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Patricia Van Gerpen  
Executive Director  
Public Utilities Commission  
500 East Capitol Avenue  
Pierre, South Dakota 57501

**RE: TRANSCANADA KEYSTONE PIPELINE; DOCKET HP07-001**  
Our file: 5057

Dear Ms. Van Gerpen:

Pursuant to permit Condition #44, TransCanada Keystone Pipeline, LP (Keystone) herewith files the Integrity Management Plan for the Keystone Pipeline with the PUC. The document contains confidential and proprietary information. Therefore, Keystone requests that the IMP be accorded confidential treatment pursuant to ARSD 20:10:01:39 and specifically subsections (4) and (6).

Keystone requests confidentiality for

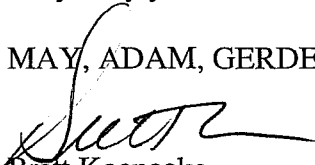
- (1) The Keystone Pipeline System Integrity Management Plan
- (2) For the operating life of the Pipeline
- (3) Brett Koenecke  
May Adam Gerdes and Thompson, LLP  
PO Box 160  
Pierre, SD 57501  
605-224-8803
- (4) SDCL 37-29, ARSD 20:10:01:39 et. seq. and SDCL 49-1-11(6)
- (5) The document does meet the trade secret standard in its entirety, as found in SDCL 37-29-1(4). It contains a number of factual determination and findings, and plans to respond to emergencies, which meet the definition. Extensive efforts and resources went into preparation of the IMP and its disclosure could be of

value to Keystone's competitors in the industry, and could commercially disadvantage Keystone. Furthermore, the contents of the IMP, should they be made public, could jeopardize Keystone's security and ability to respond to emergencies. The disclosure of the contents of the IMP would be improper and the document should be protected.

The IMP has been filed with PHMSA for review.

Very truly yours.

MAY, ADAM, GERDES & THOMPSON, LLP



Brett Koenecke

BK/sfh