

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

**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 PIPELINE)
PROJECT)**

HP07-001

**SOUTH DAKOTA PUBLIC UTILITIES COMMISSION STAFF'S FIRST SET OF
INTERROGATORIES AND REQUEST FOR DOCUMENTS TO ALL PARTIES
WITH INTERVENER STATUS**

The Staff of the Public Utilities Commission ("Staff"), by and through its Staff Attorney, hereby submits the following Interrogatories to all Intervener parties.

Responses should be received by the Commission on or before October 19, 2007, in the event you wish to participate in the formal judicial-type hearing process. In the event your responses are not received on or before October 19, 2007, any testimony you attempt to offer at the formal judicial-type hearing will be subject to objection. Please answer all information requests in accordance with the instructions below:

INSTRUCTIONS

1. You are required to respond to this Data Request under oath or stipulate in writing that your responses may be treated exactly as if they were filed under oath.
2. You are required to respond to each request set forth below, regardless of whether the information is in your possession, or whether the information is in the possession of any of your agents, employees, experts, partners, associates, representatives and/or attorneys, and regardless of the source thereof. At the end of each response, please identify the person or persons most knowledgeable about such response and the person or persons responsible for the preparation of such response.

3. These Data Requests shall be deemed to be continuing. You are obligated to change, supplement, and correct all answers to the Data Requests to conform to available information, including such information as it first becomes available to you after the answers and production of documents hereto are filed and made, should additional information become known or should information supplied in the answers or documents prove to be incorrect or incomplete.

4. If you object to any part of a request, answer all parts of such requests to which you do not object, and separately set forth the basis for the objection as to each part to which you do object.

5. Responses shall be provided in either paper or electronic format. Paper responses may be delivered via regular U.S. Mail.

6. A verification or signature of the answering individual or counsel if the Intervener is a corporation is requested with the answers for this Data Request as an indication of the genuineness and completeness of the responses and documents provided.

DEFINITIONS

1. "Commission" refers to the South Dakota Public Utilities Commission.
2. "Data Request" includes any and all interrogatory, request for production of documents, information request or other document request.
3. "Identify" or "state the identity of" means:
 - (i) In the case of a person, to state the name; last known residence; and occupation and business position held.
 - (ii) In the case of a company, to state the name; if incorporated, the place of incorporation; the principal place of business; and the identity of the person(s) having knowledge of the matter with respect to which the company is named.

- (iii) In the case of a document, to state the identity of the person(s) who prepared it; the sender and recipient; the title or a description of the general nature of the subject matter; the date of preparation; the date and manner of distribution and publication; the location of each copy and the identity of the present custodian; and the identity of the person(s) who can identify it.
- (iv) In the case of an act or event, to state a complete description of the act or event; when it occurred; where it occurred; the identity of the person(s) performing said act (or omission); the identity of all persons who have knowledge, information or belief about the act; when the act, event or omission first became known; the circumstances; the manner such knowledge was first obtained; and the documents or other writings which memorialize the instance.

4. "Oral communications" shall mean any verbal conversation or other statement from one person to another, including but not limited to any interview, conference, meeting or telephone conversation.

5. "Person" or "Persons" shall mean any individual, association, partnership, corporation, firm, organization, or entity.

6. "Refer," "referring to," "relate" and "relating to" shall mean having a legal, factual or logical connection, relationship, correlation, or association with the subject matter of the request.

7. Words of gender shall be construed as including all genders, without limitation.

8. Words in the singular shall be construed to mean the plural or vice versa as appropriate.

INFORMATION REQUEST 1:

Please list the following personal information:

- a) Your full name
- b) Your full address
- c) Your telephone number
- d) Your e-mail address, if any
- e) Whether you have personally received any specific crude

oil pipeline training. If so, from where and when?

INFORMATION REQUEST 2:

Are you or will you be represented by an attorney? If an attorney will represent you, please state your attorney's name and contact information.

INFORMATION REQUEST 3:

Do you own land in the direct path of the pipeline? If so, please provide the legal description of such land.

INFORMATION REQUEST 4:

Will a pumping station be located on your property according to the most recent TransCanada location maps?

