
Garrett P. Lent
Principal

glent@postschell.com
717-612-6032 Direct
717-731-1979 Direct Fax
File #: 200842

May 30, 2025

VIA ELECTRONIC FILING

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

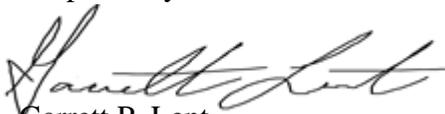
**Re: Monroe Energy, LLC, et al. v. Laurel Pipe Line Company, L.P.
Docket Nos. C-2025-3053018, et al.**

Dear Secretary Homsher:

Enclosed for filing in the above-referenced proceeding is the Motion to Compel on behalf of Laurel Pipe Line Company, L.P.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,


Garrett P. Lent
Principal

GPL/dmc
Attachment

cc: The Honorable Eranda Vero (*via email; w/attachment*)
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).

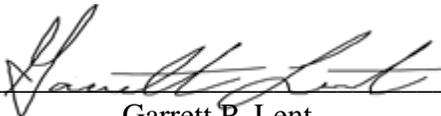
VIA E-MAIL ONLY

Todd S. Stewart
HMS Legal LLP
501 Corporate Circle, Suite 302
Harrisburg, PA 17110
Email: tsstewart@hmslegal.com
Counsel for Monroe Energy, LLC

Robert A. Weishaar, Jr.
Adeolu A. Bakare
McNees Wallace & Nurick, LLC
100 Pine Street
Harrisburg, PA 17101
Email: bweishaar@mcneeslaw.com
abakare@mcneeslaw.com
*Counsel for Lucknow Highspire Terminals,
LLC and Sheetz, Inc.*

Randall S. Rich
Pierce Atwood LLP
1875 K Street, NW, Suite 700
Washington, DC 20006
Email: rrich@pierceanwood.com
*Attorneys for PBF Holding Company LLC
Pro hac vice*

Date: May 30, 2025



Garrett P. Lent

**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. :

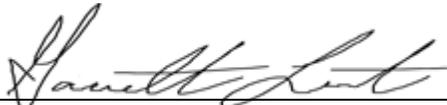
NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

Christopher J. Barr, Esquire (DC ID #375372)
Post & Schell, P.C.
607 14th Street, N.W., Suite 600
Washington, DC 20005-2000
Phone: (202) 347-1000
Fax: (202) 661-6970
E-mail: cbarr@postschell.com

Admitted Pro Hac Vice

Date: May 30, 2025


David B. MacGregor, Esquire (PA ID #28804)
Anthony D. Kanagy, Esquire (PA ID #85522)
Garrett P. Lent, Esquire (PA ID #321566)
Alice W. Wade, Esquire (ID # 335228)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: (717) 731-1970
Fax: (717) 731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: glent@postschell.com
E-mail: alice.wade@postschell.com

Counsel for Laurel Pipe Line Company, L.P.

**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.	:	

**MOTION TO COMPEL ANSWERS TO INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED BY LAUREL PIPE LINE COMPANY, L.P.
ON PBF HOLDING COMPANY LLC – SET I**

TO ADMINISTRATIVE LAW JUDGE ERANDA VERO:

As explained herein, Laurel Pipe Line Company, L.P. (“Laurel” or the “Company”) hereby files, pursuant to 52 Pa. Code § 5.342, this Motion to Compel Answers to its First Set of Interrogatories and Requests for Production of Documents (“Set I Discovery”) directed to PBF Holding Company LLC (“PBF”). The Motion to Compel requests that Administrative Law Judge Eranda Vero (the “ALJ”) direct PBF to provide full and complete responses to Questions 9, 10, 11, 12, 13, 16a, 17a, 17b, 18a, 18b, 19a, 20a, 20b, 20c, 21a, 21b, 22a, 22b, 23a, 23b, 23c, 23d, 24, 25, 26a, 26b, 27a, 27b, 28a, 28b, 29a, 29b, 29c, 29d, 30, 34 (all parts), 35, 36 (all parts), 37 (all parts), 38, 39, 40, 41 (all parts), 42, 43 (all parts), 44, 45 (all parts), 46 (all parts), and 47.of the Set I Discovery as is required by 52 Pa. Code § 5.342(a)(4). In support of this Motion, Laurel states as follows:

I. INTRODUCTION

1. This proceeding was initiated by the filing of the above-captioned Complaint by Monroe Energy, LLC (“Monroe”), Lucknow-Highspire Terminal, LLC (“LHT”), Sheetz, Inc.

(“Sheetz”) and PBF Holding Company LLC (“PBF”) (collectively the “Complainants”), dated January 21, 2025.

2. On February 11, 2025, Laurel filed its Answer and New Matter (“ANM”), and Preliminary Objections (“PO”) to the Complaint in Docket No. C-2025-3053018, rebutting in detail the various claims and arguments of the Complainants.

3. On February 21, 2025, Monroe, Sheetz, PBF, and PBF filed a response to the Preliminary Objections of Laurel.

4. On May 5, 2025, Laurel served Set I Discovery on PBF. A copy of Laurel Set I Discovery to PBF is provided as Appendix A hereto.

5. PBF timely objected to Set I Discovery on May 15, 2025. PBF lodged objections to Request Nos. 9, 10, 11, 12, 13, 16a, 17a, 17b, 18a, 18b, 19a, 20a, 20b, 20c, 21a, 21b, 22a, 22b, 23a, 23b, 23c, 23d, 24, 25, 26a, 26b, 27a, 27b, 28a, 28b, 29a, 29b, 29c, 29d, 30, 34 (all parts), 35, 36 (all parts), 37 (all parts), 38, 39, 40, 41 (all parts), 42, 43 (all parts), 44, 45 (all parts), 46 (all parts), and 47. A copy of PBF’s Objections is provided as Appendix B hereto.

6. Counsel for Laurel and PBF met and conferred regarding possible resolution of the objections on May 27, 2025. The parties were not able to resolve the objections with respect to Nos. 16, 20-22, 38-40, 41a and 44. PBF also indicated that it would provide responses to Nos. 16, 20-22, 38-40, 41a and 44, subject to and notwithstanding its objections to the same; Laurel reserved its rights to review responses to these requests and file a motion to compel with respect to any questions it believes were not sufficiently responsive. PBF further indicated that it intended to respond to certain of the requests by indicating it will address those questions in the Complainants’ written direct testimony, as it interprets those questions asking for the information regarding the basis for PBF’s “belief” or “understanding” as seeking only conclusions and positions. Laurel

indicated its disagreement with this position, and explained that Laurel is not seeking the mental impressions of counsel or experts but instead the facts or information PBF possesses that form the basis for its allegations (i.e., beliefs) as set forth in the Complaint.

7. Also on May 27, 2025, PBF served its responses to the Set I Discovery. Consistent with its prior indication, PBF maintained its objections to Nos. 16, 20-22, 38-40, 41a and 44 and provided responses subject to and notwithstanding its objections to Nos. 9, 10, 11, 12, 13, 17a, 17b, 18a, 18b, 23a, 23c, 24, 25, 26a, 26b, 27a, 27b, 28a, 28b, 29a, 29b, 29c, 29d, 30, 34a, 34b, 34c, 35, 36 (all parts), 37 (all parts), 42b, 42, 43 (all), 45 (all parts), 46, 47. PBF also responded to certain of the Set I Discovery request by indicating it will address those questions in the Complainants' written direct testimony.

8. Laurel hereby files its Motion to Compel PBF to respond to Set I, 9, 10, 11, 12, 13, 16a, 17a, 17b, 18a, 18b, 19a, 20a, 20b, 20c, 21a, 21b, 22a, 22b, 23a, 23b, 23c, 23d, 24, 25, 26a, 26b, 27a, 27b, 28a, 28b, 29a, 29b, 29c, 29d, 30, 34 (all parts), 35, 36 (all parts), 37 (all parts), 38, 39, 40, 41 (all parts), 42, 43 (all parts), 44, 45 (all parts), 46 (all parts), and 47.

II. ARGUMENT

A. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 9 OF THE SET I DISCOVERY.

9. Laurel – Set I, Request No. 9 provides as follows:

9. Please identify the sentence(s), phrase(s), or word(s) in Laurel's certificate of public convenience that PBF believes prohibit Laurel from providing intrastate service in any direction other than east-to-west in Pennsylvania.

10. PBF objects to Request No. 9 to the extent it seeks information that is subject to privilege under Sections 5.323 of the Commission's regulations. 52 Pa. Code § 5.323(a).

11. However, Request No. 9 does not seek privileged information. Request No. 7 seeks to clarify claims made in the Complaint by seeking information about the factual basis for PBF's allegations in its Complaint. Such information and materials would not be exempt from discovery under Sections 5.323(a). If PBF is asserting that their allegations are only based on legal conclusions, then PBF should be required to supply a verified response from a company representative, other than counsel, indicating that PBF has no facts within its possession or control related to the request and that the sole basis for their position on the issue identified is a legal conclusion. If, however, PBF's allegation is based upon non-privileged, non-opinion facts and information within its possession, Laurel is entitled to probe and understand those facts and information through discovery.

12. Further, the objections are not valid pursuant to 52 Pa. Code § 5.342(c). Objections are not valid "if based solely on the claim that an answer will involve an opinion or contention that is related to a fact or the application of law to fact." 52 Pa. Code § 5.342(c)(5). The objections also fail to "[i]nclude a description of the facts and circumstances purporting to justify the objection" as required by 52 Pa. Code § 5.342(c)(3). The objections are, therefore, invalid.

13. Therefore, PBF should be compelled to provide a full and complete response to Request No. 9. Alternatively, should PBF continue to refuse to provide relevant information that is necessary to evaluate its claims in its Complaint, it should be barred from continuing to assert or attempting to prove its claims as a part of this proceeding.

14. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 9 of Set I discovery.

B. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 10 OF THE SET I DISCOVERY.

15. Laurel – Set I, Request No. 10 provides as follows:

10. Please identify the sentence(s), phrase(s), or word(s) in Laurel's Tariff Pa. PUC No. 83 for intrastate service that PBF believes prohibit Laurel from providing intrastate service in any direction other than east-to-west in Pennsylvania.

16. PBF objects to Request No. 10 to the extent it seeks information that is subject to privilege under Sections 5.323 of the Commission's regulations. 52 Pa. Code § 5.323(a). Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and legal opinions or conclusions of PBF's attorneys and the specificity of the objections.

17. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 10 of Set I discovery.

C. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 11 OF THE SET I DISCOVERY.

18. Laurel – Set I, Request No. 11 provides as follows:

11. Has capacity on Laurel's pipeline system been used to provide service in a direction other than east-to-west since 2019? Fully explain any answer other than an unqualified affirmative.

19. PBF objects to Request No. 11 on the grounds that the term "capacity on Laurel's pipeline system" is undefined and therefore vague. It further objects on the grounds that this information is in Laurel's possession.

20. The objections are not valid pursuant to 52 Pa. Code § 5.342(c). Objections are not valid "if based solely on the claim that an answer will involve an opinion or contention that is related to a fact or the application of law to fact." 52 Pa. Code § 5.342(c)(5). The objections also fail to "[i]nclude a description of the facts and circumstances purporting to justify the objection" as required by 52 Pa. Code § 5.342(c)(3). It is not clear from these objections why the identified

phrase is vague. Further, the Complainants use similar phrases in their Complaint, such as “capacity on Laurel’s pipeline” (Complaint ¶ 1). The Attachments on the Complaint use the phrase “capacity on the Laurel Pipeline 12 times. As the Complainant’s use the term to advance their own claims, they have an understanding of the same.

21. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 11 of Set I discovery.

D. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 12 OF THE SET I DISCOVERY.

22. Laurel – Set I, Request No. 12 provides as follows:

12. Please identify the sentence(s), phrase(s), or word(s) in Laurel’s certificate of public convenience that PBF believes require Laurel maintain an amount of capacity over any segment of its Pennsylvania pipe line system.

23. PBF objects to Request No. 12 to the extent it seeks information that is subject to privilege under Sections 5.323 of the Commission’s regulations. 52 Pa. Code § 5.323(a). Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections.

24. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 12 of Set I discovery.

E. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 13 OF THE SET I DISCOVERY.

