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February 1, 2017

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

VIA ELECTRONIC FILING

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

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of Sheetz, Inc. ("Sheetz") in the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Thank you.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By

A handwritten signature in black ink, appearing to read 'A. Bakare', written over a horizontal line.

Adeolu A. Bakare

Counsel to Sheetz, Inc.

/lmc

Enclosure

c: Certificate of Service

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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 AND FIRST CLASS MAIL

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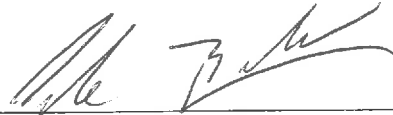
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Adeolu A. Bakare

Counsel to Sheetz, Inc.

Dated this 1st day of February, 2017, in Harrisburg, Pennsylvania.

**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 :

**PETITION TO INTERVENE OF
SHEETZ, INC.**

Pursuant to Sections 5.71 through 5.74 and 5.103 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") regulations, 52 Pa. Code §§ 5.71 - 5.74, 5.103, Sheetz, Inc. ("Sheetz") hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, Sheetz asserts the following:

1. The names and address of Sheetz's attorneys are:

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Susan E. Bruce (Pa. I.D. No. 80146)
Adeolu A. Bakare (Pa. I.D. No. 208541)
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2. On November 14, 2016, Laurel Pipe Line Company, L.P. ("Laurel" or "Applicant") filed its Application for All Necessary Authority, Approvals, and Certificates of Public Convenience to Change the Direction of Petroleum Products Transportation Service to Delivery Points West of Eldorado, Pennsylvania, with the Commission pursuant to various provisions of the Pennsylvania Public Utility Code ("Application"). *See* 66 Pa. C.S. § 101, *et seq.*

3. On November 16, 2016, the Commission issued a Secretarial Letter directing Laurel to publish notice of the Application in a newspaper having general circulation in the area involved and file proof of publication with the Commission by December 19, 2016. The Secretarial Letter also confirmed the Commission would publish notice of the Application in the *Pennsylvania Bulletin* on December 3, 2016, with formal protests and petitions to intervene due to the Commission by December 19, 2016.

4. The Commission issued a second Secretarial Letter on December 6, 2016, extending the deadline for filing formal protests and petitions to intervene in this proceeding to February 1, 2017. The Secretarial Letter confirmed that the Commission would publish notice of the Application in the *Pennsylvania Bulletin* on December 17, 2016, with formal protests and petitions to intervene due to the Commission by February 1, 2017. The Secretarial Letter also directed Laurel to serve a copy of its Application on the following parties: current customers using the pipeline; former customers who used the pipeline during the period from January 1, 2015, through the date of filing (*i.e.*, November 14, 2016); and prospective and committed customers Laurel expects to use the pipeline if the flow direction of the line is changed. Finally, the Commission noted that pursuant to 52 Pa. Code § 5.44, parties may file a petition for reconsideration of the Secretarial Letter within 20 days of the date of the Secretarial Letter, or by December 26, 2016. No party filed a petition for reconsideration.

5. As set forth in the Application, Laurel currently transports petroleum products from points of origin near Philadelphia, Pennsylvania, to destination points across the Commonwealth, terminating west of Pittsburgh, Pennsylvania. *See* Application, p. 2. In addition to the intrastate shipments, Laurel assigns a portion of its capacity to Buckeye Pipe Line Company, L.P. ("Buckeye") for interstate transportation service from origin points in New Jersey and Delaware to destination points in Pennsylvania. *See id.* at 2. Per the Application, Laurel and Buckeye are general partners with Buckeye Partners, L.P., although the Application does not clarify the ownership structure between these affiliated entities. *See id.* at 4.

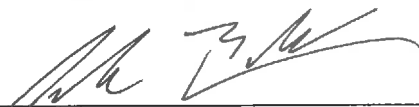
6. The Application proposes to dramatically modify the jurisdictional pipeline transportation service currently provided by Laurel by eliminating service to all points west of Eldorado (near Altoona) from the east. *See id.* at 9. Laurel proposes to continue using the pipeline facilities west of Eldorado, but for future receipt of interstate deliveries originating from origin points in the Midwest and the Pittsburgh area. *See id.*

7. As a shipper on Laurel's Pipe Line, Sheetz has a significant interest in this proceeding. A Pennsylvania corporation, Sheetz is a family owned business with more than 17,000 employees in six states. The majority of those employees work in Pennsylvania. Sheetz operates over 250 stores in Pennsylvania and over 550 total stores nationwide. In addition to retail gasoline and fuel, Sheetz sells food and other convenience items. Thus, Sheetz has a significant interest in this proceeding that is not represented by any other party of record. Consequently, Sheetz qualifies for and should be granted intervenor status in this proceeding.

WHEREFORE, Sheetz, Inc. respectfully requests that the Pennsylvania Public Utility Commission grant the Petition to Intervene and provide Sheetz, Inc. with full-party status in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to Sheetz, Inc.

Dated: February 01, 2017

VERIFICATION

I, Gary L. Zimmerman, Vice President and General Counsel of Sheetz, Inc., hereby state that the facts above set forth in the foregoing document are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

2/1/17
Date

Gary L. Zimmerman
Signature