

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION)
OF TRANSCANADA KEYSTONE)
PIPELINE, LP FOR ROUTE APPROVAL)
OF THE KEYSTONE XL PIPELINE)
PROJECT PURSUANT TO THE MAJOR)
OIL PIPELINE SITING ACT,)
)
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)
)
_____)

APPLICATION NO. OP-003

**OBJECTION TO, AND MOTION IN
LIMINE TO EXCLUDE, TESTIMONY
AND EXHIBITS SUBMITTED BY
INTERVENING LANDOWNERS**

Applicant, TransCanada Keystone Pipeline, LP (“Keystone”), objects to and moves in limine for an order preventing the Intervening Landowners (“Landowners”) from offering certain pre-filed testimony and exhibits at the hearing for the above-captioned matter. Specifically, Keystone objects to and seeks to exclude testimony and other evidence on topics which the Hearing Officer has already ruled are excluded from this proceeding or testimony which is speculative or lacks foundation. The three existing orders which have appropriately defined the scope of this matter are the Order on Formal Intervention, the Order Entering Case Management Plan (“CMP”), and the Order Granting in Part, Denying in Part, Landowner Motions to Compel. The pre-filed evidence of the Landowners, however, contains pages upon pages of testimony and exhibits that attempt to address issues that the Commission has already deemed outside of the scope of this proceeding. As a result, this written objection and motion in limine is necessary.

**THE COMMISSION’S PRIOR ORDERS BASED
UPON MOPSA’S NARROW AUTHORITY TO REVIEW**

This proceeding is not typical civil litigation. This is an administrative proceeding before the Public Service Commission, which is based upon a narrow and precise statutory directive. Merely invoking the Rules of Evidence or attempting to raise issues outside the scope of the statutory directive does change this proceeding to a civil trial in a court of general jurisdiction. The Commission’s orders have properly defined the scope of this proceeding, and there is not a

wide range of possibly relevant topics to address because there is not a series of claims or affirmative defenses to prove.

The point of this proceeding, as the name of the authorizing statute suggests, is to determine only whether the proposed site of the major oil pipeline (Keystone XL) is in the public interest, which is measured by an evaluation of specifically enumerated factors in Neb. Rev. Stat. § 57-1407(4). Based upon the language of Major Oil Pipeline Siting Act (“MOPSA”), the Hearing Officer stated it succinctly when he noted that the Major Oil Pipeline Siting Act gives the Commission “*narrow* authority to review the route of a proposed major oil pipeline” in order to make a determination whether such route is in the public interest. (*See*, Commission’s Order on Formal Intervention, page 1, March 31, 2017) (emphasis added)

Thus far, the Commission’s review of Keystone’s Application has proceeded consistently with the Legislature’s direction in MOPSA to focus on siting. In fact, in its Order on a number of motions to compel, the Hearing Officer clearly set forth the relevancy boundaries of this case. This determination was made in the context of a discovery motion. In that regard, if the information is not reasonably calculated to the discovery of admissible evidence, then it must follow that the evidence is not admissible. The following topics have been determined to be outside the scope of and not relevant to this proceeding:

- The Hearing Officer held this is not a proceeding to explore pipeline safety including the risks or impacts of spills or leaks. (*See*, Commission’s Order, page 4-5, dated June 14, 2017; Neb. Rev. Stat. § 57-1407(4))
- The Hearing Officer held that this is not a proceeding to litigate the need and necessity of the Keystone XL pipeline; nor is it appropriate to consider current commercial status (e.g., existing shipper contracts, their terms, or lack thereof) of

the Keystone XL pipeline or the anticipated depth of the Canadian oil reserves. (See, Commission's Order, page 5-7, dated June 14, 2017; Neb. Rev. Stat. § 57-1403(3))

- The Hearing Officer made it clear that this is not a proceeding to address eminent domain laws, to impose easement terms, to evaluate negotiations between the Applicant or its land agents and Landowners, or to otherwise invade the province of the judicial branch of government (i.e. county courts) charged with administering eminent domain proceedings if they should occur. (See, Commission's Order, page 6, 7, June 14, 2017; see also, Neb. Rev. Stat. 76-701 et. seq. (establishing the judicial process for eminent domain))
- The Hearing Officer held that the events which occurred before the Siting Act was passed into law by the Legislature are irrelevant to the Commission's analysis and determination under the Siting Act. (See, Commission's Order, page 5, June 14, 2017)
- The Hearing Officer held that the identity or nationality of any individual or entity which may have an interest in Keystone is not relevant to the Commission's siting duties. (See, Commission's Order, page 9, dated June 14, 2017)
- Finally, Hearing Officer held that this is not a proceeding for either party to testify as to the definitions of certain terms in MOPSA or otherwise provide legal conclusions in their testimony because those questions are within the purview of the Commission. (See, Commission's Order, page 3-4, dated June 14, 2017)

