

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Complaint by
Lake Country Power Against
Minnesota Power Alleging Violation
of its Exclusive Service Area by
Providing Service to Canadian Nation
Railway Company Facilities Near
Hoyt Lake, Minnesota

Docket No. E015, E106/C-17-893

**REPLY COMMENTS OF
LAKE COUNTRY POWER**

I. INTRODUCTION

Lake Country Power files these comments in response to these Reply Comments pursuant to the Commission’s Notice of Comment Period on Amended Complaint issued on July 23, 2018.

II. DISCUSSION

A. The plain meaning of M.S. § 216B.37 and 216B.38 preclude Minnesota Power from serving the railroads load in this instance.

Minnesota Power (“MP”) urges implementation of a result that is contrary to law. Lake Country Power (“LCP”) has the statutory right to “provide **electric service** to customers [within its geographic exclusive service area] on an excusive basis.” (Emphasis added) *See* M.S. § 216B.37. The legislature has defined “electric service” to mean “electric service furnished to a customer at retail for ultimate consumption...” *See* definition of electric service at M.S. §216B.38, Subd. 4a. It is clear that by defining electric service as service furnished to a customer at retail for ultimate consumption, as opposed to where the meter is located, that the legislature has purposely intended to place relevance on the place of ultimate consumption. It is undisputed in this case that the electricity is ultimately consumed several miles inside of LCP’s exclusive service territory. This is where the signaling equipment is located and where the electrons satisfy their intended purpose – powering the railroad’s equipment and being consumed by the same. The plain meaning of the definition of electric service requires this conclusion.

Since the exclusive service territory laws were created in 1974, the legislature has had ample opportunity to amend the statutory definition of electric service to mean service furnished to a metering location, but it has not done so. Other jurisdiction have ruled that the place and purpose of the electricity’s use was a controlling factor, not where the service was delivered. *See*, for example, *Southwestern Electric Power v. Carroll Electric Coop*, 261 Ark 919 (1977), and *Holsten River Electric Co. v. Hydroelectric Corp.*, 66 SW2d 217 (1933), cited therein.

B. The availability of customer preference is limited in Minnesota. These facts do not trigger customer choice.

Consideration of customer choice is statutorily limited. The Minnesota legislature has recognized “the preference of the customer” in the limited situation where a large load (2,000

kilowatts or more) is at issue. *See* M.S. § 216B.42, Subd. 1(5). It is clear from the statutes that customer preference was never meant to be a consideration for service territory disputes such as the one at issue here. Since establishment of the service territory laws in 1974, the legislature could have amended the statute to include customer preference as a factor to consider in all situations, but it has chosen not to do so.

Despite the claims made by Minnesota Power and Wisconsin Central in their Comments, the Commission has *never* allowed customer choice in a situation like we have here. There are only three circumstances in which customer choice has ever been allowed as a service territory violation:

- Large Load Cases (Minn. Stat. §216B.42)
- Residential/Homestead Cases (Minn. Stat. §216B.421)
- When a physical building straddles service areas.

This is not a Large Load case (2,000 kW or more), as the load that Wisconsin Central is transmitting in the present case is estimated to be in the range of less than 35 kW. This is not a residential/homestead case. And as stated above, Wisconsin Central does not have an actual building that straddles the service areas. Allowing customer choice in this circumstance would be unprecedented. A summary of prior decisions hold the same:

In the *Matter of a Complaint by McLeod Cooperative Power Association Against Hutchinson Utilities Commission, E-252,120/C-95-517*, the boundary line between the two service areas was known, and “it does not bisect any buildings”. In that matter the Commission correctly recognized that “honoring customer choice in such situations creates the potential for abuse. Customers with the means and the incentive to manipulate the system could engage in gerrymandering to obtain service from the utility of choice”. This is the precise situation we have here. The boundary line between MP and LCP does not bisect any buildings. And Wisconsin Central is the poster child of a customer with the means and incentive to manipulate the exclusive service territory system. Wisconsin Central has already shown, by its actions here and in other areas, that its intent is to do exactly that. Under past Commission precedent, this service territory violation by MP and Wisconsin Central must not be allowed.