25. Laurel – Set I, Request No. 13 provides as follows:

13. Please identify the sentence(s), phrase(s), or word(s) in Laurel’s Tariff Pa. PUC No. 83 for intrastate service that PBF

believes require Laurel maintain a specific amount of capacity over any segment of its Pennsylvania pipe line system.

26. PBF objects to Request No. 13 to the extent it seeks information that is subject to privilege under Sections 5.323 of the Commission's regulations. 52 Pa. Code § 5.323(a). Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions opinions or conclusions of PBF's attorneys and the specificity of the objections.

27. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 13 of Set I discovery.

F. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 16 OF THE SET I DISCOVERY.

28. Laurel – Set I, Request No. 16 provides as follows:

16. Reference Complaint ¶ 1, where the Complainants allege that "Buckeye's proposal would require a partial abandonment, by Laurel, of east-to-west petroleum products pipeline transportation service that Laurel has been providing exclusively on this segment of the Laurel pipeline, Sinking Spring to Eldorado, since 1957." Please explain in detail:

- a. Please define the phrase "partial abandonment" as PBF understands this term to be used in Complaint ¶ 1.
- b. Provide all Documents relied upon to provide the definition requested in subpart (a).

29. PBF objects to Request No. 16 to the extent it seeks information that is subject to privilege under Sections 5.323 of the Commission's regulations. 52 Pa. Code §§ 5.323(a).

30. First, Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant's objection on the

grounds that the information sought call for the disclosure of the mental impressions and opinions or conclusions opinions or conclusions of PBF’s attorneys and the specificity of the objections.

31. PBF indicates in its objection that it relies on the “broadest possible”: interpretation of the term in the Code “and decisions interpreting and applying” 66 Pa. C.S. §1102(a)(2). (Objections at p. 10) This is not responsive to the question. As defining this term is directly relevant to the claims asserted in the Complaint, PBF should be compelled to define it.

32. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 16 of Set I discovery.

G. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 17A AND 17B OF THE SET I DISCOVERY.

33. Laurel – Set I, Request No. 17A and 17B provides as follows:

17. Reference Complaint ¶ 2 where the Complainants allege that “Buckeye has not provided, or even endeavored to provide, firm assurances or guarantees to the Complainants or other users of the Laurel Pipeline that the current levels of east-to-west intrastate pipeline service will be maintained after the expiration of the Settlement condition that currently prohibits Laurel from reducing east-to-west capacity until after 2026.”:

- a. Is it PBF’s position that Buckeye must provide “firm assurances or guarantees to the Complainants or other users of the Laurel Pipeline that the current levels of east-to-west intrastate pipeline service will be maintained after the expiration of the Settlement condition that currently prohibits Laurel from reducing east-to-west capacity until after 2026”? Fully explain any response.
- b. What “firm assurances or guarantees to the Complainants or other users of the Laurel Pipeline that the current levels of east-to-west intrastate pipeline service will be maintained after the expiration of the Settlement condition that currently prohibits Laurel from reducing east-to-west capacity until after 2026” does PBF believe Buckeye must provide in order for Laurel to avoid providing

unreasonable and inadequate service? Fully explain any response.

34. PBF objects to Request No. 17A and 17B to the extent they seek information that is subject to privilege under Sections 5.323 of the Commission's regulations. 52 Pa. Code §§ 5.323(a).

35. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra. with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and the specificity of the objections.

36. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 17 of Set I discovery.

H. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 18A AND 18B OF THE SET I DISCOVERY.

37. Laurel – Set I, Request No. 18A and 18B provides as follows:

18. Reference Complaint ¶ 21, where the Complainants allege that “Despite the clear precedent established in the 2016 Application case that changing the direction of flow on a pipeline from a single direction, as it has been since 1957, to bi-directional flow, in this case of the east-to-west service, requires a CPC and is otherwise unreasonable service...”

- a. Identify with specificity the “clear precedent” that PBF believes was “established in the 2016 Application case that changing the direction of flow on a pipeline from a single direction...to bi-directional flow...requires a CPC.
- b. Identify with specificity the “clear precedent” that PBF believes was “established in the 2016 Application case that changing the direction of flow on a pipeline from a single direction...to bi-directional flow...and is otherwise unreasonable service.”

38. PBF objects to Request No. 18A and 18B to the extent they seek information that is subject to privilege under Sections 5.323 of the Commission’s regulations. 52 Pa. Code §§ 5.323(a). Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections.

39. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 18 of Set I discovery.

I. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 19A OF THE SET I DISCOVERY.

40. Laurel – Set I, Request No. 19 provides as follows:

19. Reference Complaint ¶ 23 where the Complainants alleged that “On December 20, 2024...Buckeye announced plans to change its Reid Vapor Pressure (RVP) level schedule on the Laurel Pipeline.”

- a. Is it PBF’s understanding that Buckeye is a Pennsylvania public utility? Fully explain any response.
- b. Is it PBF’s understanding that Buckeye is a party to this proceeding? Fully explain any response.

41. PBF objects to Request No. 19A to the extent it seeks information that is subject to privilege under Sections 5.323 of the Commission’s regulations. 52 Pa. Code §§ 5.323(a). Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections.

42. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 18 of Set I discovery.

J. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 20A, 20B, AND 20C OF THE SET I DISCOVERY.

43. Laurel – Set I, Request No. 20A, 20B, and 20C provides as follows:

20. Reference Complaint ¶ 23 where the Complainants allege that “the circumstances suggest Buckeye made this change in preparation to ready the system for bi-directional flow, the feasibility of which remains untested.”:

- a. Please identify “the circumstances” that PBF believes “suggest Buckeye made this change in preparation to ready the system for bi-directional flow”. Provide all Documents relied upon to support this belief.
- b. Please define “feasibility” as PBF understands that term to be used in Complaint. Provide all Documents relied upon by PBF to provide this definition..
- c. Please identify and explain the basis for PBF’s belief that the feasibility of bi- directional flow on the Laurel pipe line system “remains untested.” Provide all Documents relied upon to support this belief.

44. PBF objects to Request No. 20A, 20B, and 20C to the extent they seek information that is subject to privilege under Sections 5.323 of the Commission’s regulations. 52 Pa. Code §§ 5.323(a). Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections.

45. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 20 of Set I discovery.

K. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 21A AND 21B OF THE SET I DISCOVERY.

46. Laurel – Set I, Request No. 21A and 21B provides as follows:

21. Reference Complaint ¶ 23 where the Complainants allege that “Buckeye’s actions are a violation of its duty to provide reasonable service under Section 1501 of the Code.”

- a. Identify and explain why PBF believes that Buckeye has a “duty to provide reasonable service under Section 1501 of the Code, and provide all Documents relied upon by PBF to form the basis for this belief.
- b. Fully identify and explain why PBF believes “Buckeye’s actions are a violation of its duty to provide reasonable service under Section 1501 of the Code,” and provide all Documents relied upon by PBF to form the basis for this belief.

47. PBF objects to Request No. 21A and 21B on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys. 52 Pa. Code §§ 5.323(a). Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections.

48. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 21 of Set I discovery.

L. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 22 OF THE SET I DISCOVERY.

49. Laurel – Set I, Request No. 22A and 22B provides as follows:

22. Reference Complaint ¶ 23 where the Complainants allege that “Buckeye’s actions are...discriminatory in that Laurel/Buckeye is unreasonably favoring hypothetical future west-to-east customers

over existing east-to-west shippers, in violation of Section 1502 of the Code...”

- a. Identify and explain why PBF believes that Buckeye is subject to Section 1502 of the Public Utility Code, 66 Pa.C.S. § 1502, and provide all Documents relied upon by PBF to form the basis for this belief.
- b. Fully identify and explain why PBF believes “Buckeye’s actions are...discriminatory in that Laurel/Buckeye is unreasonably favoring hypothetical future west-to-east customers over existing east-to-west shippers, in violation of Section 1502 of the Code...,” and provide all Documents relied upon by PBF to form the basis for this belief.

50. PBF objects to Request No. 22A on the grounds that it calls for the mental impressions and opinions or conclusions of PBF’s attorneys and 22B on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections.

51. Regarding experts, the Commission has held that, “[o]ur discovery rules make it clear that the facts and opinions held by an expert are discoverable to the extent that the discovery does not include the disclosure of mental impressions, conclusions or opinions respecting the value or merit of a claim or defense or respecting strategy, tactics or preliminary or draft versions of written testimony or exhibits.” *N.J.A.C. 13:20-51.4*, Docket No. R-901666, et al., 1991 Pa. PUC LEXIS 54, *250. Furthermore, 52 Pa. Code § 5.324(a) only applies to discovery of “facts known or held by an expert”; it does not broadly exempt from discovery facts known or held by a party. Indeed, if this were the case, a party could shield from discovery all relevant facts within its

possession or control by simply asserting that those facts are known or held by an expert. This is absurd. And, in this case, it begs the question of whether there was any factual basis for the Complaint at all. Indeed, despite filing the Complaint in January of 2025, and claiming that factual disputes requiring a hearing existed, the Complainants later represented in their Prehearing Memorandum that:

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.¹

This statement makes clear that (a) the Complainants had not retained any expert witnesses at the time the Complaint was submitted (and had still not done so a day after Laurel propounded the Set I Discovery), and (b) there are fact witnesses that the Complainants intend to call, who ostensibly have facts or information relevant to their allegations in the Complaint. So, it is either the case that (a) the Complainants do have relevant facts and information within their possession or control which are not subject to 52 Pa. Code § 5.324(a) and this information must be produced, or (b) the Complainants had no factual basis for any of the allegations contained in the Complaint because those allegations were somehow based upon purported “facts known or held” by an unidentified expert that had not be retained at that time.

52. If PBF is asserting that their allegations are only based on expert opinion(s) and/or conclusion(s), and are not based upon any facts within the possession or control of PBF, then PBF should be required to supply a verified response from a company representative, other than counsel, indicating that PBF has no facts within its possession or control related to the request and that the sole basis for their position on the issue identified is an expert conclusion and/or opinion.

¹ Docket No. C-2025-3053018, Complainants’ Prehearing Memorandum, at p. 3 (dated May 8, 2025)

If, however, there is a factual basis for the allegation advanced in the Complaint, it cannot be shielded from disclosure solely because an expert may testify as to that fact at a later date.²

53. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 22 of Set I discovery.

M. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 23A, 23B, 21C, 21D OF THE SET I DISCOVERY.

54. Laurel – Set I, Request No. 23 provides as follows:

23. Reference Complaint ¶ 23 where the Complainants allege that “Buckeye continues to make changes to the schedule that will impact shippers and thus further reduce operational certainty and increase costs.”:

- a. Identify and explain all impacts to shippers that PBF believes will occur, and provide all Documents relied upon by PBF to form the basis for this belief.
- b. Please define “operational certainty” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
- c. Identify, explain and quantify all reductions to “operational certainty” that PBF believes will occur, and provide all Documents relied upon by PBF to form the basis for this belief.
- d. Identify, explain and quantify all increases to costs that PBF believes will occur, and provide all Documents relied upon by PBF to form the basis for this belief.

55. PBF objects to Request No. 23A, 23B, 23C, and 23D on the grounds calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with

² *Pavlak v. Dyer*, 59 Pa. D. & C.4th 353, 356 (2003) (“Pa.R.C.P. 4003.5 . . . allows for the discovery of ‘facts known and opinions held’ by testifying expert witnesses including the grounds for each opinion, even if those facts were acquired in anticipation of litigation.”).

respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's experts.

56. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 23 of Set I discovery.

N. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 24 OF THE SET I DISCOVERY.

57. Laurel – Set I, Request No. 24 provides as follows:

24. Reference Complaint ¶ 24 where the Complainants allege that “This arrangement is problematic for a number of reasons, not the least of which is that it puts Buckeye in the position of the market maker, allowed to decide what products ship physically and which do not.” Identify and explain the basis for PBF's belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief:

58. PBF objects to Request No. 24 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs

51-52 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's experts.

59. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 24 of Set I discovery.

O. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 25 OF THE SET I DISCOVERY.

