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September 19, 2018

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Giant Eagle, Inc., *et al.* v. Laurel Pipe Line Company, L.P.
Docket Nos. C-2018-3003365; MOTION FOR ADMISSION *PRO HAC VICE*

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Motion of Monroe Energy, LLC for Admission *Pro Hac Vice* in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Todd S. Stewart, Esquire
Counsel for Monroe Energy, LLC

TSS/jld

Enclosures

cc: Honorable Eranda Vero
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

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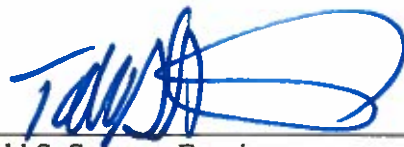
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Todd S. Stewart, Esquire

DATED: September 19, 2018

**BEFORE
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Giant Eagle, Inc.; Guttman Energy, Inc.;	:	
Lucknow-Highspire Terminals, LLC;	:	
Monroe Energy, LLC; Philadelphia Energy	:	
Solutions Refining and Marketing, LLC;	:	Docket No. C-2018-3003365
and Sheetz, Inc.	:	
	:	
Petitioners,	:	
	:	
v.	:	
	:	
Laurel Pipe Line Company, L.P.	:	
	:	
Respondent.	:	

**MOTION OF MONROE ENERGY, LLC
FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 5.103 of the Rules of Administrative Practice and Procedure of the Pennsylvania Public Utilities Commission¹ (the “Commission”), and Rule 301(b) of the Pennsylvania Bar Admission Rules, Counsel of Record for Monroe Energy, LLC (“Monroe”), Todd S. Stewart, outside counsel for Monroe Energy, LLC (“Monroe”), respectfully moves the Presiding Administrative Law Judge for entry of an Order granting

¹ The Rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission shall hereafter be cited in this Motion as “PUC Rule.”

admission *pro hac vice* to Joseph R. Hicks, as additional counsel for Monroe for all purposes in relation to these proceedings (“Motion”).

In support of this Motion, the Movant, Todd S. Stewart, avers as follows:

1. Pursuant to PUC Rule 1.24(b)(1), the Movant has entered his appearance as counsel of record for Monroe in this proceeding, is an active member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 75556), and is outside counsel for Monroe, whose principal office is in Trainer, Pennsylvania.

2. Joseph R. Hicks is an associate at the law firm of Venable LLP, which maintains its principal office at 600 Massachusetts Avenue, N.W., Washington, DC 20001.

3. Joseph R. Hicks is a *cum laude* graduate of Emory University School of Law and he has been Licensed to Practice Law in the State of Georgia since November 10, 2010, in the District of Columbia since October 3, 2011, and in US District Court for the District of Columbia since May 3, 2013. Mr. Hicks has not been the subject of any disciplinary actions in those or any other jurisdiction.

4. Joseph R. Hicks has experience and particular expertise in various aspects of regulatory and energy law, has appeared in proceedings before the Federal Energy Regulatory Commission, federal courts, and other regulatory agencies. Mr. Hicks has represented Delta Air Lines, Inc. (“Delta”), the parent company of Monroe, in energy regulatory matters and has an extensive knowledge of Delta’s operations, energy utilization activities, and regulatory history.

5. Wherefore, Todd S. Stewart, Movant and Counsel of Record for Monroe, respectfully moves for admission of Joseph R. Hicks, *pro hac vice*, on behalf of Monroe for permissible purposes in relation to these proceedings.

Respectfully submitted,



Todd S. Stewart, I.D. No. 75556
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
Phone: (717) 236-1300
Email: tsstewart@hmslegal.com

Counsel for Monroe Energy, LLC

DATED: September 19, 2018

**BEFORE
THE PENNSYLVANIA PUBLIC UTILITY COMMMISION**

Giant Eagle, Inc.; Guttman Energy, Inc.;	:	
Lucknow-Highspire Terminals, LLC;	:	
Monroe Energy, LLC; Philadelphia Energy	:	
Solutions Refining and Marketing, LLC;	:	Docket No. C-2018-3003365
and Sheetz, Inc.	:	
	:	
Petitioners,	:	
	:	
v.	:	
	:	
Laurel Pipe Line Company, L.P.	:	
	:	
Respondent.	:	

**STATEMENT OF TODD S. STEWART
SPONSOR OF JOSEPH R. HICKS
FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Todd S. Stewart, Esq., a member of the bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 75556), is moving for the admission *pro hac vice* of Joseph R. Hicks, Esq., in the above-captioned proceeding. In support of the Motion, I, the sponsor, submit this verified statement, pursuant to Pa. R.C.P. 1012.1:

1. I have worked with Mr. Hicks and have known him for several years in his capacity as an associate specializing in oil and gas pipeline regulation at the law firm of Venable LLP. I have had sufficient opportunity during that time to conduct a reasonable

investigation regarding Mr. Hicks and can state that Mr. Hicks is a reputable and competent attorney.

2. Any proceeds from the settlement of a cause of action in which the candidate is granted admission *pro hac vice* shall be received, held, distributed, and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

3. I shall remain the attorney of record in this case, as required by the Rules of Civil Procedure.

4. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information, and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Respectfully submitted,



Todd S. Stewart, I.D. No. 75556
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
Phone: (717) 236-1300
Email: tsstewart@hmslegal.com

Counsel for Monroe Energy, LLC

**BEFORE
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Giant Eagle, Inc.; Guttman Energy, Inc.; Lucknow Highspire Terminals, LLC,; Monroe Energy, LLC, Philadelphia Energy Solutions Refining & Marketing LLC, and Sheetz, Inc., Complainants	:	
	:	
	:	
	:	
	:	
	:	
v.	:	
	:	
	:	
Laurel Pipeline Company, L.P. Respondent	:	Docket No. C-2018-3003365

**VERIFIED STATEMENT OF JOSEPH R. HICKS
FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103, Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Todd S. Stewart, Esq., a member of the bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 75556), is moving for the admission *pro hac vice* of Joseph R. Hicks, Esq., in the above-captioned proceeding. In support of said sponsor's Motion, I, the candidate, submit this verified statement, pursuant to Pa. R.C.P. 1012.1:

1. I am admitted to practice in and am a member in good standing of the bars of the State of Georgia, having been admitted in 2010, and of the District of Columbia, having been admitted in 2011. I have never been suspended, disbarred, or otherwise disciplined nor am I currently the subject of any disciplinary proceeding.

2. I shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

3. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during the appearance in the matter for which admission *pro hac vice* is being sought.

4. I consent to the appointment of the sponsoring attorney, Todd S. Stewart, Esq., as the agent upon whom service shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in the matter for which admission *pro hac vice* is sought.

5. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that these statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsification to authorities).

Respectfully submitted,

Joseph R. Hicks

Joseph R. Hicks

Venable LLP

600 Massachusetts Avenue, N.W.

Washington, DC 20001

Telephone: (202) 344-4710

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jrhicks@venable.com

DATED: September 19, 2018

District of Columbia: SS

Subscribed and sworn to before me, in my presence,

this 19 day of September, 2018

Martha M. Stovall

Martha M. Stovall, Notary Public, D.C.

My commission expires September 30, 2020.

