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February 1, 2017

VIA E-FILING

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

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:

On behalf of Philadelphia Energy Solutions Refining and Marketing LLC, I have enclosed for electronic filing the Protest of Philadelphia Energy Solutions Refining and Marketing LLC in the above-captioned proceeding.

Copies have been served on all parties as indicated in the attached Certificate of Service.

Very truly yours,



Alan M. Seltzer

AMS/tlg

Enclosure

cc: Certificate of Service

**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 :

**PROTEST OF PHILADELPHIA ENERGY SOLUTIONS REFINING AND
MARKETING LLC**

In accordance with 52 Pa. Code §§ 5.51 and 5.52 of the Pennsylvania Public Utility Commission’s (the “Commission” or “PaPUC”) regulations, Philadelphia Energy Solutions Refining and Marketing LLC hereby files this Protest to the above referenced Application filed by Laurel Pipe Line Company, L.P. (“Laurel” or “Applicant”).

I. The Protestant and Its Interest

1. The Protestant is Philadelphia Energy Solutions Refining and Marketing LLC (“PESRM”), with the following address:

Philadelphia Energy Solutions Refining and Marketing LLC
1735 Market Street, 11th Floor
Philadelphia, PA 19103

2. PESRM’s attorneys are:

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3. PESRM is a Delaware limited liability company that owns and operates a merchant refinery in Philadelphia, Pennsylvania. The Philadelphia refining complex is a large-scale facility with a combined distillation capacity of 335,000 barrels per day (“bpd”), making it the largest refining complex in Petroleum Administration Defense District I (“PADD I”) and the 10th largest in the United States. PESRM produces a range of products, including gasoline and ultra-low sulfur diesel fuel, that are marketed primarily in Pennsylvania and in the northeastern United States.

4. PESRM is connected to the eastern portion of the Laurel pipeline and relies upon its transportation services to deliver petroleum products from the Philadelphia area west to the Pittsburgh area via a pipeline connection located at the Philadelphia refining complex. It is a shipper on Laurel under the shipper code “PES” and also supplies product shipped by other customers on the Laurel pipeline system.

5. In 2016, twenty percent (20%) of PESRM’s total production was delivered into the Laurel pipeline, a large portion of which was sold to and shipped by marketers, wholesalers and retail owners. During that same period PESRM delivered 4,057,812 barrels of refined products through the Laurel pipeline as a shipper and delivered another 16,964,831 barrels of refined products into the Laurel pipeline for third party customers. PESRM therefore has a direct and substantial interest in modifications to Laurel’s pipeline-related services, including those proposed by the Applicant in this filing.

II. Procedural History

6. On November 14, 2016, Laurel filed with the Commission an Application for All Necessary Authority, Approvals, and Certificates of the Public Convenience to Change the Direction of Petroleum Products Transportation Service to Delivery Points West of Eldorado,

Pennsylvania pursuant to various provisions of the Pennsylvania Public Utility Code (“Application”). 66 Pa. C. S. §§ 101, *et seq.*

7. 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 protests and petitions to intervene due to the Commission by December 19, 2016.

8. On November 22, 2016, Gulf Operating LLC (“Gulf”) filed both a Petition to Intervene and a Motion to Extend Deadline for Protests (“Motion to Extend”). Laurel filed an Answer to the Motion to Extend on November 28, 2016.

9. On December 5, 2016, PESRM filed a Petition to Intervene in this proceeding and an Answer in Support of Gulf’s Motion to Extend.

10. On December 6, 2016, the Commission’s Secretary issued a further letter to counsel for Laurel supplementing the Commission’s November 16, 2016 Secretarial Letter which, among other things, (i) granted Gulf’s Petition to Intervene; (ii) granted Gulf’s Motion to Extend the deadline for filing formal protests and petitions to intervene until February 1, 2017; and (iii) directed Laurel to serve a copy of the Application on (a) current customers using the Laurel pipeline; (b) former customers who used the pipeline from January 1, 2015 to the date the Application was filed; and (c) prospective or committed customers Laurel expects to use the pipeline if the flow direction of the line is changed.

