

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION) APPLICATION NO. OP-0003
OF TRANSCANADA KEYSTONE)
PIPELINE, LP FOR ROUTE APPROVAL OF)
THE KEYSTONE XL PIPELINE PROJECT)
PURSUANT TO THE MAJOR OIL)
PIPELINE SITING ACT)
_____)

**ECONOMIC INTERVENORS' RESPONSE TO MOTION FOR EXTENSION OF TIME
TO SUBMIT EVIDENCE**

The Midwest Regional Office of the Laborers International Union of North America, International Brotherhood of Electrical Workers Local Union No. 265, and the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada (hereafter collectively referred to as "Economic Intervenors"), responds to the formal intervenors' Motion for Extension of Time to Submit Evidence, filed on May 19, 2017, which requests to extend their deadline to provide testimony, exhibits, work papers, and witness lists from May 30, 2017 to June 7, 2017 as follows:

1. Economic Intervenors join in the request to extend the deadline to provide testimony, exhibits, work papers and witness lists from May 30, 2017 to June 7, 2017;
2. Economic Intervenors maintain that the filing deadline should be consistent and applicable to all intervenors and not merely the moving parties. All intervenors whether classified as Landowners, Natural Resources, Cultural, or Economic should be treated equally for procedural matters. Extending the deadline for filing of all intervenor testimony will ensure that all intervenors have the same amount of time between filing direct and rebuttal testimony.
3. Economic Intervenors do not oppose Applicant's request that the remaining deadlines be adjusted as follows:

- a. Keystone is to serve discovery on intervenors on or before June 19, 2017.
- b. Intervenor's responses to discovery be no later than July 3, 2017.
- c. Keystone to file motions to compel no later than July 7, 2017.
- d. Keystone to file rebuttal testimony and exhibits on or before July 17, 2017.

4. The remaining deadlines set forth in the Commission's scheduling order should remain the same.

5. Significantly, these minor modifications to the scheduling order do not prejudice any party, nor do they cause any delay in the Commission's final resolution of this matter.

ECONOMIC INTERVENORS

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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2017, that a copy of the foregoing was served by via email to the individuals and entities listed below:

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