

BEFORE THE SURFACE TRANSPORTATION BOARD

310070

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

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Public Record

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

CPKC’S SEPTEMBER 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 August 2025.

I. INTERCHANGE DATA

CPKC is submitting interchange data for the month of August 2025 in the accompanying file named “STB_FD_36500_6_GATEWAY_HC_2025_09_202509101047.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_09_202509101054.csv.”

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”).

II. CUSTOMER EXPERIENCE DATA

A. Customer Experience Data File

1. Customer Data File for Weeks Ending in August 2025

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-to-Friday Reporting Weeks ending during August 2025 (*i.e.*, the period between July 26, 2025 and August 29, 2025) in the accompanying file named

STB_FD_36500_6_CUSTOMER_2025_09_20250915141427.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

2. Adjusted Methodology for Manifest OTP Metric

The manifest on-time performance (“Manifest OTP”) figures reported in the Customer Data File (Primary Key 501) reflect a revised methodology as compared to those previously reported for the period subsequent to CPKC’s May 3, 2025 “Day-N” IT systems cut-over. CPKC noticed that Manifest OTP figures were not returning to pre-Day N levels despite significant improvements in the performance of CPKC’s manifest train network. CPKC’s investigation revealed that CPKC had inadvertently changed the manner in which the Manifest OTP metric was calculated for the post-Day N period. Specifically, prior to Day N, the Manifest OTP statistic included, for legacy-KCS, movements that were handled solely in local train service, whereas after Day N, consistent with how Legacy CP calculated Manifest OTP, such traffic was removed from the Manifest OTP calculations. CPKC has revised its Manifest OTP

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”).

methodology to match the pre-Day N Legacy-KCS approach and include all manifest traffic, even if it is handled solely in local trains.

CPKC has also applied the new methodology to re-calculate Manifest OTP for the period since Day N. Those data are set forth in the accompanying revised Customer Data files (at Primary Key 501) for weeks ending during May, June, and July 2025. Those files are named “STB_FD_36500_6_CUSTOMER_2025_06_2025091111349.csv;” “STB_FD_36500_6_CUSTOMER_2025_07_2025091111348.csv;” and “STB_FD_36500_6_CUSTOMER_2025_08_2025091111344.csv.”

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 March, June, and July 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. Metra has not yet released its On-Time Performance (“OTP”) Reports for March or July 2025. A future Data Submission will provide CPKC’s explanation for the difference, if any, between the figures reported by CPKC and the total “freight train interference” figures reported by Metra for that month.³

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	July 2025	1	1,359	0.07%	Metra has not yet released its July 2025 On-Time Performance Report.
MD-N	August 2025	6	1,331	0.45%	Metra has not yet released its August 2025 On-Time Performance Report.
MD-W Line					
MD-W	July 2025	5	1,331	0.38%	Metra has not yet released its July 2025 On-Time Performance Report.
MD-W	August 2025	12	1,307	0.92%	Metra has not yet released its August 2025 On-Time Performance Report.

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.

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 July 2025. The Table also reports the four-week rolling average figures that are used to assess trends in performance relative to the applicable benchmarks.

TABLE 2
CUSTOMER EXPERIENCE DATA REPORTING
CONSOLIDATED 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(ii)		First-Mile/Last-Mile EP 770 (Sub-No. 1), Item 5	
	CPKC		CPKC		CPKC	
	As 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
8/1/25	69.53%	68.16%	100.00%	96.28%	93.50%	92.24%
8/8/25	70.07%	69.16%	100.00%	97.45%	92.71%	92.67%
8/15/25	71.14%	69.63%	94.74%	97.50%	95.26%	93.09%
8/22/25	69.84%	70.15%	93.75%	96.95%	92.96%	93.61%
8/29/25	70.60%	70.41%	90.38%	94.71%	94.64%	93.89%