III. The Laurel Pipeline System

11. The Laurel pipeline transports liquid petroleum products through a 350-mile pipeline extending westward from three refineries, a marine terminal and a connection to the Colonial pipeline system in the Philadelphia area to Reading, Harrisburg, Altoona/Johnstown, Greensburg and Pittsburgh, Pennsylvania.¹ Laurel utilizes its pipeline system to transport *petroleum products from east to west—from points of origin near Philadelphia, Pennsylvania, to destination points across the Commonwealth, terminating west of Pittsburgh, Pennsylvania, ...* (Application, p. 2).

12. The Laurel pipeline was expressly engineered to support petroleum product deliveries from the east to west as seen by the progressive pipe diameter reductions in the 24 inch pipeline that starts in the east, then decrease in diameter as product is delivered westward along its length until it reduces to 18 inches in diameter.² Specifically, Laurel's pipeline diameter is, (i) 24 inches to the east of Harrisburg, Pennsylvania, (ii) 20 inches between Harrisburg, Pennsylvania and Duncansville, Pennsylvania, which is a point along the pipeline near Altoona, Pennsylvania, and (iii) 18 inches between Duncansville, Pennsylvania and Coraopolis, Pennsylvania, which is a delivery point near Pittsburgh. Laurel's pipeline diameters along these pipeline segments have largely been unchanged since Laurel filed its original application for a certificate of public convenience ("CPC") with the PaPUC in 1957.³

13. The Eldorado terminal itself is connected to the Laurel pipeline at Duncansville, Pennsylvania via a separate 12 inch pipeline at the point where the pipeline correspondingly

¹ Buckeye Pipeline 2015 10-K, p. 4.

² Buckeye Partners, L.P. System Map, <http://www.buckeye.com/Portals/0/ShipperBook/SystemMap.pdf>. Spur pipelines off the Laurel pipeline are of even smaller diameter, i.e. 12 inches.

³ In addition, Exhibit-A of the original 1957 Application labels segments of the proposed Laurel pipeline from east to west with Roman numerals further supporting the originally proposed westward flow. For example, the segment of the pipeline from Harrisburg to Duncansville (i.e., Altoona) is labeled on Exhibit-A as VI-20", which denotes the sixth pipeline segment and 20 inches in diameter; while the Duncansville to Coraopolis (i.e., Pittsburgh) pipeline segment is labeled as VII-18", which denotes the seventh pipeline segment and 18 inches in diameter.

reduces in size from 20 inches to 18 inches. In addition, there are no significant delivery points between the Delmont, Pennsylvania delivery location and Duncansville, Pennsylvania to the west of the Eldorado terminal, and the Carlisle, Pennsylvania delivery location to the east of the Eldorado terminal.⁴

14. The pipeline diameters are a physical constraint on the amount of product that can flow along each segment of the Laurel pipeline. Based on pipeline diameters alone, the 12 inch line that connects the Eldorado terminal to the Laurel pipeline can accept, individually, (i) only about 44 percent of the full flow that could be potentially delivered from the 18 inch pipeline originating from the west, and (ii) only about 36 percent of the full flow that could be delivered from the 20 inch pipeline originating from the east. Therefore, the pipeline reversal proposed in the Application necessarily lowers the Laurel pipeline's capacity to transport products and injects uncertainty not addressed in the Application about how the constrained 12 inch pipeline feeding the Eldorado terminal will accept shipments from both east and west.

15. The existing physical constraints of the pipeline are also a consideration in the event that additional reversals of the Laurel pipeline to the east are contemplated. The existing 18 inch pipeline from Pittsburgh could supply only 56 percent of capacity of the 24 inch line from Harrisburg to points further east based on pipeline diameters alone.

16. The current configuration of the Laurel pipeline is directly relevant to the relief requested in the Application and PESRM's Protest. The physical characteristics of the Laurel pipeline affect what can, and cannot, be achieved by the proposed flow reversal and whether it is in the public interest.

