

**March 17, 2016**

**IOWA UTILITIES BOARD**

**STATE OF IOWA  
DEPARTMENT OF COMMERCE  
IOWA UTILITIES BOARD**

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**IN RE:**

**DOCKET NO. HLP-2014-0001**

**DAKOTA ACCESS, LLC**

**MOTION FOR CONFIDENTIAL  
TREATMENT**

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Pursuant to the Board's March 10, 2016 Order in the above-captioned matter, Dakota Access is required to file, among other documents: (1) a copy of the unconditional and irrevocable guarantees of the parent companies of Dakota Access for remediation of damages from a leak or spill (the "Parental Guarantees"); and (2) a copy of a general liability policy in the amount of at least \$25,000,000 (the "Insurance Policy"). One of the Guaranty documents was initially filed in confidential form missing two pages. Dakota Access is currently filing a corrected version. As demonstrated by the Affidavit of Joey Mahmoud attached hereto, the Insurance Policy and Parental Guarantees contain confidential, protectable business information of Dakota Access. Accordingly, Dakota Access is filing the corrected Parental Guaranty herewith as a Confidential Attachment, and respectfully requests that the Board grant permanent confidential status to the Insurance Policy and Parental Guarantees, including the substituted Guaranty document.

Respectfully submitted this 17<sup>th</sup> day of March, 2016.

By: /s/ Bret A. Dublinske

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ATTORNEYS FOR DAKOTA ACCESS, LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 16th day of March, 2016, he had the foregoing document electronically filed with the Iowa Utilities Board using the EFS system which will send notification of such filing (electronically) to the appropriate persons.

/s/ Bret A. Dublinske  
BRET A. DUBLINSKE