BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE PETITION OF TRANSCANADA KEYSTONE PIPELINE, LP FOR ORDER ACCEPTING CERTIFICATION OF PERMIT ISSUED IN DOCKET HP09-0001 TO CONSTRUCT THE KEYSTONE XL PIPELINE	)))))))	Docket 14-001

RESPONSE OF BOLD NEBRASKA TO TRANSCANADA'S MOTION CONCERNING PROCEDURAL ISSUES AT THE EVIDENTIARY HEARING

COMES NOW Bold Nebraska ("Bold"), by and through counsel, in response to the July 10, 2015, Motion Concerning Procedural Issues at the Evidentiary Hearing ("Hearing Process Motion"), filed by TransCanada Keystone Pipeline, L.P., ("TransCanada") in the above captioned proceeding before the South Dakota Public Utilities Commission ("Commission"). The Hearing Process Motion contained the following six requests related to the Commission's administration of the evidentiary hearing for this docket, which hearing begins on July 27, 2015. The motion includes requests to:

1) allow only one attorney to cross examine each witness, thereby requiring prior coordination of all cross-examination among multiple intervenors;
2) prohibit oral opening statements and allow only written opening statements filed before the commencement of the hearing;
3) prohibit cross-examination by "friendly" non-adverse parties;
4) allow cross-examination only by counsel where a party is represented by counsel;
5) limit cross-examination to the scope of direct examination; and

6) prohibit argument of evidentiary objections unless allowed by the General Counsel for the Commission.

To Bold's knowledge, TransCanada did not attempt to consult with Bold or any intervenor prior to filing its motion, even though consultation on practical procedural matters is reasonable and appropriate.

By order dated July 13, 2015, the Commission required that responses to the Hearing Process Motion be filed by July 17, 2014. For the following reasons, Bold requests that the Commission deny each of the requested actions in the Hearing Process Motion.

ARGUMENT

Rather than confirm the validity of the concerns alleged in its motion by discussing them with intervenors, TransCanada unilaterally proposed a number of procedural restrictions on party participation in the evidentiary hearing. Communication with intervenors by TransCanada likely would have shown that some of its proposal are unnecessary. As a result, a number of TransCanada's requests likely address non-existent problems such that their resolution is wasteful of Commission and intervenor time. Moreover, a number of TransCanada's requests are all ill-advised because they would likely complicate the Commission's process, increase confusion, and risk delay, instead of improving hearing efficiency. Importantly, a number of the requests also violate South Dakota law. Each request is discussed in order, below.

1. Request to Allow Only One Attorney to Cross Examine Each Witness

TransCanada has proposed that only one attorney be allowed to cross-examine each witness. The basis for this request includes a fear that there will be as many as 53 witnesses,

multiple intervenors, and a seven day hearing, such that it may not be possible to complete the hearing in the allotted time. It argues that the Commission has the discretion to limit cross-examination to one counsel where multiple parties have "common interests." TransCanada makes no attempt to identify or define the common interests among intervenors, Commission staff, and itself in this docket, but instead appears to take a simplistic "us versus them" approach.

The Commission's regulations prohibit a blanket rule allowing only a single attorney to cross-examine each witness. ARSD 20:10:01:15.05 states in relevant part: "an intervener [in the singular] is entitled to . . . cross-examine witnesses . . . ."[1] (Emphasis added.) Reference to a single intervenor is significant here because the right to cross-examine is not assigned by the rule to intervenors as a group, but rather to each individual intervenor.

Bold notes that the represented intervenors in this docket include four Sioux Tribes, two Native American non-profit advocacy groups, a South Dakota landowner group, a Nebraska landowner group, and multiple individual intervenors. Given the diversity of interests in the intervenor groups and the broad range of issues relevant to this proceeding, the slightest amount of reflection would lead any rational mind to the conclusion that these parties do not have any clearly defined common interests as regards specific cross-examination questions.

Taking an obvious example, the Tribes have distinct rights and interests that are not shared with non-tribal intervenors. Moreover, since the route of the proposed Keystone XL Pipeline impacts different tribal interests, it should not be assumed that the Tribes' interests are uniform. Likewise, the nonprofit intervenors have different geographic interests, as well as different nonprofit purposes. Even more, the individual landowner intervenors may have interests specific to their properties as well as shared interests with represented parties and other

[1] The Commission's procedural rules supersede the South Dakota Rules of Civil Procedure to the extent they conflict, ARSD § 20:10:01:01:02. As such, precedent interpreting the Rules of Civil Procedure may not be applicable to the Commission when the Rules of Civil Procedure differ from applicable Commission rules.

landowners. All parties may have common interests with the state of South Dakota, which is represented by staff.

TransCanada's motion begs the question about whether or not it and Commission staff have common interests. The pre-filed testimony of the applicant and Commission staff and their agreement on a variety of issues suggest that they do.

