

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

IN THE MATTER OF THE APPLICATION BY)	
TRANSCANADA KEYSTONE PIPELINE, LP)	DOCKET NUMBER HP09-001
FOR A PERMIT UNDER THE SOUTH)	
DAKOTA ENERGY CONVERSION AND)	MOTION IN SUPPORT OF
TRANSMISSION FACILITIES ACT TO)	MOTION FOR ADMISSION
CONSTRUCT THE KEYSTONE XL PROJECT)	PRO HAC VICE

COMES NOW Paul C. Blackburn, an attorney a member of the State Bar of Massachusetts and the Bar of the District of Columbia, whose admission to the Bar of the State of North Dakota is currently pending, and who has been accepted by the South Dakota Board of Bar Examiners to sit for the South Dakota Bar Examination in July 2009, and moves the Circuit Court for Hughes County, South Dakota, pursuant to SDCL §16-18-2 for admission pro hac vice in the above-entitled action. Movant states that:

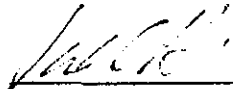
- (1) my address is P.O. Box 251, Vermillion, SD 57069;
- (2) I am associated with Caitlin F. Collier, an attorney residing in this state and a member in good standing of the State Bar of South Dakota, for the above captioned matter;
- (3) I am member in good standing in every bar in which I am a member;
- (4) I have not been the subject of disciplinary action by the bar or courts of the states in which I am a member of the bar or in any state during the preceding five years;
- (5) I have not been denied admission to the courts or any state or to any federal court during the preceding five years;

(6) I am familiar with the rules of the State Bar of South Dakota, and will at all times abide by and comply with the same so long as such trial or hearing is pending, and I have not withdrawn as counsel there from; and

(7) I am not in private practice but rather am employed on a full-time basis and appearing on behalf of Plains Justice, 100 First Street SW Cedar Rapids, Iowa 52404, a 501(c)(3) nonprofit public interest law center, which is representing Dakota Rural Action, a 501(c)(3) nonprofit corporation, without compensation in the above captioned matter, such that my appearance is part of my duties without additional compensation being paid for my appearance.

WHEREFORE, movant respectfully requests that he be admitted *pro hac vice* to appear in this matter.

Respectfully submitted this ^{15th} day of May, 2009.



Paul C. Blackburn
Plains Justice
P.O. Box 251
Vermillion, SD 57069
Phone: 605-675-9268
Fax: 866-484-2373
Email: pblackburn@plainsjustice.org