

REQUEST FOR PRODUCTION OF DOCUMENTS

16. All documents relating to waiver requests from TransCanada to any regulatory body for the Keystone XL Pipeline or Keystone Pipeline.

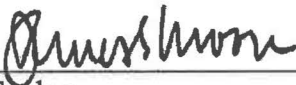
RESPONSE: Keystone objects to this request as it relates to the Keystone Pipeline on relevance grounds. Notwithstanding its objection, Keystone notes that the Special Permit (previously referred to as a “waiver”) issued by the Pipeline Hazardous Materials Safety Administration (PHMSA) for the Keystone Pipeline was admitted as Exhibit WEB 7-c in Docket HP09-001 and is available on the Commission’s docket page. TransCanada has no waiver requests pending for the Keystone XL Pipeline. TransCanada submitted a Special Permit request for the Keystone XL Pipeline to PHMSA, but has withdrawn that request.

OBJECTIONS

The objections stated to Standing Rock Sioux Tribe's Request for Production of Documents were made by James E. Moore, one of the attorneys for Applicant TransCanada herein, for the reasons and upon the grounds stated therein.

Dated this 10th day of March, 2015.

WOODS, FULLER, SHULTZ & SMITH P.C.

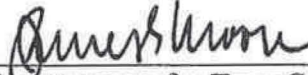
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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of March, 2015, I sent by e-mail transmission, a true and correct copy of Keystone's Responses to Standing Rock Sioux Tribe's Second Request for Production of Documents, to the following:

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