Also, somewhat importantly, in the *McLeod* decision, it was pointed out that it was the customer that created the straddling situation, and therefore the customer was not entitled to relief from a situation of its own making. Here, to the extent that there is anything that crosses service boundaries, it is the private electrical distribution system built by Wisconsin Central. So it is Wisconsin Central that created any hint of a straddling situation in the present case. As a result, Wisconsin Central should not be entitled to relief from a situation of its own making.

In the *Matter of a Request by the City of Rice for a Service Area Boundary Change Between Minnesota Power and East Central Energy, E-112,015/SA-01-696*, there was yet again a scenario where the property, as opposed to any building, straddled the service areas. **Importantly, this is the matter in which MP argued the exact opposite of the position it now takes here:**

“MP further argued that it is only when a facility receiving service straddles a service territory boundary that the customer has a choice of its energy

supplier. Customer choice does not apply in situations when it is the underlying real property ownership, and not the facility, that straddles a service territory boundary.”

MP, of course, tries to spin that argument in the present case, but it is hard to escape the black and white quote of the position it has advanced in the past. In the *Rice* case, the Commission agreed with MP and denied the request for customer choice when it was just the property, as opposed to the building, that straddled service territories. Again, this is the **precise** situation we have in this matter. Under past Commission precedent, this service territory violation by MP and Wisconsin Central must not be allowed.

In the *Matter of the Petition of Freeborn Mower Cooperative Services, E-115/SA-99-1619*, there was a physical building, a pumping station, that straddled the service territory. In that matter, the Commission found that customer choice was permitted. This is easily distinguishable from the situation in this matter, where there is **no** building that straddles any service territories, and just underlying real property.

In the *Matter of the Complaint of Minnesota Power & Light against Itasca-Mantrap Electric Cooperative, E-015, E-117/SA-84-578*, there was a physical building, a freezer addition, that straddled the service territory. In that matter, the Commission found that customer choice was permitted. This is easily distinguishable from the situation in this matter, where there is **no** building that straddles any service territories, and just underlying real property.

The **sole** situation in which the adverse parties point to in an attempt to claim that the Commission has allowed customer choice in a similar situation is the 1990 letter issued to Ruttger’s Bay Lake Lodge. However, that situation is easily distinguished from the present. First, that is a letter from the PUC to Ruttgers, and not the result of any reported decision from the Commission. Second, the load in question is related to “wiring” on a customer’s property (similar to a residential/homestead exception), as opposed to a commercial load being transmitted miles away through transmission infrastructure, including underground cabling, risers, and the like. It is by no means a similar situation, and by no means binding on the Commission.

It is quite clear that, when analyzed in the lens of the plain meaning of the statute and the past commission decisions, the complaint by LCP should be upheld. The Commission has never allowed customer choice under these facts. If the Commission were to allow Wisconsin Central’s encroachment in the present case, it would be in direct opposition to every other Commission decision.

Coincidentally, it is worth noting that Wisconsin Central has 124 active services within LCP’s territory. Attached as Exhibit A to this filing is the listing of all of Wisconsin Central’s locations within LCP’s service territory. The Railroad is well aware of its obligation to serve its various electric loads in this territory from LCP, the assigned utility. This is evidenced by these numerous other loads and by the fact that they originally made application of LCP for service to the subject loads before it manipulated the system and began taking service from MP.

C. The railroads federal preemption defense does not apply to these facts.

Wisconsin Central suggests that this electric service territory docket is preempted by federal law. Under the Interstate Commerce Commission Termination Act (Termination Act) the Surface Transportation Board does indeed have jurisdiction over the construction, acquisition, and operation of railroad tracks and facilities. 49 U.S.C. Section 105.01(b)(2)(217). However, the STB's jurisdiction has limits and the Termination Act does not preempt all state regulation effecting transportation by rail carrier. *New York Susquehanna & W. Ry. Corp v. Jackson*, 500 F3d 238, 252 (3rd Cir. 2007). Local governments may appropriately exercise police powers which "protect public health and safety." There is a two-part test for whether a state regulation avoids preemption. First, the regulation must not be unreasonably burdensome. Second, the regulation must not discriminate against the railroad. *Susquehanna*, 500 F3d at 253. The STB and the Second and Third Circuit Court of Appeals have endorsed a fact intensive inquiry approach that analyzes the following factors: (1) does the regulation protect health and safety; (2) is the regulation settled and defined; (3) can the regulation be followed with reasonable certainty; (4) would the regulation cause extended or open-ended delays; and (5) can the regulation be exercised with little to no discretion? *Id.* at 253-54.

