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

**RE: STB Docket No. EP-770 – Urgent Issues in Freight Rail Service
STB Docket No. EP-770-1 – Urgent Issues in Freight Rail Service—Railroad
Reporting**

Dear Sir or Madam:

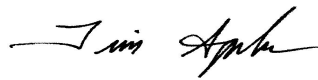
Consumers Energy Company is a combination electric and natural gas utility that provides energy to 6.7 million Michigan residents. Our coal-fired electric generation facilities have been vital to the state's electric reliability and economic growth, and shipments of the Powder River Basin coal that fuels these facilities originate on the BNSF Railway.

As a customer of the BNSF Railway for approximately 40 years, we have seen the ebb and flow of rail service challenges, but 2022 presented some of the most impactful challenges on our business. High natural gas prices led to near-record levels of coal demand and the inability of the rail network to meet this demand resulted in the curtailment of coal generation, which ultimately increased the cost of electricity to Michigan's electric customers.

In times of crisis, the value of accurate and timely communication cannot be overstated. During the delivery crisis of 2022, the level of communication between BNSF and Consumers Energy increased throughout our organizations. BNSF was always available for discussion, as they always have been, even at the senior management level. Although our requests to add trains to increase our coal deliveries were not granted as timely as we would have preferred, it was clear that BNSF was managing a system problem. By communicating an expectation of when trains could be added, we were able to develop a coal conservation strategy that allowed us to manage our coal inventory and mitigate the risk of running out of fuel. BNSF's interest and awareness of our inventory levels helped them focus resources where they were most needed. Additionally, BNSF advocated on our behalf with connecting carriers to maximize throughput and minimize interchange time.

Our experience with BNSF in 2023 shows a substantial performance improvement over 2022. With cycle times dropping more than 20% and with greater receptivity to adding trains when needed, we have been able to restore our coal inventories to targeted levels. As we have experienced throughout our history with BNSF Railway, communication continues to remain at a highly engaged level.

Regards,

A handwritten signature in black ink, appearing to read "Tim Sparks".

Timothy J. Sparks
Vice President, Electric Supply