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September 16, 2020

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**

**RE: Application of Aqua Pennsylvania Wastewater, Inc. Pursuant to Sections 1102, 1329 and 507 of the Public Utility Code for Approval of its Acquisition of the Wastewater System Assets of the Delaware County Regional Water Quality Control Authority  
Docket No. A-2019-3015173**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Answer of the County of Delaware to the Petition for Protective Order of Aqua Pennsylvania Wastewater, in the above-referenced proceeding.

As shown by the attached Certificate of Service and per the Commission's March 20, 2020, Emergency Order, all parties to this proceeding are being duly served via email only due to the current COVID-19 pandemic. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this document upon request.

Sincerely,

McNEES WALLACE & NURICK LLC

By 

Adeolu A. Bakare

AAB/ams

Enclosure

c: Honorable Angela T. Jones  
Certificate of Service

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HARRISBURG, PA • LANCASTER, PA • SCRANTON, PA • STATE COLLEGE, PA • COLUMBUS, OH • WASHINGTON, DC

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Aqua Pennsylvania	:	
Wastewater, Inc. pursuant to Sections 507,	:	
1102 and 1329 of the Public Utility Code	:	Docket No. A-2019-3015173
for, inter alia, approval of the acquisition of	:	
the wastewater system assets of the	:	
Delaware County Regional Water Quality	:	
Control Authority:	:	

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**ANSWER OF THE COUNTY OF DELAWARE TO THE PETITION FOR  
PROTECTIVE ORDER OF AQUA PENNSYLVANIA WASTEWATER**

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NOW COMES the County of Delaware, Pennsylvania (the “County”), by and through counsel, pursuant to 52 Pa. Code § 5.61 and the Prehearing Conference Order No. 2 issued by Presiding Administrative Law Judge (“ALJ”) Angela T. Jones on September 4, 2020,<sup>1</sup> who files this Answer to the Petition for Protective Order of Aqua Pennsylvania Wastewater (“Aqua”). In support thereof, the County submits the following.

1. On June 11, 2020, Aqua provided the parties of record with a draft of a Protective Order to govern the exchange of confidential and proprietary information in this proceeding, which is usually classified as Confidential or Highly Confidential Protected Materials. Thereafter, the parties discussed and proposed edits to the draft Protective Order.

2. On August 12, 2020, the County provided Aqua and the parties of record with comments to the draft Protective Order, including requesting that Aqua furnish Highly Confidential material directly to outside counsel and outside experts.

3. On August 31, 2020, Aqua filed the Petition for Protective Order.

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<sup>1</sup> In Prehearing Conference Order No. 2, the Presiding ALJ established that Answers to the Petition for Protective Order are due on or before September 18, 2020.

4. During the September 2, 2020 prehearing conference, counsel for the County objected to the Petition for Protective Order.

5. Aqua's proposed protective order includes a provision that would allow Highly Confidential Protected Material to be made available to counsel for the Bureau of Investigation & Enforcement ("I&E"), the Office of Consumer Advocate ("OCA"), and the Office of Small Business Advocate ("OSBA") as well as the experts of I&E, OCA, and OSBA that qualify as Reviewing Representatives under the proposed protective order. The proposed protective order does not make Highly Confidential Protected Material available to other parties in that same manner. As a result, the County's counsel and expert witnesses would not be allowed to receive Highly Confidential Protected Material in an electronic or stored format that would enable the County to view such material at its convenience. Instead, the proposed protective order requires:

"HIGHLY CONFIDENTIAL PROTECTED MATERIAL SHALL be produced remotely, via online video conference applications, solely for inspection by counsel of record for other parties. If the inspecting lawyer desires copies of such material, or desires to disclose its contents to persons other than counsel of record, including Reviewing Representatives, she or he shall submit a written request to the producing party's counsel. If the requesting and producing parties are unable to reach agreement with respect to such a request, they may submit the issue to the presiding Administrative Law Judge. In the meantime, the information shall be provided only to counsel of record and to I&E, OCA and OSBA and their experts as set forth above.

