

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

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IN THE MATTER OF THE APPLICATION : HP 14-001
BY TRANSCANADA KEYSTONE
PIPELINE, LP FOR A PERMIT UNDER : TRANSCANADA KEYSTONE
THE SOUTH DAKOTA ENERGY PIPELINE, LP'S SUPPLEMENTAL
CONVERSION AND TRANSMISSION : RESPONSES TO CINDY MYERS'
FACILITIES ACT TO CONSTRUCT THE FIRST INTERROGATORIES AND
KEYSTONE XL PROJECT : REQUEST FOR PRODUCTION OF
DOCUMENTS
:

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Applicant TransCanada makes the following supplemental 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 supplemental 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 Cindy Myers' First 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.

{01855195.1}

Keystone's answers are based on the requirements of SDCL §§ 15-6-26, 15-6-33, 15-6-34, and 15-6-36.

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please identify the person or persons providing each answer to an Interrogatory or portion thereof, giving the full name, address of present residence, date of birth, business address and occupation.

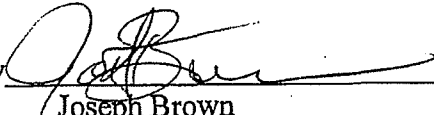
ANSWER: Given the extremely broad scope volume of more than 800 discovery requests received by Keystone in this docket, a range of personnel were involved in answering the interrogatories. Keystone will designate the following witnesses with overall responsibility for the responsive information as related to the Conditions and proposed changes to the Findings of Fact, which are identified in Appendix C to Keystone's Certification Petition: Corey Goulet, President, Keystone Projects, 450 1st Street S.W., Calgary, AB Canada T2P 5H1; Steve Marr, Manager, Keystone Pipelines & KXL, TransCanada Corporation, Bank of America Center, 700 Louisiana, Suite 700, Houston, TX 77002; Meera Kothari, P. Eng., 450 1st Street, S.W., Calgary, AB Canada T2P 5H1; David Diakow, Vice President, Commercial, Liquids Pipeline, 450 1st Street S.W., Calgary, AB Canada T2P 5H1; Jon Schmidt, Vice President, Environmental & Regulatory, exp Energy Services, Inc., 1300 Metropolitan Boulevard, Suite 200,

Tallahassee, FL 32308; Heidi Tillquist, Senior Associate, Stantec Consulting Ltd., 2950 E. Harmony Rd., Suite 290, Fort Collins, CO 80528.

In addition to the witnesses previously identified, Keystone may offer rebuttal testimony from Danielle Dracy regarding emergency response; Lou Thompson regarding tribal engagement; Steve Klekar regarding tax issues; and Doug Robertson regarding SCADA and leak detection. Resumes for these possible rebuttal witnesses are marked as Keystone 1930-1934.

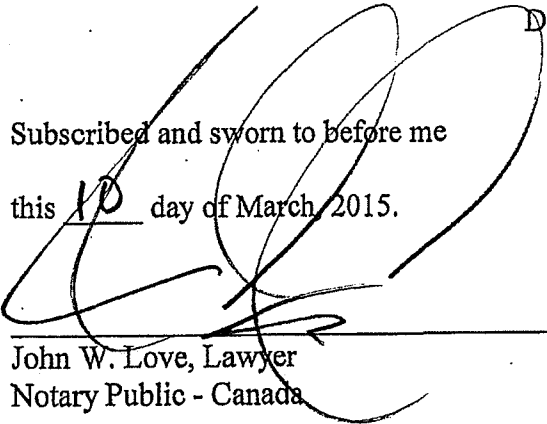
Dated this 10 day of March, 2015.

TRANSCANADA KEYSTONE PIPELINE, LP
by its agent, TC Oil Pipeline Operations, Inc.

By 
Joseph Brown
Director, Authorized Signatory

Subscribed and sworn to before me

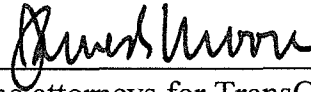
this 10 day of March, 2015.


John W. Love, Lawyer
Notary Public - Canada

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 Supplemental Responses to Cindy Myers' First Interrogatories and Request for Production of Documents, to the following:

Cindy Myers, R.N.
PO Box 104
Stuart, NE 68780
csmyers77@hotmail.com



One of the attorneys for TransCanada