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Metra Comments

STB Docket No. FD 36500

Public Hearing

September 28, 2022



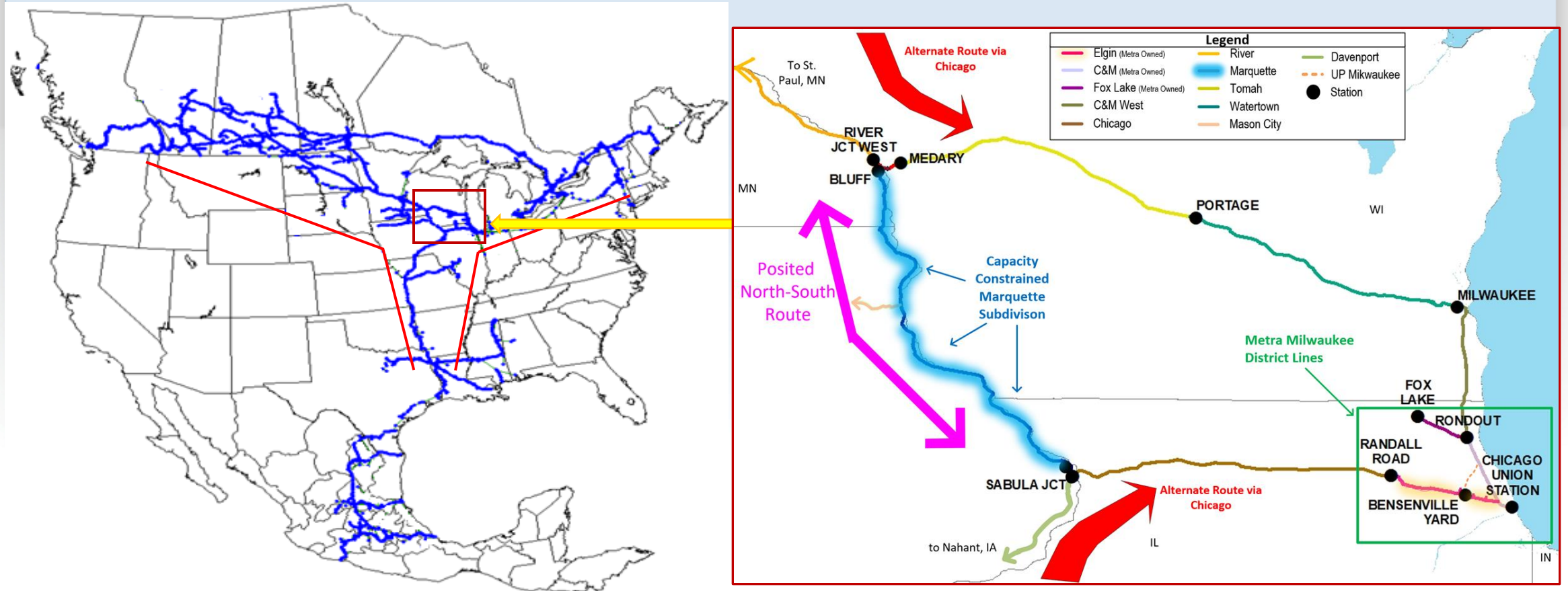
Rob Mulholland

STB Docket No. FD 36500

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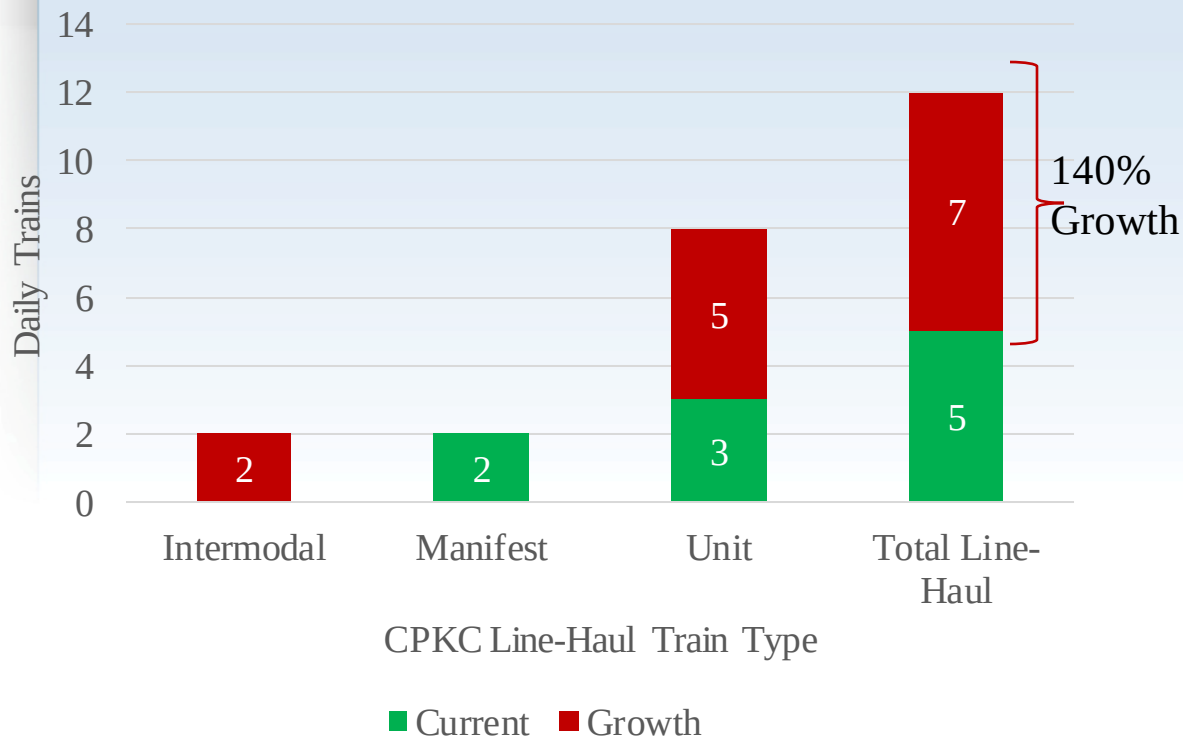
September 28, 2022

Metra's Milwaukee District Lines Are Situated at the Hub of the Proposed Merged CPKC Network