60. Laurel – Set I, Request No. 25 provides as follows:

25. Reference Complaint ¶ 24 where the Complainants allege that “Operationally this leaves shippers in the position of not knowing if, when or how their products might move, even though they may have customers that need physical barrels and there is no source for those barrels at their required delivery point.” Identify and explain the basis for PBF's belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.

61. PBF objects to Request No. 25 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 10 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's experts.

62. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 25 of Set I discovery.

P. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 26A AND 26B OF THE SET I DISCOVERY.

63. Laurel – Set I, Request No. 26 provides as follows:

26. Reference Complaint ¶ 24 where the Complainants allege that “Under the present limited bi-directional operation of the Laurel Pipeline there have been operational challenges for shippers;...”

- a. Please define “operational challenges” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
- b. Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
- c. Identify all instances where PBF communicated “operational challenges” related to existing bidirectional service to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
- d. Identify all instances where PBF communicated “operational challenges” related to existing bidirectional service to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

64. PBF objects to Request No. 26A and 26B on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set

I discovery, in paragraph 51-52 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's experts.

65. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 26 of Set I discovery.

Q. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 27A AND 27B OF THE SET I DISCOVERY.

66. Laurel – Set I, Request No. 27 provides as follows:

27. Reference Complaint ¶ 24 where the Complainants allege that “transit times have increased;...”

- a. Please define “increased” as PBF understands that term to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
- b. Identify and explain the basis for PBF's belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
- c. Identify all instances where PBF communicated that transit times have “increased” related to existing bidirectional service to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
- d. Identify all instances where PBF communicated that transit times have “increased” related to existing bidirectional service to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

67. PBF objects to Request No. 27A and 27B on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with

respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraph 51-52 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's experts.

68. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 27 of Set I discovery.

R. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 28A AND 28B OF THE SET I DISCOVERY.

69. Laurel – Set I, Request No. 28 provides as follows:

28. Reference Complaint ¶ 24 where the Complainants allege that “concerns about deliverability have certainly impacted on the willingness of shippers to use the Laurel Pipeline.”

- a. Please define “concerns about deliverability” as PBF understands that term to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
- b. Identify and explain the basis for PBF's belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
- c. Identify all instances where PBF communicated “concerns about deliverability” related to existing bidirectional service to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
- d. Identify all instances where PBF communicated “concerns about deliverability” related to existing bidirectional service to any individual responsible

for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

70. PBF objects to Request No. 28A and 28B on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's experts.

71. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 28 of Set I discovery.

S. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 29A, 29B, 29C, AND 29D OF THE SET I DISCOVERY.

72. Laurel – Set I, Request No. 29 provides as follows:

27. Reference Complaint ¶ 24 where the Complainants allege that “concerns about deliverability have certainly impacted on the willingness of shippers to use the Laurel Pipeline.”

- a. Please define “impacted on the willingness of shippers” as PBF understands that term to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
- b. Identify and explain the basis for PBF's belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.

- c. Identify all instances where PBF communicated “impacted on the willingness of shippers” to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
- d. Identify all instances where PBF communicated “impacted on the willingness of shippers” to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

73. PBF objects to Request No. 29A and 29B on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. PBF objects to request No. 29C and 29D on the grounds that the question is so, “awkwardly worded as to be incomprehensible, vague, and ambiguous.”

74. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraph 51-52 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s experts.

75. Further, the objections are not valid pursuant to 52 Pa. Code § 5.342(c). Objections are not valid “if based solely on the claim that an answer will involve an opinion or contention that is related to a fact or the application of law to fact.” 52 Pa. Code § 5.342(c)(5). The objections also fail to “[i]nclude a description of the facts and circumstances purporting to justify the objection” as re-quired by 52 Pa. Code § 5.342(c)(3). Because the objections do not conform to

Commission requirements, is not clear from these objections what parts of the question are vague. Further, the phrase “impacted on the willingness of shippers” is used by the Complainants in their Complaint. (Complaint ¶ 24). Complainants, therefore, have an understanding of the meaning of the same.

76. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 29 of Set I discovery.

T. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 30 OF THE SET I DISCOVERY.

77. Laurel – Set I, Request No. 30 provides as follows:

30. Identify all instances where PBF communicated any concerns, issues, problems or questions related to the existing bidirectional operation of Laurel’s pipe line system to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).

78. PBF objects to Request No. 30 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s experts.

79. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 30 of Set I discovery.

U. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 34 OF THE SET I DISCOVERY.

80. Laurel – Set I, Request No. 34 provides as follows:

34. Reference Complaint ¶ 24 where the Complainants allege that “it is true that east-to-west volumes have slightly declined in the past several years”.

- a. Identify the time period that comprises “the past several years.”
- b. What is PBF’s understanding of the amount by which intrastate “east-to-west” volumes have declined over the Laurel pipe line system for the period identified in subpart (a)? Provide all Documents relied upon by PBF to provide a response.
- c. What is PBF’s understanding of the amount by which interstate “east-to-west” volumes have declined over the Laurel pipe line system for the period identified in subpart (a)? Provide all Documents relied upon by PBF to provide a response.

81. PBF objects to Request No. 34 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s experts.

82. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 34 of Set I discovery.

V. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 35 OF THE SET I DISCOVERY.

83. Laurel – Set I, Request No. 35 provides as follows:

35. Reference Complaint ¶ 24 where the Complainants allege that “operational challenges are at least one cause of this decline in east-to-west volumes”. Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.

84. PBF objects to Request No. 35 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s experts.

85. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 35 of Set I discovery.

W. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 36 OF THE SET I DISCOVERY.

86. Laurel – Set I, Request No. 36 provides as follows:

36. Reference Complaint ¶ 28 where the Complainants allege that “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.”

- a. Please define “adversely impact and impair” as PBF understands that phrase to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
- b. Please define “safe” as PBF understands that term to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
- c. Identify and explain the basis for PBF’s belief that Laurel will not provide “safe” service, and provide all Documents relied upon by PBF to form the basis for this belief.
- d. Please define “adequate” as PBF understands that term to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
- e. Identify and explain the basis for PBF’s belief that Laurel will not provide “adequate” service, and provide all Documents relied upon by PBF to form the basis for this belief.
- f. Please define “reasonably continuous service” as PBF understands that phrase to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
- g. Identify and explain the basis for PBF’s belief that Laurel will not provide “reasonably continuous service” service, and provide all Documents relied upon by PBF to form the basis for this belief.

87. PBF objects to all parts of Request No. 36 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the

mental impressions and opinions or conclusions of PBF's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's experts.

88. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 36 of Set I discovery.

X. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 37 OF THE SET I DISCOVERY.

89. Laurel – Set I, Request No. 37 provides as follows:

37. Reference Complaint ¶ 29.

- a. Please Identify, explain and quantify all loss of profit and revenues that PBF believes it will incur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- b. Identify, explain, and provide copies of all firm petroleum products delivery agreements that PBF believes will be impacted due to the subject matter of the Complaint.
- c. Identify, explain and quantify all increased wholesale prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- d. Identify, explain and quantify all increased retail prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- e. Identify, explain and quantify all increased wholesale prices for diesel fuel that PBF believes will occur due to the subject matter of the Complaint,

and provide all Documents relied upon to provide a response.

- f. Identify, explain and quantify all increased retail prices for diesel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- g. Identify, explain and quantify all fuel availability constraints for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- h. Identify, explain and quantify all fuel availability constraints for diesel fuel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- i. Identify, explain and quantify “the nature and level of intrastate pipeline transportation service currently available under Laurel's existing tariff” that PBF believes will be impacted due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response

90. PBF objects to all parts of Request No. 37 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. The questions are also objected to on the basis that they are vague, that responding would create an unreasonable burden, and that it would require unreasonable investigation.

91. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-

52 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's experts.

92. Further, as these objections do not conform to Commission regulation, PBF provides no explanation regarding what portions of the question are vague, how it would be burdensome, and why it would require unreasonable investigation by PBF.

93. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 37 of Set I discovery.

Y. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 38 OF THE SET I DISCOVERY.

94. Laurel – Set I, Request No. 38 provides as follows:

38. Reference Complaint ¶ 29. Identify and explain all forms of relief that PBF is seeking under Count No. 1 of the Complaint.

95. PBF objects to Request No. 38 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraphs 11-13 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's experts.

96. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 38 of Set I discovery.

Z. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 39 OF THE SET I DISCOVERY.

97. Laurel – Set I, Request No. 39 provides as follows:

39. Reference Complaint ¶ 33. Identify and explain all “written assurances and guarantees in any tariffs, agreements, shipper manuals or other legally binding documents” that PBF is seeking as relief in this proceeding.

98. PBF objects to Request No. 39 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s experts.

99. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 39 of Set I discovery.

AA. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 41 OF THE SET I DISCOVERY.

100. Laurel – Set I, Request No. 41 provides as follows:

41. Reference Complaint ¶ 33.

a. Please define “abandoned in part” as PBF understands that phrase to be used in Complaint ¶ 33, and provide all Documents relied upon by PBF to provide this definition.

- b. Identify and explain the basis for PBF's belief that Laurel's existing east-to-west intrastate service will be "abandoned in part", and provide all Documents relied upon by PBF to form the basis for this belief

101. PBF objects to Request No. 41 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's experts.

102. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 41 of Set I discovery.

BB. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 42 OF THE SET I DISCOVERY.

103. Laurel – Set I, Request No. 42 provides as follows:

40. Reference Complaint ¶ 34. Identify and explain all changes to Laurel's "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" that PBF is seeking as relief in this proceeding

104. PBF objects to Request No. 42 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant's objection on

the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant's objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF's experts.

105. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 42 of Set I discovery.

CC. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 43 OF THE SET I DISCOVERY.

106. Laurel – Set I, Request No. 43 provides as follows:

43. Reference Complaint ¶ 35.
- a. Please Identify, explain and quantify all loss of profit and revenues that PBF believes it will incur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - b. Identify, explain, and provide copies of all firm petroleum products delivery agreements that PBF believes will be impacted due to the subject matter of the Complaint.
 - c. Identify, explain and quantify all increased wholesale prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - d. Identify, explain and quantify all increased retail prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - e. Identify, explain and quantify all increased wholesale prices for diesel fuel that PBF believes will occur due to the subject matter of the Complaint,

and provide all Documents relied upon to provide a response.

- f. Identify, explain and quantify all increased retail prices for diesel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- g. Identify, explain and quantify “the adequacy of fuel supplies” for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- h. Identify, explain and quantify “the adequacy of fuel supplies” for diesel fuel that PBF believes will be threatened due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.

107. PBF objects to all parts of Request No. 43 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Further, PBF objections on the grounds that the questions are vague, that responding would be unreasonably burden, and that they would require unreasonable investigation by PBF. 52 Pa. Code § 5.361(a)(2), (4).

108. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s experts.

109. Further, PBF provides no explanation regarding what portions of the question are vague, how it would be burdensome, and why it would require unreasonable investigation by PBF.

Further, it should be noted that terms such as “adequacy of fuel supplies, are used by the Complainants in their Complaint and thus the Complainants can be assumed to have an understanding of their meaning. (Complaint ¶ 35.)

110. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 43 of Set I discovery.

DD. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 44 OF THE SET I DISCOVERY.

111. Laurel – Set I, Request No. 44 provides as follows:

42. Reference Complaint ¶ 29. Identify and explain all forms of relief that PBF is seeking under Count No. 1 of the Complaint.

112. PBF objects to Request No. 44 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s experts.

113. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 44 of Set I discovery.

EE. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 45 OF THE SET I DISCOVERY.

114. Laurel – Set I, Request No. 45 provides as follows:

45. Reference Response to POs ¶ 17.
- a. Please define “alteration of service less than permanent flow reversal” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
 - b. Fully explain the basis for PBF’s belief that an “alteration of service” is an abandonment of service, and provide all Documents relied upon by PBF to form this belief.
 - a. Please define “sufficiently diminish flows” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
 - b. Please define “sufficiently diminish flows to constitute an abandonment” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
 - c. Fully explain the basis for PBF’s belief that “sufficiently diminishing flows” is an abandonment of service, and provide all Documents relied upon by PBF to form this belief.

115. PBF objects to Request No. 45 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s experts.

116. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 45 of Set I discovery.

FF. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 46 OF THE SET I DISCOVERY.