Moreover, TransCanada's request appears to preclude the right of individual unrepresented intervenors to conduct their own cross-examination, which is expressly allowed by ARSD § 20:10:01:15.05.

TransCanada also failed to propose any rational mechanism to define and delineate the "common interests" of all the parties. Therefore, in order to restrict cross-examination to a single counsel for parties that share "common interests," the Commission would first of logical necessity be required to define what these common interests might be or at least provide all of the parties with a mechanism for doing so. Bold submits that any attempt to do this would be complex and futile and likely to devolve into fruitless metaphysical argument.

The issues raised in this docket are not simple matters of law and fact, as exist in some civil litigation, wherein the common interests of parties can be clearly defined by their *prima facie* cases. Instead, the intervenor interests in this docket relate to the numerous conditions contained in the Commission's 2010 Final Order, come from a variety of perspectives, and implicate diverse interests. There is no clear mechanism available to define which interests are common and which are not.

Therefore, TransCanada's proposal is a blunt tool that is likely to do more harm than good. Instead of this approach, the Commission is entirely capable of limiting specific duplicative, irrelevant, or improper cross-examination questions as the hearing progresses,

thereby avoiding any need to define "common interests." The Commission should assume that all counsel will listen to prior questions and answers and conduct cross-examination appropriately.

Accordingly, TransCanada's proposal to allow only a single counsel to cross examine each witness is illegal, ill-advised, and unnecessary, such that it should be denied.

2. Request to Prohibit Oral and Allow Only Written Opening Statements

TransCanada requests that all oral opening statements be prohibited. It bases this request on an unsubstantiated fear that too many parties, including individual intervenors, may desire to make oral opening statements. To Bold's knowledge, TransCanada failed to ask any intervenors whether or not they intend to make oral opening statements.

ARSD 20:10:01:22.05 states: "A hearing shall be opened with a concise statement of its nature and purpose. Appearances shall be entered on the record. Parties may make opening statements or appropriate motions. Further oral arguments may be given at the discretion of the commission." Thus, parties have the right to make opening statements after commencement of a hearing. A requirement that opening statements be made prior to the commencement of the hearing would violate this rule. This being said, the rule does not expressly prohibit parties from submitting a written opening statement into the record before the hearing – but the Commission cannot force them to do so.

Given the prior limited participation of many individual intervenors in this docket, presuming that a substantial number of them will seek to make oral opening statements is unreasonable. Given TransCanada's fears, it would have better served the Commission's interests in efficient use of hearing time if TransCanada had simply sent an email to all

intervenors asking whether or not they wished to make an oral opening statement. Nonresponsive parties could have been presumed to not want to make an oral opening statement. The results of such inquiry would have allowed the Commission to (1) determine how many intervenors intended to make oral opening statements and (2) estimate how much time these statements would require. Instead of investigating the facts, TransCanada requested that the Commission prohibit all oral opening statements based purely on an unsubstantiated fear.

It is reasonable to assume that TransCanada, Commission staff, and the eight represented intervenors would want to make oral opening statements, and perhaps a few individual intervenors might also do so. The total time to allow all of these statements might be around two hours. Should the Commission believe that such time is excessive, it could set a maximum combined time for opening statements, require that parties notify the Commission of an intent to present such statement, and divide the available time among the parties.

Bold requests that the Commission deny TransCanada's proposed prohibition against all oral opening statements because it is in violation of ARSD 20:10:01:22.05 and because TransCanada's request is based on unsubstantiated fear rather than any assessment of the actual total time required by those parties that in fact intend to make oral opening statements.

So as to avoid confusion and provide clear direction to unrepresented intervenors on their right to file a written opening statement, should they so choose, Bold also requests that the Commission direct that any party, including but not limited to individual landowners, may file a written opening statement instead of making an oral statement and provide a deadline for doing so.

3. Request to Prohibit Cross-Examination by "Friendly" Non-Adverse Parties

TransCanada requests that cross-examination by "friendly" "non-adverse" parties be prohibited. It fails to define what these terms mean or to identify which parties are "friendly" with each other and the extent of this "friendliness." TransCanada asserts that its requested limitation would prevent duplicative and valueless testimony.

In order to implement such rule, the Commission would first need to determine the "friendliness" between the various intervenors, whether represented or not, and then determine the extent to which they are non-adverse. For example, the Commission would need to decide whether or not Commission staff and TransCanada are "friendly" and the extent of their non-adverse interests. As with TransCanada's ill-advised request to limit cross-examination to a single counsel, implementing such rule would likely create confusion and decrease the efficiency of the hearing process, rather than be useful.