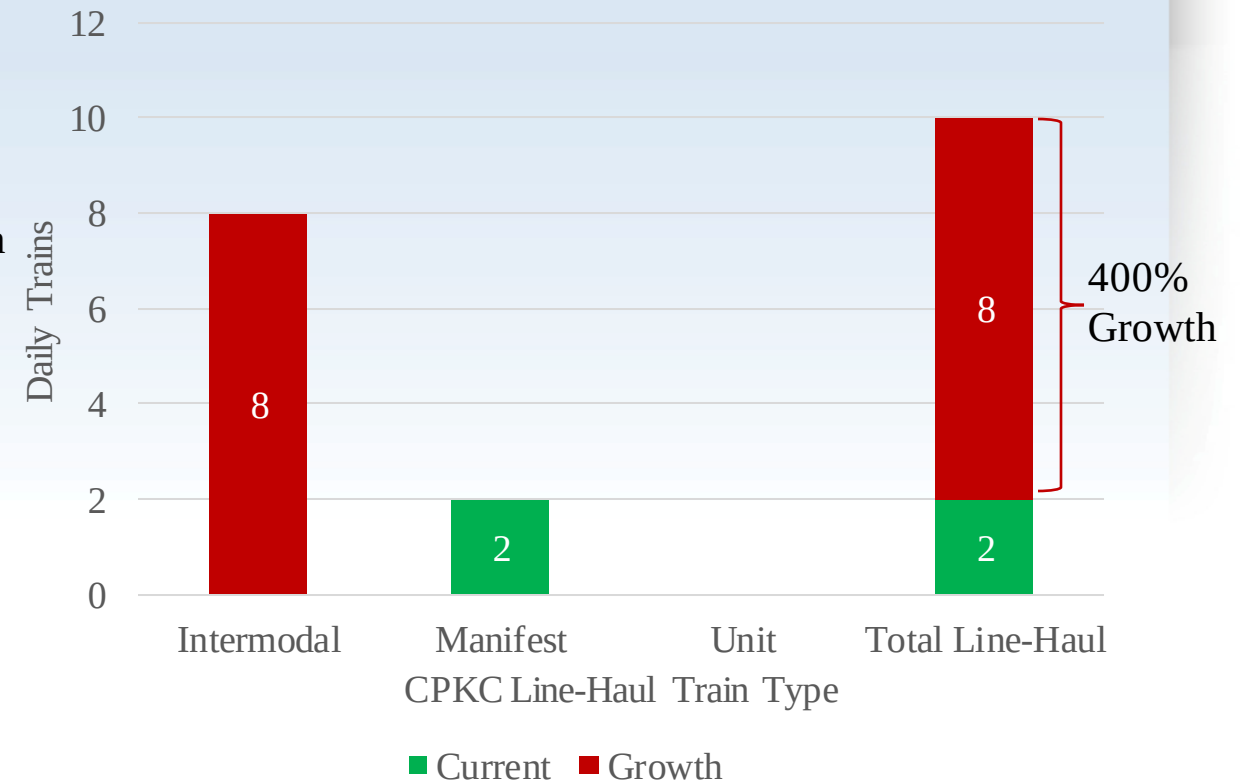


The Proposed CPKC Operating Plan Calls for Significant Daily Train Additions on the Marquette and Elgin (Metra Milwaukee District West) Subdivisions

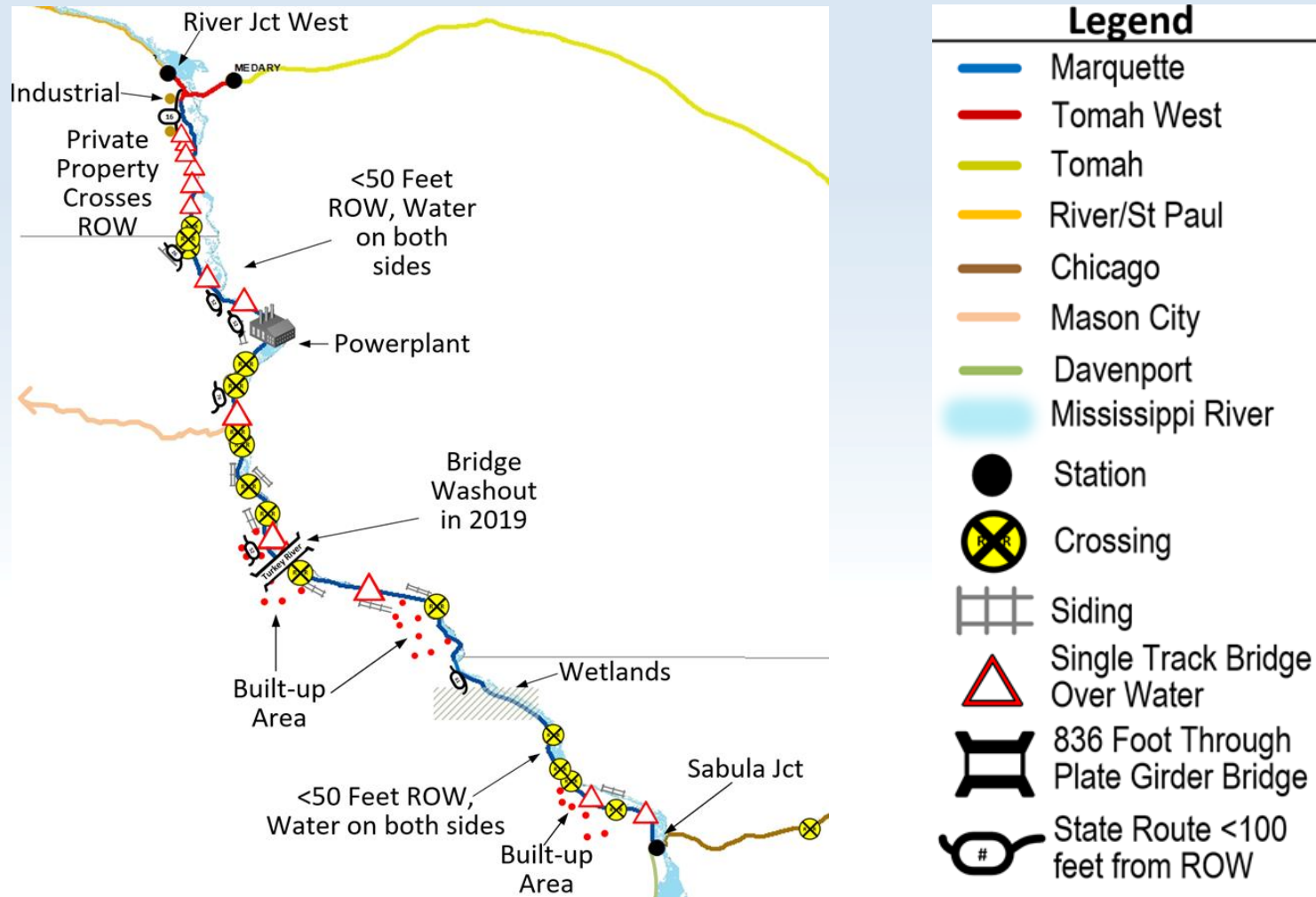
Marquette Subdivision, Current and Future Daily Line-Haul Train Volume (Excludes Local and Work Trains)



