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

STATE OF SOUTH DAKOTA):SS

COUNTY OF MINNEHAHA)

William Taylor, being first duly sworn, states as follows:

- I am one of the lawyers representing Petitioner TransCanada Keystone Pipeline,
 LP ("Keystone") in this proceeding. I have personal knowledge of the facts stated in this affidavit.
- 2. In its first round of discovery requests, the Rosebud Sioux Tribe served 79 interrogatories and 49 document requests, not including subparts. Keystone's timely responses to the discovery, a copy of which is attached as Exhibit A, filled 51 pages.
- 3. In its second round of discovery requests, the Rosebud Sioux Tribe served 20 interrogatories and 7 document requests, not including subparts. Keystone's timely responses to the discovery, a copy of which is attached as Exhibit B, filled 35 pages.

4. Counsel for the Tribe wrote a letter addressing its concerns about the sufficiency of Keystone's responses to the first round of discovery on March 3, 2015. A copy of the letter is attached as Exhibit C.

5. Counsel for the parties discussed the Tribe's concerns in a telephone conference on March 13, 2015.

6. Counsel for the Tribe wrote a follow-up letter dated March 16, 2015, summarizing the telephone conference. A copy is attached as Exhibit D.

7. Counsel for the Tribe wrote a letter addressing its concerns about the sufficiency of Keystone's responses to the second round of discovery on March 25, 2015. A copy of the letter is attached as Exhibit E.

Dated this **40** day of March, 2015.

William Taylor

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

Notary Public - South Dakota

My commission expires:

My Commission Expires Sept. 13, 2017