

BEFORE THE SURFACE TRANSPORTATION BOARD

FINANCE DOCKET NO. 36500 (SUB-NO. 6)

**CANADIAN PACIFIC RAILWAY LIMITED, ET AL. – CONTROL – KANSAS CITY SOUTHERN, ET AL.
(GENERAL OVERSIGHT)**

CPKC’S FEBRUARY 2025 DATA SUBMISSION

In accord with Oversight Decision No. 1 served on September 1, 2023, Canadian Pacific Kansas City Limited (“CPKC”), on behalf of its U.S. rail carrier subsidiaries,¹ provides this submission of data for the month of January 2025.

I. INTERCHANGE DATA

CPKC is submitting interchange data for the month of January 2025 in the accompanying file named “STB_FD_36500_6_GATEWAY_HC_2025_02_202502051507.csv.” CPKC has designated that file as Highly Confidential in its entirety.

CPKC is separately filing a public file containing aggregate interchange data for each of the specified gateways. That file is named “STB_FD_36500_6_GATEWAY_PUBLIC_2025_02_202502051507.csv.”

II. CUSTOMER EXPERIENCE DATA

A. Customer Experience Data File

As in previous months, CPKC is submitting data on the customer service metrics that were not reported by CPKC in dockets Ex Parte No. 724 and Ex Parte No. 770 for the Saturday-

¹ CPKC’s U.S. rail carrier subsidiaries include Soo Line Railroad Company; Central Maine & Quebec Railway US Inc.; Dakota, Minnesota & Eastern Railroad Corporation; Delaware & Hudson Railway Company, Inc. (collectively “CP” or “CP/Soo”); The Kansas City Southern Railway Company, Gateway Eastern Railway Company, and The Texas Mexican Railway Company (collectively, “KCSR”).

to-Friday Reporting Weeks ending during January 2025 (*i.e.*, the period between December 28, 2024 and January 31, 2025) in the accompanying file named “STB_FD_36500_6_CUSTOMER_2025_02_202502181100.csv” (the “Customer Data File”). As previously noted, the Customer Data File has been expanded to incorporate the weekly performance metrics previously reported in Ex Parte No. 770 (Sub-No. 1).² Those metrics continue to be reported separately for CP/Soo and KCSR, as they were when reported in the Ex Parte No. 770 docket, and continue to be calculated using Ex Parte No. 770 (Sub-No. 1) methodologies rather than the different methodologies required by the Board’s Final Rule in Ex Parte No. 711 (Sub-No. 2) for reporting in that docket. The Customer Data File contains blank rows that will be used in the future at such time as CPKC consolidates its performance reporting into a single set of metrics for CPKC’s U.S. network, at which point reporting of separate metrics for CP/Soo and KCSR will be discontinued.

The data reported in the Customer Data File for KCS “Industry Spot and Pull” (“ISP”) performance (at Primary Keys 236-49) – which include the First Mile/Last Mile data for KCS summarized in Table 2 below – reflect a small adjustment in the methodology used to calculate this metric in order to better reflect KCS’s original EP 770 methodology for measuring its success in meeting customer expectations.

In recent data submissions, the reported percentages treated as “failures” situations where KCS was unable to complete a work order for spotting or pulling cars at a customer facility because of a condition caused by the customer. These conditions include, but are not limited to, embargoed cars released without a permit, the customer’s tracks already being full of

² See *Urgent Issues in Freight Rail Service – Railroad Reporting*, Ex Parte No. 770 (Sub-No. 1) (STB served Jan. 31, 2024) at 9 (“Board will not require that all Class I railroads continue to submit weekly performance data in this docket”).

unreleased cars, a customer's track where cars were to have been placed or pulled being blue flagged due to work or equipment on the track; or other unsafe conditions at the customer's facility.

The corrected methodology used in this month's Customer Data File does not count such conditions as "failures" in KCS performance and as a result more accurately reflects KCS ISP performance. This corrected methodology is consistent with how KCS had reported its ISP metrics in Ex Parte No. 770 prior to KCS's combination with CP. For example, in 2022 and before, KCS adjusted work orders ahead of time by eliminating work that would not be possible because of conditions at a customer's location. Therefore, no failures resulted from such conditions because that work simply was not on the work order. Since KCS combined with CP, KCS work orders are no longer routinely adjusted ahead of time to account for conditions at customer locations.