Metra Milwaukee District West Line (Randal Road to Bensenville Yard), Current and Future Daily Line-Haul Train Volume (Excludes Local and Work Trains)



CP's Capacity-Constrained Marquette Subdivision is Primarily Single Track and Has Few Options for Significant Capacity Expansion Projects



CP/KCS Failed to Demonstrate the Feasibility of their Proposed Merged Operations in the Vicinity of the Critical Chicago Terminal

Application

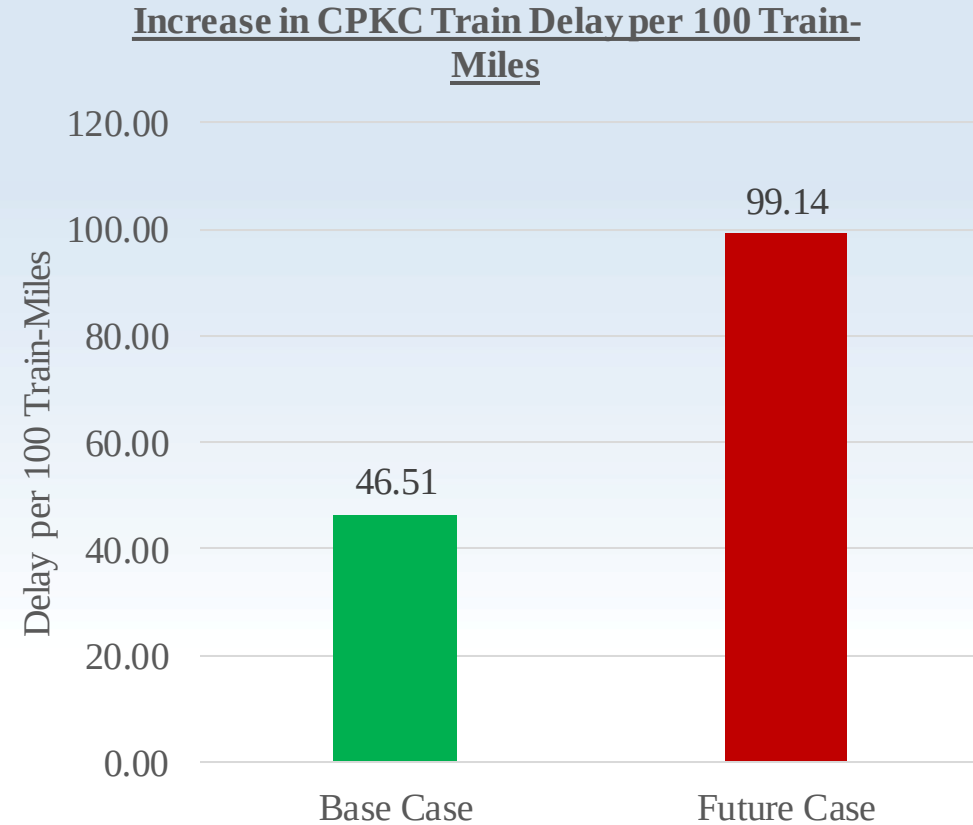
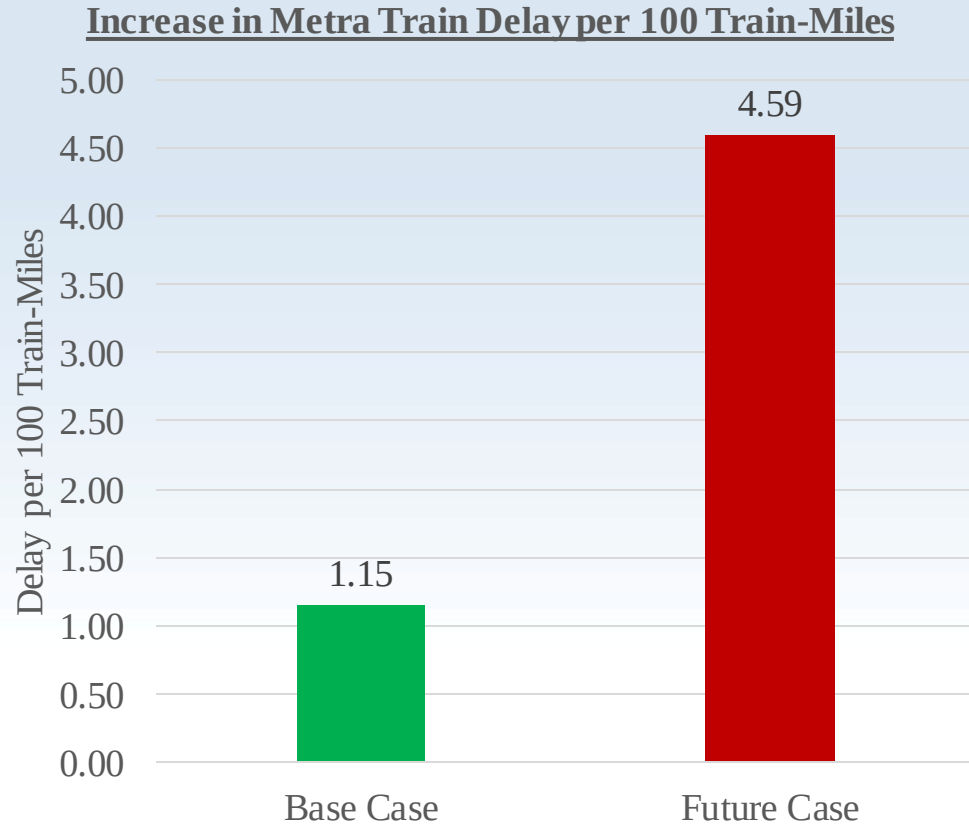
- a. Relied on MultiRail-based Operating Plan to develop Proposed Train Schedule
- b. Relied on Insufficient Capacity Analysis and Conclusory Statements
- c. Failed to Perform Rail Traffic Controller (RTC) Simulations to Test/Demonstrate Operating Plan Feasibility

CP/KCS Failed to Demonstrate the Feasibility of their Proposed Merged Operations in the Vicinity of the Critical Chicago Terminal

