



October 18, 2023

The Honorable Martin Oberman
Chairman, Surface Transportation Board

The Honorable Karen Hedlund
Vice Chairman, Surface Transportation Board

The Honorable Patrick Fuchs
Member, Surface Transportation Board

The Honorable Robert Primus
Member, Surface Transportation Board

The Honorable Michelle Schultz
Member, Surface Transportation Board

Via electronic mail

Re: Comments in Support of Coal Producer Statement, Oct. 18, 2023, Surface Transportation Board Rail Energy Advisory Committee, 88 Fed. Reg. 62,261 (Sept. 12, 2023).

Dear Chairman Oberman, Vice Chairman Hedlund, and Members Fuchs, Primus, and Schultz,

The National Mining Association (NMA) is submitting this letter to the Surface Transportation Board (Board) in support of the Coal Producer Statement provided today by Arch Resources, Inc. CEO, Paul Lang. Coal is produced throughout the United States and is reliant on Class I rail carriers, and other smaller carriers, to transport products to domestic steel mills and utilities, as well as for export to our allies across the globe. In fact, rail continues to be the primary mode of transportation for coal across the United States.

The NMA notes that rail service has improved in recent months thanks in large part to the diligent work of the rail carriers. The association and its members appreciate the time and energy that the railroads have invested recently in addressing our concerns.

However, given the inherent volatility of the energy markets, the NMA urges the carriers to ensure flexibility, spare capacity, and human capital to respond when such inflection points arise. Increased recognition of the cyclical nature of commodity and energy markets is needed to ensure capacity is available as demand rises.

In addition to highlighting the importance of U.S. railroads remaining at-the-ready for swings in domestic requirements, we also want to underscore the essential role the railroads play in facilitating U.S. energy exports, which are on an upward trajectory at present and expected to remain so. The decline in thermal coal combustion domestically has not dramatically reduced the need for moving coal by rail. Rather, it has freed up rail capacity that can be directed to coal exports. Increases in exports are well-aligned with U.S. economic objectives, including a more favorable balance of trade.

The NMA and the U.S. coal industry want to be part of the solution to efficient rail transport. We need to be able to transport metallurgical coal to the industries that use steel to build and maintain economies around the world. We need to be able to move both thermal and metallurgical coal to international business partners, who increasingly require it to keep the global economy healthy and functioning. More important still, the U.S. is uniquely equipped to answer the bell and come to the aid of key allies who find themselves facing intense and even unprecedented geopolitical turmoil in the search for reliable electricity.

These objectives depend on a high-performing rail system, and the NMA and its member companies stand ready to assist with this significant national priority in any way possible.

Thank you for the opportunity to provide these comments. If you have any questions, please contact me at kmills@nma.org.

Sincerely,

Katie Mills

Katie Mills
Associate General Counsel