117. Laurel – Set I, Request No. 46 provides as follows:

44. Reference Response to POs ¶ 30.
 - a. Please define “sufficient operational challenges” as PBF understands that phrase to be used in Response to POs ¶30, and provide all Documents relied upon by PBF to provide this definition.
 - b. Please define “sufficient operational challenges to constitute an abandonment of service” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
 - c. Fully explain the basis for PBF’s belief that “sufficiently operational challenges” are an abandonment of service, and provide all Documents relied upon by PBF to form this belief.

118. PBF objects to Request No. 46 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 9 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraphs 51-52 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s experts.

119. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 46 of Set I discovery.

GG. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 47 OF THE SET I DISCOVERY.

120. Laurel – Set I, Request No. 47 provides as follows:

47. Reference Response to POs ¶ 33 where the Complainants state “Complainants claim that Laurel’s expansion of bi-directional service conflicts with the 40,000 to 60,000 bpd of capacity allocated to Buckeye under the Capacity Use Agreement, which is a contract related to rates, raises an inconsistency between the proposed expansion of bi-directional service and Laurel’s tariff.” Identify the specific paragraph of the Complaint that alleges “Laurel’s expansion of bi-directional service conflicts with the 40,000 to 60,000 bpd of capacity allocated to Buckeye under the Capacity Use Agreement.”.

121. PBF objects to Request No. 47 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 8 of the Set I discovery, in paragraph 11-13 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 22 of the Set I discovery, in paragraph 51-52 supra with regard to the Complainant’s objection on the grounds that the information sought calls for the disclosure of the mental impressions and opinions or conclusions of PBF’s experts.

122. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 47 of Set I discovery.

III. CONCLUSION

WHEREFORE, for the foregoing reasons, Laurel Pipe Line Company, L.P. respectfully requests that Administrative Law Judge Eranda Vero grant this Motion to Compel and order PBF Holding Company LLC to fully answer to Request Nos. 9, 10, 11, 12, 13, 16a, 17a, 17b, 18a, 18b, 19a, 20a, 20b, 20c, 21a, 21b, 22a, 22b, 23a, 23b, 23c, 23d, 24, 25, 26a, 26b, 27a, 27b, 28a, 28b, 29a, 29b, 29c, 29d, 30, 34 (all parts), 35, 36 (all parts), 37 (all parts), 38, 39, 40, 41 (all parts), 42, 43 (all parts), 44, 45 (all parts), 46 (all parts), and 47 of the Set I Discovery.

Respectfully submitted,



Christopher J. Barr, Esquire (DC ID #375372)
Post & Schell, P.C.
607 14th Street, N.W., Suite 600
Washington, DC 20005-2000
Phone: (202) 347-1000
Fax: (202) 661-6970
E-mail: cbarr@postschell.com

Admitted Pro Hac Vice

Date: May 30, 2025

David B. MacGregor, Esquire (PA ID #28804)
Anthony D. Kanagy, Esquire (PA ID #85522)
Garrett P. Lent, Esquire (PA ID #321566)
Alice W. Wade, Esquire (ID # 335228)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: (717) 731-1970
Fax: (717) 731-1985
E-mail: dmacgregor@postschell.com
E-mail: akanagy@postschell.com
E-mail: glent@postschell.com
E-mail: alice.wade@postschell.com

Counsel for Laurel Pipe Line Company, L.P.

Appendix A

**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. :

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.
ON PBF HOLDING COMPANY LLC – SET I**

Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 *et seq.*, Laurel Pipe Line Company, L.P. (“Laurel”, or the “Company”) propounds the following Interrogatories and Requests for Production of Documents (hereinafter, “discovery requests”) on PBF Holding Company LLC (“PBF”), Set I.

INSTRUCTIONS AND DEFINITIONS

1. The “Responding Party,” “you,” or “your” means the party to which these discovery requests are propounded and/or all attorneys, agents, affiliates, subsidiaries, employees, consultants, members, constituents, and representatives acting on behalf of the Responding Party.

2. “Commission” means the Pennsylvania Public Utility Commission.

3. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

4. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

5. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.).

In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these discovery requests to attach a copy of each such document to the answers hereto and reference said document in the particular interrogatory to which the document is responsive.

6. “Document” means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check,

check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

7. “Communication” means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

8. “Date” means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

9. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

10. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

11. The answers provided to these discovery requests should first restate the question asked and identify the person(s) supplying the information.

12. In answering these discovery requests, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party’s attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party’s own knowledge. If any of the discovery requests cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party’s inability to answer the remainder, and stating whatever information the Responding Party has

concerning the unanswered portions. If the Responding Party's answer is qualified in any particular, please set forth the details of such qualification.

13. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 5 and state the basis of the objection.

14. If the Responding Party objects to part of a discovery request and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that discovery request. If the Responding Party objects to the scope or time period of a discovery request and refuses to answer for that scope or time period, state the Responding Party's objection and answer the discovery request for the scope or time period that the Responding Party believes is appropriate.

15. If, in connection with a discovery request, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

16. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and (c) the basis on which the privilege or other protection from disclosure is claimed.

17. As set forth in 52 Pa. Code § 5.342(g), these discovery requests are continuing and the Responding Party is obliged to change, supplement, and correct all answers given to conform to new or changing information.

18. “Complaint” means the formal complaint and all supporting data and testimony filed by Monroe Energy, LLC, Lucknow-Highpsire Terminals, LLC, Sheetz, Inc., and PBF Holding Company LLC, at Docket No. C-2025-3053018.

19. “Complainants” means, collectively, Monroe Energy, LLC, Lucknow-Highpsire Terminals, LLC, Sheetz, Inc., and PBF Holding Company LLC.

20. “Answer and New Matter” means the Answer and New Matter to the Complaint filed by Laurel on February 12, 2025, at Docket No. C-2025-3053018.

21. “Answer to New Matter” means the Answer to New Matter submitted by Monroe Energy, LLC, Lucknow-Highpsire Terminals, LLC, Sheetz, Inc., and PBF Holding Company LLC on March 4, 2025, at Docket No. C-2025-3053018.

22. “Preliminary Objections” or “POs” means the Preliminary Objections to the Complaint filed by Laurel on February 12, 2025, at Docket No. C-2025-3053018.

23. “Response to Preliminary Objections” or “Response to POs” means the Response to Preliminary Objections submitted by Monroe Energy, LLC, Lucknow-Highpsire Terminals, LLC, Sheetz, Inc., and PBF Holding Company LLC on March 4, 2025, at Docket No. C-2025-3053018.

24. “Settlement” means the Joint Petition for Approval of Settlement dated July 31, 2019 at, Docket No. C-2018-3003365, *approved without modification* by Order entered Aug. 29, 2019.

**Monroe Energy, LLC, Lucknow-Highpsire Terminals, LLC,
Sheetz, Inc., and PBF Holding Company LLC,**

v.

**Laurel Pipe Line Company, L.P.
Docket No. C-2025-3053018**

**INTERROGATORIES, REQUESTS FOR PRODUCTION OF
DOCUMENTS AND REQUESTS FOR ADMISSION ON
PBF HOLDING COMPANY LLC – SET I**

1. Please identify each person the Complainants jointly plan to call as a fact witness in this proceeding. For each person, please:
 - a) Provide the person's name, home and business address, background, and qualifications, or, alternatively, provide a resume or curriculum vitae for the person;
 - b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
 - c) Provide the source(s) of information relied upon or referenced by the witness.
2. Please identify each person the Complainants jointly plan to call as an expert witness in this proceeding. For each person, please:
 - a) Provide the person's name, home and business address, background, and qualifications, or, alternatively, provide a resume or curriculum vitae for the person;
 - b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
 - c) Provide the source(s) of information relied upon or referenced by the witness.
3. Please provide copies of all exhibits the Complainants jointly intend to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of the Complainants' direct case, please identify the witness who will be sponsoring the exhibit.
4. Identify all subsidiaries referenced in Complaint ¶ 8 that PBF purports are shippers on the Laurel pipe line system.
5. Is PBF participating in the Complaint on behalf of any of its subsidiaries? If so, identify all subsidiaries whose interests PBF purports to represent in the Complaint.
6. Please identify each person PBF individually plans to call as a fact witness in this proceeding. For each person, please:
 - a) Provide the person's name, home and business address, background, and qualifications, or, alternatively, provide a resume or curriculum vitae for the person;

- b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
 - c) Provide the source(s) of information relied upon or referenced by the witness.
7. Please identify each person PBF individually plans to call as an expert witness in this proceeding. For each person, please:
- a) Provide the person's name, home and business address, background, and qualifications, or, alternatively, provide a resume or curriculum vitae for the person;
 - b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
 - c) Provide the source(s) of information relied upon or referenced by the witness.
8. Please provide copies of all exhibits PBF individually intends to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of PBF's direct case, please identify the witness who will be sponsoring the exhibit.
9. Please identify the sentence(s), phrase(s), or word(s) in Laurel's certificate of public convenience that PBF believes prohibit Laurel from providing intrastate service in any direction other than east-to-west in Pennsylvania.
10. Please identify the sentence(s), phrase(s), or word(s) in Laurel's Tariff Pa. PUC No. 83 for intrastate service that PBF believes prohibit Laurel from providing intrastate service in any direction other than east-to-west in Pennsylvania.
11. Has capacity on Laurel's pipeline system been used to provide service in a direction other than east-to-west since 2019? Fully explain any answer other than an unqualified affirmative.
12. Please identify the sentence(s), phrase(s), or word(s) in Laurel's certificate of public convenience that PBF believes require Laurel maintain an amount of capacity over any segment of its Pennsylvania pipe line system.
13. Please identify the sentence(s), phrase(s), or word(s) in Laurel's Tariff Pa. PUC No. 83 for intrastate service that PBF believes require Laurel maintain a specific amount of capacity over any segment of its Pennsylvania pipe line system.
14. What is PBF's understanding of the maximum capacity of the segment of the Laurel pipe line system located between Altoona and Coraopolis in Pennsylvania (i.e., "Line 718" or "L718"? Provide any Documents relied upon to respond to this question.
15. What is PBF's understanding of the maximum capacity of the existing segments of the Laurel pipeline system located between Altoona and Sinking Spring in Pennsylvania (i.e., "Line 720" and "Line 724")? Provide any Documents relied upon to respond to this question.

16. Reference Complaint ¶ 1, where the Complainants allege that “Buckeye’s proposal would require a partial abandonment, by Laurel, of east-to-west petroleum products pipeline transportation service that Laurel has been providing exclusively on this segment of the Laurel pipeline, Sinking Spring to Eldorado, since 1957.” Please explain in detail
 - a) Please define the phrase “partial abandonment” as PBF understands this term to be used in Complaint ¶ 1.
 - b) Provide all Documents relied upon to provide the definition requested in subpart (a).

17. Reference Complaint ¶ 2 where the Complainants allege that “Buckeye has not provided, or even endeavored to provide, firm assurances or guarantees to the Complainants or other users of the Laurel Pipeline that the current levels of east-to-west intrastate pipeline service will be maintained after the expiration of the Settlement condition that currently prohibits Laurel from reducing east-to-west capacity until after 2026.”
 - a) Is it PBF’s position that Buckeye must provide “firm assurances or guarantees to the Complainants or other users of the Laurel Pipeline that the current levels of east-to-west intrastate pipeline service will be maintained after the expiration of the Settlement condition that currently prohibits Laurel from reducing east-to-west capacity until after 2026”? Fully explain any response.
 - b) What “firm assurances or guarantees to the Complainants or other users of the Laurel Pipeline that the current levels of east-to-west intrastate pipeline service will be maintained after the expiration of the Settlement condition that currently prohibits Laurel from reducing east-to-west capacity until after 2026” does PBF believe Buckeye must provide in order for Laurel to avoid providing unreasonable and inadequate service? Fully explain any response.

18. Reference Complaint ¶ 21, where the Complainants allege that “Despite the clear precedent established in the 2016 Application case that changing the direction of flow on a pipeline from a single direction, as it has been since 1957, to bi-directional flow, in this case of the east-to-west service, requires a CPC and is otherwise unreasonable service...”
 - a) Identify with specificity the “clear precedent” that PBF believes was “established in the 2016 Application case that changing the direction of flow on a pipeline from a single direction...to bi-directional flow...requires a CPC”.
 - b) Identify with specificity the “clear precedent” that PBF believes was “established in the 2016 Application case that changing the direction of flow on a pipeline from a single direction...to bi-directional flow...and is otherwise unreasonable service”.