Metra Review

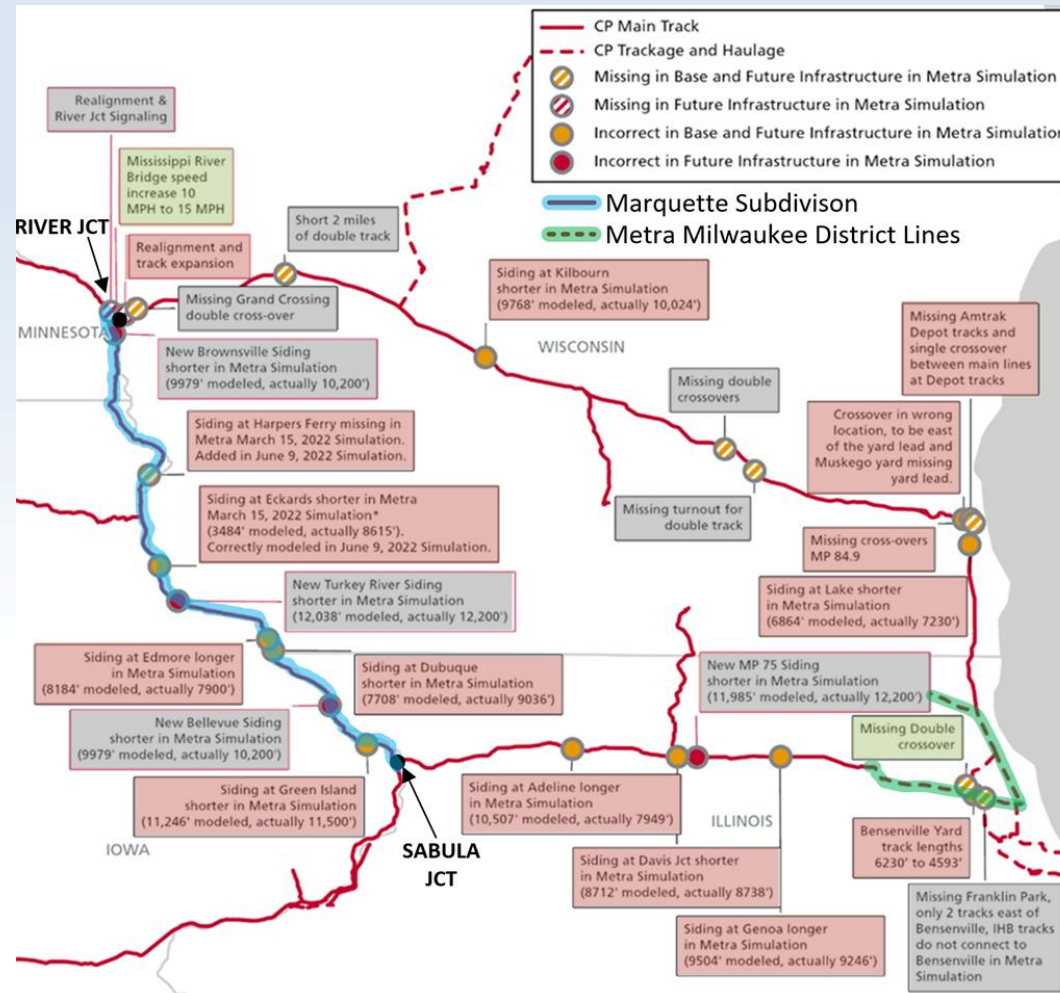
- a. Performed RTC Analysis to Test/Demonstrate Operating Plan Feasibility for Metra's Milwaukee District Lines and Proximate CP Subdivisions
- b. Relied on CP Infrastructure and Operating Data Produced through Discovery
- c. Used Standard Data Sources in a Manner Consistent with RTC Manual Instructions
- d. Leveraged Experience from Having Performed RTC Simulations in Dozens of STB Proceedings, which have been Rigorously Peer Reviewed and Accepted by the Board

Metra's RTC Simulations Show that Metra and CPKC Train Performance Will Worsen Following the Merger



*Metra's Future Case RTC Simulation would Not Run until 11
CPKC Trains were Removed, Demonstrating Inadequate Capacity*

CP/KCS' Critique of Metra Analysis and Inputs is Misleading and Disingenuous



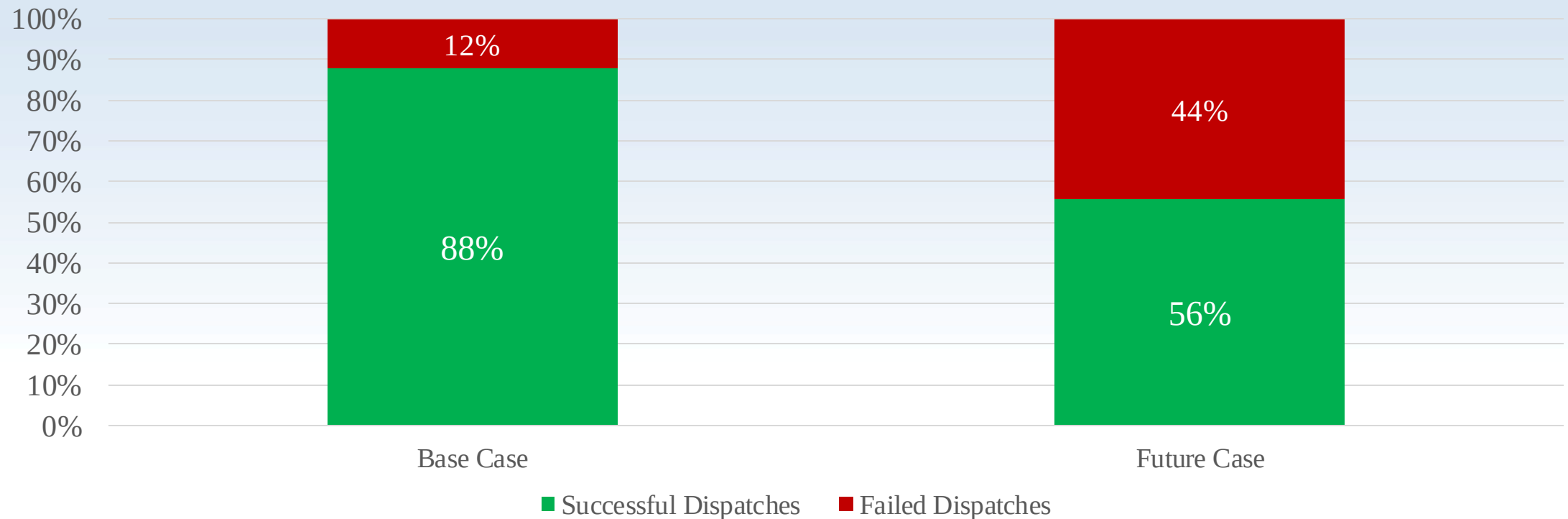
No "correction" or change made by CP/KCS in its RTC model