Minnesota's statutory scheme of regulating electric service territories serves the public health and welfare by ensuring adequate delivery of an essential service (electricity) to residents in their specified geographic area. This regulation is also non-discriminatory because it applies to all customers residing in the geographic area. Moreover, the regulation is clearly defined, i.e. individuals and entities located in specific geographic areas are required to receive electric service from defined electricity providers. The service areas, as well as the electric providers that serve them, are well defined and the boundaries generally do not change. Requiring the railroad to receive its electricity from LCP would not cause the railroad any delays. This is not a situation where the local government can exercise discretion, nor will the enforcement of the regulation cause the railroad indefinite delays in its operations.

III. CONCLUSION

For the reasons articulated in LCP's prior filings and those identified herein, the Commission must rule on the complaint in favor of LCP, disallowing MP and the railroad's breach of LCP's exclusive service territory.

Dated: August 27, 2018

Respectfully submitted,
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EXHIBIT A

Service Status	Service Addr	Sort Name	Serv Map Loc	Service Description
1 - Active	BRITT XING SIGNALS, BRITT, MN 55710	WISCONSIN CENTRAL LTD	182023232	RAILROAD SIGNALS
1 - Active	HUTTER, GILBERT, MN 55741	WISCONSIN CENTRAL LTD	228022001	RAILROAD
1 - Active	SHELDON JUNCTION, MOUNTAIN IRON, MN 55734	WISCONSIN CENTRAL LTD	226002501	RAILROAD
1 - Active	HWY 7 & 133 PAYNE SIGNAL LGTS, KEELSEY, MN 55765	WISCONSIN CENTRAL LTD	332002201	RAILROAD - PAYNE SIGNAL LIGHTS
1 - Active	ZIM RD AND HWY7 XING SIGNAL, ZIM, MN 55738	WISCONSIN CENTRAL LTD	269042713	RAILROAD - XING SIGNAL
1 - Active	HWY 25, IRON, MN 55768	WISCONSIN CENTRAL LTD	247000202	RAILROAD
1 - Active	MT IRON TRFC CNTL ST, MT IRON, MN 55768	WISCONSIN CENTRAL LTD	226001601	RAILROAD
1 - Active	ROAD NO 31.1, ZIM, MN 55738	WISCONSIN CENTRAL LTD	269011006	RAILROAD
1 - Active	SOUTH MT IRON & MAXWELL RD, MT IRON, MN 55768	WISCONSIN CENTRAL LTD	226032207	RAILROAD
1 - Active	RAMSHAW, ZIM, MN 55751	WISCONSIN CENTRAL LTD	248021403	RAILROAD
1 - Active	ARKOLA RD & HWY 7 W, COTTON, MN 55724	WISCONSIN CENTRAL LTD	311011506	RAILROAD