THE PROPER SCOPE OF THIS PROCEEDING

The proper scope of this case, as evidenced by the Hearing Officer's prior holdings, mandates the conclusion that portions of the Landowners' supporting witnesses' pre-filed testimony and certain exhibits identified on the Landowners' exhibit list must be excluded. In fact, because the above holdings were reached under a liberal discovery and evidentiary standard (before the Landowners invoked the Nebraska Rules of Evidence¹), the Hearing Officer's orders set the *extreme outer-boundary* for what can be permitted during the course of the hearing.

MOPSA and the Commission's regulations direct the Commission to consider a well-defined list of factors set forth in Neb. Rev. Stat. §57-1407(4) in evaluating Keystone's Application, while excluding safety considerations including the risk or impact of spills or leaks. *See* Neb. Rev. Stat. §§ 57-1403(1) (may not regulate safety of the major oil pipelines and pipeline facilities); 57-1407 (providing list of factors to consider and stating the Commission may not consider "risks or impacts of spills or leaks from major oil pipeline"); 291 N.A.C. § 023.01 (regulations do not intend to regulate safety as to major oil pipelines and pipeline facilities); 291 N.A.C. § 023.07 (Commission shall not evaluate safety considerations). If a witness' testimony or a proffered exhibit does not make any of the enumerated relevant factors more or less likely to be true, then it should be excluded as both outside the scope of MOPSA and not relevant under Neb. Rev. Stat. §27-401 et. seq.

¹ In the opinion on June 14, 2017, in the context of deciding whether information was reasonably calculated to lead to the discovery of admissible evidence, the Hearing Officer noted that the "Commission is not bound by the strict rules of evidence and therefore the admissibility of evidence is typically liberally applied by the Commission." (*See*, Commission's Order, page 2, June 14, 2017)

THE LANDOWNERS' IMPROPER TESTIMONY AND EXHIBITS

The Landowners filed 67 pre-filed statements of direct testimony by landowners or persons with interests in property along the Preferred Route, and eight pre-filed statements of testimony by other fact and expert witnesses. The Landowners also submitted an exhibit list which identified 52 other, stand-alone exhibits that they may offer into evidence at the hearing on this matter. Each of these three categories of evidence go beyond the scope of this proceeding, and are addressed separately below.

A. TESTIMONY BY LANDOWNERS / INTERESTED INDIVIDUALS.²

The vast majority of the Landowners' pre-filed direct testimony discusses issues which have already been held to be beyond the scope of, and irrelevant to, this proceeding. The Landowners' testimony is also frequently repetitive, and from witnesses to witness, verbatim (or almost verbatim) answers are often found.

The Landowners' 67 pre-filed statements of direct testimony are attached to this motion as Exhibits 1-67, and, in each of the Exhibits, Keystone has identified the specific testimony which concerns issues that the Commission has already deemed outside of the scope of this proceeding. In particular, testimony regarding the safety of the pipeline is marked **blue**; testimony regarding eminent domain, eminent domain proceedings and easement terms or the negotiation thereof is marked **yellow**; testimony regarding the necessity or commercial viability of the Keystone XL pipeline is marked **green**; testimony regarding participation in the legislative process is marked **red**, testimony purporting to give a legal conclusion under the purview of the

² The only individuals whose testimonies are included in this category but who are not actual intervenors in this proceeding include: (a) Seth Davis (grandson and tenant of Landowner Intervenor Germaine Berry); (b) Rick Hammond (tenant of Landowner Intervenor Terri Harrington); and (c) Tim Sayer (son of and holder of power of attorney for Landowner Intervenor Edith Sayer).

Commission is marked pink, and testimony regarding the nationality of individuals or entities having an interest in Keystone is marked gray. For the same reasons discovery on these topics was not permitted, Keystone's motion should be granted and the Landowners' highlighted testimony should be excluded from the hearing. Testimony which should be excluded on the basis that it is speculative and/or lacks foundation is highlighted in purple.

