

**BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION**

In the Matter of the Application of ) Application No. OP-0003  
TransCanada Keystone Pipeline, LP, for )  
route approval of the Keystone XL Pipeline )  
Project pursuant to the Major Oil Pipeline )  
Siting Act )

**MOTION TO AUTHORIZE DIRECT ORAL TESTIMONY**

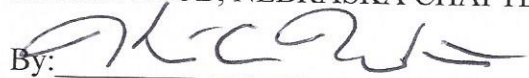
Bold Alliance (Bold) and Sierra Club, Nebraska Chapter (Sierra Club) by and through their attorney of record, Kenneth C. Winston, hereby jointly Move to Authorize Oral Testimony on Direct for the following reasons:

1. This proceeding is being conducted pursuant to the Nebraska Rules of Evidence, which contemplate oral direct testimony.
2. This would be a more efficient use of resources, reducing the necessity of attempts to introduce evidence through cross-examination.
3. This is a matter of great public interest, as defined by the Nebraska Supreme Court, and direct oral testimony increases the ability of the public to understand the nature of the proceeding,
4. Prohibiting direct oral testimony violates the intent of the Major Oil Pipeline Siting Act which makes numerous references to public involvement and public interest.
5. Conversely, there is nothing in the Major Oil Pipeline Siting Act, the legislative history or the regulations adopted pursuant to the act that authorizes the Commission to prohibit direct oral testimony in this proceeding.
6. Direct oral testimony would provide greater clarity and reduce of confusion of issues for the Commission and all parties.

**CERTIFICATE OF SERVICE**

Pursuant to 291 Neb. Admin Code § 015.0 (b), and the hearing officer's ruling on service, the above Motion was served upon all parties or their respective attorneys of record using the service list provided by the Commission electronically on this 5<sup>th</sup> August 2017.

BOLD ALLIANCE  
SIERRA CLUB, NEBRASKA CHAPTER

By: 

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