1 - Active	W TOWNLINE & PEARY RD, ZIM, MN 55738	WISCONSIN CENTRAL LTD	269000101	RAILROAD
1 - Active	HWY 7 & FERMOY RD, ZIM, MN 55738	WISCONSIN CENTRAL LTD	269011007	RAILROAD
1 - Active	5770 COMSTOCK LK RD, COTTON, MN 55724	WISCONSIN CENTRAL LTD	314000701	RAILROAD
1 - Active	MUNGER SHAW ROAD, COTTON, MN 55724	WISCONSIN CENTRAL LTD	313003407	RAILROAD
1 - Active	GHEEN MICRO TOWER, GHEEN, MN 55771	WISCONSIN CENTRAL LTD	123003601	RAILROAD
1 - Active	ORR XING SIGNAL, ORR, MN 55771	WISCONSIN CENTRAL LTD	123050141	RAILROAD
1 - Active	LOOK-OUT MOUNTAIN MICRO, VIRGINIA, MN 55792	WISCONSIN CENTRAL LTD	205002803	RAILROAD
1 - Active	MINORCA JCT, VIRGINIA, MN 55792	WISCONSIN CENTRAL LTD	205003002	RAILROAD
1 - Active	MINORCA JCT N APPROACH, VIRGINIA, MN 55792	WISCONSIN CENTRAL LTD	205001902	RAILROAD
1 - Active	KEENAN YARD, FORBES, MN 55751	WISCONSIN CENTRAL LTD	248032818	
1 - Active	NORTH SPRUCE, EVELETH, MN 55751	WISCONSIN CENTRAL LTD	248021311	RAILROAD
1 - Active	ZUPETZ RD, ZIM, MN 55738	WISCONSIN CENTRAL LTD	269000303	RAILROAD
1 - Active	EVELETH SOUTH SPRUCE, EVELETH, MN 55734	WISCONSIN CENTRAL LTD	249001802	RAILROAD
1 - Active	HWY 37 XING SIGNALS, EVELETH, MN 55734	WISCONSIN CENTRAL LTD	248042515	RAILROAD
1 - Active	JONES, GILBERT, MN 55741	WISCONSIN CENTRAL LTD	228021908	RAILROAD
1 - Active	KEENAN RD, IRON, MN 55751	WISCONSIN CENTRAL LTD	248003408	RAILROAD
1 - Active	HBD MP 122.4, CUSSON, MN 55771	WISCONSIN CENTRAL LTD	114000101	RAILROAD
1 - Active	PIONEER LK-END OF THE ROAD, COTTON, MN 55724	WISCONSIN CENTRAL LTD	313032224	RAILROAD - COMMUN SHACK FOR SIGNALLING
1 - Active	HBD MP 63.8, FORBES, MN 55734	WISCONSIN CENTRAL LTD	248042518	RAILROAD
1 - Active	COUNTY RD 52 & MINK RD, COTTON, MN 55724	WISCONSIN CENTRAL LTD	313000905	RAILROAD
1 - Active	CORNER OF HWY 7 & LAKE NICHOLS RD, MEADOWLANDS,	WISCONSIN CENTRAL LTD	332000303	RAILROAD
1 - Active	HWY 7, KEELSEY, MN 55724	WISCONSIN CENTRAL LTD	311003401	RAILROAD
1 - Active	8707 W MCKAY RD, KEELSEY, MN 55765	WISCONSIN CENTRAL LTD	311002704	RAILROAD
1 - Active	NO SHAW, COTTON, MN 55724	WISCONSIN CENTRAL LTD	313002701	RAILROAD
1 - Active	ULLANDS BALLAST SPUR, BRITT, MN 55768	WISCONSIN CENTRAL LTD	204003601	RAILROAD
1 - Active	ANGORA HWY 22, ANGORA, MN 55703	WISCONSIN CENTRAL LTD	168010914	RAILROAD
1 - Active	HILLS CROSSING, COOK, MN 55723	WISCONSIN CENTRAL LTD	154011327	RAILROAD
1 - Active	SOUTH DRIVE CROSSING, MOUNTAIN IRON, MN 55792	WISCONSIN CENTRAL LTD	226022407	RAILROAD

