over 2,500 tons of rip rap was reserved for loading.

Along with the material, BNSF mobilized a fleet of equipment to staging locations near the affected area, including over five dozen dump trucks and over 20 roadway maintenance machines. In addition to the resources needed for track work, BNSF staged over 100 power generators to provide power for the signal system along with replacement switch machines and grade crossing warning devices. From a personnel perspective, BNSF began targeted briefing on our special instructions related to operating in potential flood

¹ Press Release, *STB Monitoring Rail Service Impacts of Tropical Storm Hilary*, available at <https://www.stb.gov/news-communications/latest-news/pr-23-14/> (Aug. 21, 2023).

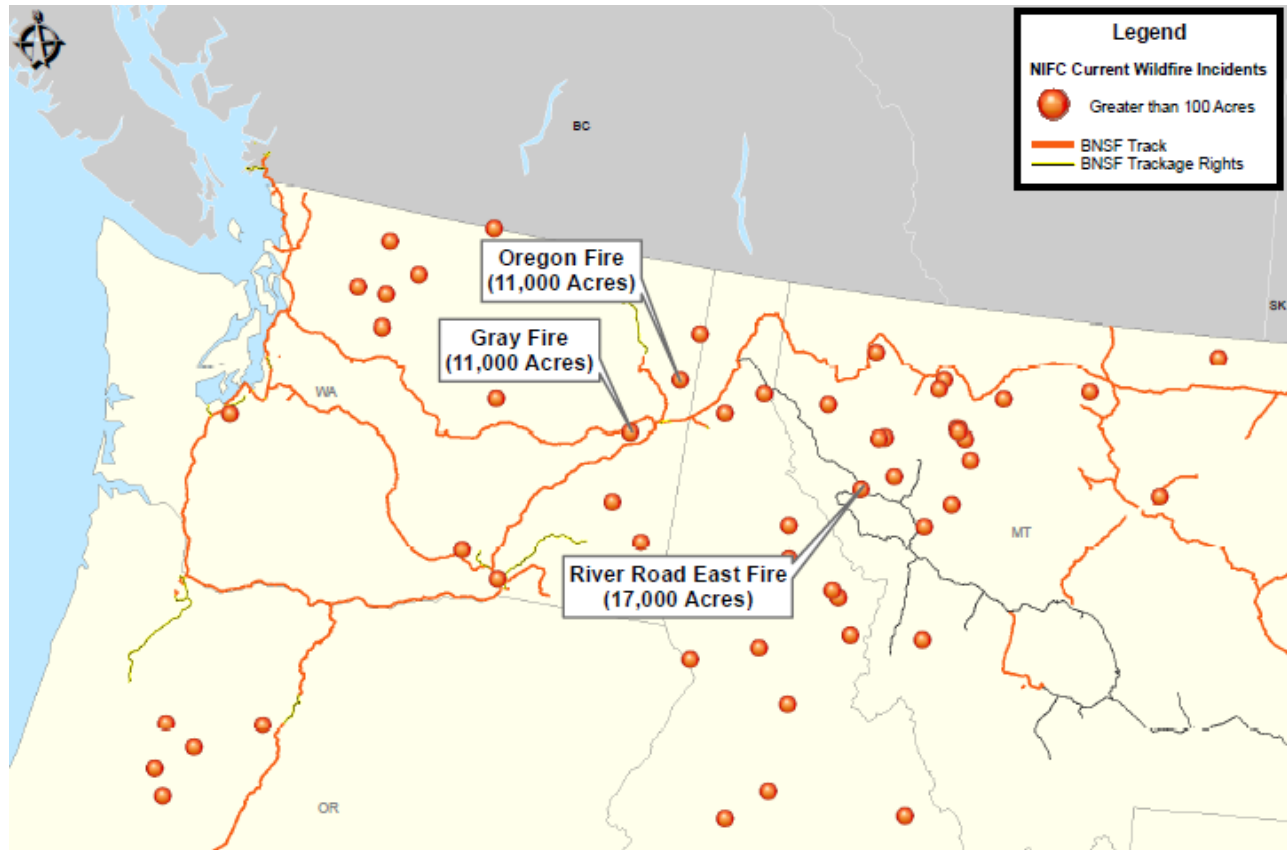
conditions and engaged with our union partners to offer assistance to any employees displaced by the storm. Engineering forces were identified and staged to begin inspection and restoration work, and our service design team began to change the transportation service plan to account for anticipated service interruptions and reduced crew availability.

