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May 8, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, 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; **PREHEARING CONFERENCE MEMORANDUM**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum of Monroe Energy, LLC, Lucknow-Highspire Terminals, LLC, Sheetz, Inc. and PBF Holding Company LLC in the above-referenced matter. A copy of this Memorandum 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: Administrative Law Judge Eranda Vero (via electronic mail – evero@pa.gov)
Per Certificate of Service

CERTIFICATE OF SERVICE

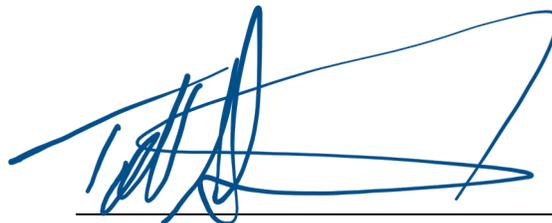
I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC MAIL

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Todd S. Stewart

DATED: May 8, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING CONFERENCE MEMORANDUM
OF MONROE ENERGY, LLC, LUCKNOW-HIGHSPIRE TERMINALS, LLC
SHEETZ, INC. AND PBF HOLDING COMPANY LLC**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE ERANDA VERO:

NOW COME Monroe Energy, LLC, Lucknow-Highspire Terminals, LLC, Sheetz, Inc. and PBF Holding Company LLC (“Complainants”), and hereby submit this Prehearing Conference Memorandum in compliance with the Prehearing Conference Notice issued May 5, 2025. The fundamental issue is whether Laurel Pipe Line Company, L.P. (“Laurel”) can extend bi-directional service to additional segments of the Laurel Pipeline that now flow only east to west, without obtaining the Commission’s approval and without addressing shippers’ concerns about unlawfully inferior service.

A. A PROPOSED PLAN AND SCHEDULE OF DISCOVERY

Complainants have endeavored to conduct discovery as early in the proceeding as possible, given the pendency of Laurel’s preliminary objections, and will make a good faith attempt to

resolve any discovery disputes informally. Complainants expect that initial discovery should take until the end of June or early July to complete. The Complainants do not expect that discovery other than interrogatories, requests for production of documents, and requests for admission will be necessary until after written testimony is circulated.

B. POSSIBILITY OF SETTLEMENT

Parties have already expressed interest in potential settlement and Complainants will remain willing to engage in settlement discussions .

C. ISSUES

At this time, the issues to be addressed by Complainants include, but are not limited to, the following:

1. Whether Laurel's decision to proceed with bi-directional service without Commission authorization (including the absence of appropriate tariffs on file with and approved by the Commission), will adversely impact and impair the existing intrastate tariffed pipeline transportation service provided by Laurel to Complainants and constitutes a violation by Laurel of its obligation under Code Sections 1501, 1302 and 1303 to provide safe, adequate and reasonably continuous service consistent with its current tariff to its customers, including the Complainants.

2. Whether the proposed bi-directional service will adversely impact transit time or other operational qualifies for current tariffed intrastate east-to-west deliveries along the Laurel Pipeline.

3. Whether the operational impacts of extended bidirectional service impedes the availability of east-to-west flows such that Laurel is required as a matter of law to file an

application for a certificate of public convenience before attempting to abandon its current service and implement bi-directional service in its place.

4. Whether the proposed changes to Laurel's intrastate service require changes to Laurel's PUC-jurisdictional tariff, including the rules, terms, and conditions under which bi-directional service is to be provided in a manner that does not impair service to the point of constituting abandonment.

5. Whether the proposed changes to Laurel's intrastate service require changes to Laurel's PUC-jurisdictional Capacity Use Agreement with Buckeye, including the rules, terms, and conditions under which bi-directional service is to be provided in a manner that does not conflict with the terms of Buckeye's leased capacity on the Laurel Pipeline.

6. Whether Buckeye's changes to the Reid Vapor Pressure (RVP) level schedule on the Laurel Pipeline unreasonably favor west-to-east shippers over east-to-west shippers in violation of Laurel's obligation to provide safe and adequate service.

7. Complainants reserve the right to update this list of issues upon review of discovery and testimony submitted in this proceeding.

D. AMOUNT OF HEARING TIME NEEDED

Based upon the probable number of witnesses, Complainants estimate that three days should be allotted for hearings.

E. WITNESSES

Complainants are in the process of retaining the consulting firms Secretariat and Pipeline Knowledge Group and expects to present at least one economics expert and at least one pipeline operations expert from those firms. It is likely that there will be several fact witnesses from the individual complainant Companies, but those have not yet been identified.

F. SCHEDULE FOR SUBMISSION OF TESTIMONY, HEARINGS AND BRIEFS

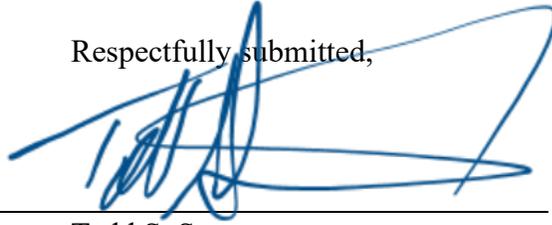
The Complainants propose the following Schedule for submission of testimony, hearings and briefs.

Friday, August 15	Direct Testimony
Friday, September 26	Rebuttal Testimony
Friday, October 17	Surrebuttal Testimony
Tuesday November 4 – Thursday November 6	Evidentiary Hearings
Friday, December 5	Main Briefs Due
Tuesday, December 23	Reply Briefs Due

G. ANY OTHER APPROPRIATE MATTER

WHEREFORE, the Complainants submit this Prehearing Conference Memorandum in anticipation of the May 9 Prehearing Conference in this case.

Respectfully submitted,

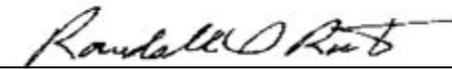


Dated: May 8, 2025

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