CP/KCS "correction" is inconsistent with the record

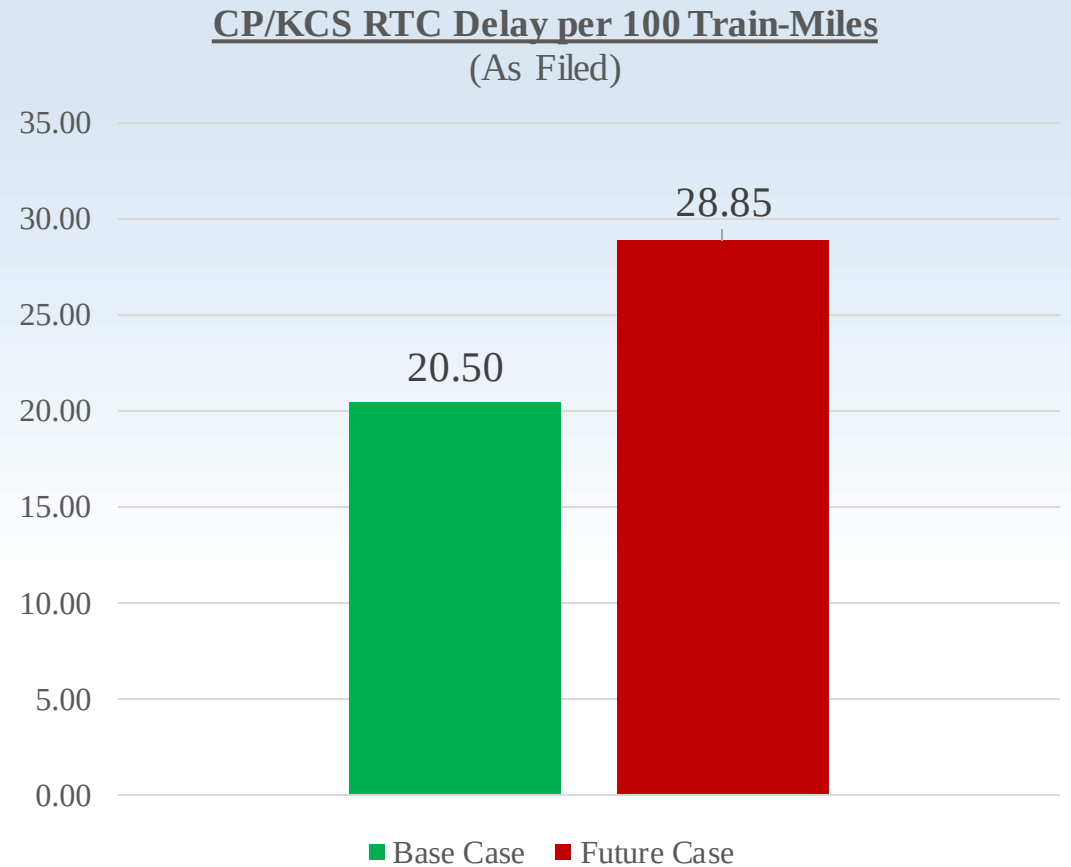
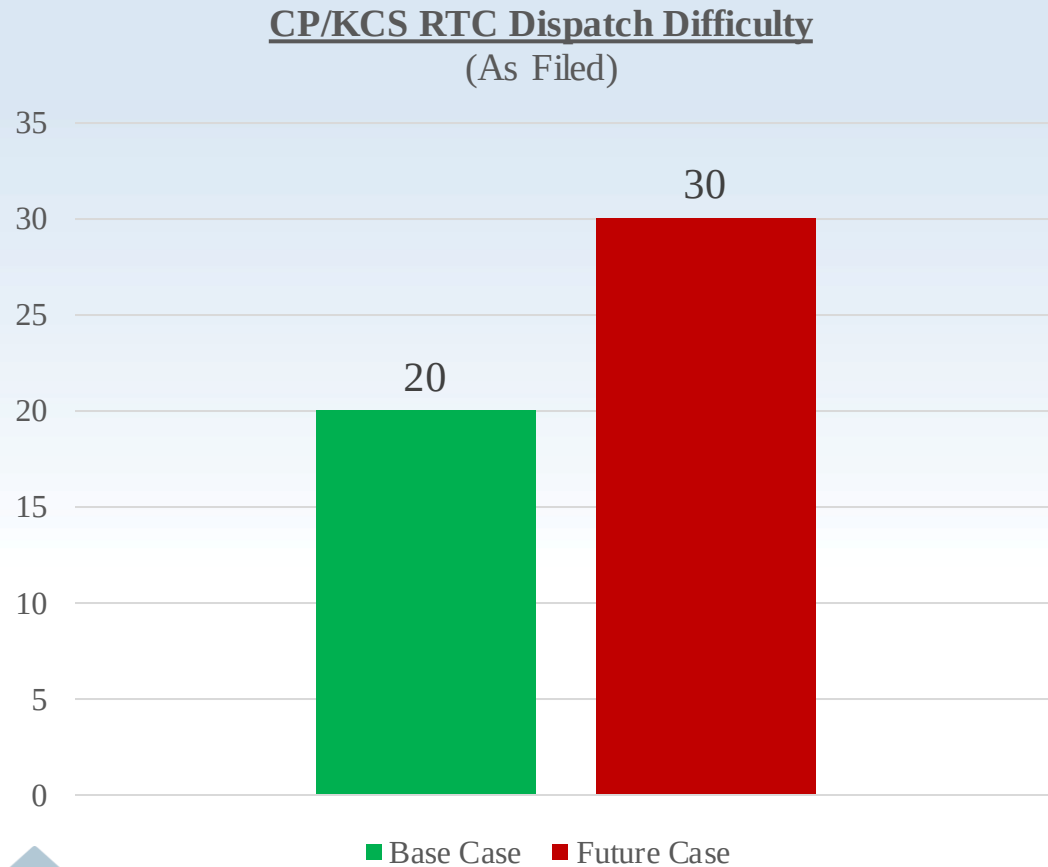
Only 2 corrections made by CP/KCS are supported by the record

CP/KCS' RTC Simulations Confirm that Infrastructure will be Insufficient for Planned Volume Increases Following the Merger

CP/KCS RTC Simulation Dispatch Failure Rate (As Filed)