1 - Active	HALEY NORTH, COOK, MN 55723	WISCONSIN CENTRAL LTD	139003507	RAILROAD
1 - Active	NORTH PERRY 16 W WALK - LOC14, ZIM, MN 55734	WISCONSIN CENTRAL LTD	270000604	RAILROAD
1 - Active	S PERRY BEHIND EVTAC, ZIM, MN 55734	WISCONSIN CENTRAL LTD	270000801	RAILROAD
1 - Active	MAPLE GROVE & LEISTE RD CROSSING, CLOQUET, MN 55724	WISCONSIN CENTRAL LTD	390002018	
1 - Active	HWY 24 & E VERMILION BLVD, COOK, MN 55723	WISCONSIN CENTRAL LTD	155071804	
1 - Active	EAST LEANDER RD CROSSING, COOK, MN 55723	WISCONSIN CENTRAL LTD	155003307	RAILROAD SERVICE
1 - Active	HALEY, ORR, MN 55723	WISCONSIN CENTRAL LTD	139002306	RAILROAD
1 - Active	5148 CENTERLINE RD, SAGINAW, MN 55779	WISCONSIN CENTRAL LTD	375002152	
1 - Active	CLOSE TO MELRUDE RD, MELRUDE, MN 55724	WISCONSIN CENTRAL LTD	292001904	
1 - Active	5861 CHALBERG RD MP .37, MEADOWLANDS, MN 55765	WISCONSIN CENTRAL LTD	332003530	
1 - Active	TREMBLAY RD MP 35.27, ALBORN, MN 55702	WISCONSIN CENTRAL LTD	353000254	
1 - Active	LOC# 8 MP39, 1850' S OF CR-133 DOWN TRAC, MEADOWLANDS	WISCONSIN CENTRAL LTD	332002203	
1 - Active	LOC #9 MP 41, KEISEY, MN 55765	WISCONSIN CENTRAL LTD	332001002	
1 - Active	RAMSHAW RD LOC#15 MP67.23, IRON, MN 55751	WISCONSIN CENTRAL LTD	248001105	
1 - Active	LOC 20, MP49, COTTON, MN 55724	WISCONSIN CENTRAL LTD	292003201	
1 - Active	LOC 18 - MP45, COTTON, MN 55724	WISCONSIN CENTRAL LTD	313001501	
1 - Active	LOC 19 - MP 47.2, COTTON, MN 55724	WISCONSIN CENTRAL LTD	313000406	
1 - Active	LOC 22 - MP 51.58, MELRUDE, MN 55724	WISCONSIN CENTRAL LTD	292011810	
1 - Active	LOC 23 - MP 53, COTTON, MN 55766	WISCONSIN CENTRAL LTD	292000761	
1 - Active	LOC 24 - MP 55, EVELETH, MN 55766	WISCONSIN CENTRAL LTD	291000201	
1 - Active	BURNETT RD LOC #1 MP 26.80, CULVER, MN 55779	WISCONSIN CENTRAL LTD	375001766	
1 - Active	LOC 25 MP 39.20, CANYON, MN 55717	WISCONSIN CENTRAL LTD	334001501	
1 - Active	LOC 26 MP57, EVELETH, MN 55734	WISCONSIN CENTRAL LTD	270042726	
1 - Active	LOC 27 MP59, EVELETH, MN 55734	WISCONSIN CENTRAL LTD	270002101	
1 - Active	ARKOLA RD & HWY 7, COTTON, MN 55724	WISCONSIN CENTRAL LTD	311011508	
1 - Active	500' W OF RAMSHAW RD, ZIM, MN 55751	WISCONSIN CENTRAL LTD	248021418	
1 - Active	CN MILE PT 37.2 & MUNGER SHAW RD N, COTTON, MN 55	WISCONSIN CENTRAL LTD	334002701	
1 - Active	MUNGER SHAW RD MP 35.2, GRAND LAKE, MN 55803	WISCONSIN CENTRAL LTD	355000204	
1 - Active	MUNGER SHAW RD MP 33.2, GRAND LAKE, MN 55803	WISCONSIN CENTRAL LTD	355001410	
1 - Active	MUNGER SHAW RD MP 28.97, GRAND LAKE, MN 55779	WISCONSIN CENTRAL LTD	355043599	
1 - Active	HWY 7 (3 MILES N OF SAX RD) CN 52.14, ZIM, MN 55738	WISCONSIN CENTRAL LTD	290001011	
1 - Active	TRKS & CTY RD 312 CN 56.6, FORBES, MN 55738	WISCONSIN CENTRAL LTD	269042225	
1 - Active	TRACKS & SAX RD CN 50.14, ZIM, MN 55738	WISCONSIN CENTRAL LTD	290002707	
1 - Active	TRACKS & E STONE LK RD - CN 54.14, ZIM, MN 55738	WISCONSIN CENTRAL LTD	290000306	
1 - Active	TRACKS & HWY 7 CN 48.14, ZIM, MN 55738	WISCONSIN CENTRAL LTD	290003401	
1 - Active	PRINDLE E-LOCK, BRITT, MN 55768	WISCONSIN CENTRAL LTD	204003606	
1 - Active	CN RAILROAD AND JERRY ROAD MP 17.75, CLOQUET, MN 5	WISCONSIN CENTRAL LTD	390002684	
1 - Active	MP 113.4 DWP/CN RR, ORR, MN 55771	WISCONSIN CENTRAL LTD	124001902	1.4 M OFF 53 NEAR ORR TRF STATION
1 - Active	HWY 7 & CN TRACKS FAIRLANE, ZIM, MN 55738	WISCONSIN CENTRAL LTD	269011013	FAIRLANE
1 - Active	FERMOY RD & CN TRACKS - N FAIRLANE, ZIM, MN 55738	WISCONSIN CENTRAL LTD	269011014	NORTH FAIRLANE