19. Reference Complaint ¶ 23 where the Complainants alleged that “On December 20, 2024... Buckeye announced plans to change its Reid Vapor Pressure (RVP) level schedule on the Laurel Pipeline.”

- a) Is it PBF's understanding that Buckeye is a Pennsylvania public utility? Fully explain any response.
 - b) Is it PBF's understanding that Buckeye is a party to this proceeding? Fully explain any response.
20. Reference Complaint ¶ 23 where the Complainants allege that "the circumstances suggest Buckeye made this change in preparation to ready the system for bi-directional flow, the feasibility of which remains untested."
- a) Please identify "the circumstances" that PBF believes "suggest Buckeye made this change in preparation to ready the system for bi-directional flow". Provide all Documents relied upon to support this belief.
 - b) Please define "feasibility" as PBF understands that term to be used in Complaint ¶ 23. Provide all Documents relied upon by PBF to provide this definition.
 - c) Please identify and explain the basis for PBF's belief that the feasibility of bi-directional flow on the Laurel pipe line system "remains untested." Provide all Documents relied upon to support this belief.
21. Reference Complaint ¶ 23 where the Complainants allege that "Buckeye's actions are a violation of its duty to provide reasonable service under Section 1501 of the Code."
- a) Identify and explain why PBF believes that Buckeye has a "duty to provide reasonable service under Section 1501 of the Code, and provide all Documents relied upon by PBF to form the basis for this belief.
 - b) Fully identify and explain why PBF believes "Buckeye's actions are a violation of its duty to provide reasonable service under Section 1501 of the Code," and provide all Documents relied upon by PBF to form the basis for this belief.
22. Reference Complaint ¶ 23 where the Complainants allege that "Buckeye's actions are...discriminatory in that Laurel/Buckeye is unreasonably favoring hypothetical future west-to-east customers over existing east-to-west shippers, in violation of Section 1502 of the Code..."
- a) Identify and explain why PBF believes that Buckeye is subject to Section 1502 of the Public Utility Code, 66 Pa.C.S. § 1502, and provide all Documents relied upon by PBF to form the basis for this belief.
 - b) Fully identify and explain why PBF believes "Buckeye's actions are...discriminatory in that Laurel/Buckeye is unreasonably favoring hypothetical future west-to-east customers over existing east-to-west shippers, in violation of Section 1502 of the Code..." and provide all Documents relied upon by PBF to form the basis for this belief.

23. Reference Complaint ¶ 23 where the Complainants allege that “Buckeye continues to make changes to the schedule that will impact shippers and thus further reduce operational certainty and increase costs.”
- a) Identify and explain all impacts to shippers that PBF believes will occur, and provide all Documents relied upon by PBF to form the basis for this belief.
 - b) Please define “operational certainty” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
 - c) Identify, explain and quantify all reductions to “operational certainty” that PBF believes will occur, and provide all Documents relied upon by PBF to form the basis for this belief.
 - d) Identify, explain and quantify all increases to costs that PBF believes will occur, and provide all Documents relied upon by PBF to form the basis for this belief.
24. Reference Complaint ¶ 24 where the Complainants allege that “This arrangement is problematic for a number of reasons, not the least of which is that it puts Buckeye in the position of the market maker, allowed to decide what products ship physically and which do not.” Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
25. Reference Complaint ¶ 24 where the Complainants allege that “Operationally this leaves shippers in the position of not knowing if, when or how their products might move, even though they may have customers that need physical barrels and there is no source for those barrels at their required delivery point.” Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
26. Reference Complaint ¶ 24 where the Complainants allege that “Under the present limited bi-directional operation of the Laurel Pipeline there have been operational challenges for shippers;...”
- a) Please define “operational challenges” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
 - b) Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
 - c) Identify all instances where PBF communicated “operational challenges” related to existing bidirectional service to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
 - d) Identify all instances where PBF communicated “operational challenges” related to existing bidirectional service to any individual responsible for the operations of the

Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

27. Reference Complaint ¶ 24 where the Complainants allege that “transit times have increased;...”
 - a) Please define “increased” as PBF understands that term to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
 - b) Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
 - c) Identify all instances where PBF communicated that transit times have “increased” related to existing bidirectional service to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
 - d) Identify all instances where PBF communicated that transit times have “increased” related to existing bidirectional service to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

28. Reference Complaint ¶ 24 where the Complainants allege that “concerns about deliverability have certainly impacted on the willingness of shippers to use the Laurel Pipeline.”
 - a) Please define “concerns about deliverability” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
 - b) Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
 - c) Identify all instances where PBF communicated “concerns about deliverability” related to existing bidirectional service to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
 - d) Identify all instances where PBF communicated “concerns about deliverability” related to existing bidirectional service to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

29. Reference Complaint ¶ 24 where the Complainants allege that “concerns about deliverability have certainly impacted on the willingness of shippers to use the Laurel Pipeline.”

- a) Please define “impacted on the willingness of shippers” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
 - b) Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
 - c) Identify all instances where PBF communicated existing bidirectional service “impacted on the willingness of shippers” to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
 - d) Identify all instances where PBF communicated existing bidirectional service “impacted on the willingness of shippers” to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).
30. Identify all instances where PBF communicated any concerns, issues, problems or questions related to the existing bidirectional operation of Laurel’s pipe line system to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
 31. Identify all instances where PBF communicated any concerns, issues, problems or questions related to the existing bidirectional operation of Laurel’s pipe line system to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).
 32. Identify any informal complaint filed by PBF with the Commission related to the existing bidirectional operation of Laurel’s pipe line system, and provide copies of such informal complaint.
 33. Identify any formal complaint filed by PBF, prior to the Complaint, with the Commission related to the existing bidirectional operation of Laurel’s pipe line system, and provide copies of such formal complaint.
 34. Reference Complaint ¶ 24 where the Complainants allege that “it is true that east-to-west volumes have slightly declined in the past several years”.
 - a) Identify the time period that comprises “the past several years.”
 - b) What is PBF’s understanding of the amount by which intrastate “east-to-west” volumes have declined over the Laurel pipe line system for the period identified in subpart (a)? Provide all Documents relied upon by PBF to provide a response.
 - c) What is PBF’s understanding of the amount by which interstate “east-to-west” volumes have declined over the Laurel pipe line system for the period identified in subpart (a)? Provide all Documents relied upon by PBF to provide a response.

35. Reference Complaint ¶ 24 where the Complainants allege that “operational challenges are at least one cause of this decline in east-to-west volumes”. Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
36. Reference Complaint ¶ 28 where the Complainants allege that “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.”
- a) Please define “adversely impact and impair” as PBF understands that phrase to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
 - b) Please define “safe” as PBF understands that term to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
 - c) Identify and explain the basis for PBF’s belief that Laurel will not provide “safe” service, and provide all Documents relied upon by PBF to form the basis for this belief.
 - d) Please define “adequate” as PBF understands that term to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
 - e) Identify and explain the basis for PBF’s belief that Laurel will not provide “adequate” service, and provide all Documents relied upon by PBF to form the basis for this belief.
 - f) Please define “reasonably continuous service” as PBF understands that phrase to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
 - g) Identify and explain the basis for PBF’s belief that Laurel will not provide “reasonably continuous service” service, and provide all Documents relied upon by PBF to form the basis for this belief.
37. Reference Complaint ¶ 29.
- a) Identify, explain and quantify all loss of profit and revenues that PBF believes it will incur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - b) Identify, explain, and provide copies of all firm petroleum products delivery agreements that PBF believes will be impacted due to the subject matter of the Complaint.

- c) Identify, explain and quantify all increased wholesale prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - d) Identify, explain and quantify all increased retail prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - e) Identify, explain and quantify all increased wholesale prices for diesel fuel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - f) Identify, explain and quantify all increased retail prices for diesel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - g) Identify, explain and quantify all fuel availability constraints for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - h) Identify, explain and quantify all fuel availability constraints for diesel fuel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - i) Identify, explain and quantify “the nature and level of intrastate pipeline transportation service currently available under Laurel's existing tariff” that PBF believes will be impacted due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
38. Reference Complaint ¶ 29. Identify and explain all forms of relief that PBF is seeking under Count No. 1 of the Complaint.
39. Reference Complaint ¶ 33. Identify and explain all “written assurances and guarantees in any tariffs, agreements, shipper manuals or other legally binding documents” that PBF is seeking as relief in this proceeding.
40. Reference Complaint ¶ 33. Identify and explain all “written assurances and guarantees in any tariffs, agreements, shipper manuals or other legally binding documents” that PBF is seeking as relief in this proceeding.
41. Reference Complaint ¶ 33.
- a) Please define “abandoned in part” as PBF understands that phrase to be used in Complaint ¶ 33, and provide all Documents relied upon by PBF to provide this definition.

- b) Identify and explain the basis for PBF's belief that Laurel's existing east-to-west intrastate service will be "abandoned in part", and provide all Documents relied upon by PBF to form the basis for this belief.
42. Reference Complaint ¶ 34. Identify and explain all changes to Laurel's "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" that PBF is seeking as relief in this proceeding.
43. Reference Complaint ¶ 35.
- a) Identify, explain and quantify all loss of profit and revenues that PBF believes it will incur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - b) Identify, explain, and provide copies of all firm petroleum products delivery agreements that PBF believes will be impacted due to the subject matter of the Complaint.
 - c) Identify, explain and quantify all increased wholesale prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - d) Identify, explain and quantify all increased retail prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - e) Identify, explain and quantify all increased wholesale prices for diesel fuel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - f) Identify, explain and quantify all increased retail prices for diesel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - g) Identify, explain and quantify "the adequacy of fuel supplies" for gasoline that PBF believes will be threatened due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
 - h) Identify, explain and quantify "the adequacy of fuel supplies" for diesel that PBF believes will be threatened due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
44. Reference Complaint ¶ 29. Identify and explain all forms of relief that PBF is seeking under Count No. 1 of the Complaint.
45. Reference Response to POs ¶ 17.

- a) Please define “alteration of service less than permanent flow reversal” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
 - b) Fully explain the basis for PBF’s belief that an “alteration of service” is an abandonment of service, and provide all Documents relied upon by PBF to form this belief.
 - a) Please define “sufficiently diminish flows” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
 - b) Please define “sufficiently diminish flows to constitute an abandonment” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
 - c) Fully explain the basis for PBF’s belief that “sufficiently diminishing flows” is an abandonment of service, and provide all Documents relied upon by PBF to form this belief.
46. Reference Response to POs ¶ 30.
- a) Please define “sufficient operational challenges” as PBF understands that phrase to be used in Response to POs ¶30, and provide all Documents relied upon by PBF to provide this definition.
 - b) Please define “sufficient operational challenges to constitute an abandonment of service” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
 - c) Fully explain the basis for PBF’s belief that “sufficiently operational challenges” are an abandonment of service, and provide all Documents relied upon by PBF to form this belief.
47. Reference Response to POs ¶ 33 where the Complainants state “Complainants claim that Laurel's expansion of bi-directional service conflicts with the 40,000 to 60,000 bpd of capacity allocated to Buckeye under the Capacity Use Agreement, which is a contract related to rates, raises an inconsistency between the proposed expansion of bi-directional service and Laurel's tariff.” Identify the specific paragraph of the Complaint that alleges “Laurel's expansion of bi-directional service conflicts with the 40,000 to 60,000 bpd of capacity allocated to Buckeye under the Capacity Use Agreement.”

Appendix B

**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.	:	

**OBJECTIONS OF PBF HOLDING COMPANY, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 *et seq.*, PBF Holding Company, LLC (“PBF” or “Complainant”) objects to the following Interrogatories and Requests for Production of Documents propounded by the Laurel Pipe Line Company, L.P. (“Laurel”, or the “Company”) on PBF, Set I. The basis of the objections, of which there are THREE, are: 1) that the requests are ambiguous, unintelligible and not answerable, there are three such requests that are objected-to; 2) that the requests are unreasonably burdensome and would require unreasonable investigation, there are two such requests that are objected-to; and/or, 3) that the requests seek the mental impressions of the attorney or representative other than the attorney, which is prohibited by the Commission’s Regulations at 52 Pa. Code § 5.323:

The discovery may not include disclosure of the mental impressions of a party’s attorney or his conclusions, opinions, memoranda, notes, summaries, legal research or legal theories. With respect to the representative of a party other than the party’s attorney, discovery may not include disclosure of his mental impressions,

conclusions or opinions respecting the value or merit of a claim or defense or respecting strategy, tactics or preliminary or draft versions of written testimony or exhibits, whether or not final versions of the testimony or exhibits are offered into evidence.