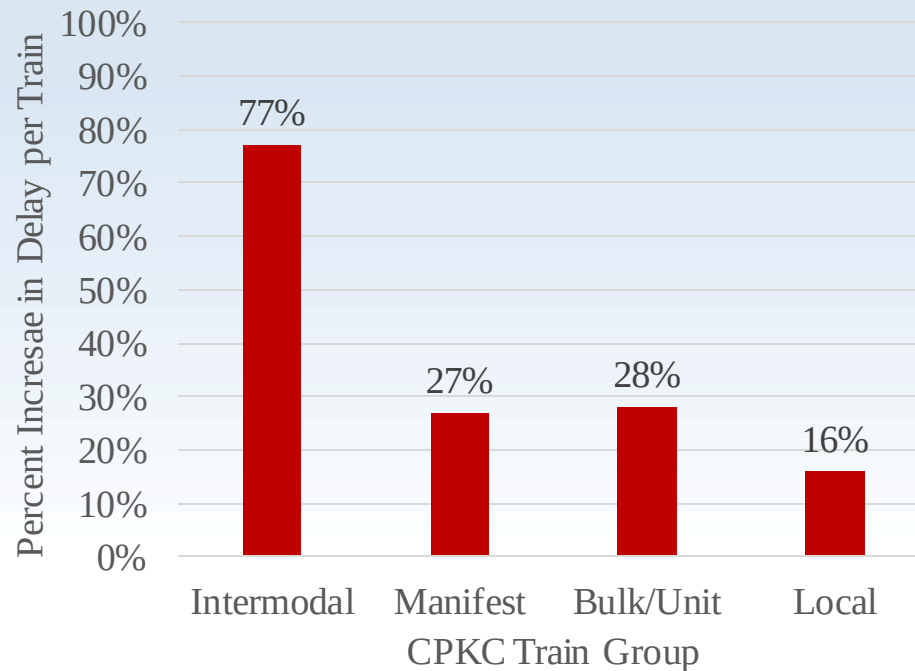


CP/KCS' RTC Simulations Confirm that Overall Train Performance (for All Trains) Will Worsen Following the Merger

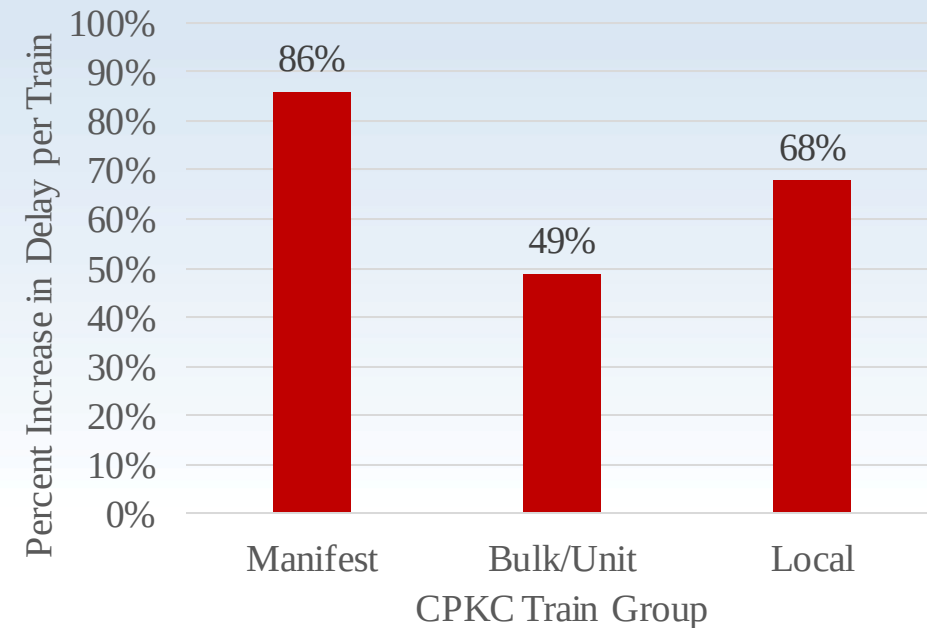


CP/KCS' RTC Simulations Confirm that Train Performance for CPKC Trains Will Dramatically Worsen Following the Merger

Overall Percent Increase in Delay Minutes per Train by Category, CP/KCS RTC Results



Marquette Subdivision, Percent Increase in Delay Minutes per Train by Category, CP/KCS RTC Results



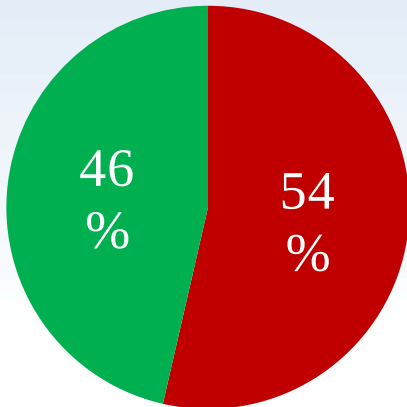
CP/KCS' own RTC simulation results show that CPKC will have to willingly accept severe performance degradation in order to ensure static Metra train performance. Metra is highly skeptical that CPKC will allow its trains to incur substantial delay increases in its daily dispatching practices, especially for its highest priority intermodal trains (77% delay increase in CP/KCS' modeling).

CP/KCS' RTC Simulations Rely on Unrealistic Inputs and Assumptions (Unattainable Train Schedule Adherence)

CP/KCS' RTC Simulation Forced CP Freight Trains to Maintain Standards CP Does Not Achieve in the Real World

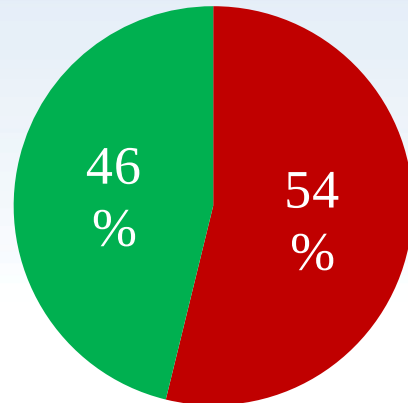
100-Series Intermodal Trains

CP/KCS assumed maximum schedule deviation of +/- 1 hour from the operating plan schedule



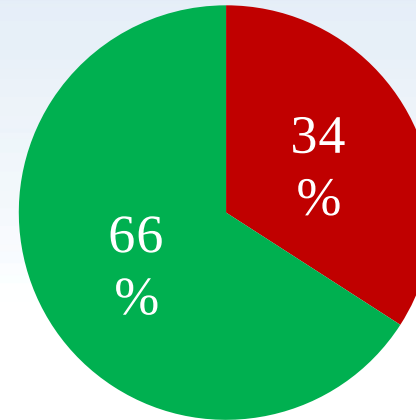
200-Series Manifest Trains

CP/KCS assumed maximum schedule deviation of +/- 1 hour from the operating plan schedule