Likewise, the Landowners' pre-filed direct testimonies contain a number of attachments which go beyond the scope of this proceeding. In particular, all of the Landowners' testimonies attach the following (exemplars are attached separately as Exhibits 68-70),³ which should not be allowed into evidence because they address issues that have already been properly excluded:

- 1) An Easement and Right-of-Way Agreement presented to the Landowner by Keystone. (Easement Negotiations & Terms)
- 2) An Advance Release of Damage Claims and Indemnity Agreement presented to the Landowner by Keystone. (Easement Negotiations & Terms)
- 3) A copy of a Complaint brought by Zurich American Insurance Company against three individuals for Negligence and Trespass based on allegations of negligent excavation of easement land in connection with *a release of mixed gasoline and jet fuel and diesel fuel from another company's pipeline*. (Easement Negotiations & Terms)
(Pipeline safety, including the risk or impact of leaks or spills)

The following Landowner-specific attachments should also be barred from the hearing for the same reasons:

³ The testimonies of Tim Sayer, Mia Bergman, Seth Davis, and Rick Hammond do not include the Advance Release of Damage Claims and Indemnity Agreement as an attachment.

1) William Dunavan and Susan Dunavan (Exhibits 19 and 20) :

- Attachment 8.2, Sections 1, 3, 5, 6, 7, 9, 10 (Easement Terms & Negotiations), Section 2 (Speculation/Foundation), Section 4 (Need/Necessity) and Sections 3, 11 (Nationality of individuals or entities with an interest in Keystone)
- Attachment 8.3 (Easement Terms & Negotiations)
- Attachment 8.6 (Speculation/Foundation)
- Attachment 8.7 (Legislative Process before MOPSA existed)
- Attachment 8.10 (Easement Terms & Negotiations)
- Attachment 8.11 (Easement Terms & Negotiations)
- Attachment 8.12 (Easement Terms & Negotiations)
- Attachments 8.13 & 8.14 (Questions of Eminent Domain & Easement Terms & Negotiations)
- Attachment 8.15 (Nationality of individuals or entities with an interest in Keystone)
- Attachment 8.16 (Pipeline safety, including the risk or impact of leaks or spills)

2) Richard Kilmurry and Bonny Kilmurry (Exhibits 29 and 30):

- Attachment 8.1 (Pipeline safety, including the risk or impact of leaks or spills) (Speculation/Foundation)
- Attachment 8.3 (Pipeline safety, including the risk or impact of leaks or spills) (Questions of Eminent Domain) (Speculation/Foundation) (Need/Necessity)
- Attachment 8.4 (Pipeline safety, including the risk or impact of leaks or spills) (Speculation/Foundation)
- Attachment 8.5 (Pipeline safety, including the risk or impact of leaks or spills)

- Attachment 8.6 (Pipeline safety, including the risk or impact of leaks or spills)
 - Attachment 8.8. (Pipeline safety, including the risk or impact of leaks or spills)
 - Attachment 8.9, pg. 2-4 (Pipeline safety, including the risk or impact of leaks or spills) (Easement Terms & Negotiations)
- 3) Byron Steskal and Diana Steskal (Exhibits 58 and 59):
- Attachment 8.6 (Pipeline safety, including the risk or impact of leaks or spills) (Speculation/Foundation)
 - Attachment 8.10 (Pipeline safety, including the risk or impact of leaks or spills)
 - Attachment 8.13 (Pipeline safety, including the risk or impact of leaks or spills)
 - Attachment 8.14(Pipeline safety, including the risk or impact of leaks or spills)
- 4) Art Tanderup and Helen Tanderup (Exhibits 60 and 61):
- Attachment 8.5 (Article relating to a *different company's* alleged reclamation practices)

Copies of these attachments accompany the corresponding written testimonies.

B. TESTIMONY BY OTHER FACT AND EXPERT WITNESSES.

The following testimony is not from landowners or other persons with interests in property along the Preferred Route. Rather, the testimony encompasses statements from non-intervenor fact and expert witnesses which the Landowners are attempting to offer in support of their position. This testimony, like that discussed above, should be excluded because it addresses irrelevant issues and topics, which the Hearing Officer has already determined are well-beyond the scope of this proceeding.

