

Finding Number	NRG Response
The Project	
14	The updated information provided by Keystone for Finding Number 14 has been reviewed and results in no change to NRG's original (2009) testimony.
15	Updated information has been reviewed and results in no change to NRG's original testimony.
16	Updated information has been reviewed and results in no change to NRG's original testimony.
17	Updated information has been reviewed and results in no change to NRG's original testimony.
18	Updated information has been reviewed and results in no change to NRG's original testimony.
19	The updated information provided by Keystone for Finding Number 19 is outside the scope of NRG's 2009 review and testimony, and therefore results in no change to NRG's original testimony.
20	Updated information is outside the scope of NRG's original review and results in no change to our original testimony.
22	Updated information is outside the scope of NRG's original review and results in no change to our original testimony.
23	Updated information is outside the scope of NRG's original review and results in no change to our original testimony.
Demand for the Facility	
24	The updated information provided by Keystone for Finding Number 24 is outside of the scope of NRG's original (2009) review and testimony, and therefore results in no change to NRG's original testimony.
25	Updated information is outside the scope of NRG's original review and results in no change to our original testimony.
26	Updated information is outside the scope of NRG's original review and results in no change to our original testimony.
27	Updated information is outside the scope of NRG's original review and results in no change to our original testimony.
28	Updated information is outside the scope of NRG's original review and results in no change to our original testimony.
29	Updated information is outside the scope of NRG's original review and results in no change to our original testimony.
Environmental	
32	I reviewed the redline changes to Keystone's CMRP (dated April 2012) and compared those changes to NRG's original testimony from Ross Hargrove and Dr. James Arndt. My findings are summarized in Attachment 2. This table lists all CMRP sections with redline changes where NRG also provided recommendations in 2009, and provides my evaluation of Keystone's change with respect to NRG's 2009 testimony. None of the redline changes to Keystone's CMRP result in a change to NRG's original testimony.

33	Updated information has been reviewed and results in no change to NRG's original testimony.
41	I reviewed the additional site-specific crossing plans for the HDD crossings of Bad River and Bridger Creek, and reviewed NRG's original testimony. The addition of these two waterbodies as HDD crossings, and the supporting site-specific crossing drawings, result in no change to NRG's original testimony.
50	No change to original testimony.
54	No change to original testimony.
Design and Construction	
60	The updated information provided by Keystone for Finding Number 60 is outside of the scope of NRG's original (2009) review and testimony, and therefore results in no change to NRG's original testimony.
61	Updated information is outside the scope of NRG's original review and results in no change to our original testimony.
62	Updated information is outside the scope of NRG's original review and results in no change to our original testimony.
63	Updated information is outside the scope of NRG's original review and results in no change to our original testimony.
68	Updated information is outside the scope of NRG's original review and results in no change to our original testimony.
73	See response to Finding Number 32 above. I reviewed the redline changes to Keystone's CMRP (dated April 2012) and compared those changes to NRG's original testimony from Ross Hargrove and Dr. James Arndt. My findings are summarized in Attachment 2. This table lists all CMRP sections with redline changes where NRG also provided recommendations in 2009, and provides my evaluation of Keystone's change with respect to NRG's 2009 testimony. None of the redline changes to Keystone's CMRP result in a change to NRG's 2009 testimony.
80	NRG's original recommendation was that Keystone provide the final Construction/Reclamation Units and associated restoration and mitigation procedures and corresponding pipeline milepost references to the PUC prior to construction. Keystone's update indicates that Con/Rec Unit mapping in consultation with area NRCS offices has been completed and that the results are included with the Department of State's FSEIS in Appendix R. This update appears to satisfy NRG's original recommendation.
83	Refer to Finding Number 41. No change to NRG's original testimony.
Operation and Maintenance	
90	The updated information provided by Keystone for Finding Number 90 is outside of the scope of NRG's original (2009) review and testimony, and therefore results in no change to NRG's original testimony.
Socio-Economic Factors	
107	The updated information provided by Keystone for Finding Number 107 is outside of the scope of NRG's original (2009) review and testimony, and therefore results in no change to NRG's original testimony.