Proposed Protective Order, ¶ 5.

6. On multiple occasions, the County expressed its concerns to Aqua regarding the restrictions in Paragraph 5 of the proposed Protective Order that limit and impair the County's

right to view Highly Confidential Protected Material. However, Aqua did not articulate to the County any rational or valid basis for restricting the ease of access by which outside counsel to the County could view Highly Confidential Protected Material. Instead, Aqua finds that the County should only be able to review Highly Confidential Protected Material through an online videoconference virtual platform and then submit a follow-up written request for copies of documents as needed. Such a review process is a roadblock without a reason, impairs and infringes on the County's discovery rights, and could unnecessarily lead to more litigation and require the Presiding ALJ's intervention to resolve a dispute regarding the viewing and access of certain discovery materials.

7. As the incorporating municipality of DELCORA, the County has a uniquely significant interest in the outcome of this proceeding. Similar to I&E, OSBA, and OCA, the County is a public body that seeks to protect the public interest and its constituents – the citizens and ratepayers of the County. Unlike other cases and rate proceedings before the Commission wherein certain less active intervenors may agree to more limited discovery rights because their interest in the proceeding is more tangential, the County is highly active in this proceeding and possesses a substantial interest in the outcome of this proceeding.

8. The County further submits that reasons of administrative efficiency warrant allowing outside counsel and outside expert witnesses for the County to receive and view Highly Confidential Protected Material directly. Even after accounting for the 60-day extension granted by the Chief Administrative Law Judge, this proceeding remains subject to a fixed schedule with approximately 6 weeks between the September 29 deadline for Other Party Direct Testimony and evidentiary hearings on November 9, 2020. *See Application of Aqua PA et al.*, "Prehearing Conference Order No. 2," at pp. 9-10, Docket No. A-2019-3015173 (Sep. 4, 2020)]. The Presiding

ALJ has already granted modified and accelerated discovery deadlines in light of the fixed schedule in this proceeding. To ensure the County can develop a comprehensive record for the Commission's consideration, the County submits that Highly Confidential Protected Material should be directly served upon outside counsel for distribution to any outside expert witnesses that have executed the Appendix A to the Protective Order.

9. The County further notes that any objection to the request on grounds that no party has labeled any material as Highly Confidential to date should be given no weight. Despite Aqua's pronouncements to the contrary, discovery remains active in this proceeding, with approximately 12 sets of discovery collectively being propounded by the County, Kimberly Clark Corporation, Edgemont Township, Southwest Delaware County Municipal Authority (SWDCMA), Upland Borough, and Trainer Borough since the prehearing conference. Just as Aqua saw fit to include provisions to protect Highly Confidential information despite having not labeled any information as such to date, the County desires to proactively ensure its representatives have reasonable access to such information before the proverbial fat hits the fire.

10. In light of the foregoing, the County proposes the following revisions to Paragraph 5 of the Proposed Protective Order. Additional language is noted in underline with adjustments made using the strikethrough feature.

5. Information deemed as "HIGHLY CONFIDENTIAL PROTECTED MATERIAL" shall be made available to counsel for I&E, OCA, ~~and OSBA~~, and the County. Counsel for I&E, OCA, ~~and OSBA~~, and the County may make such information available to their experts who are designated and qualified as Reviewing Representatives. HIGHLY CONFIDENTIAL PROTECTED MATERIAL SHALL be produced remotely,

via online video conference applications, solely for inspection by counsel of record for other parties.

The procedures proposed by the County are reasonable and consistent with a Protective Order approved in a prior proceeding at PUC Docket No. A-2016-2575829 (“Laurel Pipeline Protective Order”), which also involved a voluminous evidentiary record. *See* Attachment A at ¶ 6.


Similar to the procedures set forth in the Laurel Pipeline Protective Order, the County proposes that Highly Confidential Material will be provided solely to the outside counsel and outside experts. The County consents to seek permission from the producing party prior to distributing any Highly Confidential Material to County employees.