INFORMATION REQUEST 5:

The applicable applicant burden of proof statute reads as follows:

49-41B-22. Applicant's burden of proof. The applicant has the burden of proof to establish that:

- (1) The proposed facility will comply with all applicable laws and rules;*
- (2) The facility will not pose a threat of serious injury to the environment nor to the social and economic condition of inhabitants or expected inhabitants in the siting area;*
- (3) The facility will not substantially impair the health, safety or welfare of the inhabitants; and*
- (4) The facility will not unduly interfere with the orderly development of the region with due consideration having been given the views of governing bodies of affected local units of government.*

- a) Please specify particular aspect/s of the applicant's burden of proof you intend to personally testify to.
- b) Please specify particular aspect/s of the applicant's burden of proof you intend to call a witness to testify on.

INFORMATION REQUEST 6:

Do you intend to offer evidence regarding "terms, conditions or modifications of the construction, operation, or maintenance?" See SDCL 49-41B-24 and 49-41B-36. If so, please specify the same.

INFORMATION REQUEST 7:

Do you intend to offer evidence regarding the bond the Commission requires pursuant to SDCL 49-41B-38?

INFORMATION REQUEST 8:

Please list with specificity the witnesses (including yourself) you intend to call.
Please include, name, address, phone number, credentials and area of expertise.

INFORMATION REQUEST 9:

Do you intend to take depositions? If so, of whom?

INFORMATION REQUEST 10:

Do you intend to file written testimony? If so, whose testimony will you submit?

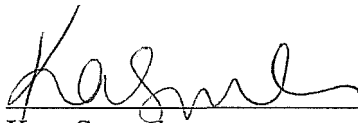
DOCUMENT REQUEST 1:

Do you intend to offer any documents as evidence in the case other than your own written testimony? If so, please specify and provide a copy.

DOCUMENT REQUEST 2:

Please, as an ongoing request, provide Commission Staff with a copy of all data, documentary or interrogatory requests you send any party or Intervener to this docket along with its complete answer to such request.

Dated at Pierre, South Dakota, this 19 day of September, 2007.



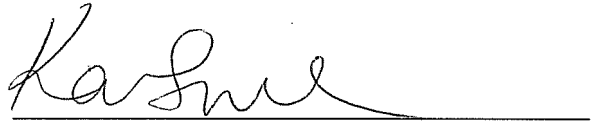
Kara Semmler
Staff Attorney
South Dakota Public Utilities Commission
500 East Capitol
Pierre, SD 57501
(605) 773-3201

CERTIFICATE OF SERVICE

I hereby certify that a copy of South Dakota Public Utilities Commission Staff's First Set of Interrogatories and Request for Documents to Interveners was served on the attached Intervener list by filing the same according to the Commission U.S. mail Service list.

See attached service list of all Interveners and method of service.

Sent this 19th day of September, 2007.

A handwritten signature in cursive script, appearing to read "Kara Semmler", is written over a horizontal line.

Kara Semmler
Staff Attorney
South Dakota Public Utilities Commission

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ENGINEERING
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CONNIE MUTH
PO BOX 845
HURON 57350-0845

