

proposed pipeline route.” The application identifies no other interest that COUP has in Keystone's certification request under SDCL § 49-41B-27.²

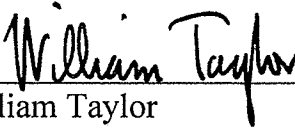
By statute, the Commission lacks jurisdiction over the proposed route of the Keystone XL Pipeline. “Nothing in this chapter is a delegation to the commission of the authority to route a transmission facility” SDCL § 49-41B-36. Thus, COUP's application does not identify any interest in the proceedings over which the PUC has jurisdiction.

COUP is not a governmental agency in the area where the facility is proposed to be sited under SDCL § 49-41B-17(2), and it is not a nonprofit organization with one of the interests enumerated in § 49-41B-17(3). Its application does not meet the statutory standard for party status, and it identifies no interest within the Commission's jurisdiction. Keystone respectfully requests that the application for party status be denied.

² COUP's website says it was formed in 1994 and provides “. . . policy analysis and recommendations . . . on telecommunications, climate change, WAPA hydropower allocations, energy efficiency, energy planning and renewable energy, with a heavy emphasis on wind energy development. . . .” in Indian country.

Dated this 22nd day of October, 2014.

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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of October, 2014, I sent by United States first-class mail, postage prepaid, or e-mail transmission, a true and correct copy of Keystone's Response to Application of Party Status of The Intertribal Council on Utility Policy, to the following:

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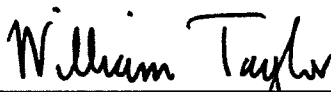
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