The Commission should deny this request because it is fully capable of preventing duplicative or unnecessary cross-examination by all parties on a question-by-question basis and because TransCanada's proposed restriction is likely to produce confusion and inefficiency.

4. Request to Prohibit Cross-Examination by Non-Counsel When a Party Is Represented by Counsel

TransCanada has requested that represented parties be allowed to cross-examine witnesses only via their counsel. TransCanada presents no evidence indicating that any represented parties intend to allow individuals other than their counsel to do so. TransCanada argues that this restriction would avoid "duplicative testimony having no evidentiary value." Bold is not aware that TransCanada asked any of the intervenors whether or not they intended to have non-counsel conduct cross examination.

The Commission should deny this request because TransCanada failed to provide any evidence that this concern even exists, such that the requested restriction likely addresses a non-existent problem. In the unlikely event that a represented party wishes to have an individual other than its counsel conduct cross-examination, the Commission could address this situation on a case-by-case basis and need not issue a blanket decree. Even if a non-attorney is allowed to cross-examine witnesses, the Commission is fully capable of preventing duplicative and valueless questions on a case-by-case basis.

5. Request to Limit Cross-Examination to the Scope of Direct Examination

TransCanada requests that the Commission limit all cross-examination to the scope of direct examination only. TransCanada fails to provide any legal or factual argument related to this request, instead merely claiming that it is a "standard judicial practice" that "saves time" and preserves "the fairness of the proceedings."

The Commission should deny this request because it is not in accordance with law. SDCL § 19-19-611(b) defines the scope of cross-examination. It states: "Cross-examination should be limited to the subject matter of the direct examination and matters affecting the credibility of the witness. The court may, in the exercise of discretion, permit inquiry into additional matters as if on direct examination." (Emphasis added.) Thus, the Commission is without legal authority to prohibit cross-examination related to the credibility of witnesses, and it must also exercise discretion on a matter-by-matter basis with regard to cross-examination questions that are outside of the scope of direct examination. A failure by the Commission to exercise its discretion on a matter-by-matter basis would be arbitrary and capricious. The law does not say that the Commission has the discretion to determine before a hearing that there are

no possible additional matters that are appropriate for cross-examination even though they are outside the scope of direct examination. Instead, the rule requires that the Commission exercise informed discretion on a matter-by-matter basis.

Therefore, the Commission must deny TransCanada's request to limit the scope of cross-examination to only the subject matter of direct examination.

6. Request to Prohibit Argument of Evidentiary Objections Unless Allowed by the General Counsel for the Commission

TransCanada requests that parties not be allowed to argue evidentiary objections unless permitted by the Commission's General Counsel, such that objections would be made without argument, explanation, or clarification. TransCanada provides no legal arguments in support of its request, but merely states: "This will save considerable time given the number of parties."

The Commission should deny this request because it would violate South Dakota law. SDCL § 19-19-103(a) states: "[e]rror may not be predicated upon a ruling which admits or excludes evidence unless [1] a substantial right of the party is affected, and [2] … [i]n case the ruling is one admitting evidence, a timely objection or motion to strike appears of record, stating the specific ground of objection, if the specific ground was not apparent from the context . . . ." A blanket prohibition on all argument would not allow the Commission to properly exercise the discretion granted to it by SDCL § 19-19-1-3(a), because the specific grounds for all possible objections are unlikely to be "apparent from the context." Instead, the Commission may allow evidentiary arguments as needed to ensure creation of an adequate record and limit them to the extent necessary to ensure proper administration of the hearing.

Since a blanket prohibition on argument of evidentiary arguments would violate state law, and in light of the Commission's duty and capacity to properly exercise its discretion on evidentiary objections, the Commission must deny this request.

CONCLUSION

For the foregoing reasons, Bold requests that the Commission deny TransCanada's Hearing Process Motion in its entirety.

Dated July 17, 2015

Respectfully submitted,

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STATE OF MINNESOTA
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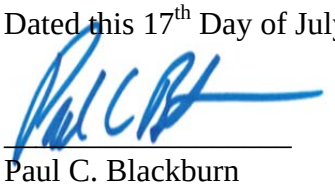
IN THE MATTER OF THE PETITION OF TRANSCANADA KEYSTONE PIPELINE, LP FOR ORDER ACCEPTING CERTIFICATION OF PERMIT ISSUED IN DOCKET HP09-0001 TO CONSTRUCT THE KEYSTONE XL PIPELINE	)))))	**Docket 14-001 CERTIFICATE OF SERVICE**

I, Paul C. Blackburn, hereby certify that I have this day, served a true and correct copy of the following documents for the above captioned matter to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

RESPONSE OF BOLD NEBRASKA TO TRANSCANADA'S MOTION CONCERNING PROCEDURAL ISSUES AT THE EVIDENTIARY HEARING

Dated this 17th Day of July, 2015



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