

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

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	)	
IN THE MATTER OF TRANSCANADA	)	MOTION TO JOIN
KEYSTONE PIPELINE, LP	)	JOINT MOTION FOR
FOR ORDER ACCEPTING CERTIFICATION	)	CONTINUANCE AND
OF PERMIT ISSUED IN DOCKET HP09-001	)	RELIEF FROM
TO CONSTRUCT THE KEYSTONE XL	)	SCHEDULING ORDER
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 Parties, the Dakota Rural Action, Bold Nebraska, Rosebud Sioux Tribe, Yankton Sioux Tribe, the Cheyenne Sioux Tribe, and the Standing Rock Sioux Tribe’s *Joint Motion for Continuance and Relief from Scheduling Order*. As grounds the Indigenous Environmental Network states:

1. On April 24, 2015, Intervenor parties, listed above, filed a *Joint Motion*, seeking equitable relief from the scheduling order and to continue the evidentiary hearing scheduled for May 5th to the 8<sup>th</sup>, 2015 as noticed in the South Dakota Public Utility Commission’s Notice of Hearing dated April 17<sup>th</sup>, 2015.
2. In all substantive ways, the Intervenor Parties’ *Joint Motion* applies with equal force to the Indigenous Environmental Network. As such, the Indigenous Environmental Network seeks to join in the Intervenor Parties’ *Joint Motion for Continuance and Scheduling Order*.
3. IEN believes that a continuance of the proceeding is warranted in order for the discovery process to be completed and should be granted in order for the

Intervening parties' substantive and procedural due rights to be protected.

4. WHEREFORE, Kimberly Craven respectfully requests that the South Dakota Public Utility Commissioners enter an Order permitting the Indigenous Environmental Network to join Intervenor Parties, the Dakota Rural Action, Bold Nebraska, Rosebud Sioux Tribe, Yankton Sioux Tribe, the Cheyenne Sioux Tribe, and the Standing Rock Sioux Tribe's *Joint Motion for Continuance and Relief from Scheduling Order*.

Dated this 27th Day of April, 2015.

/s/Kimberly Craven

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CERTIFICATE OF SERVICE

I certify that on this 24<sup>th</sup> day of April, 2015, the original of behalf of the Rosebud Sioux Tribe Direct Testimony of Ian Goodman, Brigid Rowan, RST Exhibit 1 “CV/Resume of Ian Goodman”, RST Exhibit 2 “CV/Resume of Brigid Rowan”, RST Exhibit 3 “Expert Testimony Report by the Goodman Group, Ltd.,” RST Exhibit 4 “Landslide Hazard Areas,” RST Exhibit 5 “Spill Cost Per Barrel,” RST Exhibit 6 “Range of Worst Case Scenario Costs,” RST Exhibit 7 “Range of Worst Case Scenario Costs” in Case Number HP-14-001 was filed on the Public Utilities Commission of the State of South Dakota e-filing website and also that on this day and a true and correct copy was sent via email and/or U.S. Mail first class postage prepaid to the following persons, as designated:

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