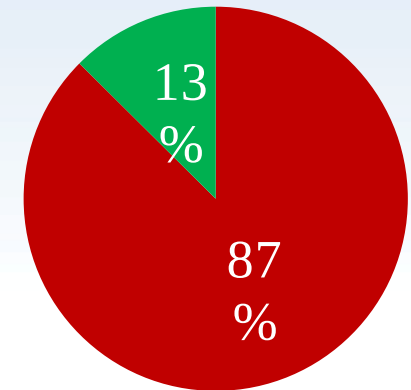
400-Series Manifest Trains

CP/KCS assumed maximum schedule deviation of +2 hours / -1 hour from the operating plan schedule



Local Trains

CP/KCS assumed no deviation (+/- 0 hours) from the operating plan schedule

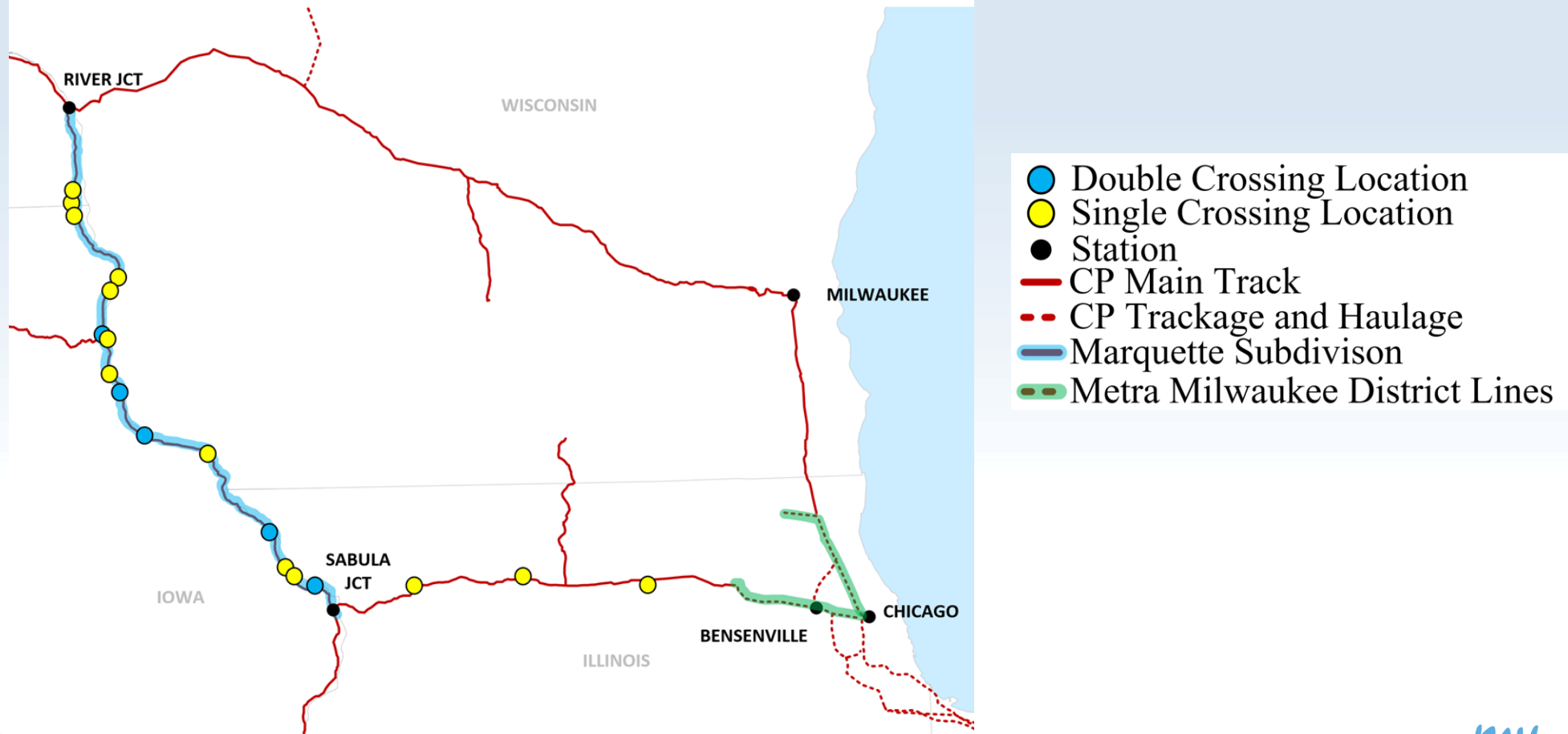


 Real-world CP Trains meeting the modeled standard

 Real-world CP Trains NOT meeting the modeled standard

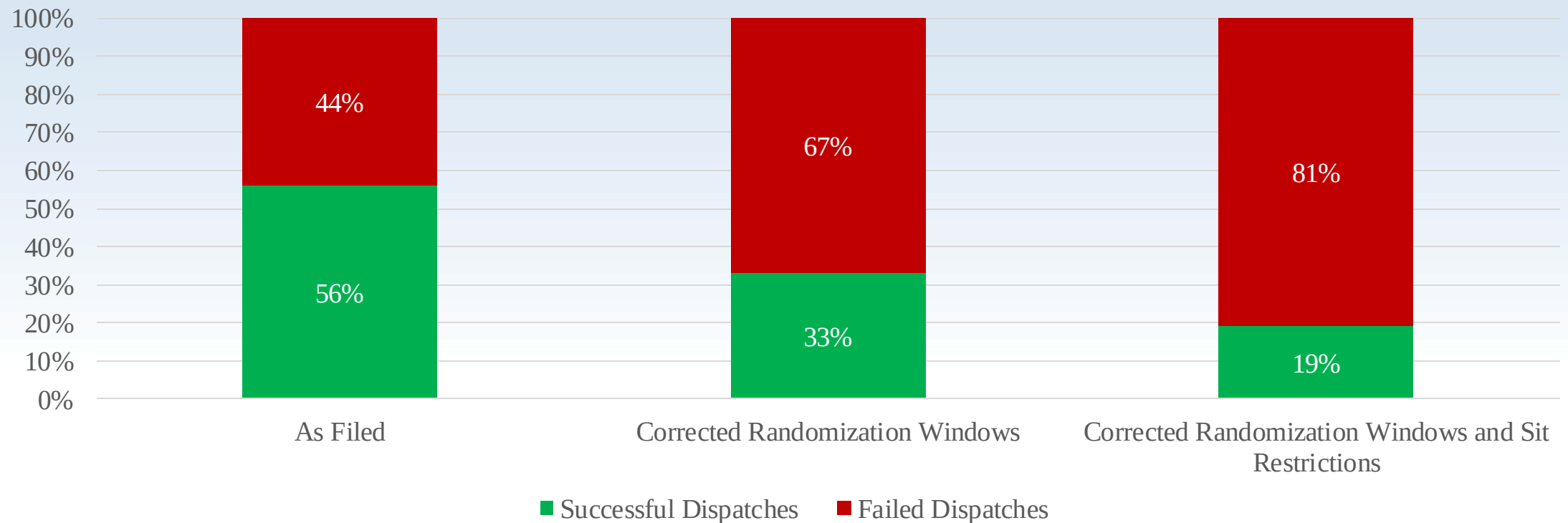
CP/KCS' RTC Simulations Rely on Unrealistic Inputs and Assumptions (Allowed Trains to Block Auto Traffic for 30 Days at Public Road Crossings)