By Sunday morning, most of these resources were in place at their designated staging areas, and BNSF stood up a 24-hour command center based in San Bernardino to actively monitor conditions and coordinate deployment of restoration assets. BNSF track and structures inspectors undertook continuous inspection of our lines beginning Sunday morning to ensure trains could operate safely. As the brunt of the storm hit on Sunday and Monday, BNSF held a number of trains ahead of areas under flash flood warning and experienced anticipated reductions to employee availability as employees laid off due to the weather and related road closures. To mitigate manpower constraints, our team focused on ensuring the fluid movement of through trains already online and identifying train-building opportunities to reduce the number of train starts and attendant manpower strain.

Fortunately, Tropical Storm Hilary did not do substantial damage to the BNSF network, and we have moved quickly to perform the necessary inspections of our track, bridges, and culverts in order to restore service for our customers. We are proud of the dedicated efforts across the BNSF team to respond to Tropical Storm Hilary and to do so safely—no injuries to BNSF employees arising from the storm have been reported. While we expect that our performance against our KPIs will degrade owing to the storm’s impacts, we believe that the quick pace of our return to normal service demonstrates the resiliency of the BNSF network.

Wildfire Preparedness

Wildfire season in the Pacific Northwest generally runs from late June/early July to October. During this time period, draught conditions and high winds can cause fires to spread rapidly and become difficult to contain. Over the past week, three major wildfires have had substantial effects on our network. The Gray Fire and the Oregon Fire, both burning in the vicinity of Spokane, Washington, have collectively burned over 20,000 acres and led to service slowdowns on BNSF. In western Montana, the River Road East Fire has burned over 17,000 acres and resulted in portions of the Montana Rail Link network being taken out of service over the weekend. BNSF maintains a wildfire preparedness plan to reduce fire risks and quickly respond to protect our infrastructure and support community firefighting efforts in the event of a fire.



Wildfires active over the past seven days along BNSF lines in the Pacific Northwest

Implementation of the plan begins well before wildfire season and entails work by all of BNSF's operating teams. The mechanical department actively monitors locomotives operating into wildfire-prone regions to identify locomotives for preventative maintenance to their fire suppression features. When fire risk is at a high level, locomotives with inoperable fire suppression features are shut down or cut out of a train before traversing the territory. The transportation department will move tank cars of water to staging locations for use by firefighting trains. Our train crews also serve as our front-line eyes on the ground to identify and report fires during the season. Our engineering department will clear fuel sources from our right of way and build and maintain fire guards. During the season, our engineering teams travel with the necessary firefighting equipment to immediately put out any fire that could be caused by maintenance activities. When fire risk is at its highest level, our local engineering leadership actively monitors all maintenance work for fire risk and may suspend any work that poses a fire risk that is not immediately critical for safe operations of trains and equipment. Finally, during wildfire season, BNSF actively monitors air quality levels in affected areas to ensure appropriate actions are taken to ensure safety. For instance, over the weekend, BNSF paused switching work at our Spokane yard, held road trains, and annulled a number of local trains due to poor air quality in the region.

Our people live and work in communities threatened by wildfires and face the same risks to their homes and families as their neighbors. To assist with that burden, BNSF has operated a disaster assistance hotline for our employees affected by the wildfires to help employees displaced by the fire with their immediate needs for shelter and necessities.

BNSF also plays a role in wildfire response in the communities where we operate. BNSF operates six firefighting trains in the Pacific Northwest that can deploy to fight fires from cabooses fitted with water cannons and firefighting foam or to transport firefighters to areas inaccessible by other means. Each firefighting train can carry 30,000 gallons of water, an amount equivalent to 60 fire trucks, and can thus serve as crucial surge capacity for local firefighting efforts or as a last line of defense for BNSF's infrastructure. BNSF's local operations leaders coordinate with state, local, and tribal emergency management agencies to ensure clear lines of communication and rapid response times when a need for a fire train arises.



