

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

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HP 14-001

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, :
:
:

AFFIDAVIT OF
WILLIAM TAYLOR IN RESPONSE
TO GARY DORR’S MOTION TO
COMPEL

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STATE OF SOUTH DAKOTA)
 :SS
COUNTY OF MINNEHAHA)

William Taylor, having been first duly sworn on oath, deposes and says:

- 1. I am one of the attorneys for TransCanada Keystone Pipeline LP, ("Keystone"), applicant herein.
- 2. Intervener Gary Dorr wrote to the undersigned on April 6 regarding responses to Mr. Dorr’s discovery requests. Keystone had served its responses on Mr. Dorr on February 6 and March 10, 2015, and had not heard anything from him prior to receiving the letter via email at 2:50 p.m. Monday April 6.
- 3. On April 7, 2015, Mr. Dorr filed a motion to compel with the South Dakota Public Utilities Commission, with accompanying exhibits. The motion parrots his letter to counsel of April 6. He did not serve the motion on Keystone or its counsel. I discovered the motion while reviewing the PUC docket on its website on April 9.

4. Attached hereto, collectively marked Exhibit 1, are emails sent to Mr. Dorr on April 9 and 10 regarding requests made in his motion and letter he sent to counsel on April 6, 2015.

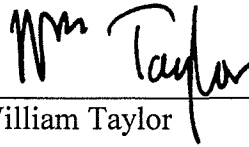
5. The Mni Wiconi water project brings water via pipeline from a treatment plant near Pierre, South Dakota to rural water systems serving a variety of customers across western South Dakota. The project, authorized by Congress and constructed primarily with federal funds, is owned by the United States in trust for several South Dakota Indian Tribes. It is sometimes called the Oglala Sioux Rural Water Supply System.

6. The Bureau of Reclamation, an agency within the Department of the Interior, is charged with management of the federal government's responsibility for the Mni Wiconi pipeline. The branch office of the Bureau of Reclamation dealing with the Mni Wiconi pipeline is in Bismarck, ND.

7. The Keystone KXL pipeline will cross the Mni Wiconi core lines in Haakon County and in Jones County. Keystone has secured easements from both landowners for the KXL pipeline.

8. The Bureau of Reclamation has developed crossing criteria for the KXL crossings of the Mni Wiconi core lines.


Dated this 13th day of April, 2015.



William Taylor

Subscribed and sworn to before me

this 13th day of April, 2015.



Notary Public – South Dakota
My commission expires:

**My Commission Expires
Sept. 13, 2017**

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of April, 2015, I sent by United States first-class mail, postage prepaid, or e-mail transmission, a true and correct copy of Affidavit of William Taylor in Response to Gary Dorr's Motion to Compel, to the following:

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