B. Metra Delay Data

Weekly data reflecting performance of Metra trains is included in the Customer Data File. Table 1 below summarizes the Metra on-time performance data for the full months of November and December 2024 and January 2025 consistent with how Metra reports its on-time performance data publicly. Table 1 reflects the number and percentage of Metra trains delayed by CPKC freight trains on the MD-N and MD-W lines. Table 1 also includes CPKC's explanation for the difference between the figures reported by CPKC for November and December 2024 and the total "freight train interference" figures reported by Metra for those

months.³ Metra has not yet released its January 2025 On-Time Performance (“OTP”) Reports.

A future Data Submission will explain any differences for January 2025.

³ Metra’s public OTP reporting provides aggregate figures that include all delays caused by “foreign” freight train interference, and thus does not distinguish between freight train interference caused by CPKC trains and that caused by trains of other freight railroads operating over, or crossing, Metra’s lines. Note that the FTI delays reported herein and in Metra’s Public OTP Reports include delays resulting from CPKC freight trains that Metra has concluded are not “controllable” by CPKC.

TABLE 1

Metra Line	Period	Metra Delays Attributed to CPKC Freight Train Interference	Total Metra Trains Scheduled	Percentage of Metra Trains with Delays Attributed to CPKC Freight Train Interference	Difference, if Any, from Total FTI Figures in Metra's Public OTP Reports
MD-N Line					
MD-N	November 2024	2	1,270	0.16%	Metra's November 2024 On-Time Performance Report (showing 9 FTI delays) included 4 delays caused by a CN freight train, and 3 delays associated with single-tracking resulting from a freight train making an emergency stop.
MD-N	December 2024	0	1,257	0.00%	Metra's Dec. 2024 On-Time Performance Report (showing 2 FTI delays) included 2 delays caused by CN freight trains.
MD-N	January 2025	4	1,359	0.29%	Metra has not yet released its January 2025 On-Time Performance Report.
MD-W Line					
MD-W	November 2024	2	1,250	0.16%	Metra's November 2024 On-Time Performance Report showed only 1 delay caused by freight train interference, reflecting only 0.08% of Metra trains delayed by CPKC freight trains.
MD-W	December 2024	7	1,244*	0.56%*	Metra's Dec. 2024 On-Time Performance Report showed only 5 delays caused by freight train interference, reflecting only 0.40% of Metra trains delayed by CPKC freight trains.
MD-W	January 2025	11	1,330	0.83%	Metra has not yet released its January 2025 On-Time Performance Report.

* - Figures have been corrected to reflect correct total number of Metra trains operated.

C. Service Action Plan Metric Benchmarks

As set forth in Decision No. 35 (at 141-42), CPKC committed to develop Service Action Plans in the event specified thresholds are triggered by trends in three customer experience metrics: Manifest Carloads On Time (based on EP 770 Item 7(i)), First/Mile/Last Mile (Industry Spot and Pull) (based on EP 770 Item 5), and Bulk Train On Time (based on EP 770 Item 7(i)). *See Applicants' Final Brief, Appendix A, p. A9.*⁴

Table 2 on the next page reports the values for the applicable metrics as set forth in the Customer Data File (or, in the case of bulk train OTP, the aggregate of the reported metrics) for the Reporting Weeks ending during the month of January 2025. The Table also reports the four-week rolling average figures that are used to assess trends in performance relative to the applicable benchmarks.

⁴ The methodology used to calculate KCS's FMLM metric has been adjusted as discussed at pages 2-3 above. Because the adjusted methodology is consistent with the way KCS reported FMLM performance prior to the CP/KCS combination, the previously reported baseline based on KCS 2022 performance remains applicable. *See CPKC'S October 15, 2023 Data Submission (CPKC-1) (filed Oct. 15, 2023) at 10.*

