

The Honorable Patrick Fuchs  
Chairman, Surface Transportation Board

The Honorable Robert Primus  
Member, Surface Transportation Board

The Honorable Karen Hedlund  
Member, Surface Transportation Board

The Honorable Michelle Schultz  
Member, Surface Transportation Board

*Via electronic mail*  
C/O Elizabeth McGrath, [elizabeth.mcgrath@stb.gov](mailto:elizabeth.mcgrath@stb.gov)

**Re: Comments for May 29, 2025, Surface Transportation Board Rail  
Energy Transportation Advisory Committee (RETAC), 90 Fed.  
Reg. 17,683 (April 28, 2025).**

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

The National Mining Association (NMA) writes to the Surface Transportation Board (Board) expressing our support for the Coal Producer Statement at the Board's Rail Energy Transportation Advisory Committee Meeting (RETAC) on May 29, 2025. Coal is produced in regions across the country and remains highly dependent on Class I and other rail carriers to reach domestic steel mills, electric utilities, and industrial facilities, as well as allied nations abroad. Rail remains the dominant mode of transportation for coal across the United States, regardless of whether the customer is domestic or international.

This Administration has recently reaffirmed the vital role coal plays in our national energy agenda. Several new Executive Orders (EOs) demonstrate the federal government's intent to secure the continued operation of coal-fired generation and to expand opportunities for U.S. coal producers:

- EO 14154, "*Unleashing American Energy*", establishes a federal energy policy emphasizing traditional energy sources and reassessing regulatory burdens that hinder coal development.

- EO 14156, "*Declaring a National Energy Emergency*", accelerates the development of energy and infrastructure projects.
- EO 14241, "*Reinvigorating America's Beautiful Clean Coal Industry*", lifts multiple restrictions on coal production in response to increased electricity demand from manufacturing growth and AI-powered data centers.
- EO 14262, "*Strengthening the Reliability and Security of the United States Grid*", addresses the urgent need to maintain reliable electricity in the face of growing demand and capacity challenges.

Despite claims that coal demand is waning, recent indicators tell a different story. The U.S. Energy Information Administration (EIA) has revised its 2025 forecast upward, citing an 18% increase in coal consumption during January and February over the same period in 2024. In parallel, the North American Electric Reliability Corporation (NERC) has warned that heat-driven demand surges this summer could outpace electricity supply, raising the risk of widespread power outages. Since last summer, peak demand has climbed by over 10 GW, twice the year-over-year increase seen between 2023 and 2024.

This increase in electricity demand, driven largely by the growth of artificial intelligence and the expansion of data centers, has prompted utilities to pause or reverse the retirements of coal plants. At least 22 coal units with a combined capacity of 12 GW have had planned retirements delayed, representing 21% of all U.S. coal generation previously scheduled for decommissioning.

Globally, the U.S. exported nearly 100 million tons of coal to over 50 countries in 2023, marking a new record in global coal consumption. Seaborne thermal coal demand reached an estimated 1.1 billion tons, and demand for U.S. metallurgical coal, essential for steelmaking in Asia and other growing economies, is projected to remain strong for decades to come. The ability of U.S. producers to capitalize on these opportunities hinges on a resilient and flexible rail system.

Given the volatility of global and domestic energy markets, it is essential that railroads maintain spare capacity. This includes not just physical infrastructure but also human capital at both the administrative and operating levels. Coal continues to play a critical role in maintaining grid



reliability, especially during periods of peak demand or disruptions to other energy sources. Any atrophy in coal-hauling capacity, through equipment divestment, workforce reductions, or line abandonments, would be difficult and costly to reverse, potentially putting the grid at risk.

A high-performing U.S. rail network is essential to coal's role in our domestic energy mix and to capitalizing on robust international market demand. The NMA and U.S. coal producers are committed to constructive collaboration with rail carriers and policymakers to improve service in challenged lanes and to develop new, forward-looking transportation corridors across the country and globally.

All of this depends on a competitive and dependable rail infrastructure. The NMA and its members stand ready to assist with this vital national effort.

Thank you for considering these comments. Please feel free to contact me at [mnewell@nma.org](mailto:mnewell@nma.org) should you have any questions.

Sincerely,



Martha Newell  
Director, Government and Political Affairs