YANKTON COUNTY AUDITOR
PAULA JONES
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YANKTON 57078-0137

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CLARK 57225-0294

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ALEXANDRIA 57311-0500

HUTCHINSON COUNTY AUDITOR
JEANIE SIMONSEN
140 EUCLID RM 128
OLIVET 57052-0128

KINGSBURY COUNTY AUDITOR
JENNIFER ALBRECHT
PO BOX 196
DESMET 57231-0196

MARSHALL COUNTY AUDITOR
JULIE HAGEN
PO BOX 130
BRITTON 57430-0130

Name	Street	City	State	Zip
Adeline Creviston	1607 John St.	Yankton,	SD	57078
Elmer Erickson	141 E. Park Street	Irene	SD	57037
Josh Kraft	PO Box 123	Britton	SD	57430
Kenneth Tuschen	25262 - 426th Ave	Alexandria	SD	57311
Kim Madsen	18852 - 415th Ave	Carpenter	SD	57322
Kirk Madsen	18852 - 415th Ave	Carpenter	SD	57322
Valerie Madsen	18852 - 415th Ave	Carpenter	SD	57322
Alan Aughenbaugh	21024 - 421st Ave	Iroquois	SD	57353
Alice Slate	609 Pearl	Yankton	SD	57078
Alvin Hofer	26589 - 432nd Ave	Bridgewater	SD	57319
Andrea Kilker	41650 SD Hwy 10	Britton	SD	57430
Angela Wermers	1108 Peninah	Yankton	SD	57078
Ann Beisch	203 W. College Ave	Howard	SD	57349
Ardella Gross	552 S. Main Street	Freeman	SD	57029
Arlene Marie Harper	43988 SD Hwy 46	Irene	SD	57037
Arlo Koerner	PO Box 182	Bridgewater	SD	57314
Bernard and Connie Wagner	2021 Ferdig	Yankton	SD	57078
Bernard V.Kayser	25636 - 421st Ave	Alexandria	SD	57311
Bernie Hunhoff	PO Box 175	Yankton	SD	57078
Betty Jean Fisher	110 - 10th Ave.	Britton	SD	57430
Brenda Schmidt on behalf of Kelly Yankton Ventures Limited Partnership	3205 W. Sencore Dr	Sioux Falls	SD	57107
Carl Moschell	25329 - 482nd Ave	Garretson	SD	57030
Carol Fischer	8273 Bonnie Oak Way	Citres Heights	CA	95610
Carol Hansen on behalf of Bethlehem Norsk Evangelical Lutheran Church	141 E. Park Street	Irene	SD	57037
Chris Hastings	41410 - 101st Street	Britton	SD	57430
Clark Moeckly	41648 SD Hwy 10	Britton	SD	57430
Curt Hohn	822 South Washington	Aberdeen	SD	57402
Dale Strasser for the City of Freeman	PO Box 428	Freeman	SD	57029
Darlene Hastings	41409 - 101st Street	Britton	SD	57430
Darrell L. Nelson	44023 - 306th Street	Yankton	SD	57078
Daryl Heckenlaible	40697 Chase Ct	Mitchell	SD	57301
David and Glenda Mensch	5601 W. Jeanne Dr	Sioux Falls	SD	57106
David C. Wade on behalf of BDM Rural Water System, Inc.	705 - 7th Street	Britton	SD	57430
David Ewald	900 Ferdig Ave	Yankton	SD	57078
De Ette Goss	10997 Minnesila Rd	Bell Fourche	SD	57717
Dean Farley	47418 - 301st Street	Alcester	SD	57001
Deborah Hausman	1701 John Street	Yankton	SD	57078
Delores and Raymond Lowe	2209 Zinnia Way	Golden	CO	80401
Delwin Hofer	40916 - 192nd Street	Carpenter	SD	57322
Dennis & Thelma Mentel	11189 W. Thunderbird Blvd	Sun City	AZ	85351
Dixie Conner	1100 E. 15th Street	Yankton	SD	57078
Dominick Driano, Jr. on behalf of Cimpl's LLC	PO Box 80	Yankton	SD	57078
Donald Fisher	PO Box 1022	Britton	SD	57430
Donald Jarrett	41996 - 106th St	Britton	SD	57430
Donnell Hanson	41354 - 120th Street	Claremont	SD	57432

