

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

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HP 14-001

IN THE MATTER OF THE APPLICATION :
BY TRANSCANADA KEystone :
PIPELINE, LP FOR A PERMIT UNDER THE :
SOUTH DAKOTA ENERGY CONVERSION :
AND TRANSMISSION FACILITIES ACT TO :
CONSTRUCT THE KEystone XL :
PROJECT, :
:
:

AFFIDAVIT OF
JAMES E. MOORE

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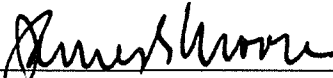
STATE OF SOUTH DAKOTA)
):SS
COUNTY OF MINNEHAHA)

James E. Moore, being first duly sworn, states as follows:

1. I am one of the lawyers representing Petitioner TransCanada Keystone Pipeline, LP, in this proceeding, and have personal knowledge of the facts stated in this affidavit.
2. In its initial responses to Keystone's written discovery, the Standing Rock Sioux Tribe did not disclose any expert testimony. In its supplemental responses served on March 10, 2015, the Tribe disclosed two experts: Linda S. Black Elk, and Kevin E. Cahill. A copy of the Tribe's supplemental responses, without the attachments, is attached as Exhibit A.
3. In the first round of written discovery, Keystone responded to 856 interrogatories and document requests, not including subparts, served by 17 Intervenors and PUC Staff. In the second round of written discovery, Keystone responded to 180 interrogatories and document requests, not including subparts, served by 11 Intervenors and PUC Staff.


4. On February 24, 2015, counsel for Keystone and the Standing Rock Sioux Tribe spoke by telephone in response to the Tribe's request to discuss the adequacy of Keystone's initial discovery responses to the Tribe's discovery, which were made on February 6, 2015.

Dated this 30th day of March, 2015.



James E. Moore

Subscribed and sworn to before me
this 30th day of March, 2015.



Notary Public – South Dakota
My commission expires: **My Commission Expires
Sept. 13, 2017**

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of March, 2015, I sent by United States first-class mail, postage prepaid, or e-mail transmission, a true and correct copy of the foregoing Affidavit of James E. Moore, to the following:

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