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October 19, 2005

Honorable Roger Nober, Chairman
Surface Transportation Board
1925 K Street N.W.
Washington, DC 20423-0001

Re: The 25th Anniversary of the Staggers Rail Act of 1980:
A Review and Look Ahead
STB Ex Parte No. 658

Headquartered in downtown Chicago, Midwest Generation, LLC is one of the nation's largest independent power producers. Midwest Generation, LLC is a subsidiary of Edison Mission Energy and is part of the Edison International family of companies. Midwest Generation owns or operates six coal fired electric power generating stations in Illinois and supervises operation of a single station in western Pennsylvania. The six Illinois stations are capable of producing in excess of 5,600 megawatts of electricity and our single site in Pennsylvania is capable of producing 1,884 megawatts of electricity.

Our Illinois stations burn coal from the Powder River Basin ("PRB") in Wyoming. Since Midwest Generation acquired these assets in late 1999, demand from our Illinois stations for PRB coal has grown from 16 million to 20.5 million tons of coal per year. The PRB coal destined for our Illinois stations is delivered exclusively by rail pursuant to long term rail contracts with carriers. Between 1999 and 2005, Midwest Generation has shipped approximately 110 billion ton-miles of coal to our Illinois stations.

Our Pennsylvania station currently burns coal from Northern Appalachia. Of the approximate 6 million tons of coal consumed each year at our Pennsylvania station, about 1.2 million tons is transported by rail from mines to a rail-to-truck transloading facility. We recently have completed construction of a rail spur which will allow us to supplement our truck deliveries with direct rail service to the station and encourage increased rail movement.

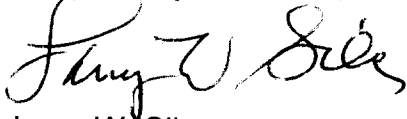
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Since we began operations in 1999, Midwest Generation has received rail services under negotiated agreements with carriers. While our demand for PRB coal grew over that time period by almost thirty percent, the service we have received under those agreements has been reliable and cost-effective. Looking ahead, we expect that our demand for reliable, competitive rail transportation will continue to grow.

While the pricing of rail services is always a concern, of more importance today to Midwest Generation is the ability of the railroads to expand capacity to meet growing demand for coal and other commodities. In 2005, the line which is jointly operated by the Union Pacific Railroad Company and the Burlington Northern Santa Fe Railroad Company serving the southern PRB has been unable to meet the demand of the railroad customers. Capacity shortages, traffic congestion, rail infrastructure, and maintenance issues affect other parts of the rail system as well. Our key concern going forward is that the railroads have the financial and human resources to address these issues.

Midwest Generation appreciates the opportunity to comment on the 25th Anniversary of the Staggers Act of 1980. The Staggers Act was a step in the right direction on the way to improving the United States rail system.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Larry W. Siler", written in a cursive style.

Larry W. Siler
Director, Fuel Transportation

Cc: James R. Young
President and Chief Operating Officer
Union Pacific Railroad Company