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IN THE MATTER OF THE APPLICATION :
BY TRANSCANADA KEYSTONE : KEYSTONE’S RESPONSE TO
PIPELINE, LP FOR A PERMIT UNDER THE : DAKOTA RURAL ACTION,
SOUTH DAKOTA ENERGY CONVERSION : ROSEBUD SIOUX TRIBE,
AND TRANSMISSION FACILITIES ACT TO : CHEYENNE RIVER SIOUX TRIBE,
CONSTRUCT THE KEYSTONE XL : AND INDIGENOUS
PROJECT, ENVIRONMENTAL NETWORK’S
JOINT MOTION FOR APPOINTMENT
OF SPECIAL MASTER

Several intervenors have asked the Commission to appoint a special master to resolve discovery disputes. For the following reasons, TransCanada Keystone Pipeline, LP ("Keystone") respectfully requests that the motion be denied.

2. The motion is untimely. Hearing is set to begin on May 5, 2015. A motions hearing is set for April 14, 2015. The Scheduling Order has been in place since December 17, 2014. The only purpose of filing such a motion at this late date is to delay the proceedings.

- Commission, which has set aside ample time for hearing on April 14, cannot timely resolve

outstanding discovery issues. Moreover, the Commission is familiar with the issues in the case, and should be the decisionmaker on discovery issues given its history with the case and its responsibility to conduct the hearing.

Keystone respectfully requests that the motion be denied.

Dated this 9th day of April, 2015.

WOODS, FULLER, SHULTZ & SMITH P.C.

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of April, 2015, I sent by United States first-class mail, postage prepaid, or e-mail transmission, a true and correct copy of Keystone's Response to Dakota Rural Action, Rosebud Sioux Tribe, Cheyenne River Sioux Tribe, and Indigenous Environmental Network's Joint Motion for Appointment of Special Master, to the following:

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