11. In light of the foregoing, the County requests the Presiding ALJ to grant relief consistent with this Answer and modify the Proposed Protective Order to enable outside counsel and outside expert witnesses for the County that have executed the Appendix A to the Protective Order to receive and view Highly Confidential Protected Material directly.

**WHEREFORE**, the County of Delaware, Pennsylvania respectfully requests the Presiding Administrative Law Judge to grant relief as requested in this Answer and modify Paragraph 5 in the Proposed Protective Order as set forth herein.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to the County of Delaware,  
Pennsylvania

Dated: September 16, 2020

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Laurel Pipe Line Company,	:	
L.P. for All Necessary Authority, Approvals,	:	
and Certificates of Public Convenience To	:	Docket No. A-2016-2575829
Change the Direction of Petroleum Products	:	
Transportation Service to Delivery Points West	:	
of Eldorado, Pennsylvania	:	
	:	
Laurel Pipe Line Company, L.P. - Pipeline	:	
Capacity Agreement with Buckeye Pipe Line	:	Docket No. G-2017-2587567
Company, L.P.	:	
	:	

**PROTECTIVE ORDER**

Upon consideration of the Motion for a Protective Order that was filed by Laurel Pipe Line Company, L.P. on April 25, 2017;

**IT IS ORDERED THAT:**

1. The Motion is hereby granted with respect to all materials and information identified in Paragraphs 2 – 3 below.

2. The information subject to this Protective Order is all correspondence, documents, data, information, studies, methodologies and other materials, furnished in this proceeding, that are reasonably believed by the producing party to be of a proprietary or confidential nature and that are so designated by being marked “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL PROTECTED MATERIAL.” Such materials will be referred to below as “Proprietary Information.” When a statement or exhibit is identified for the record, the portions thereof that constitute Proprietary Information shall be designated as such for the record.

3. This Protective Order applies to the following categories of materials: (a) the parties may designate as “CONFIDENTIAL” those materials that customarily are treated by that



party as sensitive or proprietary, that are not available to the public, and that, if disclosed freely, would subject that party or its clients to risk of competitive disadvantage or other business injury; (b) the parties may designate as “HIGHLY CONFIDENTIAL PROTECTED MATERIAL” those materials that are of such a commercially sensitive nature or of such a private, personal nature that the producing party is able to justify a heightened level of confidential protection with respect to those materials; moreover, information subject to the restrictions of 49 U.S.C.A. App. Section 15(13) will be designated as “HIGHLY CONFIDENTIAL PROTECTED MATERIAL.” Given the limited distribution afforded to “HIGHLY CONFIDENTIAL PROTECTED MATERIAL” under the terms of this Protective Order, the parties shall endeavor to limit their designation of information as HIGHLY CONFIDENTIAL PROTECTED MATERIAL. The parties shall also redact or take other steps reasonably necessary to eliminate from any discovery responses the names, addresses or any other information that could reveal the identity of shippers or customers, whose actual names shall be replaced by a letter or numerical designation.

4. Proprietary Information shall be made available to counsel for a party, subject to the terms of this Protective Order. Such counsel shall use or disclose the Proprietary Information only for purposes of preparing or presenting evidence, cross examination, argument, or settlement in this proceeding. No person who may be entitled to receive, or who is afforded access to any CONFIDENTIAL or HIGHLY CONFIDENTIAL PROTECTED MATERIAL shall use or disclose such information for purposes of business or competition, or any purpose other than the preparation for and conduct of this proceeding or any administrative or judicial review thereof. To the extent required for participation in this proceeding, counsel for a party

may afford access to Proprietary Information subject to the conditions set forth in this Protective Order.