The requests also impinge upon 52 Pa. Code § 5.324(a) which addresses the situation where there is expert testimony to be provided, and the witness is permitted to respond with timely submitted written testimony. Laurel is seeking to discover the Complainant's case before the case is presented, even though written testimony will be provided in this case.

The objected-to interrogatories, other than the incomprehensible ones, all seek the legal theories or mental impressions of the attorney or representative which are not discoverable. To the extent that the Complainants, including PBF, address any of the issues addressed in the requests in testimony, it may then be appropriate for Laurel to discover information regarding stated opinions or evidence, but not before. Moreover, the regulations provide for expert testimony to be provided in lieu of responding to questions about material to be included in testimony. It is PBF's expectation that such testimony will be provided.

As shown in the attached Exhibit 1, PBF objects to the following requests as for the reason stated therein: 9, 10, 11, 12, 13, 16a, 17a, 17b, 18a, 18b, 19a, 20a, 20b, 20c, 21a, 21b, 22a, 22b, 23a, 23b, 23c, 23d, 24, 25, 26a, 26b, 27a, 27b, 28a, 28b, 29a, 29b, 29c, 29d, 30, 34 (all parts), 35, 36 (all parts), 37 (all parts), 38, 39, 40, 41 (all parts), 42, 43 (all parts), 44, 45 (all parts), 46 (all parts), and 47.

For the reasons stated herein, PBF objects to the listed requests pursuant to 52 Pa. Code § 5.342(e).

Respectfully submitted,



Randall S. Rich
Pierce Atwood, LLP
1875 K Street, NW, Suite 700
Washington, DC 20006
(202) 530-6424
rrich@pierceatwood.com

**Attorneys for
PBF HOLDING COMPANY, LLC**

May 15, 2025

EXHIBIT 1

**OBJECTIONS OF PBF HOLDING COMPANY, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.
Docket No. C-2025-3053018**

9. Please identify the sentence(s), phrase(s), or word(s) in Laurel's certificate of public convenience that PBF believes prohibit Laurel from providing intrastate service in any direction other than east-to-west in Pennsylvania.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF's attorneys. 52 Pa. Code § 5.323 (a).

**OBJECTIONS OF PBF HOLDING COMPANY, LLC TO
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Docket No. C-2025-3053018**

10. Please identify the sentence(s), phrase(s), or word(s) in Laurel's Tariff Pa. PUC No. 83 for intrastate service that PBF believes prohibit Laurel from providing intrastate service in any direction other than east-to-west in Pennsylvania.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF's attorneys. 52 Pa. Code § 5.323 (a).

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Docket No. C-2025-3053018**

11. Has capacity on Laurel’s pipeline system been used to provide service in a direction other than east-to-west since 2019? Fully explain any answer other than an unqualified affirmative.

Objection: Neither the question nor the definitions define the term “capacity on Laurel’s pipeline system” and, as such, the question is vague and ambiguous. Additionally, the information sought is in the possession of Laurel.

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Docket No. C-2025-3053018**

12. Please identify the sentence(s), phrase(s), or word(s) in Laurel's certificate of public convenience that PBF believes require Laurel maintain an amount of capacity over any segment of its Pennsylvania pipe line system.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF's attorneys. 52 Pa. Code § 5.323 (a).

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Docket No. C-2025-3053018**

13. Please identify the sentence(s), phrase(s), or word(s) in Laurel's Tariff Pa. PUC No. 83 for intrastate service that PBF believes require Laurel maintain a specific amount of capacity over any segment of its Pennsylvania pipe line system.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF's attorneys. 52 Pa. Code § 5.323 (a).

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Docket No. C-2025-3053018**

16. Reference Complaint ¶ 1, where the Complainants allege that “Buckeye’s proposal would require a partial abandonment, by Laurel, of east-to-west petroleum products pipeline transportation service that Laurel has been providing exclusively on this segment of the Laurel pipeline, Sinking Spring to Eldorado, since 1957.” Please explain in detail.
- a) Please define the phrase “partial abandonment” as PBF understands this term to be used in Complaint ¶ 1.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys. 52 Pa. Code § 5.323 (a). Without waiving its Objection, PBF relies upon the broadest interpretation given to the term in the Public Utility Code and decisions interpreting and applying 66 Pa. C.S. §1102(a)(2).

- b) Provide all Documents relied upon to provide the definition requested in subpart (a).

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17. Reference Complaint ¶ 2 where the Complainants allege that “Buckeye has not provided, or even endeavored to provide, firm assurances or guarantees to the Complainants or other users of the Laurel Pipeline that the current levels of east-to-west intrastate pipeline service will be maintained after the expiration of the Settlement condition that currently prohibits Laurel from reducing east-to-west capacity until after 2026.”

- a) Is it PBF’s position that Buckeye must provide “firm assurances or guarantees to the Complainants or other users of the Laurel Pipeline that the current levels of east-to-west intrastate pipeline service will be maintained after the expiration of the Settlement condition that currently prohibits Laurel from reducing east-to-west capacity until after 2026”? Fully explain any response.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys. 52 Pa. Code § 5.323 (a).

- b) What “firm assurances or guarantees to the Complainants or other users of the Laurel Pipeline that the current levels of east-to-west intrastate pipeline service will be maintained after the expiration of the Settlement condition that currently prohibits Laurel from reducing east-to-west capacity until after 2026” does PBF believe Buckeye must provide in order for Laurel to avoid providing unreasonable and inadequate service? Fully explain any response.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys. 52 Pa. Code § 5.323 (a).

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Docket No. C-2025-3053018**

18. Reference Complaint ¶ 21, where the Complainants allege that “Despite the clear precedent established in the 2016 Application case that changing the direction of flow on a pipeline from a single direction, as it has been since 1957, to bi-directional flow, in this case of the east-to-west service, requires a CPC and is otherwise unreasonable service...”

- a) Identify with specificity the “clear precedent” that PBF believes was “established in the 2016 Application case that changing the direction of flow on a pipeline from a single direction...to bi-directional flow...requires a CPC”.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys. 52 Pa. Code § 5.323 (a).

- b) Identify with specificity the “clear precedent” that PBF believes was “established in the 2016 Application case that changing the direction of flow on a pipeline from a single direction...to bi-directional flow...and is otherwise unreasonable service”.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys. 52 Pa. Code § 5.323 (a).

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Docket No. C-2025-3053018**

19. Reference Complaint ¶ 23 where the Complainants alleged that “On December 20, 2024... Buckeye announced plans to change its Reid Vapor Pressure (RVP) level schedule on the Laurel Pipeline.”
- a) Is it PBF’s understanding that Buckeye is a Pennsylvania public utility? Fully explain any response.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys. 52 Pa. Code § 5.323 (a).

Without waiving its objection, PBF did not state in ¶ 23 that Buckeye was a Pennsylvania Public Utility. However, Buckeye is registered with the Commission as the Laurel Pipeline’s operator. See, <https://www.puc.pa.gov/utility/1714408>.

- b) Is it PBF’s understanding that Buckeye is a party to this proceeding? Fully explain any response.

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20. Reference Complaint ¶ 23 where the Complainants allege that “the circumstances suggest Buckeye made this change in preparation to ready the system for bi-directional flow, the feasibility of which remains untested.”

- a) Please identify “the circumstances” that PBF believes “suggest Buckeye made this change in preparation to ready the system for bi-directional flow”. Provide all Documents relied upon to support this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys. 52 Pa. Code § 5.323 (a).

- b) Please define “feasibility” as PBF understands that term to be used in Complaint ¶ 23. Provide all Documents relied upon by PBF to provide this definition.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys. 52 Pa. Code § 5.323 (a).

- c) Please identify and explain the basis for PBF’s belief that the feasibility of bi-directional flow on the Laurel pipe line system “remains untested.” Provide all Documents relied upon to support this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys. 52 Pa. Code § 5.323 (a).

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21. Reference Complaint ¶ 23 where the Complainants allege that “Buckeye’s actions are a violation of its duty to provide reasonable service under Section 1501 of the Code.”
- a) Identify and explain why PBF believes that Buckeye has a “duty to provide reasonable service under Section 1501 of the Code, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys. 52 Pa. Code § 5.323 (a).

- b) Fully identify and explain why PBF believes “Buckeye’s actions are a violation of its duty to provide reasonable service under Section 1501 of the Code,” and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys. 52 Pa. Code § 5.323 (a).

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22. Reference Complaint ¶ 23 where the Complainants allege that “Buckeye’s actions are...discriminatory in that Laurel/Buckeye is unreasonably favoring hypothetical future west-to-east customers over existing east-to-west shippers, in violation of Section 1502 of the Code...”
- a) Identify and explain why PBF believes that Buckeye is subject to Section 1502 of the Public Utility Code, 66 Pa.C.S. § 1502, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys. 52 Pa. Code § 5.323 (a).

- b) Fully identify and explain why PBF believes “Buckeye’s actions are...discriminatory in that Laurel/Buckeye is unreasonably favoring hypothetical future west-to-east customers over existing east-to-west shippers, in violation of Section 1502 of the Code...,” and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

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23. Reference Complaint ¶ 23 where the Complainants allege that “Buckeye continues to make changes to the schedule that will impact shippers and thus further reduce operational certainty and increase costs.”

- a) Identify and explain all impacts to shippers that PBF believes will occur, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

- b) Please define “operational certainty” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.

Objection: The term “operational certainty” does not appear in ¶ 24 of the Complaint.

- c) Identify, explain and quantify all reductions to “operational certainty” that PBF believes will occur, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

- d) Identify, explain and quantify all increases to costs that PBF believes will occur, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

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24. Reference Complaint ¶ 24 where the Complainants allege that “This arrangement is problematic for a number of reasons, not the least of which is that it puts Buckeye in the position of the market maker, allowed to decide what products ship physically and which do not.” Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

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25. Reference Complaint ¶ 24 where the Complainants allege that “Operationally this leaves shippers in the position of not knowing if, when or how their products might move, even though they may have customers that need physical barrels and there is no source for those barrels at their required delivery point.” Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

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26. Reference Complaint ¶ 24 where the Complainants allege that “Under the present limited bi-directional operation of the Laurel Pipeline there have been operational challenges for shippers;...”
- a) Please define “operational challenges” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

- b) Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

- c) Identify all instances where PBF communicated “operational challenges” related to existing bidirectional service to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
- d) Identify all instances where PBF communicated “operational challenges” related to existing bidirectional service to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

**OBJECTIONS OF PBF HOLDING COMPANY, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
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BY LAUREL PIPE LINE COMPANY, L.P.
Docket No. C-2025-3053018**

27. Reference Complaint ¶ 24 where the Complainants allege that “transit times have increased;...”
- a) Please define “increased” as PBF understands that term to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

- b) Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

- c) Identify all instances where PBF communicated that transit times have “increased” related to existing bidirectional service to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
- d) Identify all instances where PBF communicated that transit times have “increased” related to existing bidirectional service to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

**OBJECTIONS OF PBF HOLDING COMPANY, LLC TO
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28. Reference Complaint ¶ 24 where the Complainants allege that “concerns about deliverability have certainly impacted on the willingness of shippers to use the Laurel Pipeline.”
- a) Please define “concerns about deliverability” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

- b) Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

- c) Identify all instances where PBF communicated “concerns about deliverability” related to existing bidirectional service to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
- d) Identify all instances where PBF communicated “concerns about deliverability” related to existing bidirectional service to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

**OBJECTIONS OF PBF HOLDING COMPANY, LLC TO
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29. Reference Complaint ¶ 24 where the Complainants allege that “concerns about deliverability have certainly impacted on the willingness of shippers to use the Laurel Pipeline.”