Duane Hacecky	29840 - 439th Ave	Irene	SD	57037
Earl Keller	302 S. Alfalfa Street	Menno	SD	57045
Earla and Richard Strid	PO Box 213	DeSmet	SD	57231
Edward Goss	10997 Minnesila Rd	Bell Fourche	SD	57717
Edward Miller	PO Box 557	Salem	SD	57058
Edward Munkvold	43723 - 294th Street	Menno	SD	57045
Edward Novak	1120 First Street	Wagner	SD	57380
Edward Schmit	24015 - 454th Ave	Madison	SD	57042
Eileen Schmidt	205 S. Stewart Rd #166	Mission	TX	78572
Elta Zens	42668 - 243rd Street	Canova	SD	57321
Ferdinand J. Barrie	16140 - 411th Ave	Conde	SD	57434
Floyd Carson	41830 - 122nd Street	Langford	SD	57454
Francis Heer	41069 - 176th Street	Doland	SD	57436
Gary Cwach	30627 - 439th Ave	Yankton	SD	57078
Gary Roby	23378 - 434th Ave	Howard	SD	57349
Gene Cassels	1104 Birchwood Ln	Aberdeen	SD	57402
Genevieve Liberty	1640 Princeton Ave	St. Louis Park	MN	55416
Gladys Stromberg	PO Box 55	Newfolden	MN	56738
Grace Plath, Trustee	402 E. 3rd Street	Yankton	SD	57078
Harlan Latimer	1914 Peninah St	Yankton	SD	57078
Ila French	22943 US Hwy 81	Madison	SD	57042
J. James New Trust	3706 Staci Lane	Yankton	SD	57078
James Feller	4722 Amber Glen Ct.	Las Vegas	NV	89147
Janice Hofer	43405 - 258th Street	Bridgewater	SD	57319
Jean Burger	4308 Pletzer Blvd	Rootstown	OH	44272
Jeanette Schramm	1705 Pearl Street	Yankton	SD	57073
Jeffrey Vonk on behalf of South Dakota Department of Game, Fish & Parks	523 E. Capitol Ave	Pierre	SD	57501
Jeffrey W. Weldon on behalf of the City of Yankton	PO Box 176	Yankton	SD	57078
Jerauld and Elaine Glanzer	26936 - 432nd Ave.	Bridgewater	SD	57319
Jerry Burger	10644 - 417th Ave	Britton	SD	57430
Jerry Pollard for Yankton Ag Service, Inc.	114 Mulberry St	Yankton	SD	57078
Joanne Schramm	30091 US Hwy 81	Yankton	SD	57078
Joe Wartz	11796 - 414th Ave	Claremont	SD	57432
John Adolph Rahn, Jr.	PO Box 156	Yankton	SD	57078
John Sieh on behalf of Granary Rural Cultural Center	11 E. 4th Ave	Groton	SD	57445
Jonathan and Linda Dietrich	1702 John Street	Yankton	SD	57078
Judy Kaufman	28434 - 444th Ave	Mandan	SD	57043
Julie Ann Lenius	PO Box 581	Britton	SD	57430
Kaley Madsen	18852 - 415th Ave	Carpenter	SD	57322
Karen Edzards	2500 S. Elmwood Ave	Sioux Falls	SD	57105
Karen Hansen	2167 Indian Rd	Fort Scott	KS	66701
Kent Moeckly	PO Box 903	Britton	SD	57430
Kent Moeckly on behalf of Merl Moeckly CO.	PO Box 903	Britton	SD	57430
Kent Moeckly on behalf of MMP, Inc.	PO Box 903	Britton	SD	57430
Kim D. Alberty	1912 Princeton Land	West Fargo	ND	58078
Larry French	221 S. Egan	Madison	SD	57042

LaVia Merrick	117 W. Street Andrews	Sioux Falls	SD	57108
Lawrence Roster	24874 SD Hwy 25	Spencer	SD	57374
Leo Sibson	24586 - 411th Ave	Mitchell	SD	57301
Lillian Anderson	12189 - 415th Ave	Langford	SD	57454
Lillian Anderson, Dakotans Concerned with the TransCanada Pipeline	12189 - 415th Ave	Langford	SD	57454
Lloyd Huber	704 S. Horizon Ln	Sioux Falls	SD	57106
Lois Ablin	PO Box 701046	Tulsa	OK	74170
Lorene Pokorny	1308 E 8th	Yankton	SD	57078
LuAnn Dather	615 S Elm Ave	Parker	SD	57053
Margaret Heard	615 E. 5th	Yankton	SD	57078
Margaret Rahn	801 Dakota Street - Apt 29	Yankton	SD	57078
Marie Connell	2003 Bradley	Yankton	SD	57078
Marlin Herrboldt	43752 - 289th Street	Menno	SD	57045
Marlis Dodds	4300 Nichole Ct	Missoula	MT	59803
Mary Hastings	41415 - 101st Street	Britton	SD	57430
Mary Opsahl	PO Box 104	Carpenter	SD	57322
Maureen Friesen	27307 - 435th Ave	Freeman	SD	57029
Max Burger	10644 - 418th Ave	Britton	SD	57430
Mela DeJean	2604 Ella Ln	Yankton	SD	57078
Merrill Watters	131 Mt. Pleasant Rd	Porrstown	PA	19465
Michael Burger	10641 - 417th Ave	Britton	SD	57430
Michael Nelson	41552 - 122nd Street	Langford	SD	57454
Michael Sibson	23782 - 426th Ave	Howard	SD	57349
Myrtis and Wallace Hanson	42596 - 144th Street	Webster	SD	57274
Norman Hofer	43439 - 279th Street	Freeman	SD	57029
Norman Papendick	42850 - 252nd Street	Spencer	SD	57374
Ordell R. Munkvold on behalf of Munkvold Land and Cattle Co. Inc.	43723 - 294th Street	Menno	SD	57045
Oren Stahl	43539 - 282nd Street	Freeman	SD	57029
Oris Hove and Susan Hove	46973 298th Street	Beresford	SD	57004
Pamela Hofer	40916 - 192nd Street	Carpenter	SD	57322
Paul Decker	42906 Colony Road	Olivet	SD	57052
Paul Fishbach Chairman of Web Water Development Association, Inc.	PO Box 51	Aberdeen	SD	57402
Phyllis & Bill Tisher	PO Box 181	Amherst	SD	57421
Phyllis Peterson	183 Sundown Ln	Hamilton	AL	35570
Ramon Feller	3511 Christine Street	Salt Lake City	UT	84106
Raymond Anderson	12189 - 415th Ave	Langford	SD	57454
Raymond Wormke Trust Dan Tople, Trustee	3204 S. Lupine	Sioux Falls	SD	57110
Rhonda Hardina	PO Box 94	Britton	SD	57430
Richard Burghardt	23191 - 425th Ave	Fedora	SD	57337
Richard Hastings	41415 - 101st Street	Britton	SD	57430
Richard Schmit	23225 - 432nd Ave	Howard	SD	57349
Robert Farrar	PO Box 1029	Britton	SD	57430
Robert Hastings on behalf of Hastings Land & Cattle Inc.	10349 - 417th Ave	Britton	SD	57430
Robert Hofer	26589 - 432nd Ave	Bridgewater	SD	57319
Robert K. Sahr on behalf of East River Electric Power Co-op, Inc.	PO Box 227	Madison	SD	57042
Robert Klimisch on behalf of Yankton County	PO Box 58	Yankton	SD	57078