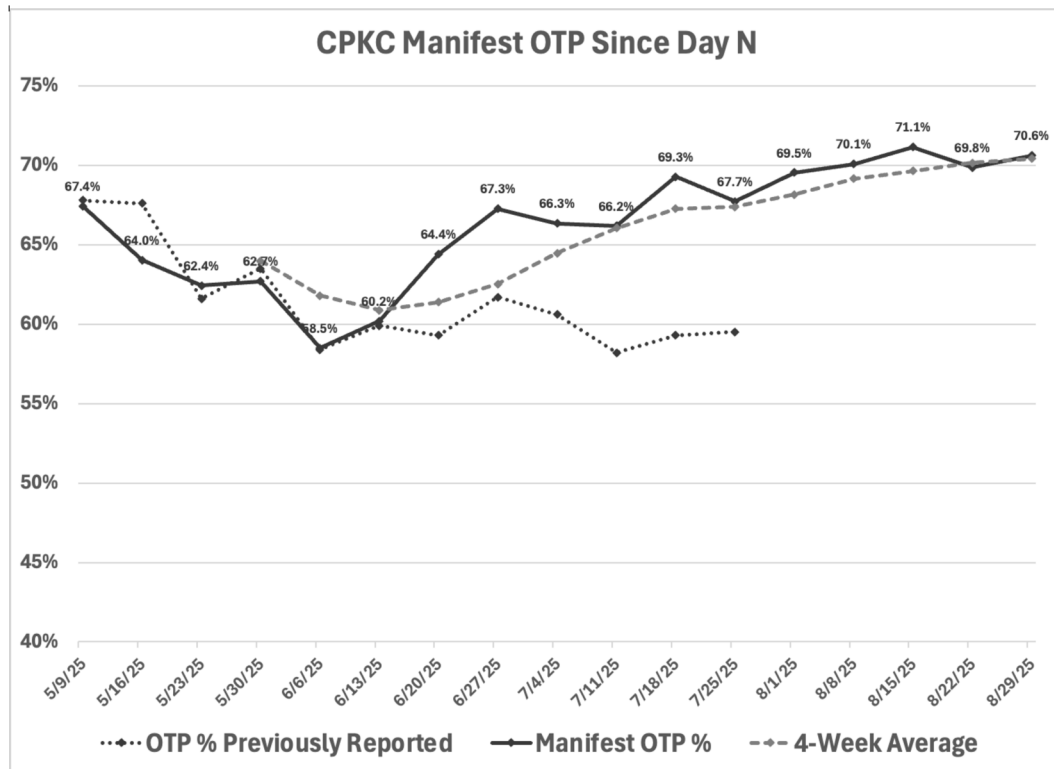
As noted above, CPKC has recalculated the Manifest OTP metrics previously reported (*i.e.*, weekly percentage on-time performance and the four-week average). Table 3 below sets forth the previously reported figures and the revised figures.

TABLE 3

WEEK ENDING	MANIFEST OTP % - PREVIOUSLY REPORTED	MANIFEST OTP % - UPDATED METHODOLOGY	4-WEEK AVERAGE AS REPORTED	4-WEEK AVERAGE (UPDATED)
5/9/25	67.8%	67.4%	N/A	N/A
5/16/25	67.6%	64.0%	N/A	N/A
5/23/25	61.6%	62.4%	N/A	N/A
5/30/25	63.5%	62.7%	65.1%	64.0%
6/6/25	58.4%	58.5%	62.7%	61.8%
6/13/25	59.9%	60.2%	60.8%	60.9%
6/20/25	59.3%	64.4%	60.2%	61.4%
6/27/25	61.7%	67.3%	59.8%	62.5%
7/4/25	60.6%	66.3%	60.4%	64.5%
7/11/25	58.2%	66.2%	59.9%	66.0%
7/18/25	59.3%	69.3%	59.9%	67.3%
7/25/25	59.5%	67.7%	59.4%	67.4%

As shown in Figure 1 below, the Manifest Mani figures calculated using the updated methodology reflect very significant improvement in performance of CPKC's manifest network.

FIGURE 1



CPKC recognizes that the methodology change described above will require a re-basing of CPKC’s Service Action plan threshold for the Manifest OTP metric. While the new methodology matches that used by KCS for the 2022 period, CP did not include traffic moving only on local trains in that statistic in 2022. CPKC expects a slight increase in the Service Action Plan threshold as a result of this rebasing, which CPKC will report when it has completed the recalculation of the metric for 2022 traffic data.

III. OPERATIONAL DATA

A. Data for Reporting Period

CPKC is submitting data on the operational metrics for the Reporting Weeks ending during August 2025 in the accompanying file named

“STB_FD_36500_6_OPERATIONAL_2025_09_202509101223.csv” (the “Operational Data File”).

CPKC is also submitting a replacement Operational Data File for August (weeks ending in July), which updates reported train length statistics for several Chicago-area segments to reflect correct data for two trains included in the calculations. The corrections affect Primary Keys 6 and 124 for the week ending July 11 (maximum length for the Polo Line and B35-B-17 segments) and Primary Keys 130-133, 139-141, 146-149 for the week ending July 4 (length statistics for the B12-A5, A20-A5, and Rondout-A20 segments). The corrected file is named “STB_FD_36500_6_OPERATIONAL_2025_08_202509121659.csv.”

B. Status of Capital Projects on CP Marquette Subdivision

This information is provided in Table 4 below.

TABLE 4
STATUS OF MARQUETTE SUBDIVISION CAPITAL PROJECTS AS OF SEPTEMBER 15, 2025

LOCATION	PROJECT	STATUS
MP 24 to MP100 (Marquette)	72 Miles of CTC Signaling	For segment between MP 46 and MP 72, CTC placed in service November 29, 2023. For segment between MP 72 and MP 100, CTC placed in service November 20, 2024. For segment between MP 24 and MP 46, CTC placed in service March 19, 2025.
Brownsville (MP 155)	New 10,200-foot siding	Design has been completed; construction planned to begin in Q2 2027, with completion in Q2 2028.
Turkey River (MP71)	New 12,200-foot siding	Complete and in service June 19, 2025.
Bellevue (MP24)	New 10,200-foot siding	Complete and in service July 11, 2024.

Respectfully submitted,



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September 15, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing CPKC's September 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

September 15, 2025