5. Information deemed as “CONFIDENTIAL” shall be made available to a “Reviewing Representative” who is a person that has signed a Non-Disclosure Certificate attached as Appendix A, and who is:

- (i) An attorney who has entered an appearance in this proceeding for a party or who serves as the General Counsel or Assistant General Counsel for a party;
- (ii) Attorneys, paralegals, and other employees associated for purposes of this case with an attorney described in Paragraph 5(i);
- (iii) An expert or an employee of an expert retained by a party for the purpose of advising, preparing for or testifying in this proceeding; or
- (iv) Employees or other representatives of a party appearing in this proceeding with significant responsibility for this docket.

With regard to Bureau of Investigation and Enforcement (“I&E”), information deemed as “CONFIDENTIAL” shall be made available to I&E Prosecutors subject to the terms of this Protective Order. The I&E Prosecutors shall use or disclose the CONFIDENTIAL information only for purposes of preparing or presenting evidence, cross examination, argument, or settlement in this proceeding. To the extent required for participation in this proceeding, the I&E Prosecutors may afford access to CONFIDENTIAL information only to I&E’s experts, without the need for the execution of a Non-Disclosure Certificate, who are full-time employees of the Commission and bound by all the provisions of this Order by virtue of the I&E Prosecutors’ execution of a Non-Disclosure Certificate.

6. Information deemed as “HIGHLY CONFIDENTIAL PROTECTED MATERIAL”, may be provided to a “Reviewing Representative” who has signed a Non-Disclosure Certificate attached as Appendix A and who is:

- (i) An attorney for a statutory advocate pursuant to 52 Pa. Code §1.8, or an outside attorney who has entered an appearance in this proceeding for a party;
- (ii) An attorney, paralegal, or other employee associated for purposes of this case with an attorney described in Paragraph 6(i);
- (iii) An outside expert or an employee of an outside expert retained by a party for the purposes of advising, preparing for or testifying in this proceeding; or
- (iv) A person designated as a Reviewing Representative for purposes of HIGHLY CONFIDENTIAL PROTECTED MATERIAL, provided that a Reviewing Representative for purposes of HIGHLY CONFIDENTIAL PROTECTED MATERIAL shall not include an officer, director, stockholder, partner, or owner of any competitor of the parties, or of any shipper, customer or consignee on Laurel, or of any affiliate of any competitor of the parties, or shipper, customer or consignee on Laurel, or any employee of any such entity, if that person's duties involve marketing or pricing responsibilities, or any responsibility for marketing or pricing with respect to the transportation or commodity sales and/or exchanges of refined petroleum products.

With regard to I&E, information deemed as “HIGHLY CONFIDENTIAL PROTECTED MATERIAL” shall be made available to the I&E Prosecutors subject to the terms of this Protective Order. The I&E Prosecutors shall use or disclose the HIGHLY CONFIDENTIAL PROTECTED MATERIAL only for purposes of preparing or presenting evidence, cross examination, argument, or settlement in this proceeding. To the extent required for participation in this proceeding, the I&E Prosecutors may afford access to HIGHLY CONFIDENTIAL PROTECTED MATERIAL, only to I&E's experts, without the need for the execution of a Non-Disclosure Certificate, who are full-time employees of the Commission and bound by all the provisions of this Protective Order by virtue of the I&E Prosecutors' execution of a Non-Disclosure Certificate.

Provided, further, that in accordance with the provisions of Sections 5.362 and 5.365(e) of the Commission's Rules of Practice and Procedure, 52 Pa. Code §§ 5.362, 5.365(e), any party

may, by subsequent objection or motion, seek further protection with respect to HIGHLY CONFIDENTIAL PROTECTED MATERIAL, including, but not limited to, total prohibition of disclosure or limitation of disclosure only to particular parties.