Robert Papendick	540 SE Crestview Street	Pullman	WA	99163
Robert Stieha as Trustee for the Gladys Stieha Trust	PO Box 44	Britton	SD	57430
Robert Stieha as Trustee for the Joyce Stieha Trust	PO Box 44	Britton	SD	57430
Rodrick Tobin & Reed Rasmussen of Web Water Development Association	PO Box 490	Aberdeen	SD	57402
Ron Schaeffer	43656 - 291st Street	Menno	SD	57045
Ronald Jenkins	1517 Ridge Lane	Mitchell	SD	57301
Ronald Opsahl	18935 - 415th Ave	Carpenter	SD	57322
Rory King for MMP Inc, Merl Moeckly Co., and Kent Moeckly	PO Box 970	Aberdeen	SD	57401
Rory King Representing MMP, Inc, and Merl Moeckly Co.	PO Box 970	Aberdeen	SD	57401
Ruby McAllister	1215 - 9th Street	Langford	ND	58249
Ryan Hastings	41415 - 101st Street	Britton	SD	57430
Sam Stahl	100 S. Relanto St	Freeman	SD	57029
Sarah Stahl	28078 - 435th Ave	Freeman	SD	57029
Scott A. Weber and Pamela K Weber	42884 - 258th Street	Emery	SD	57332
Scott Anderson	41384 - 122nd Street	Langford	SD	57454
SD Association of Towns and Townships	PO Box 28	Madison	SD	57042
Sharon Frank	1144 Hollybrook Dr.	Wayzata	MN	55391
Sharon List	803 W. 12th Street	Yankton	SD	57078
South Dakota Resources Coalition	117 W. Street Andrews	Sioux Falls	SD	57108
South Dakota Resources Coalition	928 - 8th Street	Brookings	SD	57006
Susan Sibson	23782 - 426th Ave	Howard	SD	57349
Susie Haas	1104 E. 14	Yankton	SD	57078
Teresa Hastings	41410 - 101st Street	Britton	SD	57430
Terrence Schramm	30091 US Hwy 81	Yankton	SD	57078
Thomas Johnston and Maxine Johnston	110 N. Pleasant St	Howard	SD	57349
Thomas Riddle	519 E. 15th	Mitchell	SD	57301
Timothy Hofer	4091E 192nd Street	Carpenter	SD	57322
Vicki Larsen	308 Pearl	Yankton	SD	57078
Viola Olson	12221 - 415Ave	Langford	SD	57754
William Klimisch	PO Box 708	Yankton	SD	57078