BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

)	HP14-001
IN THE MATTER OF THE)	
APPLICATION BY TRANSCANADA)	KEYSTONE'S RESPONSES TO
KEYSTONE PIPELINE, LP FOR A)	STANDING ROCK SIOUX
PERMIT UNDER THE SOUTH DAKOTA)	TRIBE'S SECOND REQUEST
ENERGY CONVERSION AND)	FOR THE PRODUCTION OF
TRANSMISSION FACILITIES ACT TO)	DOCUMENTS
CONSTRUCT THE KEYSTONE XL)	
PROJECT	357	

Applicant TransCanada makes the following 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 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 Standing Rock Sioux Tribe's Second Set of 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. Keystone's answers are based on the requirements of SDCL §§ 15-6-26, 15-6-33, 15-6-34, and 15-6-36.

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REQUEST FOR PRODUCTION OF DOCUMENTS

16. All documents relating to waiver requests from TransCanada to any regulatory body for the Keystone XL Pipeline or Keystone Pipeline.

RESPONSE: Keystone objects to this request as it relates to the Keystone Pipeline on relevance grounds. Notwithstanding its objection, Keystone notes that the Special Permit (previously referred to as a "waiver") issued by the Pipeline Hazardous Materials Safety Administration (PHMSA) for the Keystone Pipeline was admitted as Exhibit WEB 7-c in Docket HP09-001 and is available on the Commission's docket page. TransCanada has no waiver requests pending for the Keystone XL Pipeline.

TransCanada submitted a Special Permit request for the Keystone XL Pipeline to PHMSA, but has withdrawn that request.

OBJECTIONS

The objections stated to Standing Rock Sioux Tribe's Request for Production of Documents were made by James E. Moore, one of the attorneys for Applicant TransCanada herein, for the reasons and upon the grounds stated therein.

Dated this 10th day of March, 2015.

WOODS, FULLER, SHULTZ & SMITH P.C.

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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 Responses to Standing Rock Sioux Tribe's Second Request for Production of Documents, to the following:

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One of the attorneys for TransCanada