23 Locations Where CP/KCS Deleted Sit Restrictions for Public At-Grade Road Crossings



When CP/KCS' Unrealistic Inputs are Adjusted, CP/KCS' RTC Simulations Confirm that Capacity Will be Grossly Exceeded Following the Merger

CP/KCS Future Case RTC Dispatch Failure Rate



CP/KCS' and Metra's RTC Simulations Point to the Same Negative Impact on Operations

1. Both parties' RTC Simulations project a significant increase in post-merger train delay for CPKC trains.
2. Metra's RTC Simulations also project a significant increase in Metra train delay.
3. Both parties' RTC Simulations show that Marquette Subdivision capacity will be exceeded by post-merger train volumes, inevitably leading to CPKC reroutes over Metra's Milwaukee District lines.



Steve Cork

STB Docket No. FD 36500

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Greg Godfrey

STB Docket No. FD 36500

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METRA SYSTEM OPERATIONS

Metra

Division of Strategic Capital Planning - October 2018

Metra System Operations

Division of Strategic Capital Planning - October 2018

Metra

Division of Strategic Capital Planning - October 2018

Metra System

Railroads

Metra Stations

Chicago, Joliet, Naperville, etc.

Metra Lines

UP-NW, MD-N, MD-W, UP-W, BNSF, HC, SWS, RI, ME

Legend

Metra System

Railroads

Chicago, Joliet, Naperville, etc.

UP-NW, MD-N, MD-W, UP-W, BNSF, HC, SWS, RI, ME



Eric Pilsk

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METRA REQUESTED CONDITIONS (METR-7 at 69-71)

Operational

- Transfer dispatching control to Metra

Planning

- Use RTC modeling to inform new binding standard and process to evaluate Metra schedule/service changes

Oversight

- 10-year STB oversight condition of CP dispatching practices (if dispatching is not transferred)
- 10-year STB oversight condition of any other conditions re: Metra

Financial

- Compensate Metra for additional use and wear and tear on Metra's lines caused by the merger:
 - Full cost of projects if project needed to accommodate increased CP traffic
 - Base CP's maintenance contribution on train counts and gross ton mile
 - Base Rent on dollar per car mile
- Compensation for avoidable delay/interference events
- Indemnification for performance charges imposed by Amtrak due to CP's dispatching
- Compensation for non-compliance with any condition imposed by the Board

METRA REQUESTED CONDITIONS (METR-7 at 69-71)

CAPITAL IMPROVEMENTS

MD-N Construction:

- New third mainline track from Rondout to A-20
- New universal cross-overs at Lake Forest and Glenview
- New connection at A-20 to allow parallel moves to new extended connecting tracks

MD-W, Tower B-12 to B-17 Construction:

- Two new mainline tracks
- New powered cross-overs at Bartlett and Itasca
- Receiving tracks at Bensenville Yard equal to the length of trains

MD-W, Tower A-5 to B-12 Construction:

- Two new mainline tracks
- New southeasterly wye leg at Cragin Junction.
- Receiving tracks at Galewood Yard equal to the length of trains

MD-W, Tower A 5 Construction:

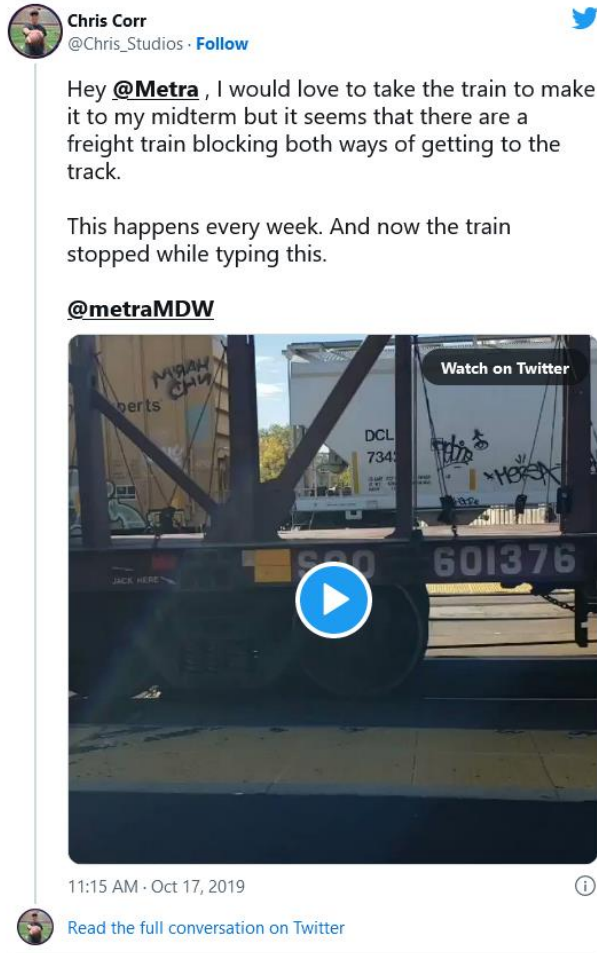
- Reduce curves to increase speeds from 10 to 25 MPH
- Fly-over from south of A-5 to MD-W Metra tracks

CP's Unsafe Dispatching



<https://twitter.com/kamitchell/status/993499153656438786?s=20&t=oesjPDmB2EM9rDWsFO0ovg>

CP's Unsafe Dispatching



https://twitter.com/Chris_Studios/status/1184850423632543744?s=20&t=oesjPDmB2EM9rDWsFO0ovg



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