



about how TransCanada manages and operates its pipelines. The manual is maintained as confidential by TransCanada. It has substantial commercial value and would place Keystone at a competitive disadvantage if publicly disclosed and made available to competitors.

4. The SCADA specifications for the Keystone and Keystone XL Pipelines is a highly sensitive and proprietary document developed by TransCanada's engineering personnel at a substantial time and cost. It is maintained as a confidential document. It has substantial commercial value and would place Keystone at a competitive disadvantage if publicly disclosed and made available to competitors.

5. TransCanada's Material Grade Selection Guiding Principle is one of TransCanada's engineering standards. These standards are proprietary. They are developed by TransCanada based on thousands of hours of engineering work and experience. They are maintained by TransCanada as confidential. They are not disclosed to competitors. They have substantial commercial value and would place Keystone at a competitive disadvantage if publicly disclosed and made available to competitors.

6. TransCanada's Underground Coating Directive is one of TransCanada's engineering standards and is confidential for the same reasons addressed in paragraph 5.

7. TransCanada's Issued For Construction drawings provide construction compliance direction on a site-specific basis for the pipeline. They are the result of thousands of hours of engineering, surveys, and design, at a cost of hundreds millions of dollars. TransCanada would be substantially injured if they were publicly disclosed and made available to competitors. They also contain locational information regarding sensitive biological and cultural resources areas. This information also should not be made publicly available for the

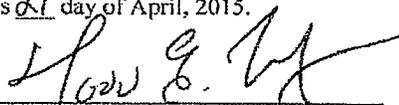
reasons set forth in the accompanying response to the motion to lift the protective order in this case.

Dated this 27 day of April, 2015.

  
James P. White

Subscribed and sworn to before me

this 27 day of April, 2015.

  
Notary Public – County of Prince William  
My commission expires: 02/28/18

**TODD ETHAN MCCASLIN**  
NOTARY PUBLIC  
COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES FEB. 28, 2018  
COMMISSION # 7185887

**CERTIFICATE OF SERVICE**

I hereby certify that on the 27<sup>th</sup> day of April, 2015, I sent by United States first-class mail, postage prepaid, or e-mail transmission, a true and correct copy of Affidavit of James P. White Regarding Confidential Documents, to the following:

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