1) Lori Collins and JB Collins (Exhibits 71 and 72)

Lori Collins and JB Collins (husband and wife), are Texas landowners whose property was acquired by Keystone during construction of a portion of the Keystone XL pipeline in Texas. Neither Mrs. Collins nor Mr. Collins are from Nebraska, and they do not own property in Nebraska along the Keystone XL Preferred Route or any alternative. The Collins' testimony is focused solely upon their experiences with Keystone in connection with Keystone's acquisition and use of their land in Texas, and the easement terms to which the Collins' ultimately agreed. These matters (i.e. **Easement Terms & Negotiations**) are, and have been already determined to be, outside of the scope of this proceeding under MOPSA. Mr. and Mrs. Collins' testimonies should, therefore, be excluded in their entirety. Copies of Mr. and Mrs. Collins' testimonies, without attachments, are attached hereto as Exhibits 71 and 72.

2) Galen Heckenliable (Exhibit 73)

Galen Heckenliable is a South Dakota landowner who entered into an easement agreement with Keystone to allow the construction of the Keystone Mainline pipeline on his property. His testimony pertains solely to his easement agreement with Keystone, as well as a leak in the Keystone Mainline pipeline which occurred on his property in 2016. In particular, Mr. Heckenliable offers his opinion regarding the fairness of his easement terms, including the relationship between those terms and Keystone's response to the 2016 Keystone Mainline leak. Such matters (i.e. **Easement Terms & Negotiations**, **Pipeline safety, including the risk or impact of leaks or spills**) are entirely irrelevant and, as the Hearing Officer has held, outside of the Commission's review authority under MOPSA. Accordingly, Mr. Heckenliable's testimony should be excluded in its entirety. A copy of Mr. Heckenliable's testimony, without attachments, is attached as Exhibit 73.

3) Randy Thompson (Exhibit 74)

Randy Thompson is a Nebraska resident who had previous dealings with Keystone in connection with the Keystone XL pipeline. His mother owned property along an earlier proposed route for Keystone XL, and his testimony focuses on prior eminent domain proceedings and easement negotiations with Keystone. These issues (i.e. **Eminent Domain Proceedings, Easement Terms & Negotiations**) do not address pipeline siting, and are the exact same matters that have already been held to fall outside the scope of MOPSA. As a result, Mr. Thompson's testimony is prohibited from being considered and is irrelevant, and should be stricken in its entirety. A copy of Mr. Thompson's testimony, without attachments, is attached as Exhibit 74.

4) Lorne Stockman (Exhibit 75)

Lorne Stockman is a Senior Research Analyst at Oil Change International and his testimony seeks to offer expert opinions regarding the commercial viability of Canadian crude oil production and Keystone XL. This testimony (i.e. **Commercial Viability & Necessity**) is not relevant to the Major Oil Pipeline Siting process, and it should be excluded. The merits of the Keystone XL pipeline and whether it is needed or economically viable are well beyond the scope of MOSPA as has already been held in this proceeding. Mr. Stockman's testimony is therefore, irrelevant in its entirety, and that testimony should be excluded. A copy of Mr. Stockman's testimony, without attachments, is attached as Exhibit 75.

5) Shaun "Sean" Sweeney (Exhibit 76)

Shaun "Sean" Sweeney is the Director of the International Program for Labor, Climate & Environment at the City University of New York. As part of his expert testimony, Mr. Sweeney discusses a document titled "Pipe Dreams?" (Attachment No. 2) which, in part, relates to the cost of oil spills and the dangers of carbon emissions resulting from the oil transported through the

Keystone XL pipeline. He also attaches and provides testimony regarding a document titled “The Impact of Tar Sands Pipeline Spills on Employment and the Economy” (Attachment No. 4), which addresses the same topic. These issues (i.e. Pipeline safety, including the risk or impact of leaks or spills, Commercial Viability & Necessity) have already been determined to be beyond the scope of this proceeding, and MOPSA explicitly directs that the Commission may not consider “risks or impacts of spills or leaks from major oil pipeline.” *See e.g.* Neb. Rev. Stat. § 57-1407. Accordingly, Mr. Sweeney’s testimony on these matters, portions of his Attachment No. 2, and the entirety of his Attachment No. 4 are irrelevant and should be excluded from evidence. A marked copy of Mr. Sweeney’s testimony and Attachment No. 2 which identifies the portions that should be excluded on this basis, as well as Attachment No. 4 which should be excluded in its entirety, are attached to this motion as Exhibit 76.