- a) Please define “impacted on the willingness of shippers” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

- b) Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

- c) Identify all instances where PBF communicated existing bidirectional service “impacted on the willingness of shippers” to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).

Objection: The Question is so awkwardly worded as to be incomprehensible, vague and ambiguous.

- d) Identify all instances where PBF communicated existing bidirectional service “impacted on the willingness of shippers” to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

Objection: The Question is so awkwardly worded as to be incomprehensible, vague and ambiguous.

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30. Identify all instances where PBF communicated any concerns, issues, problems or questions related to the existing bidirectional operation of Laurel’s pipe line system to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

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34. Reference Complaint ¶ 24 where the Complainants allege that “it is true that east-to-west volumes have slightly declined in the past several years”.
- a) Identify the time period that comprises “the past several years.”
 - b) What is PBF’s understanding of the amount by which intrastate “east-to-west” volumes have declined over the Laurel pipe line system for the period identified in subpart (a)? Provide all Documents relied upon by PBF to provide a response.
 - c) What is PBF’s understanding of the amount by which interstate “east-to-west” volumes have declined over the Laurel pipe line system for the period identified in subpart (a)? Provide all Documents relied upon by PBF to provide a response.

Objection: The response (a)-(c) calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

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35. Reference Complaint ¶ 24 where the Complainants allege that “operational challenges are at least one cause of this decline in east-to-west volumes”. Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

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36. Reference Complaint ¶ 28 where the Complainants allege that “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.”
- a) Please define “adversely impact and impair” as PBF understands that phrase to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
 - b) Please define “safe” as PBF understands that term to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
 - c) Identify and explain the basis for PBF’s belief that Laurel will not provide “safe” service, and provide all Documents relied upon by PBF to form the basis for this belief.
 - d) Please define “adequate” as PBF understands that term to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
 - e) Identify and explain the basis for PBF’s belief that Laurel will not provide “adequate” service, and provide all Documents relied upon by PBF to form the basis for this belief.
 - f) Please define “reasonably continuous service” as PBF understands that phrase to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
 - g) Identify and explain the basis for PBF’s belief that Laurel will not provide “reasonably continuous service” service, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response (a)-(g) calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

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37. Reference Complaint ¶ 29.

- a) Identify, explain and quantify all loss of profit and revenues that PBF believes it will incur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- b) Identify, explain, and provide copies of all firm petroleum products delivery agreements that PBF believes will be impacted due to the subject matter of the Complaint.
- c) Identify, explain and quantify all increased wholesale prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- d) Identify, explain and quantify all increased retail prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- e) Identify, explain and quantify all increased wholesale prices for diesel fuel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- f) Identify, explain and quantify all increased retail prices for diesel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- g) Identify, explain and quantify all fuel availability constraints for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- h) Identify, explain and quantify all fuel availability constraints for diesel fuel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- i) Identify, explain and quantify “the nature and level of intrastate pipeline transportation service currently available under Laurel's existing tariff” that PBF believes will be impacted due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.

Objection: The response (a)-(i) calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a). Additionally, the questions seek comprehensive and undefined future analysis of pricing and fuel supply impacts such that the questions are excessively vague and responding would impose an unreasonable burden and require unreasonable investigation by LHT. 52 Pa. Code § 5.361(a)(2), (4).

**OBJECTIONS OF PBF HOLDING COMPANY, LLC TO
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BY LAUREL PIPE LINE COMPANY, L.P.
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38. Reference Complaint ¶ 29. Identify and explain all forms of relief that PBF is seeking under Count No. 1 of the Complaint.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF's attorneys and/or experts. 52 Pa. Code § 5.323 (a).

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39. Reference Complaint ¶ 33. Identify and explain all “written assurances and guarantees in any tariffs, agreements, shipper manuals or other legally binding documents” that PBF is seeking as relief in this proceeding.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

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SET I INTERROGATORIES AND REQUESTS FOR
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BY LAUREL PIPE LINE COMPANY, L.P.
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40. Reference Complaint ¶ 33. Identify and explain all “written assurances and guarantees in any tariffs, agreements, shipper manuals or other legally binding documents” that PBF is seeking as relief in this proceeding.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

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41. Reference Complaint ¶ 33.

- a) Please define “abandoned in part” as PBF understands that phrase to be used in Complaint ¶ 33, and provide all Documents relied upon by PBF to provide this definition.
- b) Identify and explain the basis for PBF’s belief that Laurel’s existing east-to-west intrastate service will be “abandoned in part”, and provide all Documents relied upon by PBF to form the basis for this belief.

Objection: The response (a)-(b) calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

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42. Reference Complaint ¶ 34. Identify and explain all changes to Laurel’s “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” that PBF is seeking as relief in this proceeding.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

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43. Reference Complaint ¶ 35.

- a) Identify, explain and quantify all loss of profit and revenues that PBF believes it will incur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- b) Identify, explain, and provide copies of all firm petroleum products delivery agreements that PBF believes will be impacted due to the subject matter of the Complaint.
- c) Identify, explain and quantify all increased wholesale prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- d) Identify, explain and quantify all increased retail prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- e) Identify, explain and quantify all increased wholesale prices for diesel fuel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- f) Identify, explain and quantify all increased retail prices for diesel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- g) Identify, explain and quantify “the adequacy of fuel supplies” for gasoline that PBF believes will be threatened due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- h) Identify, explain and quantify “the adequacy of fuel supplies” for diesel that PBF believes will be threatened due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.

Objection: The response (a)-(h) calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a). Additionally, the questions seek comprehensive and undefined future analysis of pricing and fuel supply impacts such that the questions are excessively vague and responding would impose an unreasonable burden and require unreasonable investigation by LHT. 52 Pa. Code § 5.361(a)(2), (4).

**OBJECTIONS OF PBF HOLDING COMPANY, LLC TO
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BY LAUREL PIPE LINE COMPANY, L.P.
Docket No. C-2025-3053018**

44. Reference Complaint ¶ 29. Identify and explain all forms of relief that PBF is seeking under Count No. 1 of the Complaint.

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF's attorneys and/or experts. 52 Pa. Code § 5.323 (a).

**OBJECTIONS OF PBF HOLDING COMPANY, LLC TO
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45. Reference Response to POs ¶ 17.

- a) Please define “alteration of service less than permanent flow reversal” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
- b) Fully explain the basis for PBF’s belief that an “alteration of service” is an abandonment of service, and provide all Documents relied upon by PBF to form this belief.
- a) Please define “sufficiently diminish flows” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
- b) Please define “sufficiently diminish flows to constitute an abandonment” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
- c) Fully explain the basis for PBF’s belief that “sufficiently diminishing flows” is an abandonment of service, and provide all Documents relied upon by PBF to form this belief.

Objection: The response (a)-(b) and repeated subparagraphs (a)-(c) calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

**OBJECTIONS OF PBF HOLDING COMPANY, LLC TO
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46. Reference Response to POs ¶ 30.

- a) Please define “sufficient operational challenges” as PBF understands that phrase to be used in Response to POs ¶30, and provide all Documents relied upon by PBF to provide this definition.
- b) Please define “sufficient operational challenges to constitute an abandonment of service” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
- c) Fully explain the basis for PBF’s belief that “sufficiently operational challenges” are an abandonment of service, and provide all Documents relied upon by PBF to form this belief.

Objection (all): The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

**OBJECTIONS OF PBF HOLDING COMPANY, LLC TO
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47. Reference Response to POs ¶ 33 where the Complainants state “Complainants claim that Laurel's expansion of bi-directional service conflicts with the 40,000 to 60,000 bpd of capacity allocated to Buckeye under the Capacity Use Agreement, which is a contract related to rates, raises an inconsistency between the proposed expansion of bi-directional service and Laurel's tariff.” Identify the specific paragraph of the Complaint that alleges “Laurel's expansion of bi-directional service conflicts with the 40,000 to 60,000 bpd of capacity allocated to Buckeye under the Capacity Use Agreement.”

Objection: The response calls for the disclosure of the mental impressions and legal theories of PBF’s attorneys and/or experts. 52 Pa. Code § 5.323 (a).

Appendix C

**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.	:	

**RESPONSES OF
PBF HOLDING COMPANY, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

May 27, 2025

**RESPONSES OF
PBF HOLDING COMPANY, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

1. Please identify each person the Complainants jointly plan to call as a fact witness in this proceeding. For each person, please:
 - a) Provide the person's name, home and business address, background, and qualifications, or, alternatively, provide a resume or curriculum vitae for the person;
 - b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
 - c) Provide the source(s) of information relied upon or referenced by the witness.

RESPONSE:

- a) The Complainants have not yet identified fact witnesses.
- b) The requested information will be provided through Complainants' pre-served written direct testimony.
- c) The requested information will be provided through Complainants' pre-served written direct testimony.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

**RESPONSES OF
PBF HOLDING COMPANY, LLC
TO INTERROGATORIES AND REQUESTS
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2. Please identify each person the Complainants jointly plan to call as an expert witness in this proceeding. For each person, please:
- a) Provide the person's name, home and business address, background, and qualifications, or, alternatively, provide a resume or curriculum vitae for the person;
 - b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
 - c) Provide the source(s) of information relied upon or referenced by the witness.

RESPONSE:

- a) The Complainants have contracted with the firms of Secretariat and Pipeline Knowledge Group but have not yet identified the primary witness from each firm and will notify Laurel when such are known.
- b) The requested information will be provided through Complainants' pre-served written direct testimony.
- c) The requested information will be provided through Complainants' pre-served written direct testimony.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

**RESPONSES OF
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3. Please provide copies of all exhibits the Complainants jointly intend to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of the Complainants' direct case, please identify the witness who will be sponsoring the exhibit.

RESPONSE: With regard to exhibits to be used as part of Complainants' direct case, the requested information will be provided through Complainants' pre-served written direct testimony. For other hearing exhibits not provided with any pre-served written direct testimony, the Complainants have not yet identified any exhibits that might be introduced at hearing and such will be provided when known.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

**RESPONSES OF
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4. Identify all subsidiaries referenced in Complaint ¶ 8 that PBF purports are shippers on the Laurel pipe line system.

RESPONSE: None of PBF's subsidiaries are shippers on the Laurel pipeline system. PBF Holding Company LLC is the shipper on Laurel.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

**RESPONSES OF
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5. Is PBF participating in the Complaint on behalf of any of its subsidiaries? If so, identify all subsidiaries whose interests PBF purports to represent in the Complaint.

RESPONSE: No. See response to Question 4.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

**RESPONSES OF
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TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

6. Please identify each person PBF individually plans to call as a fact witness in this proceeding. For each person, please:
- a) Provide the person's name, home and business address, background, and qualifications, or, alternatively, provide a resume or curriculum vitae for the person;
 - b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
 - c) Provide the source(s) of information relied upon or referenced by the witness.

RESPONSE:

- a) PBF has not yet identified fact witnesses and will notify Laurel when such are known.
- b) The requested information, if applicable, will be provided through PBF's pre-served written direct testimony.
- c) The requested information, if applicable, will be provided through PBF's pre-served written direct testimony.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

**RESPONSES OF
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DOCKET NO. C-2025-3053018

7. Please identify each person PBF individually plans to call as an expert witness in this proceeding. For each person, please:
- a) Provide the person's name, home and business address, background, and qualifications, or, alternatively, provide a resume or curriculum vitae for the person;
 - b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
 - c) Provide the source(s) of information relied upon or referenced by the witness.

RESPONSE:

- a) PBF does not presently intend to retain its own independent expert witness.
- b) See response to 5. a.
- c) See response to 5. a.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

**RESPONSES OF
PBF HOLDING COMPANY, LLC
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DOCKET NO. C-2025-3053018

8. Please provide copies of all exhibits PBF individually intends to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of PBF's direct case, please identify the witness who will be sponsoring the exhibit.

RESPONSE: With regard to exhibits to be used as part of Complainants' direct case, the requested information will be provided through Complainants' pre-served written direct testimony. For other hearing exhibits not provided with any pre-served written direct testimony, PBF has not yet identified any exhibits that it individually intends to offer at hearings but will provide such to Laurel when known.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

**RESPONSES OF
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9. Please identify the sentence(s), phrase(s), or word(s) in Laurel's certificate of public convenience that PBF believes prohibit Laurel from providing intrastate service in any direction other than east-to-west in Pennsylvania.

