

4. The Movants cite no legal authority that the filing was contrary to statute or regulation, or was otherwise inappropriate. The fact that the filing was not required by Commission order does not mean that the filing was improper. The parties in this docket have made numerous filings not specifically requested or required by the Commission.

5. The Movants cite no legal authority that would require the Commission to strike the proposed findings and conclusions.

6. The joint motion proposes nothing constructive. The post-hearing briefing process is complete. The evidentiary hearing was concluded on August 5, 2015, three months ago. There are no further necessary steps for the Commission to take other than to decide whether to accept Keystone's certification under SDCL§ 49-41B-27. Having elected not to respond to Keystone's proposed findings and conclusions other than by their joint motion, the movants appear motivated to delay the ultimate disposition of this docket, which was opened on September 15, 2014, and they should not be allowed to succeed.

Keystone therefore respectfully requests that the joint motion be denied and that the Commission act on its certification petition.

Dated this 9th day of November, 2015.

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of November, 2015, I sent by United States first-class mail, postage prepaid, or e-mail transmission, a true and correct copy of Applicant's Opposition to Joint Motion to Strike Proposed Findings of Fact and Conclusions of Law, to the following:

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