1 - Active	2000FT S OF TRKS & KEENAN RD - MP 60.9, IRON, MN 55724	WISCONSIN CENTRAL LTD	248003413	
1 - Active	NEW N HALEY - MP 106, ORR, MN 55723	WISCONSIN CENTRAL LTD	139002201	
1 - Active	NORTH OF NORTH HALEY, ORR, MN 55771	WISCONSIN CENTRAL LTD	139001601	
1 - Active	END OF BIRCH ROAD, ALBORN, MN 55765	WISCONSIN CENTRAL LTD	332003529	
1 - Active	8601 TREMBLAY RD RADIO TOWER, ALBORN, MN 55702	WISCONSIN CENTRAL LTD	353000253	
1 - Active	NORTH ALBORN SITE, ALBORN, MN 55702	WISCONSIN CENTRAL LTD	353001415	
1 - Active	TAFT CROSSING, SAGINAW, MN 55779	WISCONSIN CENTRAL LTD	355042606	
1 - Active	INDEPENDENCE RD SAGINAW RD, SAGINAW, MN 55779	WISCONSIN CENTRAL LTD	375002739	
1 - Active	SEVILLE RD HEATER, SAGINAW, MN 55779	WISCONSIN CENTRAL LTD	389000118	
1 - Active	SO COONS HEATER, SAGINAW, MN 55779	WISCONSIN CENTRAL LTD	390000880	
1 - Active	MUNGER, CLOQUET, MN 55720	WISCONSIN CENTRAL LTD	390002127	
1 - Active	HWY 2 & JEFFERY RD-JEFFERY RD HEATER, HERMANTOWN,	WISCONSIN CENTRAL LTD	390002334	
1 - Active	CTY 137 RR CROSS S 592, IRON, MN 55751	WISCONSIN CENTRAL LTD	247001313	RAILROAD CROSSING
1 - Active	COUNTY RD 307 CROSSING, BRITT, MN 55710	WISCONSIN CENTRAL LTD	205020714	RAILROAD
1 - Active	SIMAR SOUTH OFF 194, SAGINAW, MN 55810	WISCONSIN CENTRAL LTD	390001010	
1 - Active	N GLENDALE W SIDE, GLENDALE, MN 55771	WISCONSIN CENTRAL LTD	123031356	RAILROAD
1 - Active	N GLENDALE W SIDE, GLENDALE, MN 55771	WISCONSIN CENTRAL LTD	124001811	RAILROAD
1 - Active	S GLENDALE E SIDE, GLENDALE, MN 55771	WISCONSIN CENTRAL LTD	123031357	RAILROAD
1 - Active	CUSSON CROSSING, CUSSON, MN 55771	WISCONSIN CENTRAL LTD	114012427	RAILROAD
1 - Active	LEANDER, ANGORA, MN 55723	WISCONSIN CENTRAL LTD	168000410	RAILROAD SERVICE
1 - Active	LEANDER-POTLATCH SWITCH, ANGORA, MN 55723	WISCONSIN CENTRAL LTD	168000411	RAILROAD
1 - Active	HILL RD BRITT, BRITT, MN 55792	WISCONSIN CENTRAL LTD	182032014	RAILROAD
1 - Active	CENTRAL LAKES, EVELETH, MN 55734	WISCONSIN CENTRAL LTD	270043421	RAILROAD
1 - Active	GHEEN, GHEEN, MN 55771	WISCONSIN CENTRAL LTD	139010529	RAILROAD
1 - Active	MUNGER SHAW & BOWMAN LK, SAGINAW, MN 55803	WISCONSIN CENTRAL LTD	355002381	
1 - Active	KEENAN RD XNG SIGNALS NUMBER 7, IRON, MN 55751	WISCONSIN CENTRAL LTD	248003411	RAILROAD - CROSSING SIGNALS
1 - Active	HEINO RD, ANGORA, MN 55703	WISCONSIN CENTRAL LTD	168002701	RAILROAD
1 - Active	BESSETTE RD S OF X'ING, ORR, MN 55771	WISCONSIN CENTRAL LTD	115003105	RAILROAD
1 - Active	HWY 53 MP115, CUSSON, MN 55771	WISCONSIN CENTRAL LTD	114001302	RAILROAD
1 - Active	HWY 53 MP 119, ASH LAKE, MN 55771	WISCONSIN CENTRAL LTD	105003503	RAILROAD
1 - Active	JOHNSON RD, COOK, MN 55723	WISCONSIN CENTRAL LTD	155001904	RAILROAD
1 - Active	COUNTY RD 540 GHEEN, GHEEN, MN 55723	WISCONSIN CENTRAL LTD	154000105	RAILROAD
1 - Active	COUNTY RD 505 HALEY, ORR, MN 55723	WISCONSIN CENTRAL LTD	139002305	RAILROAD
1 - Active	ACROSS FROM 4640 LAKE STREET, ORR, MN 55771	WISCONSIN CENTRAL LTD	124010696	RAILROAD
1 - Active	HIGHWAY 53, ORR, MN 55771	WISCONSIN CENTRAL LTD	123051228	RAILROAD
1 - Active	HOODOO RD OLD GHEEN, GHEEN, MN 55771	WISCONSIN CENTRAL LTD	139010549	RAILROAD
1 - Active	ARMSTRONG RD, COOK, MN 55723	WISCONSIN CENTRAL LTD	155093211	RAILROAD
1 - Active	BURGHARDT RD, COOK, MN 55703	WISCONSIN CENTRAL LTD	168011506	RAILROAD
1 - Active	ASH LAKE, ASH LAKE, MN 55771	WISCONSIN CENTRAL LTD	105002205	RAILROAD
1 - Active	N RIVER ST, COOK, MN 55723	WISCONSIN CENTRAL LTD	155021895	RAILROAD

