

ATTACHMENT F

**TRANSCANADA'S SUPPLEMENTAL RESPONSES TO BOLD
NEBRASKA'S FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS**

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

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IN THE MATTER OF THE APPLICATION	:	HP 14-001
BY TRANSCANADA KEYSTONE	:	
PIPELINE, LP FOR A PERMIT UNDER	:	KEYSTONE'S SUPPLEMENTAL
THE SOUTH DAKOTA ENERGY	:	RESPONSES TO BOLD
CONVERSION AND TRANSMISSION	:	NEBRASKA'S FIRST
FACILITIES ACT TO CONSTRUCT THE	:	INTERROGATORIES AND
KEYSTONE XL PROJECT	:	REQUESTS FOR PRODUCTION
	:	OF DOCUMENTS
	:	

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Applicant TransCanada makes the following supplemental responses to interrogatories pursuant to SDCL § 15-6-33, and responses to requests for production of documents pursuant to SDCL § 15-6-34(a). These supplemental 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 Bold Nebraska's First Interrogatories and Requests for Production of Documents to the extent that they are inconsistent with the provisions of SDCL Ch. 15-6. See ARSD 20:10:01:01.02.

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Keystone's answers are based on the requirements of SDCL §§ 15-6-26, 15-6-33, 15-6-34, and 15-6-36.

INTERROGATORIES

INTERROGATORY NO. 3: State the full name, current address, telephone number, and present employment of each person who you expect to call as a witness in Docket HP14-001, the subject matter on which each such witness is expected to testify, the substance of the facts and opinions to which each witness is expected to testify, a summary of the grounds for each opinion expected to be expressed by such witness, and for each expert witness also state:

- a. the facts supporting each opinion to which the expert is expected to testify;
- b. the expert's profession or occupation, educational background, specialized training, and employment history relevant to the expert's proposed testimony;
- c. the expert's previous publications within the preceding 10 years; and
- d. all other cases in which the witness has testified as an expert at trial.

ANSWER: Keystone will offer prefiled direct testimony from the following persons, each of whom will testify to the changes identified in Keystone's tracking table for that person's area of expertise:

- (1) Corey Goulet, President, Keystone Projects, 450 1st Street S.W., Calgary, AB Canada T2P 5H1; (403) 920-2546; Project purpose, Overall description; Construction schedule; Operating parameters; Overall design; Cost; Tax Revenues
- (2) Steve Marr, Manager, Keystone Pipelines & KXL, TransCanada Corporation, Bank of America Center, 700 Louisiana, Suite 700, Houston, TX 77002; (832) 320-5916; CMR Plan, Con/Rec Units, HDD's
- (3) Meera Kothari, P. Eng., 450 1st Street S.W., Calgary, AB Canada T2P 5H1; (832) 320-5190; same; Design and Construction; PHMSA compliance
- (4) David Diakow, Vice President, Commercial, Liquids Pipeline, 450 1st Street S.W.,

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Calgary, AB Canada T2P 5H1; (403) 920-6019; Demand for the Facility

(5) Jon Schmidt, Vice President, Environmental & Regulatory, exp Energy Services, Inc., 1300 Metropolitan Boulevard, Suite 200, Tallahassee, FL 32308; (850) 385-5441; Environmental Issues; CMR Plan, Con/Rec Units, HDD's

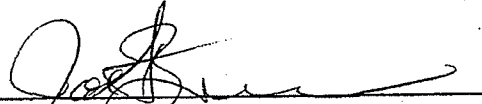
(6) Heidi Tillquist, Senior Associate, Stantec Consulting Ltd., 2950 E. Harmony Rd., Suite 290, Fort Collins, CO 80528; (970) 449-8609; High Consequence Areas, Spill Calculations

None of these persons is a retained expert, so subparts (a) through (d) do not apply.

In addition to the witnesses previously identified, Keystone may offer rebuttal testimony from Danielle Dracy regarding emergency response; Lou Thompson regarding tribal engagement; Steve Klekar regarding tax issues; and Doug Robertson regarding SCADA and leak detection. Resumes for these possible rebuttal witnesses are marked as Keystone 1930-1934.

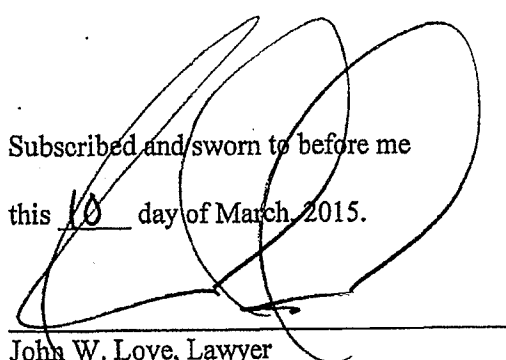
Dated this 10 day of March, 2015.

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

By 
Joseph Brown
Its Director, Authorized Signatory

Subscribed and sworn to before me

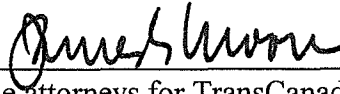
this 10 day of March, 2015.


John W. Love, Lawyer
Notary Public - Canada

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 Supplemental Responses to Bold Nebraska's First Interrogatories and Request for Production of Documents, to the following:

Paul C. Blackburn
PO Box 17234
Minneapolis, MN 55407
paul@paulblackburn.net



One of the attorneys for TransCanada