A BNSF fire train deployed in western Montana to assist firefighting efforts on the MRL last week

Our fire trains have been operating to keep our lines in service during this wildfire season. For instance, last week a train crew reported a brush fire moving toward our right-of-way on our Fallbridge Subdivision in eastern Washington. Our dispatching center held trains short of the location to clear the line for our fire train to deploy from Pasco. Within three hours of the initial report, the fire train had deployed to the location and contained the fire, an initial assessment of the location and inspection of the track was performed, and operations had resumed at restricted speed.²

With the partnership of local emergency response agencies, our teams have worked hard to keep our employees safe, protect our network, and move as much freight as possible during this most recent uptick in wildfire activity. All BNSF lines in the region have remained open, although subject to delays due to firefighting efforts, track damage, and operational changes to reduce exposure to air quality hazards.

Winter Preparedness

Winter comes every year, and it brings different challenges in different parts of our network. In our south region, we see high winds, seasonal rains, and cold temperatures while our north region experiences much colder temperatures and heavy snowfall. To mitigate the effects of winter on our network, BNSF's winter preparedness efforts contain multiple layers. There is our operational planning effort, which entails

² Restricted speed is an operating practice of operating a train at a speed low enough to permit the train to be brought to a complete stop within half the sight distance of the train crew.

similar measures as described above concerning preventative maintenance and pre-positioning necessary resources, and there is also a capital investment component involving adding capacity to handle these challenges.

Each of BNSF's ten operating divisions maintains a Winter Action Plan to address winter-related safety hazards to our workforce, prepare and position snow removal equipment and ensure that winter-related infrastructure is in proper operating condition, and provide clear direction on actions to take to restore service when a winter-related service interruption hits. A paramount focus for BNSF is making sure our employees can operate safely in these challenging conditions. For instance, on our Montana Division, work has already begun to bring in supplies such as winter PPE and snow melting materials as well as inspecting and winterizing road vehicles and other equipment in order to meet the plan date for these deliverables of October 15.

When a major storm hits a portion of our network, we establish 24-hour command centers as necessary to adjust service plans and routes to avoid storms as well as to plan and dispatch our mechanical and engineering rapid responder teams to get lines or equipment back in service. One of the most challenging aspects of winter weather recovery is our ability to get our employees to work safely when roads are out of service. These response efforts also include operating dedicated restored passenger cars (our "snow coaches") to reposition train crews when roadways are impassable. In some extreme situations, we have even assisted the local authorities with clearing public roads to allow for safe passage.



Our snow coaches provide the capacity to safely relocate up to 40 employees when roads are impassible

These plans are tailored to the unique operational conditions on our network. For instance, BNSF maintains a dedicated avalanche mitigation program in conjunction with the National Park Service to actively monitor conditions in Glacier National Park and trigger controlled slides when and where necessary to avoid hazardous snow accumulation and the threat of an uncontrolled and unexpected avalanche. As an another example, high winds in winter are an environmental risk in portions of our network running through the southwest. To mitigate this, we have built a network of wind stations and issued handheld anemometers to our field supervisors to actively monitor wind conditions on the network. This information is supplied in real-time to both our Network Operations Center and to train crews via their company-issued tablets, which allows our crews to confirm when and where a train must be stopped ahead of hazardous wind conditions or get back underway after winds die down.

Underlying and supporting these plans are the ongoing investments BNSF makes to harden our network and provide an environmentally resilient equipment base to support our customers' transportation needs. For instance, BNSF currently operates 17 snow plows on our network, and we plan to add an additional plow each year for the next three years. These plows are operated on dedicated non-revenue trains for maximum flexibility and speed. Often times, we build these trains with a plow on each end of the consist to allow the plows to operate in either direction without time consuming work events to reposition a single plow. Additionally, BNSF has installed over 5,000 switch heaters across our network to ensure remote-controlled rail switches do not freeze during extreme cold. Under our Winter Action Plans, all of this equipment and infrastructure is inspected and maintained in the fall to be ready for winter.



