

## **Accufacts Inc.**

“Clear Knowledge in the Over Information Age”

4643 192<sup>nd</sup> Dr. NE  
Redmond, WA 98074  
Ph (425) 836-4041  
Fax (425) 836-1982  
kuprewicz@comcast.net

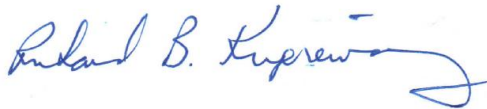
**April 7, 2015**

**To: South Dakota Public Utilities Commission**

**Re: Statement of Richard B. Kuprewicz, concerning the Keystone XL matter before the South Dakota Public Utilities Commission (“PUC”).**

Because of TransCanada’s unwillingness to provide adequate information during discovery, especially as it relates to the Keystone XL elevation profiles and related additional requested information that should be included with this request and because pre-filed direct testimony is required to be submitted prior to the close and completion of discovery, I am advising my clients that I cannot adequately provide a proper evaluation of TransCanada’s proposed oil spill responses plans or worst-case discharges that can be independently verified.

This simple requested information that is core to a liquid pipeline’s operation is usually a matter of public record in Canadian NEB pipeline filings that are made public. Failure to provide this information in this proceeding raises serious questions as to the ability of the PUC to also make any informed decisions on oil spill response without the same information being provided to the PUC. There are simple methods to provide such information without making them fully public, if it were deemed sensitive, such as simple confidentiality or nondisclosure agreements



Richard B. Kuprewicz  
President,  
Accufacts Inc

Accufacts Inc.