⁴ Buckeye Partners, L.P. System Map, <http://www.buckeye.com/Portals/0/ShipperBook/SystemMap.pdf>

IV. The Application

17. As set forth in the Application, Laurel currently transports petroleum products east to west from points of origin near Philadelphia, Pennsylvania, to destination points across the Commonwealth, terminating west of Pittsburgh, Pennsylvania. (Application, p. 2).

18. 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. *Id.* at 2. Per the Application, Laurel and Buckeye are general partners with Buckeye Partners, L.P. *Id.* at 4.

19. The Application requests all necessary PaPUC approvals to change the direction of its existing petroleum products transportation service on a portion of Laurel’s pipeline system west of Eldorado, Pennsylvania (in the vicinity of Altoona) and to confirm that Laurel can in the future, *in its sole discretion and without any further PaPUC review or approval*, reinstate the current direction of service. (Application, p.3). The Application further states that Laurel would exercise its discretionary power to change the direction of service, *should sustained market conditions support such action in the future*, (Application, ¶ 20). However, Laurel does not define what would constitute the ‘sustained market conditions’, which could lead to continual re-interpretation by Laurel as to what circumstances justify a change in the direction of service to the detriment of shippers seeking to deliver product in either direction.

20. The Application asserts in the alternative that Commission authorization is not necessary to reverse the direction of service on the subject Laurel pipeline or, if such authorization is required, the Commission should approve the Application because it “is necessary or proper for the service, accommodation, convenience, or safety of the public.” 66 Pa. C.S. § 1103(a). (Application, p.1-2).

21. Laurel is a public utility and traces its rights to transport petroleum products along the subject pipeline to a CPC granted to a predecessor company in 1957 (the “1957 Application”). The Application further represents that the 1957 CPC does not specify the direction of flow of the certificated petroleum products transportation service (Application, ¶ 9). However, the 1957 Application represented to the PaPUC that the “route to be followed” was “*from the vicinity of Philadelphia to the vicinity of Pittsburgh.*”⁵ That Application also represented that there were no competitive conditions created by the proposed new services with respect to companies “which carry petroleum products in a westerly direction across the southern half of the Commonwealth of Pennsylvania from the vicinity of Philadelphia to the vicinity of Pittsburgh and beyond.”⁶ Indeed, the flow of petroleum products on the pipeline has since the mid-1950’s consistently and uniformly been in an easterly direction originating in Eastern Pennsylvania with points of delivery in Central and Western Pennsylvania (Application, ¶ 15).

22. Laurel claims in the Application that it is not seeking to “abandon” any authority granted to it under the 1957 CPC despite the fact that the service proposed in the 1957 Application was the movement of products from the vicinity of Philadelphia to the vicinity of Pittsburgh (Application, ¶ 20).

23. Laurel claims that if the PaPUC approves the Application and Laurel reverses the direction of transportation of petroleum services on the pipeline west of Eldorado, Pennsylvania, existing Philadelphia-based customers will still have options, other than service through the Applicant, to deliver their product to points west of Eldorado (Application, ¶¶ 13, 21, 22). However, the Application does not represent that current shippers on the Laurel pipeline consider these options to be economic, practical or viable from a business perspective.

⁵ 1957 Application p. 2 (emphasis added).

⁶ 1957 Application p. 3.

24. The Application claims the following public benefits associated with the change in direction of service along the Laurel pipeline: (i) generally reduced wholesale commodity prices for petroleum products delivered over the Laurel system (Application, ¶ 35); (ii) decreased at-the-pump gasoline and diesel prices (Application, ¶ 35); (iii) the same petroleum products will be delivered to the public at the same receipt points as they are currently delivered (Application, ¶ 36); (iv) improved supply reliability because the public will receive an additional source of supply that will alleviate delivery problems and constraints (Application, ¶ 36); and (iv) consumers will have access to generally lower wholesale commodity prices for petroleum products *without the need to construct a completely new pipeline*, saving Laurel costs and avoiding the impacts of constructing new pipeline infrastructure (Application, ¶ 37).

25. The Application further states, without providing any factual information, that *no new rights-of-way are needed*, and that *only limited upgrades on Applicant's facilities are necessary to complete the project* (Application, ¶ 37).

