

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

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IN THE MATTER OF TRANSCANADA	)	
KEYSTONE PIPELINE, LP	)	MOTION TO JOIN
FOR ORDER ACCEPTING CERTIFICATION	)	YANKTON SIOUX TRIBE'S
OF PERMIT ISSUED IN DOCKET HP09-001	)	MOTION TO DISMISS
TO CONSTRUCT THE KEYSTONE XL	)	
PIPELINE	)	HP14-001

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COMES NOW, the Indigenous Environmental Network (IEN), by and through counsel, Kimberly E. Craven, admitted *pro hac vice*, and moves to join Intervenor Party, the Yankton Sioux Tribe's *Motion to Dismiss* TransCanada Keystone Pipeline LP's Petition for Certification. As grounds the Indigenous Environmental Network states:

1. On December 1, 2014, Intervenor, Yankton Sioux Tribe filed a *Motion to Dismiss* TransCanada Keystone Pipeline LP's Petition for Certification of the Keystone XL Pipeline pending before the South Dakota Public Utility Commission.
2. In all substantive ways, the Yankton Sioux Tribe's *Motion to Dismiss* applies with equal force to the Indigenous Environmental Network. As such, the Indigenous Environmental Network seeks to join in the Yankton Sioux Tribe's *Motion to Dismiss*.
3. WHEREFORE, Kimberly Craven respectfully requests that the South Dakota Public Utility Commissioners enter an Order permitting the Indigenous Environmental Network to join the Yankton Sioux Tribe's *Motion to Dismiss*.

Dated this 2<sup>nd</sup> Day of January, 2015.

/s/Kimberly Craven

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