

ATTACHMENT J

**TRANSCANADA LETTER TO BOLD REGARDING DISCOVERY
SCHEDULE**



February 12, 2015

William Taylor
Bill.Taylor@woodsfuller.com
Extension 647

Via e-mail

Paul C. Blackburn
BOLD Nebraska
paul@paulblackburn.net

Re: In the Matter of the Application by TransCanada Keystone Pipeline, LP
HP 14-001

Dear Mr. Blackburn:

We received your discovery responses on February 6. While we appreciate the information that you provided, not all of your responses comply with the South Dakota Rules of Civil Procedure. The rules require a good faith effort to fully answer the questions and provide the documents requested. Given the time available for discovery and the fixed hearing date, we need to know the identity of all lay and expert witnesses you intend to call and need all documents that you intend to introduce at the hearing.

Please fully and completely respond to our discovery requests by the close of business March 10, 2015, the date discovery closes per the Public Utilities Commission order. If you do not make a good faith effort to respond, you can expect that TransCanada will seek protections allowed by the Rules of Civil Procedure, which would include limiting your participation in the hearing.

Yours sincerely,

WOODS, FULLER, SHULTZ & SMITH P.C.

A handwritten signature in blue ink that reads 'William Taylor'.

William Taylor