26. The Application also asserts that the public will not be harmed by the change in direction of service along the Laurel pipeline because “adequate alternatives exist for these Customers to transport their products to market” (Application, ¶ 39).

27. Finally, and without specific legal support, the Application claims that the proposed change in direction of service would also change “the jurisdictional authority for the service from the Commission to FERC [Federal Energy Regulatory Commission]” (Application, ¶ 32).

V. PESRM's Grounds for Protest

28. As a Laurel Regular Shipper, as defined by Laurel's PaPUC tariff, PESRM has a substantial, immediate, direct and material interest in any cessation of service enabling the flow

of petroleum products from southeastern Pennsylvania to delivery points near Pittsburgh, which has been the flow on the subject line since Laurel or its predecessors were granted a CPC by the Commission in the 1950's. PESRM opposes any change in the flow of petroleum products between Pittsburgh and Altoona, Pennsylvania along the Laurel pipeline as proposed in the Application. Although PESRM has yet to see all the details and support for Laurel's proposal, which will likely be contained in testimony in support of the Application, and has therefore not fully completed its evaluation of the relief sought by the Application, PESRM has determined that the proposal is not in the public interest. PESRM disputes material facts asserted by Laurel regarding the impact of the proposed flow reversal and submits that if granted, there will be substantial, material and adverse economic, financial, environmental, safety, energy security and other impacts on various Regular Shippers, as they are defined in Laurel's PaPUC tariff, including PESRM, and is therefore not necessary or proper for the service, accommodation, convenience, or safety of the public." 66 Pa. C.S. § 1103(a).

29. PESRM disputes and challenges the various alleged public benefits Laurel claims in the Application to be associated with the change in direction of service along the Laurel pipeline including the benefit claims of, (i) generally reduced wholesale commodity prices for petroleum products delivered over the Laurel pipeline system (Application, ¶ 35); (ii) decreased gasoline and diesel prices at the pump (Application, ¶ 35); (iii) that the same petroleum products will be delivered to the public at the same receipt points as they are currently delivered (Application, ¶ 36); (iv) that there will be improved supply reliability because the public will receive an additional source of supply that will alleviate delivery problems and constraints (Application, ¶ 36); and (iv) that consumers will have access to generally lower wholesale commodity prices for petroleum products *without the need to construct a completely new*

pipeline, saving the costs and impacts of constructing new pipeline infrastructure (Application, ¶ 37). PESRM disputes these factual assertions by Laurel and, subject to the completion of discovery and the evaluation of other relevant information, PESRM expects to demonstrate that the so-called benefits of the flow reversal identified in the Application are unsupported, ephemeral and unlikely to be achieved. There is no material harm to Laurel from continuing to provide the services previously authorized by the Commission under Laurel’s existing CPC, and the negative impacts of Laurel’s proposal to reverse flow on a portion of the subject pipeline are outweighed by any potential positive impacts alleged in the Application.

30. PESRM therefore protests the Application for the following reasons and reserves the right to expand and/or modify the bases for its Protest as additional information becomes available to it during the course of this proceeding:

General Commonwealth-Wide Impacts

- As a matter of law, the proposed flow reversal constitutes a direct abandonment of pipeline transportation service between Altoona, Pennsylvania and Pittsburgh, Pennsylvania along the Laurel pipeline, depriving PESRM and other shippers and refiners from being able to move petroleum products in a continuous and safe manner across the Commonwealth to Pittsburgh, Pennsylvania and, accordingly, no such abandonment of service can lawfully be effected without express Commission authorization pursuant to Chapter 11 of the Public Utility Code, 66 Pa.C.S. § 1102, and findings supported by a preponderance of the evidence that the abandonment of service is in the public interest;
- The proposed flow reversal is a material change in the type and nature of service approved by the PaPUC and provided along the Laurel pipeline to various refiners, customers and shippers, including PESRM, and such a change cannot be effected unilaterally by Laurel without first obtaining specific Commission approval under Chapter 11 of the Public Utility Code, 66 Pa. C. S. § 101 *et seq.* (“Code”);
- The proposed cessation of east to west service on the Eldorado to Pittsburgh portion of the Laurel pipeline is not a matter of Laurel’s discretion because it was east to west service that was directly authorized by the CPC the Commission granted to Laurel or its predecessors in the 1957 CPC Application for the subject pipeline;