7. For purposes of this Protective Order, a Reviewing Representative may not be a “Restricted Person.”

(a) A “Restricted Person” shall mean: (i) an officer, director, stockholder, partner, or owner of any competitor of the parties or an employee of such an entity if the employee’s duties involve marketing or pricing of the competitor’s products or services; (ii) an officer, director, stockholder, partner, or owner of any affiliate of a competitor of the parties (including any association of competitors of the parties) or an employee of such an entity if the employee’s duties involve marketing or pricing of the competitor’s products or services; (iii) an officer, director, stockholder, owner or employee of a competitor of a customer of the parties if the Proprietary Information concerns a specific, identifiable customer of the parties; and (iv) an officer, director, stockholder, owner or employee of an affiliate of a competitor of a customer of the parties if the Proprietary Information concerns a specific, identifiable customer of the parties; provided, however, that no expert shall be disqualified on account of being a stockholder, partner, or owner unless that expert’s interest in the business would provide a significant motive for violation of the limitations of permissible use of the Proprietary Information. For purposes of this Stipulated Protective Agreement, stocks, partnership or other ownership interests valued at more than \$100,000 or constituting more than a 1% interest in a business establishes a significant motive for violation.

(b) If an expert for a party, another member of the expert’s firm or the expert’s firm generally also serves as an expert for, or as a consultant or advisor to, a Restricted

Person with respect to the marketing or pricing of the competitor's products or services, said expert must: (i) identify for the parties each Restricted Person and each expert or consultant; (ii) make reasonable attempts to segregate those personnel assisting in the expert's participation in this proceeding from those personnel working on behalf of a Restricted Person; and (iii) if segregation of such personnel is impractical the expert shall give to the producing party written assurances that the lack of segregation will in no way jeopardize the interests of the parties or their customers. The parties retain the right to challenge the adequacy of the written assurances that the parties' or their customers' interests will not be jeopardized. No other persons may have access to the Proprietary Information except as authorized by order of the Commission.

8. A qualified "Reviewing Representative" for "HIGHLY CONFIDENTIAL PROTECTED MATERIAL" may review and discuss "HIGHLY CONFIDENTIAL PROTECTED MATERIAL" with their client or with the entity with which they are employed or associated, to the extent that the client or entity is not a "Restricted Person", but may not share with or permit the client or entity to review the "HIGHLY CONFIDENTIAL PROTECTED MATERIAL". Such discussions must be general in nature and not disclose specific "HIGHLY CONFIDENTIAL PROTECTED MATERIAL," provided however that counsel for I&E may share proprietary information with the I&E Director, without obtaining a Non-Disclosure Certificate from these individuals, provided however, that this individual otherwise abide by the terms of the Protective Order.

9. Information deemed Proprietary Information shall not be used except as necessary for the conduct of this proceeding, nor shall it be disclosed in any manner to any person except a Reviewing Representative who is engaged in the conduct of this proceeding and who needs to know the information in order to carry out that person's responsibilities in this proceeding.

10. Reviewing Representatives may not use information contained in any Proprietary Information obtained through this proceeding to give any party or any competitor or customer or consignee of any party a commercial advantage. In the event that a party wishes to designate as a Reviewing Representative a person not described in Paragraphs 5(i) through 5(iv) or 6(i) through 6(iii) above, the party shall seek agreement from the party providing the Proprietary Information. If an agreement is reached, that person shall be a Reviewing Representative pursuant to Paragraph 6(iv) above with respect to those materials. If no agreement is reached, the party shall submit the disputed designation to the presiding Administrative Law Judge for resolution.

11. (a) A Reviewing Representative shall not be permitted to inspect, participate in discussions regarding, or otherwise be permitted access to Proprietary Information pursuant to this Protective Order unless that Reviewing Representative has first executed a Non-Disclosure Certificate provided that if an attorney qualified as a Reviewing Representative has executed such a certificate, the paralegals, secretarial and clerical personnel under the attorney's instruction, supervision or control need not do so, nor do Commission employees assisting I&E as noted above in Paragraphs 5 and 6. A copy of each Non-Disclosure Certificate shall be provided to counsel for the parties asserting confidentiality prior to disclosure of any Proprietary Information to that Reviewing Representative.

(b) Attorneys and outside experts qualified as Reviewing Representatives are responsible for ensuring that persons under their supervision or control comply with the Protective Order.

