October 23, 2026

The Honorable Patrick Fuchs
Chairman, Surface Transportation Board

The Honorable Michelle Schultz
Member, Surface Transportation Board

The Honorable Karen Hedlund
Member, Surface Transportation Board

The Honorable Richard Kloster
Member, Surface Transportation Board

Submitted via electronic mail
C/O Elizabeth McGrath, elizabeth.mcgrath@stb.gov

RE: Comments for Oct. 27, 2026, Surface Transportation Board Rail Energy Transportation Advisory Committee, 91 Fed. Reg. 63,377 (Oct. 5, 2026).

Dear Chairman Fuchs and Members Schultz, Hedlund, and Kloster:

The National Mining Association (NMA) respectfully submits these comments in support of the Coal Producer Statement at the Surface Transportation Board's (STB) Rail Energy Transportation Advisory Committee (RETAC) meeting on Oct. 27, 2026. 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 to our allies across the globe. Rail continues to be the primary mode of transportation for coal across the United States whether the customer is domestic or international.

The NMA's coal improvements and ensuring that railroads preserve the flexibility necessary to respond to changing market conditions.

Reliable coal transportation depends upon resilient rail networks supported by adequate workforce development, sufficient equipment availability, and long-term infrastructure investment. Hiring, training, and retaining qualified

railroad employees remains a significant undertaking, but continued investment in both workforce and equipment should help ensure the railroads can continue to transport the coal necessary to take full advantage of opportunities in domestic and international markets. Coal producers encourage rail carriers to continue investing in the personnel, equipment, and operational flexibility necessary to preserve recent improvements and maintain the reliability on which coal producers depend.

After decades of relatively flat electricity demand, the U.S. is experiencing a period of significant growth driven largely by data centers and electrification.[1] U.S. power demand is expected to reach record highs in 2026 and 2027.[2] As demand grows, maintaining a reliable, and fuel-secure electric system will become increasingly critical.

Coal remains an important component of that reliability network. The National Coal Council's July 2026 report, "Maximizing the Value of America's Existing Coal Fleet," concluded that preserving and modernizing the existing coal fleet represents one of the fastest and most cost-effective ways to support grid reliability while meeting growing electricity demand.[3] The report further highlights the value of dispatchable generation resources with on-site fuel supplies that can provide resilience during periods of high demand and extreme weather. Consistent, cost-effective, and reliable rail service remains essential to realizing these benefits.

Because coal transportation remains overwhelmingly rail dependent, the reliability, flexibility, and affordability of rail service contribute directly to electric reliability, fuel security, and broader national energy objectives. As electricity demand grows, preserving the ability of coal to provide dispatchable, reliable, and affordable baseload power will depend in part on producer members generally reported stable or improved service conditions 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 in addressing previous concerns. At the same time, stakeholders emphasize the importance of maintaining these

---

[1] BloombergNEF, The US Transition Ahead: Booming Energy Demand, Shifting Mobility (Jan. 9, 2026), *available at* https://about.bnef.com/insights/clean-energy/the-us-transition-ahead-booming-energy-demand-shifting-mobility/.

[2] Reuters, US power use to beat record highs in 2026 and 2027 as AI use surges, EIA says (Oct. 6, 2026), *available at* https://www.reuters.com/business/energy/us-power-use-beat-record-highs-2026-2027-ai-use-surges-eia-says-2026-10-06/.

[3] National Coal Council, Maximizing the Value of the U.S. Coal Fleet 4 (July 2026), *available at* https://wyoenergy.org/wp-content/uploads/2026/07/NCC_Maximizing-Value-of-US-Coal-Fleet.pdf.

reliable transportation networks capable of responding to changing market conditions. Competitive freight rail rates also play an essential role by helping ensure coal remains an economically viable option. Cost competitive rates allow coal to compete with alternative fuel sources and provide a stable source of traffic and revenue for rail carriers.[4]

In addition to supporting domestic reliability, railroads serve as the backbone of the coal export supply chain.[5] Export markets have become an increasingly significant source of demand for U.S. coal producers and support employment and economic activity across mining regions, rail networks, ports, and terminal facilities.

As highlighted in the National Coal Council's July 2026 U.S. coal exports report, strong global demand for both metallurgical and thermal coal continues to present opportunities for U.S. producers. However, transportation costs and access to export infrastructure remain critical factors affecting coal's competitiveness in global markets. The cost of moving coal from western U.S. mines to a port are significant and can be more than the cost of mining the coal.[6] With these cost constraints in mind, the National Coal Council recommended that coal companies and rail operators "redouble their efforts to collaborate to lower the cost of moving coal from mine to the port."[7]

The National Coal Council's recent export report also identifies transportation access and terminal capacity as important considerations affecting export growth opportunities. A Wyoming coal study demonstrates that transportation costs and limited export access remain key barriers to expanding Powder River Basin exports despite the region's highly competitive production costs.[8] The lack of an efficient, Pacific deep-water port has constrained U.S. producers' ability to move coal and other energy resources to global markets.

Recognizing the importance of additional infrastructure to improve access to international markets, the administration has pledged up to $75 million for the West Gateway Terminal project, a rail-served marine export terminal

---

[4] *Id.* at 23.
[5] National Coal Council, Outlook and Opportunities for U.S. Coal Exports 16 (July 21, 2026), *available at* https://nationalcoalcouncil.energy.gov/ncc/sites/default/files/studies/2026/NCC_Coal%20Exports%20Report.pdf.
[6] *Id.*
[7] *Id.* at 7.
[8] Energy Ventures Analysis, Wyoming Coal Study 1-1, 1-2, 2-1 (February 2026), *available at* https://wyoenergy.org/wp-content/uploads/2026/02/Wyoming-Coal-Study-Final-Report-Public.pdf.

capable of handling more than 10 million tons of bulk commodities annually.[9] The West Gateway Terminal project is part of the solution, as is continued investments that improve transportation efficiency, maintain competitive rail rates, and increased access to critical export infrastructure are still needed to enhance the export competitiveness of U.S. producers.

Current service improvements are encouraging, but stakeholders must also remain focused on future transportation needs. For example, the NMA's coal producer members continue to consider the future availability of coal cars as portions of the coal fleet continue to age. The retirement of aging coal cars, without a sufficient replacement plan, could lead to capacity constraints.

Rising electricity demand, expanding export opportunities, and the potential shift of freight from truck to rail could create additional short- and long-term demands on the rail network. Therefore, the question to consider is not simply whether the rail network is performing adequately today, but whether it will be prepared to support future energy and export requirements. Maintaining adequate capacity, preserving network resiliency, and planning for future growth should remain shared priorities. All of these objectives depend on a competitive and dependable rail system, and the NMA and its member companies stand ready to assist with this significant national priority.

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

Sincerely,

Kathryn Sarver

Kathryn Sarver
Assistant General Counsel

[9] U.S. Department of Energy, Energy Department to Use Defense Production Act Funding to Expand Coal Capacity at 13 Plants and Build Export Infrastructure (June 4, 2026), *available at* https://www.energy.gov/articles/energy-department-use-defense-production-act-funding-expand-coal-capacity-13-plants-and.