- The proposed flow reversal is inconsistent with the engineering and actual operation of the Laurel Pipeline for about a half century;

Eastern Pennsylvania Impacts

- PESRM disputes Laurel’s suggestion (Application, ¶ 13) that Philadelphia market participants seeking to deliver petroleum products into the Pittsburgh market *after the flow reversal* would have viable alternatives, including (i) to the relatively low population density markets of Altoona, other parts of Pennsylvania, and Upstate New York, or (ii) to the highly competitive markets in New Jersey and New York within which PESRM already operates. On the contrary, significantly higher transportation options, such as truck or Jones Act⁷-compliant shipping, are likely to materially and adversely affect stakeholders’ successful participation in those other markets;
- PESRM believes that the flow reversal on the Laurel pipeline will provide a material impediment to eastern refiners of summer gasoline like PESRM from delivering their products to the Pittsburgh market in an economic and safe way, given the higher costs associated with transporting products from Eldorado and points further to the east of Eldorado;
- The proposed flow reversal on a portion of the Laurel pipeline may be the first phase of additional efforts in the future to reverse flows further east on that line, completely abandoning the service authorized by the PaPUC in 1957, and further limiting the ability of PESRM and others to access the Pittsburgh market or markets west of Philadelphia with their petroleum products;
- Northeast consumers and businesses may also face significantly higher prices for gasoline and diesel since Philadelphia market participants may lose markets which cannot be replaced at a similar margin, which would result in inducing Northeast refinery capacity closures that, in turn, would affect the current balance among petroleum product supplies towards a regional product supply mix that is more reliant on distant suppliers delivering product along long supply chains that are subject to periodic interruption and that, as stated in the Application, would not include any potential for supply from Laurel either directly or by substitution of Northeast supply;
- The Application also asserts that the public will not be harmed by the change in the direction of service along Laurel’s pipeline because “adequate alternatives exist for these Customers to transport their products to market” (Application, ¶ 39). PESRM disagrees and asserts there are no realistic and economically viable

⁷ The “Jones Act” is the commonly used name for Section 27 of the Merchant Marine Act of 1920,” (P.L. 66-261), which is a U.S. Federal statute that regulates maritime commerce in U.S. waters and between U.S. ports. Section 27 requires that all commercial shipping between U.S. ports and trade or navigation in coastal waters must be performed by U.S.-flag ships constructed in the U.S., wholly-owned by U.S. citizens, and crewed by U.S. citizens and U.S. permanent residents; with steep penalties for non-compliance.

alternatives to accessing the Pittsburgh market if the Laurel pipeline reversal takes place;

Western Pennsylvania Impacts

- Assuming that Laurel’s eastward shippers fully intend to use the full capacity of the pipeline from Pittsburgh to Altoona as stated in the Application, the proposed flow reversal results in about a 50 percent derating of the capacity for the 18-inch line between Delmont and Eldorado because (i) the Eldorado 12-inch line itself lacks the capacity to accept more than about 50 percent of the potential deliveries that could be delivered along that segment, (ii) Laurel has not advised in the Application that it intends to obtain the additional rights-of-way or construct additional pipelines necessary to address that deficiency, and (iii) the Application states there will not be any eastward deliveries beyond Eldorado, which would result in a major change in Laurel’s potential throughput and potentially increase Laurel’s future tariff charges;
- Assuming eastward shippers fully intend to use the full capacity of the Laurel pipeline from Pittsburgh to Altoona, the proposed flow reversal results in an abandonment of pipeline capacity on Laurel’s 20-inch line from Carlisle to Eldorado because (i) the Eldorado 12-inch line itself lacks the capacity to accept more than about 50 percent of the potential Pittsburgh-to-Altoona deliveries that could be delivered to that point, (ii) Laurel has not advised in the Application that it intends to obtain the additional rights-of-way or construct additional pipelines necessary to address that deficiency, and (iii) the Application states there will not be any eastward deliveries beyond Eldorado. The effect of this will be to substantially – if not completely – eliminate the capacity available for westward flows, which will likely increase costs and be reflected in Laurel’s future tariff charges;
- Laurel has not explained in the Application how the very small Altoona gasoline and diesel markets, as compared to the Pittsburgh markets, warrants such a large change in its configuration as reflected in the proposed flow reversal;
- Laurel has not substantiated in the Application why expansion of the availability of Midwest supplies of gasoline is environmentally acceptable in the Pittsburgh area in the Summer, a time period when “summer gasoline” from eastern refiners has been the clear economical choice to meet environmental requirements for the Pittsburgh area, currently a non-attainment air quality area;
- The proposed flow reversal is likely to increase the cost of gasoline and diesel in the Pittsburgh, Altoona, and other Pennsylvania markets and adversely affect Pennsylvania consumers and commerce;
- The proposed flow reversal will likely decrease the reliability of gasoline and diesel supply to the Pittsburgh market, leading to potentially greater and more frequent price spikes and increased probability of shortages;