Jordan Spreaders, such as the one pictured here, are the most powerful plows in our fleet and are capable of pushing heavy snow and other debris well away from the track

With respect to rolling stock, BNSF has made substantial investments to winterize our locomotive fleet and has fully winterized more than 1,600 locomotives with a further 3,500 locomotives partially winterized.³ In total, 34% of the fleet is fully winterized, and 74% of the fleet is partially winterized. Last year, BNSF proactively replaced more than 33,000 brake valves, including 7,000 valves each on BNSF's coal and grain car fleets, and 6,300 brake gaskets on railcars to ensure that air hose connectors between cars do not freeze and allow air to escape the brake system. For the upcoming winter, we are already pre-positioning locomotives in strategic points including Minot, Havre, Glendive, and Lincoln. This number includes roughly 25 new A/C Heavy locomotives that will positively impact our winter-preparedness and overall performance/reliability for the BNSF fleet.

These efforts have shown results. Last winter, we were able to recover quickly from a number of substantial snowstorms in the first quarter of 2023. BNSF's velocity through the peak winter weather months of January-March 2023 was consistent with or ahead of historical performance despite record-breaking winter conditions on the eastern portion of our hi-line route from Minnesota to the PNW. Thus, while we cannot prevent extreme weather from occurring, we remain dedicated to building and operating a resilient network to operate through the winter.

³ At BNSF, complete winterization is a retrofitting process that entails installing heated blowdowns, air dryers, water separators, and relocating internal piping, and partial installation is the installation of at least one of these measures.

* * *

As much as we pride ourselves on operating 24/7/365 in the outdoor sport that is railroading, service interruptions and slowdowns due to natural disasters and severe weather are sometimes unavoidable. The extensive planning and effort by our operating teams and the substantial investments we make are targeted at ensuring the safety of our employees during these conditions while also mitigating the effects of these events on our customers. We recognize that no amount of planning or investment would result in a resilient network without the hard work of our employees who safely execute on those plans under the most challenging of circumstances. We express our appreciation for their skill and their commitment.

Sincerely,



Adam Weiskittel
AVP & Associate General Counsel, Operations

CC: Mr. Michael Higgins, Office of Public Assistance, Government Affairs, and Compliance



BNSF Service Recovery Plan

Key Performance Indicators

	Baseline (March 4, 2022)	Current ¹	Progress Against Baseline	Target
Overall Velocity	24.4 mph	26.2 mph	+7.4% 	26 mph
Terminal Dwell	28.8 hrs	25.4 hrs	-11.8% 	25.5 hrs
Local Service Performance	87.6%	91.0%	+3.9% 	91%
Overall On Time Performance	62.4%	82.0%	+31.4% 	70%
Average Trains Holding	147.3	49.5	-66.4% 	95

¹ The data in this column reflects the data BNSF reported on August 23, which reflects performance in the week ending August 18.



BNSF Service Recovery Plan

Key Performance Indicators

	Baseline	Current	Progress Against Baseline	Target
Intermodal	66.9%	90.2%	+23.3pp ↑	75%
Coal Unit	66.6%	80.6%	+14.0pp ↑	75%
Merchandise	46.9%	64.0%	+17.1pp ↑	65%
Grain Unit	62.7%	80.3%	+17.6pp ↑	75%
Crude Unit	46.1%	59.9%	+13.8pp ↑	70%
Auto Unit	52.0%	81.0%	+29.0pp ↑	70%
Ethanol Unit	18.0%	38.0%	+20.0pp ↑	50%

TYE Unavailability and Cause

	8/6/23	8/7/23	8/8/23	8/9/23	8/10/23	8/11/23	8/12/23	8/13/23	8/14/23	8/15/23	8/16/23	8/17/23	8/18/23	8/19/23
Availability	61.0%	69.6%	72.4%	73.5%	73.4%	69.3%	62.2%	63.3%	71.8%	73.4%	71.8%	71.0%	67.2%	61.5%
Agreement	394	524	494	400	361	393	413	369	526	489	442	419	450	455
Absences	653	523	510	504	594	696	592	623	496	520	695	787	846	666
Company Business	23	35	46	57	44	37	24	28	45	62	73	70	40	12
FMLA/Medical Leave	327	225	181	202	195	243	295	295	198	178	216	240	310	312
Furloughed	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Miscellaneous	77	59	36	29	33	34	31	34	35	35	42	44	42	35
Training	20	50	74	80	53	4	4	15	41	76	87	69	20	2
Vacation/Paid Leave	1,439	1,285	1,173	1,161	1,203	1,309	1,366	1,313	1,159	1,110	1,073	1,104	1,229	1,260