TABLE 2

**CUSTOMER EXPERIENCE DATA REPORTING
SERVICE ACTION PLAN METRICS**

Week Ending	Manifest On-Time Performance EP 770 (Sub-No. 1), Item 7(i)				Bulk On-Time Performance EP 770 (Sub-No. 1), Item 7(i)				First-Mile/Last-Mile EP 770 (Sub-No. 1), Item 5			
	CP		KCS		CP		KCS		CP		KCS	
	As Reported in Customer Data File	Four- Week Rolling Average	As Reported in Customer Data File	Four- Week Rolling Average	Aggregate of Figures Reported in Customer Data File	Four- Week Rolling Average	Aggregate of Figures Reported in Customer Data File	Four- Week Rolling Average	As Reported in Customer Data File	Four- Week Rolling Average	As Reported in Customer Data File	Four- Week Rolling Average
1/3/2025	70.20%	69.23%	66.89%	68.13%	95.65%	94.74%	90.82%	92.15%	98.00%	96.07%	96.11%	90.80%
1/10/2025	70.20%	68.40%	72.81%	69.23%	97.67%	95.16%	93.33%	93.34%	96.38%	95.94%	96.23%	92.11%
1/17/2025	72.60%	69.48%	78.47%	71.43%	98.31%	96.94%	95.29%	93.15%	96.13%	96.13%	95.62%	93.37%
1/24/2025	67.50%	70.16%	74.06%	73.00%	95.35%	96.86%	95.21%	93.57%	93.63%	96.04%	93.43%	95.35%
1/31/2025	60.40%	67.50%	75.78%	75.25%	98.28%	97.54%	95.09%	94.79%	96.75%	95.72%	95.58%	95.22%

III. OPERATIONAL DATA

A. Data for Reporting Period

CPKC is submitting data on the operational metrics for the Reporting Weeks ending during January 2025 in the accompanying file named “STB_FD_36500_6_OPERATIONAL_2025_02_202502131211.csv” (the “Operational Data File”).

In addition, CPKC is submitting replacement Operational Data File covering weeks ending during October (named “STB_FD_36500_6_OPERATIONAL_2024_11_202502131420.csv”), November (named “STB_FD_36500_6_OPERATIONAL_2024_12_202502131440.csv”), and December 2024 (named “STB_FD_36500_6_OPERATIONAL_2025_01_202502131903.csv”) (collectively, “Corrected Operational Data Files”). The Corrected Operational Data Files correct certain data relating to trains crossing the Laredo Bridge, reported at Primary Keys 97-116. The methodology for calculating these data has not changed, but work associated with the opening of the new second span of the Laredo Bridge (which became operational during December and was dedicated on February 6, 2025 as the Patrick J. Ottensmeyer International Railway Bridge), including installation of new AEI readers, required new logic in order to capture all trains crossing the two bridge spans. Several of the trains that crossed during weeks ending in October, November, and December had inadvertently been omitted from the versions of the Operational Data Files previously submitted.

B. Status of Capital Projects on CP Marquette Subdivision

This information is provided in Table 3 below.

TABLE 3
STATUS OF MARQUETTE SUBDIVISION CAPITAL PROJECTS AS OF FEBRUARY 15, 2025

LOCATION	PROJECT	STATUS
MP 24 to MP100 (Marquette)	72 Miles of CTC Signaling	For segment between MP 46 and MP 72, construction completed; CTC placed in service on November 29, 2023. For segment between MP 72 and MP 100, construction completed; CTC placed in service on November 20, 2024. For segment between MP 24 and MP 46, construction completed and ready to be placed in service; following coordination with CN at Dubuque (where CPKC and CN share trackage), planned to be placed in service on March, 17, 2025.
Brownsville (MP 155)	New 10,200-foot siding	Design has been completed; construction planned to begin in 2026, but could be accelerated if volumes increase faster than anticipated.
Turkey River (MP71)	New 12,200-foot siding	Design and tree clearing completed; civil construction began on April 22, 2024, for target in-service date in Q2 2025.
Bellevue (MP24)	New 10,200-foot siding	Complete and in service on July 11, 2024.

Respectfully submitted,



CANADIAN PACIFIC KANSAS CITY LIMITED

Cassandra P. Quach
7550 Ogden Dale Road S.E.
Calgary, AB T2C 4X9 Canada
Email: Cassandra.Quach@cpkcr.com

Nizam Hasham
1290 Central Parkway West, Suite 800
Mississauga, ON L5C 4R3 Canada
Email: Nizam.Hasham@cpkcr.com

Telephone: (888) 333-6370

**THE KANSAS CITY SOUTHERN RAILWAY
COMPANY**

David C. Reeves
427 West 12th Street
Kansas City, MO 64105-1403
Email: David.Reeves@cpkcr.com
Telephone: (816) 983-1387

David L. Meyer
LAW OFFICE OF DAVID L. MEYER
1105 S Street N.W.
Washington, D.C. 20009
Email: David@MeyerLawDC.com
Telephone: (202) 294-1399

Attorneys for CPKC

February 18, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing CPKC's February 2025 Data Submission to be served electronically or by first class mail, postage pre-paid, on all parties of record in this proceeding.

/s/ David L. Meyer
David L. Meyer

February 18, 2025