



November 3, 2014

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Chairman Daniel R. Elliott, III
Surface Transportation Board
395 E. Street, S.W.
Washington, DC 20423-0001

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Re: **Docket No. 724, United States Rail Service Issues**

Dear Chairman Elliott:

Ameren Missouri is sending this letter in support of the WCTL Petition in Docket No. EP 724 to the Surface Transportation Board (the "Board").

The Midwest (including Missouri) is heavily dependent on coal generation. It is a critical fuel necessary to provide reliable electricity. Unlike some other utilities (particularly in the East), Ameren Missouri cannot substitute natural gas as an electric generation fuel in the event coal is not delivered in adequate quantities. Maintaining a reliable electric system is of the utmost importance to the Midwest; accordingly, coal deliveries must have first priority on the rail network.

At the end of August of this year, the US power plant coal inventories were at their lowest level since 2005 (when a prior railroad service disruption occurred). The correct level of coal inventories serve as a buffer to accommodate periodic delivery disruptions caused by flooding, snow, congestion or other conditions. The two Ameren Missouri BNSF served coal-fired power plants with low inventories generate approximately 32% of all of Ameren Missouri's power.

Over the last several months, ongoing crew issues, parking train sets and train rerouting have all negatively impacted deliveries. Ameren Missouri has not been provided with adequate assurances that service levels will improve and a coal delivery plan is needed. As a result of low inventory levels caused by reduced deliveries during this timeframe, Ameren Missouri now requires additional deliveries to replenish inventory levels to normal levels.

As the Board found when it established the Rail Energy Transportation Advisory Committee (RETAC) in 2007, "the reliability of the nation's energy supply [is] crucial to this nation's economic and national security, and the transportation by rail of coal and other energy resources [is] a vital link in the energy supply chain." This holds true today and a Board approved coal service recovery plan should require adequate coal delivery levels to assure electric grid reliability.

If additional specifics are needed for the Board to implement WCTL's Petition, Ameren Missouri respectfully requests that the Board issue a Protective Order to establish a framework for the protection of any confidential information.

We thank you for your prompt attention to this important matter.

Please feel free to contact me (314.554.2276 or JSobule@ameren.com).

Very truly yours,

James A. Sobule
Vice President and Deputy General Counsel
Legal Department