6) Joseph Suntum (Exhibit 77)

Joseph Suntum is an eminent domain and condemnation attorney from Maryland, and his expert testimony addresses the sole issue of Keystone’s proposed Easement and Right of Way Agreements for the Keystone XL pipeline. As previously stated, the nature of easements generally and the terms of Keystone’s proposed Easement and Right of Way Agreements (i.e. Eminent Domain Proceedings, Easement Terms & Negotiations) do not address pipeline siting matters, and are outside the scope of this proceeding under MOPSA. Mr. Suntum’s testimony is, therefore, not admissible and should be excluded in its entirety. A copy of Mr. Suntum’s testimony, including attachments, is attached as Exhibit 77.

7) Michael O’Hara (Exhibit 78)

Michael O’Hara is a professor at the University of Nebraska Omaha within the College of Business Administration Finance, Banking, and Real Estate Department. His testimony contains

a report analyzing various aspects of Keystone's Application No. OP-003. Part of that report discusses the cost of pipeline leaks and spills. Additionally, the report contains discussions regarding the nature of Keystone's proposed easement agreement with landowners, including the economic consequences of Keystone's use of easements. These issues (i.e. Pipeline safety, including the risk or impact of leaks or spills, Eminent Domain Proceedings, Easement Terms & Negotiations) are completely outside of the scope of this proceeding under the Sitting Act and are irrelevant. Accordingly, all of Mr. O'Hara's testimony on those matters should be excluded. A copy of Mr. O'Hara's testimony, including attachments, is attached as Exhibit 78. Within that Exhibit, Keystone has marked the testimony and areas of Mr. O'Hara's report (Attachment No. 2) to which this issue pertains.

C. LANDOWNERS' EXHIBITS.

The Landowners' exhibit list identifies 52 stand-alone exhibits which they may offer into evidence at the hearing on this matter. However, a number of those exhibits have not been produced, adequately described as being publicly accessible or previously produced by Keystone, or otherwise made available. In addition, although the Landowners' exhibit list indicates testimony from Amy Schaffer may be offered (referenced on the Exhibit List as Exhibit 72), that written testimony has not been provided. These items must be excluded from the hearing on this basis alone because the CMP and Amended CMP expressly required that the Landowners file "testimony, exhibits, workpapers, and witness lists" by June 7th and serve a copy of those filings on all parties. (See, Commission Order, p. 3, 6, April 5, 2017; Commission's Order, p. 1, May 24, 2017) (emphasis added) A copy of the Landowners' Exhibit List is attached hereto as Exhibit 79, and the items listed on that Exhibit List which should be excluded on this basis include Trial Ex. Nos. 72, 87, 90, 95, 96, 116-120, and 123-128.

Perhaps more significant is the fact that a number of the stand-alone exhibits identified by the Landowners - like the Landowners' direct testimonies - relate to or, based on their descriptions, appear to relate to matters that are beyond the scope of this proceeding and irrelevant. Keystone has identified these exhibits on the Exhibit List attached hereto as Exhibit 79 in the same manner it marked the Landowners' direct testimonies above. Specifically, exhibits concerning the safety of the pipeline are marked **blue**; exhibits regarding eminent domain proceedings and easement terms or the negotiation thereof are marked **yellow**; exhibits regarding the necessity or commercial viability of the Keystone XL pipeline are marked **green**; and exhibits regarding participation in the legislative process are marked **red**. While Keystone reserves its right to object at the hearing to the Landowners' other, stand-alone, exhibits which have not yet been produced, those highlighted should undoubtedly be excluded.

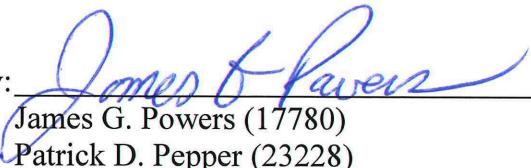
CONCLUSION

Testimony and exhibits regarding the issues outlined above have already been excluded from this proceeding by order of the Hearing Officer and are not relevant to the Commission's decision under the Major Oil Pipeline Siting Act. Accordingly, for that reason and those more fully explained herein, Keystone respectfully requests that the Commission grant its Motion in Limine and prohibit the Landowners from offering the identified testimony and exhibits at the hearing.

Dated July 24, 2017.

Respectfully Submitted,

TransCanada Keystone Pipeline, LP

By:  _____

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CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2017, that a copy of the foregoing was served by email to the individuals and entities listed below:

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