BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE PETITION OF TRANSCANADA KEYSTONE PIPELINE, LP FOR ORDER ACCEPTING CERTIFICATION OF PERMIT ISSUED IN DOCKET HP09-001 TO CONSTRUCT THE KEYSTONE XL PIPELINE

AFFIDAVIT OF KRISTEN EDWARDS
HP14-001

STATE OF SOUTH DAKOTA) :SS COUNTY OF HUGHES)

Kristen N. Edwards, being first duly sworn, states as follows:

- 1. I am an attorney for the Staff ("Staff") of the South Dakota Public Utilities Commission ("Commission").
- I am currently the Staff attorney assigned to the Keystone XL dockets, both HP09-001 and HP14-001.
- 3. I have been with the Commission since September of 2012.
- 4. Prior to my becoming employed as Staff attorney, this position was held by Kara Semmler, who was previously assigned to HP09-001.
- All communications between Keystone and Staff since I became employed as a Staff
 attorney have been conducted exclusively between myself in my official position as Staff
 attorney and the attorneys for Keystone.
- I have never contacted or attempted to contact any person from Keystone other than Keystone's attorneys.

- 7. I have contacted my predecessor, Kara Semmler, and confirmed that all communications went through her while she was Staff attorney, as well.
- 8. I have reviewed all of my communications which were saved in my email files.
- 9. In an attempt to make a good faith effort to confirm the existence or lack thereof of any emails sent by persons other than those Staff members still employed with the Commission, whom I was able to easily contact, I contacted the Attorney General's Office and was informed that they do not keep emails beyond sixty days after they are deleted or the employee leaves their employment with the State of South Dakota.
- 10. I have thoroughly reviewed every email correspondence to which I have access between myself and Keystone.
- 11. Staff submitted its answers to the request for production of documents on February 6,2015. See Exhibit 1, attached hereto.
- 12. The first contact I had with anyone from Dakota Rural Action regarding this motion to compel was a phone call at approximately 3:00 p.m., Tuesday, April 7, 2015.

Dated this 4 day of April, 2015.

Kristen N. Edwards

Subscribed and sworn to before me this

day of April, 2015.

Notary Public South Dakota

v commission Expires: My Commission E