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January 23, 2025

**VIA ELECTRONIC FILING**

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

RE: Monroe Energy, LLC, Lucknow-Highspire Terminals, LLC, Sheetz, Inc. and PBF Holding Company LLC v. Laurel Pipe Line Company, L.P.; Docket No. C-2025-3053018; **MOTION FOR ADMISSION *PRO HAC VICE OF RANDALL S. RICH***

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Motion for Admission *Pro Hac Vice* of Randall S. Rich in the above-captioned matter. A copy of this Motion has been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Todd S. Stewart", is written over a horizontal line.

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

TSS/jld  
Enclosure  
cc: Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Monroe Energy, LLC, Lucknow-Highspire	:	
Terminals, LLC, Sheetz, Inc. and PBF	:	
Holding Company LLC	:	
	:	
Complainants,	:	Docket No. C-2025-3053018
	:	
v.	:	
	:	
Laurel Pipe Line Company, L.P.	:	
	:	
Respondent.	:	

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**MOTION FOR ADMISSION *PRO HAC VICE***

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Pursuant to 52 Pa. Code § 1.22(b), Pa. B.A.R. 301 (b), and Pa. R.C.P. No. 1012.1, Todd S. Stewart (“Sponsor”) moves for the admission pro hac vice of Randall S. Rich (the “Candidate”) to appear on behalf of PBF Holding Company LLC (“PBF”) in the above-referenced proceeding. In support of this motion, Candidate and Sponsor hereby state the following:

1. Pursuant to 231 Pa. Code § 1012.1(b)(2), a Verified Statement of Todd S. Stewart is attached hereto, as is a Verified Statement of Randall S. Rich.

2. Sponsor is a member in good standing of the bar of the Commonwealth of Pennsylvania and has never been suspended, disbarred, or otherwise disciplined by a court or administrative body. Sponsor has entered an appearance in the above-captioned proceeding on behalf of Monroe Energy, LLC and shall remain attorney of record.

3. Randall S. Rich is a member of good standing of the bars of the District of Columbia and Missouri (Inactive), and has never been suspended, disbarred, or otherwise disciplined by any court or administrative body.

4. *Pro hac vice* appearance before the Commission is the equivalent of appearance before a special court as defined in 204 Pa. Code § 81.501(g). As such, the Candidate's appearance in this proceeding *pro hac vice* does not require the payment of any fee to the Pennsylvania Interest on Lawyers' Trust Accounts Board ("IOLTA Board") under 204 Pa. Code § 81.505(c) or the filing of an informational form with the IOLTA Board under 204 Pa. Code § 81.503(c) and 204 Pa. Code § 81.504.

5. The Candidate has experience in matters relating to oil pipeline and public utility tariffs, as well as the procedures of regulatory proceedings before public utility commissions, and PBF has requested that the Candidate be admitted to represent it in this proceeding.

WHEREFORE, the undersigned Sponsor respectfully moves that the Candidate be admitted to appear *pro hac vice* on behalf of PBF in this proceeding.

Respectfully submitted,



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Todd S. Stewart, Attorney ID No. 75556  
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501 Corporate Circle, Suite 302  
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(717) 236-1300  
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E-mail: [tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

*Counsel for Monroe Energy, LLC*

Dated: January 23, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Monroe Energy, LLC, Lucknow-Highspire	:	
Terminals, LLC, Sheetz, Inc. and PBF	:	
Holding Company LLC	:	
	:	
Complainants,	:	Docket No. C-2025-3053018
	:	
v.	:	
	:	
Laurel Pipe Line Company, L.P.	:	
	:	
Respondent.	:	

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**VERIFIED STATEMENT OF TODD S. STEWART**

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I, Todd S. Stewart, hereby state as follows:

1. I am an attorney at HMS Legal LLP in the Commonwealth of Pennsylvania.
2. I am admitted to practice law in the Commonwealth of Pennsylvania (PA ID No. 75556) and am in good standing with all courts and administrative agencies of the Commonwealth.
3. I have never been suspended, disbarred, or disciplined by a court or administrative agency, nor am I subject to any proceeding for suspension, disbarment, or disciplinary action.
4. I am currently acting as sponsor for one (1) candidate, Randall S. Rich, for admission *pro hac vice* in the above-captioned proceeding of the Commission. Otherwise, I am not currently acting as a sponsor in any other cases in any court of record in the Commonwealth.
5. After reasonable investigation, I believe Randall S. Rich to be a reputable and competent attorney, and I am in a position to recommend the candidate's admission.

6. If there should be any proceeds from the settlement of this proceeding, such proceeds 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.

7. The foregoing statements are true to the best of my knowledge, information, and belief. I understand that the statements made herein are subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

Respectfully submitted,



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Todd S. Stewart, Attorney ID No. 75556  
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Harrisburg, PA 17110  
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E-mail: [tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

*Counsel for Monroe Energy, LLC*

Dated: January 23, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Monroe Energy, LLC, Lucknow-Highspire	:	
Terminals, LLC, Sheetz, Inc. and PBF	:	
Holding Company LLC	:	
	:	
Complainants,	:	Docket No. C-2025-3053018
	:	
v.	:	
	:	
Laurel Pipe Line Company, L.P.	:	
	:	
Respondent.	:	

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**VERIFIED STATEMENT OF RANDALL S. RICH**

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Pursuant to 52 Pa. Code § 1.22(b), Pa. B.A.R. 301(b), and 231 Pa. Code 1012.1(c), Todd S. Stewart (“Sponsor”), a member of the bar of the Commonwealth of Pennsylvania (PA ID No. 75556), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of Sponsor’s motion, I, Randall S. Rich, state as follows:

1. I am a Partner at Pierce Atwood LLP.
2. I am admitted to practice law in the District of Columbia and Missouri (Inactive).

I am in good standing in these jurisdictions, and I have never been suspended, disbarred, or disciplined by a court or administrative agency in any of these jurisdictions, nor am I subject to any proceeding for suspension, disbarment, or disciplinary action at this time.

3. I have not applied for admission *pro hac vice* in any other pending action in any court of Pennsylvania prior to this motion, and as such I have never been denied admission. I have applied for and been granted admission *pro hac vice* in previous Pennsylvania Public Utility Commission proceedings, which are not currently pending.

4. I will 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.

5. If granted *pro hac vice* admission in this proceeding, I 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.

6. If granted *pro hac vice* admission in this proceeding, I consent to the appointment of Sponsor as the agent upon whom service of process 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.

Respectfully submitted,



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Randall S. Rich  
Pierce Atwood LLP  
1875 K Street, NW, Suite 700  
Washington, DC 20006  
202-530-6424  
E-mail: [r-rich@pierceanwood.com](mailto:r-rich@pierceanwood.com)

*Counsel for PBF Holding Company LLC*

Dated: January 23, 2025

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a true copy of the foregoing documents upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA ELECTRONIC MAIL**

David B. MacGregor  
Anthony D. Kanagy  
Garrett P. Lent  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)  
*Counsel for Laurel Pipe Line Company L.P.*



---

Todd S. Stewart

DATED: January 23, 2025