12. None of the parties waive their right to pursue any other legal or equitable remedies that may be available in the event of actual or anticipated disclosure of Proprietary Information.

13. The parties shall designate data or documents as constituting or containing Proprietary Information by marking the documents “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL PROTECTED MATERIAL.” Where only part of data compilations or multi-page documents constitutes or contains Proprietary Information, the parties, insofar as reasonably practicable within discovery and other time constraints imposed in this proceeding, shall designate only the specific data or pages of documents that constitute or contain Proprietary Information. The Proprietary Information shall be served upon the parties hereto only in an envelope separate from the nonproprietary materials, and the envelope shall be conspicuously marked “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL PROTECTED MATERIAL.” Notwithstanding the above, since “HIGHLY CONFIDENTIAL PROTECTED MATERIAL” is intended to be distributed only to a small group of persons who are not directly employed by the parties in this proceeding, the parties shall use their best reasonable efforts to reduce the amount and type of information that is provided with the “HIGHLY CONFIDENTIAL PROTECTED MATERIAL” designation and to not identify the names, addresses or any other information that could reveal the identity of shippers or customers in response to discovery.

14. The parties will consider and treat the Proprietary Information as within the exemptions from disclosure provided in Section 335(d) of the Public Utility Code, 66 Pa. C.S. § 335(d), and the Pennsylvania Right-to-Know Act, 65 P.S. §§ 67.101 *et seq.*, until such time as the information is found to be non-proprietary. In the event that any person or entity seeks to compel the disclosure of Proprietary Information, the non-producing party shall promptly notify

the producing party in order to provide the producing party an opportunity to oppose or limit such disclosure.

15. Any public reference to Proprietary Information by a party or its Reviewing Representatives shall be to the title or exhibit reference in sufficient detail to permit persons with access to the Proprietary Information to understand fully the reference and not more. The Proprietary Information shall remain a part of the record, to the extent admitted, for all purposes of administrative or judicial review.

16. Part of any record of this proceeding containing Proprietary Information, including but not limited to all exhibits, writings, testimony, cross examination, argument, and responses to discovery, and including reference thereto as mentioned in Paragraph 15 above, shall be sealed for all purposes, including administrative and judicial review, unless such Proprietary Information is released from the restrictions of this Protective Order, either through the agreement of the parties to this proceeding or pursuant to an order of the Commission.

17. The parties shall retain the right to question or challenge the confidential or proprietary nature of Proprietary Information including, without limitation, the identity of shippers and/or customers, and to question or challenge the admissibility of Proprietary Information. In the event of a question or challenge to the confidential or proprietary nature of Proprietary Information, the parties shall make a good faith effort to redact or modify the Proprietary Information so that it is no longer “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL PROTECTED MATERIAL”. If a party challenges the designation of a document or information as proprietary, the party providing the information retains the burden of demonstrating that the designation is appropriate.



18. The parties shall retain the right to question or challenge the admissibility of Proprietary Information; to object to the production of Proprietary Information on any proper ground; and to refuse to produce Proprietary Information pending the adjudication of the objection.

19. Within 30 days after a Commission final order is entered in the above-captioned proceeding, or in the event of appeals, within thirty days after appeals are finally decided, the parties, upon request, shall either destroy or return to the parties all copies of all documents and other materials not entered into the record, including notes, which contain any Proprietary Information. In the event that a party elects to destroy all copies of documents and other materials containing Proprietary Information instead of returning the copies of documents and other materials containing Proprietary Information to the parties, the party shall certify in writing to the other producing party that the Proprietary Information has been destroyed.

