

Before the Nebraska Public Service Commission

In the Matter of the Application

of

**TransCanada Keystone Pipeline LP
For Route Approval of Keystone XL
Pipeline Project, Pursuant to *MOPSA***

Intervenors:

**Susan Dunavan and William Dunavan,
Bartels Farms, Inc.
Johnnie Bialas and Maxine Bialas,
Bonnie Brauer,
James Carlson and Christine Carlson,
Timothy Choat, Gary Choat Farms LLC,
and Shirley Choat Farms, LLC,
CRC, Inc.,
Daniel A. Graves and Joyce K. Graves,
Patricia A. Grosserode a/k/a Patricia A.
Knust,
Terri Harrington,
Donald C. Loseke and Wanda G. Loseke,
Arla Naber and Bryce Naber,
Mary Jane Nyberg,
Kenneth Prosocki and Karen Prosocki,
Edythe Sayer,
Dan Shotkoski and Clifford Shotkoski,
Leonard Skoglund and Joyce Skoglund,
John F. Small and Ginette M. Small,
Deborah Ann Stieren and Mary Lou
Robak,
Jim Tarnick,
Terry J. Van Housen and Rebecca Lynn
Van Housen,
Donald D. Widga,**

**Byron Terry "Stix" Steskal and Diana
Steskal,
Allpress Brothers, LLC,
Germaine G. Berry,
Karen G. Berry,**

**Application No: OP-003
(Filed by Applicant on 2/16/17)**

**Landowner Intervenors'
Motion for Reconsideration**

&

Request for Oral Argument

**Cheri G. Blocher and Michael J. Blocher,
L.A. Breiner and Sandra K. Breiner,
Jerry Carpenter and Charlayne Carpenter,
CHP 4 Farms, LLC,
Larry D. Cleary,
Jeanne Crumly and Ronald C. Crumly,
Ken Dittrich,
Lloyd Z. Hipke and Vencille M. Hipke.
R. Wynn Hipke and Jill Hipke,
Richard Kilmurry and Bonnie Kilmurry,
Rosemary Kilmurry,
Beverly Krutz and Robert Krutz,
LJM Farm, LLC,
Carol Manganaro,
Frankie Maughan and Sandra Maughan,
Beverly Miller and Earl Miller,
Edna Miller and Glen Miller,
Milliron Ranch, LLC,**

**Frank C. Morrison and Lynn H. Morrison,
Larry D. Mudloff, J.D. Mudloff, and Lori
Mudloff,
Constance Myers a/k/a Constance Ramold,
Nicholas Family Limited Partnership,
Ann A. Pongratz and Richard J. Pongratz,
Donald Rech,
Schultz Brothers Farms, Inc.,
Connie Smith and Verdon Smith,
Joshua R. Stelling,
Richard Stelling and Darlene Stelling,
Todd Stelling and Lisa Stelling,
Arthur R. Tanderup and Helen J.
Tanderup,
TMAG Ranch, LLC,
Tree Corners Farm, LLC,
Dave Troester and Sharyn Troester,
and
Gregory Walmer and Joanne Walmer,**

Intervenors,

Motion to Reconsider

1. Landowner Intervenors' respectfully request the Commission reconsider its November 20, 2017 Order, modify and clarify that Order by affirmatively expressing its unanimous denial of Applicant TransCanada's February 2017 Application for approval of its "Preferred Route", the only Route it requested be approved in its Application, and the only Route for which prerequisite statutory study has been conducted.

2. The Commission is requested to recognize the limitations on its power to act on the Application in view of TransCanada's Application's scope, and the absence of evidence that prerequisite elements of study or submission were made on any route other than the "Preferred Route". Further, TransCanada's February 2017 Application is, by its terms, limited to a request for approval of only the "Preferred Route".

3. Landowner Intervenors request that the Commission do so in accord with the law.

Request for Oral Argument

Landowner Intervenors' respectfully request Oral Argument before the Commission pursuant to 291 Neb Admin Code § 1 021.02A. Under this Rule, Oral Argument is mandatory when requested.

November 25, 2017.

Susan Dunavan, et al., Domina Group
Intervenors,

By: David A. Domina Brian E. Jorde

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Certificate of Service

Pursuant to 291 *Neb Admin Code* § 015.01(b), a copy of the foregoing is served upon all Interveners of record to this proceeding or their attorneys of record as follows:

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