3 - Active DVC	KEENAN SL ONLY, IRON, MN 55751	WISCONSIN CENTRAL LTD	248003409	
3 - Active DVC	SAGINAW DEPOT, SAGINAW, MN 55779	WISCONSIN CENTRAL LTD	375003676	
7 - Pending Cor	CN MP 41 IRON RANGE SUB SKIBO, HOYT LAKES, MN 55750	WISCONSIN CENTRAL LTD	2310028	SKIBO LOCATION
7 - Pending Cor	CN MP39 IRON RANGE SUB, HOYT LAKES, MN 55750	WISCONSIN CENTRAL LTD	2310034	SKIBO
42 - Inactive Sel	PAYNE, KELSEY, MN 55724	WISCONSIN CENTRAL LTD	311002703	
42 - Inactive Sel	KELSEY, MONROEVILLE, MN 55724	WISCONSIN CENTRAL LTD	311012214	
42 - Inactive Sel	DAUNKDOWN 00055, MONROEVILLE, MN 55734	WISCONSIN CENTRAL LTD	249000702	
42 - Inactive Sel	DAUNKDOWN 00056, MONROEVILLE, MN 55734	WISCONSIN CENTRAL LTD	249000703	
42 - Inactive Sel	S APPROACH ASH LK, COOK, MN 55771	WISCONSIN CENTRAL LTD	105002701	
42 - Inactive Sel	SEVILLE RD HOUSE, SAGINAW, MN 55779	WISCONSIN CENTRAL LTD	389000121	
42 - Inactive Sel	SAGINAW DEPOT, SAGINAW, MN 55779	WISCONSIN CENTRAL LTD	375003675	
42 - Inactive Sel	HWY 2, SAGINAW, MN 55779	WISCONSIN CENTRAL LTD	390010663	