20. In addition, in light of the fact that documents requested in this proceeding may contain information concerning interstate shipments that may be subject to the restrictions contained in the Interstate Commerce Act (“ICA”), 49 U.S.C.A. App. Section 15(13), the undersigned finds that an order compelling disclosure of information and materials, which disclosure in the absence of such an order might be deemed to violate the provisions of the Interstate Commerce Act, would facilitate discovery in this matter, and be in the public interest. The undersigned also finds that, consistent with the purpose and intent of Section 15(13) of the ICA—*i.e.* to preclude disclosure of competitively sensitive information that could be used to the detriment of a shipper—such disclosure should be made contingent upon and subject to a protective order that will adequately protect shipper interests. Accordingly, it is hereby ordered

that such information and materials shall be disclosed in accordance with, and subject to, the terms and conditions of this Protective Order.

Date: April 26, 2017

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Eranda Vero  
Administrative Law Judge

## **APPENDIX A**

**APPENDIX A**  
**BEFORE THE**  
**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Laurel Pipe Line Company,	:	
L.P. for All Necessary Authority, Approvals,	:	
and Certificates of Public Convenience To	:	Docket No. A-2016-2575829
Change the Direction of Petroleum Products	:	
Transportation Service to Delivery Points West	:	
of Eldorado, Pennsylvania	:	
	:	
	:	
Laurel Pipe Line Company, L.P. - Pipeline	:	
Capacity Agreement with Buckeye Pipe Line	:	Docket No. G-2017-2587567
Company, L.P.	:	

**NON-DISCLOSURE CERTIFICATE**

**TO WHOM IT MAY CONCERN:**

The undersigned is the \_\_\_\_\_ of \_\_\_\_\_  
(the retaining party). The undersigned has read and understands the Protective Order deals with  
the treatment of Proprietary Information, and the undersigned is a (check ONE):

- ☐ Reviewing Representative for CONFIDENTIAL information.
- ☐ Reviewing Representative for CONFIDENTIAL & HIGHLY CONFIDENTIAL  
information.

The undersigned agrees to be bound by and comply with the terms and conditions of said  
Protective Order.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Address

\_\_\_\_\_  
Employer

**A-2016-2575829 & G-2017-2587567 APPLICATION OF LAUREL PIPE LINE  
COMPANY, L.P**

**SERVICE LIST**

DAVID B. MCGREGOR, ESQUIRE  
ANTHONY D. KANAGY, ESQUIRE  
GARRETT P. LENT, ESQUIRE  
CHRISTOPHER .J BARR, ESQUIRE  
JESSICA R. ROGERS, ESQUIRE  
POST & SCHELL PC  
17 NORTH SECOND STREET  
12TH FLOOR  
HARRISBURG PA 17101-1601  
717.612.6032

*Accepts E-service*

JONATHAN MARCUS ESQUIRE  
DANIEL J. STUART, ESQUIRE  
ONE OXFORD CENTRE 35TH FLOOR  
301 GRANT STREET  
PITTSBURGH PA 15219

WHITNEY E. SNYDER, ESQUIRE  
TODD S. STEWART, ESQUIRE  
KEVIN J. MCKEON, ESQUIRE  
JOSEPH R. HICKS, ESQUIRE  
RICHARD E. POWERS JR., ESQUIRE  
CHRISTOPHER A. RUGGIERO, ESQUIRE  
100 NORTH TENTH STREET  
HARRISBURG PA 17101

**717-236-1300**

*Accepts E-service*

ADEOLU A. BAKARE ESQUIRE  
SUSAN E. BRUCE, ESQUIRE  
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ALAN MICHAEL SELTZER, ESQUIRE  
JOHN F. POVILAITIS, ESQUIRE  
BUCHANAN INGERSOLL & ROONEY  
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CARL SHULTZ, ESQUIRE  
Karen O. MOURY, ESQUIRE  
ECKERT SEAMANS CHERIN & MELLOTT LLC  
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ANDREW LEVINE PARTNER  
STRADLEY RONON  
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*Accepts E-service*

JOSEPH OTIS MINOTT, ESQUIRE  
ERNEST LOGAN WELDE, ESQUIRE  
CLEAN AIR COUNCIL  
135 S 19TH STREET  
SUITE 300  
PHILADELPHIA PA 19103  
*Accepts E-service*

## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

### VIA E-MAIL

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