- The proposed flow reversal may increase the cost and availability of jet fuel to civilian and military aviation fuel customers at Pittsburgh airport;
- The proposed flow reversal may lead to significantly more truck traffic between Altoona, Pennsylvania, and points further to the east, and Pittsburgh, Pennsylvania, which will lead to more pollution, accidents and exacerbated destruction of the local western Pennsylvania highway infrastructure compared to the status quo;
- The proposed flow reversal would essentially eliminate product supply into the Pittsburgh market from sources other than the Midwest which could (i) reduce supply diversity into the Pittsburgh market and eliminate certain types of crude-supplied products; and (ii) make the Pittsburgh market more susceptible to regional infrastructure events, such as rail/pipeline/truck disruptions and refinery outages; and

Interstate Impacts

- Reversing the flow along a portion of the Laurel pipeline between Altoona and Pittsburgh could also cause a portion of that pipeline to lose its intrastate status and result in different – and likely higher – transportation rates to shippers and refiners like PESRM seeking transportation services on those facilities. These jurisdictional implications should be thoroughly evaluated before any decision is made about reversing the flow on any portion of the Laurel pipeline.

31. The Application appears to be a prelude to further west-to-east flow reversals along the Laurel pipeline given the inadequacy of the Eldorado 12-inch line to accept the full capacity of eastward flows, let alone any westward flows which would effectively result in the abandonment of additional pipeline capacity east of Eldorado. In addition, there is no mention by Laurel in the Application of any new infrastructure, or support for Altoona as a significant market for fuels that are materially underserved under the current pipeline configuration.

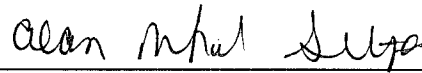
32. As a party directly impacted by the Laurel pipeline's operations, any change in flow along that line has a material, substantial and adverse impact on PESRM and its ability to move its petroleum products across the Commonwealth. Accordingly, PESRM has identified material facts which cannot be resolved without trial-type evidentiary hearings that it disputes in

connection with the Application, and it otherwise has standing to file this Protest, challenge the Application, and fully participate as an active party in this proceeding.

33. For the reasons specified above, PESRM requests that the Application be denied in its entirety or the proceeding be referred to the Commission's Office of Administrative Law Judge for evidentiary hearings, a recommended decision and appropriate final resolution by the Commission.

Respectfully submitted,

Date: February 1, 2017



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*Counsel for Philadelphia Energy Solutions Refining
and Marketing LLC*

VERIFICATION

I, A. Michael Schaal, a Principal at Energy Ventures Analysis, Inc., hereby verify that the information in the foregoing Protest of Philadelphia Energy Solutions Refining and Marketing LLC filed at Docket No. A-2016-2575829, is true and correct to the best of my information, knowledge and belief. I understand that the statements are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to the unsworn falsification to authorities.


Signature

Dated: February 1, 2017

**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 :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the Protest of Philadelphia Energy Solutions Refining and Marketing LLC upon the parties and in the manner listed below:

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Dated this 1st day of February, 2017.



Alan M. Seltzer, Esq.