

BEFORE THE SURFACE TRANSPORTATION BOARD

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

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Office of Chief Counsel
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Part of
Public Record

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

CPKC’S OCTOBER 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 September 2025.²

I. INTERCHANGE DATA

CPKC is submitting interchange data for the month of September 2025 in the accompanying file named “STB_FD_36500_6_GATEWAY_HC_2025_10_202510091556.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_10_202510091554.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”).

² This submissions would have been due on October 15, but deadlines for all submissions to the Board were tolled during the federal government shutdown. *Materials Due to Be Submitted During the Federal Government Shutdown*, Ex Parte No. 751 (STB served Oct. 1, 2025). CPKC is filing this Data Submission on the earliest practical opportunity following the Board’s notice that it is again accepting filings.

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-to-Friday Reporting Weeks ending during September 2025 (*i.e.*, the period between August 30, 2025 and September 26, 2025) in the accompanying file named “STB_FD_36500_6_CUSTOMER_2025_10_202511131304.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).³

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 July, August, and September 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 September 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.⁴

³ 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”).

⁴ 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's July 2025 OTP Report (showing 5 FTI delays) included 4 delays caused by CN freight trains.
MD-N	August 2025	6	1,331	0.45%	No difference.
MD-N	September 2025	3	1,304	0.23%	No difference.
MD-W Line					
MD-W	July 2025	5	1,331	0.38%	Metra's July 2025 OTP Report showed only 4 delays caused by freight train interference, reflecting only 0.30% of Metra trains delayed by CPKC freight trains.
MD-W	August 2025	12	1,307	0.92%	Metra's August 2025 OTP Report showed only 6 delays caused by freight train interference, reflecting only 0.46% of Metra trains delayed by CPKC freight trains.
MD-W	September 2025	4	1,278	0.31%	No difference.

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 September 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
9/5/25	72.13%	70.95%	94.92%	93.52%	95.99%	94.71%
9/12/25	78.24%	72.65%	98.15%	94.37%	91.98%	93.89%
9/19/255	74.15%	73.72%	92.98%	94.14%	90.52%	93.28%
9/26/25	73.63%	74.50%	96.49%	95.60%	94.66%	93.29%

As explained in CPKC’s September Data Submission (CPKC-47), the Manifest On-Time Performance metric reported above for the CPKC U.S. network uses a methodology that varies from that used to calculate 2022 baseline performance for purposes of CPKC’s Service Action Plan triggers. CPKC has recalculated the 2022 baseline by applying the current methodology to legacy-KCS and legacy-CP 2022 traffic, which resulted in a slight upward revision in weighted average 2022 performance and a corresponding adjustment in the Service Action Plan trigger, as shown in Table 3 below.

TABLE 3
SERVICE ACTION PLAN METRIC BENCHMARKS

METRIC	CPKC 2022 BASELINE AS REPORTED IN JUNE 2025 DATA SUBMISSION		CORRECTED CPKC 2022 BASELINE	
	2022 AVERAGE	BENCHMARK (AVERAGE LESS 15%)	2022 AVERAGE	BENCHMARK (AVERAGE LESS 15%)
Manifest OTP (EP 770 Item 7(i))	73.3%	53.3%	73.4%	53.4%

III. OPERATIONAL DATA

A. Data for Reporting Period

CPKC is submitting data on the operational metrics for the Reporting Weeks ending during September 2025 in the accompanying file named “STB_FD_36500_6_OPERATIONAL_2025_10_202510071339.csv” (the “Operational Data File”).

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 OCTOBER 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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November 13, 2025

CERTIFICATE OF SERVICE

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

November 13, 2025