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May 9, 2022

Cynthia Brown, Chief
Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: STB Ex Parte No. 770, Urgent Issues in Freight Rail Service

Dear Ms. Brown:

Tampa Electric Company (TECO) respectfully requests that the Surface Transportation Board (STB) accept this letter as part of the written record for the important public hearing on urgent issues in freight rail service that was held on April 26 and 27, 2022.

Coal-fired electricity generated at TECO's Big Bend Power Station in Florida has been curtailed in light of severe rail service shortages. The Big Bend facility is served by CSX Transportation (CSXT); TECO has had a productive relationship with CSXT in the past and appreciates the rail service provided by CSXT during that time. However, the past few months have been full of CSXT's refusing and declining TECO's requests for rail service from the relevant Illinois coal mine to Big Bend. TECO originally requested delivery of several trains in March and three trains in April, but CSXT has only delivered one train in that entire time. CSXT did so only after repeated refusals and TECO's formal letter of objection on March 25th. The cars for that train were picked up from Big Bend on April 7 and did not return loaded from the Illinois mine to Big Bend until April 22.¹ Unfortunately, CSXT has now refused all requests for service until June at the earliest based on what CSXT describes as continuing labor and congestion issues.

As an explanation for the repeated refusals to provide service, CSXT has stated that it is focusing on minimum tonnage agreements and customers who, in CSXT's view, are in danger of running out of coal and are more dependent on coal than TECO. We are troubled by CSXT's reduction in service based on their opinion of customer need. One train out of ten over a three-month period is unacceptable and unsustainable. TECO utilizes coal at the Big Bend facility to keep

¹ TECO understands that issues at the mine resulted in the train being at the mine for four days for loading.

fuel costs low for customers when coal pricing is favorable to natural gas and to balance natural gas usage which is limited by our existing natural gas transportation agreements and pipelines that are fully subscribed. To maintain reliable, low cost fuel supply at the Big Bend facility, TECO will need three or four trains in May and each succeeding month. Without these trains, generation from the coal-fired unit has been and will be limited. Furthermore, CSXT's inability to transport coal that TECO has under contract with the mine forces TECO to go to the market and try and secure higher cost power if natural gas is also unavailable. TECO may be required to buy power from the very utility's that CSXT has deemed to be in need of or dependent on coal. This causes harm to our customers, harm to our inventory and forces the curtailment of coal burn. In addition, CSXT's failure to move our trains results in our rail assets sitting at Big Bend as an additional expense while not being utilized to move the coal so desperately needed at the facility.

TECO understands that supply chain and employee retention issues are affecting businesses throughout the country. TECO is engaged in regular communication with CSXT. However, CSXT's rejection of TECO's transportation requests in the Unit Train Management System for weeks or a month at time is unacceptable.

TECO appreciates the Board's attention to the service crisis affecting the freight rail industry, and TECO urges the Board to exercise strict oversight and employ all measures within its power to ensure that adequate freight rail service is provided to our Big Bend facility.

Respectfully submitted,



Carlos Aldazabal
Vice President, Energy Supply

cc: Sara Schryer, CSXT
Elizabeth Peacock, CSXT
Sandra Brown, Thompson Hine LLP