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## BY ELECTRONIC FILING

The Honorable Cynthia T. Brown  
Chief, Section of Administration, Office of Proceedings  
Surface Transportation Board  
395 E Street, S.W.  
Washington, D.C. 20423-0001

Re: Western Coal Traffic League Notice of Intent to Participate in  
EP 558 (Sub-No. 18), Railroad Cost of Capital - 2014

Dear Ms. Brown:

This letter constitutes the notice of intent of the Western Coal Traffic League ("WCTL") to participate in the above-referenced proceeding in response to the Board's decision served in the above-captioned proceeding on February 19, 2015 ("Notice"). WCTL expects to file comments on May 11, 2015, and wishes to receive copies of any submissions made by other parties as well as any releases from the Board.

WCTL notes for the record its objection to the Board's instruction in its Notice at 2 to "us[e] the methodology followed in *Railroad Cost of Capital--2013*." As WCTL explained in its comments in the EP 664 (Sub-No. 2), referenced in footnote 2 of the Board's Notice, the Board's existing methodology is severely flawed in several fundamental respects. The Board's instruction invites, and effectively requires, a continuation of past errors that have resulted in an overstated cost of capital.

If the Board wants accuracy, it should resolve, or at least advance, the EP 664 (Sub-No. 2) rulemaking before it seeks input on the 2014 cost of capital. WCTL notes that it filed its petition to institute a rulemaking in EP 664 (Sub-No. 2) on August 27, 2013, nineteen months ago.

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Respectfully submitted,

A handwritten signature in blue ink that reads "Robert D. Rosenberg". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Robert D. Rosenberg  
An Attorney for the Western Coal  
Traffic League

cc: Service Lists in EP 664 (Sub-No. 2) and EP 558