

January 5, 2024

Jay C. Johnson

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Danielle Gosselin
Director
Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Docket No. FD 36732, Response to Information Request No. 1

Dear Ms. Gosselin:

On behalf of our client, Canadian Pacific Kansas City Limited and the Kansas City Southern Railway Company (“CPKC”), I am writing to respond to OEA’s Information Request No. 1. The substantive answers to OEA’s requests appear below with accompanying tables when necessary.

REQUEST 1.A – For all Meridian & Bigbee Railroad (MNBR) rail segments between Meridian, Mississippi and Burkville, Alabama, provide the milepost endpoints for operation of local trains pre- and post-transactions.

Pre-Transaction. As described in CPKC’s operating plan, MNBR currently utilizes their road trains to service customers with the exception of Georgia Pacific at Naheola which is serviced by a local train out of the immediately adjacent yard. MNBR operates two road trains over the Western Line.

Train	Route (including milepost endpoints)
L128	Meridian Yard (MP 0.5) – Naheola Yard (MP 45.3)
L129	Naheola Yard (MP 45.3) – Meridian Yard (MP 0.5)
Y101	Naheola Switcher: Naheola Yard (45.3) – Myrtlewood (49.6) – Naheola Yard (45.3)

Post-Transaction. On the Western Lines, pursuant to its operating agreement with MNBR, CPKC will not operate local trains after the transaction and MNBR will continue to service customers as they do today.

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Train	Route (including milepost endpoints)
L128	Meridian Yard (MP 0.5) – Naheola Yard (MP 45.3)
L129	Naheola Yard (MP 45.3) – Meridian Yard (MP 0.5)
Y101	Naheola Switcher: Naheola Yard (45.3) – Myrtlewood (49.6) – Naheola Yard (45.3)

REQUEST 1.B – Provide segment lengths and milepost endpoints for each rail segment between Meridian, Mississippi and Burkville, Alabama.

Segment	Begin MP	End MP	Length (Miles)
Meridian - Whynot	0.0	15.5	15.5
Whynot - Pennington	15.5	42.9	27.4
Pennington - Naheola	42.9	45.3	2.4
Naheola - Myrtlewood	45.3	49.6	4.3

REQUEST 1.C – Provide estimates of the average number of locomotives per train, the average number of railcars per train, and the average total length (in feet) of trains pre- and post-transactions.

CPKC's operating plan is based on run-through power with CPKC providing 50% of the locomotives.

Operation	Locomotives Per Train	Railcars Per Train	Average Train Length
Pre-Transaction			
MNBR	3	85	5400'
Post-Transaction			
MNBR	2	30	2000'
CPKC Through Trains	2	70	5200'

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REQUEST 1.D – Provide estimates of the average length of locomotives and average rail car length pre- and post-transactions.

In general, the length of different types of assets are not expected to change pre and post transaction.

Asset Type	Representative Length	Representative Type
MNBR Locomotive	69'	SD 40
CPKC 6-Axle Locomotive	74'	AC 4400
Intermodal 5-Well Car	270'	TTX Intermodal Car
Intermodal 3-Well Car	205'	TTX Intermodal Car
Auto Rack	94'	Standard Auto Carrier
Box Car	65'	Standard Box Car
Tank Car	65'	Standard DOT 111 Tank

REQUEST 1.E – Provide the proportion of locomotives in each US Environmental Protection Agency emissions tier fleetwide (Uncontrolled, 0, 0+, 1, 1+, 2, 2+, 3 and 4) pre- and post-transactions.

The proportion of locomotives in each EPA Emissions Tier is not expected to materially change pre and post transaction. (If anything CPKC would be expected to add higher Tier locomotives and retire old, lower Tier units).

The information below for MNBR includes all active locomotives, while the information for CPKC includes active line haul locomotives (excluding yard and road switchers as CPKC is moving through traffic only).

Railroad	Percentage of Respective Fleet in Each EPA Emissions Tier													
	N/A	0	0+	0+C	1	1+	1+C	2	2+	3	3+C	4	4 Credit	Total
MNBR	38	46	16											100
CPKC						30	13	4	36	13		2	2	100

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REQUEST 1.F – Provide anticipated fleet-wide locomotive fuel efficiency factor in gross ton miles per gallon of fuel pre-and post-transactions.

CPKC's pre-transaction fuel efficiency is obtained from its Q3 2023 financial results. CPKC's post-transaction fuel efficiency assumes 4% betterment over five years (which is the same factor communicated in the KCS transaction). MNBR's efficiency is calculated using communicated fuel burn (44,000 gallons per month) and estimated 2022 GTMs from CPKC and CSXT applications.

Railroad	Fuel Efficiency (GTM / Gallon)	
	Pre-Transaction	Post-Transaction
MNBR	438	438
CPKC	965	1004

REQUEST 1.G – Provide average train speed on each MNBR rail line segment pre- and post-transactions.

Segment	Average Timetable Speed (MPH)	
	Pre-Transaction	Post-Transaction
Meridian - Whynot	17.3	22.1
Whynot - Pennington	24.5	25.0
Pennington - Naheola	10.0	25.0
Naheola - Myrtlewood	8.8	22.1

CPKC notes that the pre-transaction speeds listed in the table apply to MNBR as a short line railroad and may not be suitable for Class I operations.

For the post-transaction speed, it was assumed that CPKC would make the investments required to raise the authorized speed to 25 MPH where feasible. Additionally, it was assumed that CPKC would shorten yard limits to allow for higher track speeds across the corridor. The post-transaction yard limits on the

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Western Line used in the calculation were: Meridian Yard MP 0.0 – 3.0; Naheola Yard MP 45.3 – 46.0; and Myrtlewood Yard MP 49.5 – 52.0.

REQUEST 2. – Confirm that there would be no growth in daily carloads switched above the 100% threshold in 49 C.F.R. § 1105.7(e)(5)(B) at any yard on the MNBR line.

CPKC confirms that there will be no growth in daily carloads switched above the 100% threshold in 49 C.F.R. § 1105.7(e)(5)(B) at any yard on the Western Line.

As always, please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jay C. Johnson".

Jay C. Johnson

cc: Elizabeth Webster
Joe Van Humbeck
Glen Wilson
Waymon Peer
David Rifkind