

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

IN THE MATTER OF THE APPLICATION) BY TRANSCANADA KEYSTONE) PIPELINE, LP FOR A PERMIT UNDER THE) SOUTH DAKOTA ENERGY CONVERSION) AND TRANSMISSION FACILITIES ACT TO) CONSTRUCT THE KEYSTONE XL) PROJECT)	HP14-001 KEYSTONE'S RESPONSES TO STANDING ROCK SIOUX TRIBE'S SECOND SET OF INTERROGATORIES
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Applicant TransCanada makes the following responses to interrogatories pursuant to SDCL § 15-6-33. These responses are made within the scope of SDCL 15-6-26(e) and shall not be deemed continuing nor be supplemented except as required by that rule. Applicant objects to definitions and directions in answering the discovery requests to the extent that such definitions and directions deviate from the South Dakota Rules of Civil Procedure.

GENERAL OBJECTION

Keystone objects to the instructions and definitions contained in Standing Rock Sioux Tribe's Second Set of Interrogatories to the extent that they are inconsistent with the provisions of SDCL Ch. 15-6. Keystone's answers are based on the requirements of SDCL §§ 15-6-26, 15-6-33, 15-6-34, and 15-6-36.

INTERROGATORIES

51. Identify every document, data compilation or tangible thing in your possession, custody or control relating to the Keystone XL Pipeline, including the title of the document or a

brief description if it is untitled, its date, identify the author and describe his or her relationship to TransCanada, summarize its contents, and identify its location and custodian.

OBJECTION: This request is overlybroad and unduly burdensome. It also seeks information that is not relevant and not likely to lead to the discovery of admissible evidence.

52. Identify the “foreign utility” referred to in the answer to Interrogatory No. 30.

OBJECTION: This request is not relevant and not likely to lead to the discovery of admissible evidence. As indicated in the tracking table, the situation occurred in a shared pipeline corridor and no similar situation exists in South Dakota.

53. Explain the basis for the answer provided to Interrogatory No. 42, including any calculations that were performed to reach the estimate.

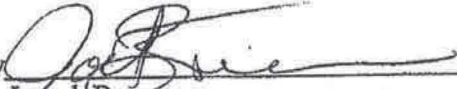
ANSWER: The estimated water requirements for hydrostatic testing were determined based on the maximum volume of the pipeline.

54. Explain the basis for the answer provided to Interrogatory No. 43, including any calculations that were performed to reach the estimate.

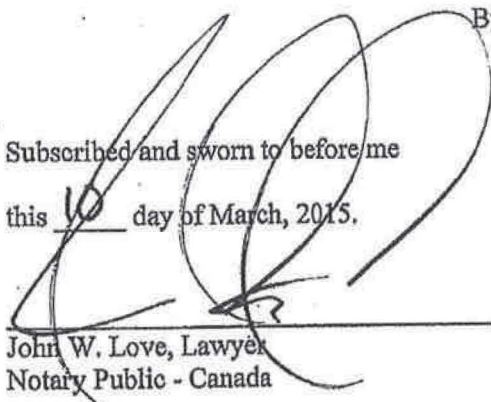
ANSWER: The estimated water requirements for dust suppression were determined based on the width and length of the construction right of way.

Dated this 10 day of March, 2015.

TRANSCANADA KEYSTONE PIPELINE, LP
by its agent, TC Oil Pipeline Operations, Inc.

By 
Joseph Brewn
Its Director, Authorized Signatory

Subscribed and sworn to before me
this 10 day of March, 2015.

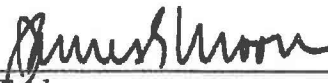

John W. Love, Lawyer
Notary Public - Canada

OBJECTIONS

The objections stated to Standing Rock Sioux Tribe's Second Set of Interrogatories 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 Set of Interrogatories, to the following:

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One of the attorneys for TransCanada