RESPONSE: Without waiving PBF's prior objection to this interrogatory, Laurel's certificate of public convenience speaks for itself.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

**RESPONSES OF
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TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

10. Please identify the sentence(s), phrase(s), or word(s) in Laurel's Tariff Pa. PUC No. 83 for intrastate service that PBF believes prohibit Laurel from providing intrastate service in any direction other than east-to-west in Pennsylvania.

RESPONSE: Without waiving PBF's prior objection to this interrogatory, Laurel's tariff speaks for itself.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

**RESPONSES OF
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FOR PRODUCTION OF DOCUMENTS
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11. Has capacity on Laurel's pipeline system been used to provide service in a direction other than east-to-west since 2019? Fully explain any answer other than an unqualified affirmative.

RESPONSE: Without waiving PBF's prior objection to this interrogatory, it is PBF's understanding that a settlement agreement between certain parties, not including PBF, made capacity on Laurel Pipe Line eligible for use in limited bi-directional service between certain points since 2019. PBF has no direct knowledge of actual movements on Laurel, other than its own.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

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12. Please identify the sentence(s), phrase(s), or word(s) in Laurel's certificate of public convenience that PBF believes require Laurel maintain an amount of capacity over any segment of its Pennsylvania pipe line system.

RESPONSE: Without waiving PBF's prior objection to this interrogatory, neither the Complaint, the Answer to New Matter nor the Answer to Preliminary Objections make such a representation. Laurel's Capacity Agreement with Buckeye, however, does have such restrictions.

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13. Please identify the sentence(s), phrase(s), or word(s) in Laurel's Tariff Pa. PUC No. 83 for intrastate service that PBF believes require Laurel maintain a specific amount of capacity over any segment of its Pennsylvania pipe line system.

RESPONSE: Without waiving PBF's prior objection to this interrogatory, Laurel's Capacity Agreement with Buckeye, paragraph 1, limits the capacity available to Buckeye and consequently requires Laurel to maintain the remainder for intrastate use.

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14. What is PBF's understanding of the maximum capacity of the segment of the Laurel pipe line system located between Altoona and Coraopolis in Pennsylvania (i.e., "Line 718" or "L718"? Provide any Documents relied upon to respond to this question.

RESPONSE: PBF reserves the right to address the maximum capacity available on the Laurel Pipe Line between Altoona and Coraopolis in pre-served written testimony, but notes that the Capacity Agreement between Buckeye and Laurel limits the capacity available to Buckeye to provide service over that segment to 40,000 bpd in throughput capacity.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

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15. What is PBF's understanding of the maximum capacity of the existing segments of the Laurel pipeline system located between Altoona and Sinking Spring in Pennsylvania (i.e., "Line 720" and "Line 724")? Provide any Documents relied upon to respond to this question.

RESPONSE: PBF reserves the right to address the maximum capacity available on the Laurel Pipeline, between Altoona and Sinking Springs in pre-submitted written testimony, but notes that the capacity agreement between Buckeye and Laurel limits the capacity available for Buckeye to provide service on that segment to 45,000 bpd in throughput capacity.

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16. Reference Complaint ¶ 1, where the Complainants allege that “Buckeye’s proposal would require a partial abandonment, by Laurel, of east-to-west petroleum products pipeline transportation service that Laurel has been providing exclusively on this segment of the Laurel pipeline, Sinking Spring to Eldorado, since 1957.” Please explain in detail
- a) Please define the phrase “partial abandonment” as PBF understands this term to be used in Complaint ¶ 1.
 - b) Provide all Documents relied upon to provide the definition requested in subpart (a).

RESPONSE: Objection submitted.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

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17. Reference Complaint ¶ 2 where the Complainants allege that “Buckeye has not provided, or even endeavored to provide, firm assurances or guarantees to the Complainants or other users of the Laurel Pipeline that the current levels of east-to-west intrastate pipeline service will be maintained after the expiration of the Settlement condition that currently prohibits Laurel from reducing east-to-west capacity until after 2026.”
- a) Is it PBF’s position that Buckeye must provide “firm assurances or guarantees to the Complainants or other users of the Laurel Pipeline that the current levels of east-to-west intrastate pipeline service will be maintained after the expiration of the Settlement condition that currently prohibits Laurel from reducing east-to-west capacity until after 2026”? Fully explain any response.
 - b) What “firm assurances or guarantees to the Complainants or other users of the Laurel Pipeline that the current levels of east-to-west intrastate pipeline service will be maintained after the expiration of the Settlement condition that currently prohibits Laurel from reducing east-to-west capacity until after 2026” does PBF believe Buckeye must provide in order for Laurel to avoid providing unreasonable and inadequate service? Fully explain any response.

RESPONSE: Without waiving PBF’s objection to this interrogatory:

- a) No. The statement in Complaint ¶ 2 is clear that neither Laurel nor Buckeye have made any firm assurances that the east to west capacity levels will be maintained, thus making the proposed extension of bi-directional service even more economically disadvantageous for PBF. The moratoria agreed to in the Settlement will soon expire, and without any assurances, there is no basis to conclude that Laurel and Buckeye will not seek a full reversal of the Laurel Pipeline under Buckeye’s interstate tariff rates as opposed to Laurel’s intrastate tariff.
- b) PBF will provide the requested information through pre-served written direct testimony.

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18. Reference Complaint ¶ 21, where the Complainants allege that “Despite the clear precedent established in the 2016 Application case that changing the direction of flow on a pipeline from a single direction, as it has been since 1957, to bi-directional flow, in this case of the east-to-west service, requires a CPC and is otherwise unreasonable service...”
- a) Identify with specificity the “clear precedent” that PBF believes was “established in the 2016 Application case that changing the direction of flow on a pipeline from a single direction...to bi-directional flow...requires a CPC”.
 - b) Identify with specificity the “clear precedent” that PBF believes was “established in the 2016 Application case that changing the direction of flow on a pipeline from a single direction...to bi-directional flow...and is otherwise unreasonable service”.

RESPONSE: Without waiving its objection to this interrogatory:

- a) PBF will provide the requested information through pre-served written direct testimony.
- b) PBF will provide the requested information through pre-served written direct testimony.

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19. Reference Complaint ¶ 23 where the Complainants alleged that “On December 20, 2024... Buckeye announced plans to change its Reid Vapor Pressure (RVP) level schedule on the Laurel Pipeline.”
- a) Is it PBF’s understanding that Buckeye is a Pennsylvania public utility? Fully explain any response.
 - b) Is it PBF’s understanding that Buckeye is a party to this proceeding? Fully explain any response.

RESPONSE: Without waiving PBF’s objection to this interrogatory:

- a) The Complaint did not state in ¶ 23 that Buckeye was a Pennsylvania Public Utility. However, Buckeye is registered with the Commission as the Laurel Pipe Line’s operator. See, <https://www.puc.pa.gov/utility/1714408>.
- b) No. But that does not mean that Buckeye’s actions in furtherance of its plan to expand bi-directional service on the Laurel Pipe Line, which it also operates, are not pertinent to this proceeding, the outcome of which will determine, among other things, if the expansion of bi-directional service constitutes a partial abandonment of east to west service and whether the joint actions of Laurel, with its affiliate Buckeye, constitute unreasonable service.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

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20. Reference Complaint ¶ 23 where the Complainants allege that “the circumstances suggest Buckeye made this change in preparation to ready the system for bi-directional flow, the feasibility of which remains untested.”
- a) Please identify “the circumstances” that PBF believes “suggest Buckeye made this change in preparation to ready the system for bi-directional flow”. Provide all Documents relied upon to support this belief.
 - b) Please define “feasibility” as PBF understands that term to be used in Complaint ¶ 23. Provide all Documents relied upon by PBF to provide this definition.
 - c) Please identify and explain the basis for PBF’s belief that the feasibility of bi-directional flow on the Laurel pipe line system “remains untested.” Provide all Documents relied upon to support this belief.

RESPONSE: Objection submitted.

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Washington, DC 20006, 202-530-6424**

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21. Reference Complaint ¶ 23 where the Complainants allege that “Buckeye’s actions are a violation of its duty to provide reasonable service under Section 1501 of the Code.”
- a) Identify and explain why PBF believes that Buckeye has a “duty to provide reasonable service under Section 1501 of the Code, and provide all Documents relied upon by PBF to form the basis for this belief.
 - b) Fully identify and explain why PBF believes “Buckeye’s actions are a violation of its duty to provide reasonable service under Section 1501 of the Code,” and provide all Documents relied upon by PBF to form the basis for this belief.

RESPONSE: Objection submitted.

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Washington, DC 20006, 202-530-6424**

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22. Reference Complaint ¶ 23 where the Complainants allege that “Buckeye’s actions are...discriminatory in that Laurel/Buckeye is unreasonably favoring hypothetical future west-to-east customers over existing east-to-west shippers, in violation of Section 1502 of the Code...”
- a. Identify and explain why PBF believes that Buckeye is subject to Section 1502 of the Public Utility Code, 66 Pa.C.S. § 1502, and provide all Documents relied upon by PBF to form the basis for this belief.
 - b. Fully identify and explain why PBF believes “Buckeye’s actions are...discriminatory in that Laurel/Buckeye is unreasonably favoring hypothetical future west-to-east customers over existing east-to-west shippers, in violation of Section 1502 of the Code...,” and provide all Documents relied upon by PBF to form the basis for this belief.

RESPONSE: Objection submitted.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

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23. Reference Complaint ¶ 23 where the Complainants allege that “Buckeye continues to make changes to the schedule that will impact shippers and thus further reduce operational certainty and increase costs.”

- a) Identify and explain all impacts to shippers that PBF believes will occur, and provide all Documents relied upon by PBF to form the basis for this belief.
- b) Please define “operational certainty” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
- c) Identify, explain and quantify all reductions to “operational certainty” that PBF believes will occur, and provide all Documents relied upon by PBF to form the basis for this belief.
- d) Identify, explain and quantify all increases to costs that PBF believes will occur, and provide all Documents relied upon by PBF to form the basis for this belief.

RESPONSE: Without waiving its objections to this interrogatory:

- a) PBF will address the question through pre-served written direct testimony.
- b) Operational certainty is the state of a system operating as, in this case, PBF expects it to operate based on the reasonable needs of its ratepaying customers, tariffs, procedures and experience. Without Operational Certainty it is riskier to send barrels of product westward because of concerns about Laurel’s ability to move the product in a timely fashion to the point of delivery.
- c) PBF will provide the requested information through pre-served written direct testimony. See Attachment 23c-1. Attachment 23c-1 includes Confidential or Highly Confidential shipper information and it will be provided once the Judge issues a Protective Order and PBF has received Non-Disclosure Certificates from Laurel and other parties.
- d) Complainants’ will address the question through pre-served written direct testimony. At a minimum PBF’s costs of transportation will increase as it may need to seek other modalities to reliably transport its product to markets west of Sinking Spring. Product that is not delivered on time also imposes costs on PBF in terms of relationships with its customers and accommodations that may need to be made in response to missed delivery windows. PBF currently is unaware of any Documents in its possession that respond to this question.

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24. Reference Complaint ¶ 24 where the Complainants allege that “This arrangement is problematic for a number of reasons, not the least of which is that it puts Buckeye in the position of the market maker, allowed to decide what products ship physically and which do not.” Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.

RESPONSE: Without waiving its prior objection to this interrogatory PBF will address the question through pre-served written direct testimony. See Attachment 23c-1.

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25. Reference Complaint ¶ 24 where the Complainants allege that “Operationally this leaves shippers in the position of not knowing if, when or how their products might move, even though they may have customers that need physical barrels and there is no source for those barrels at their required delivery point.” Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.

RESPONSE: Without waiving its prior objection to this interrogatory PBF will address the question through pre-served written direct testimony. See Attachment 23c-1.

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Washington, DC 20006, 202-530-6424**

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26. Reference Complaint ¶ 24 where the Complainants allege that “Under the present limited bi-directional operation of the Laurel Pipeline there have been operational challenges for shippers;...”
- a) Please define “operational challenges” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
 - b) Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
 - c) Identify all instances where PBF communicated “operational challenges” related to existing bidirectional service to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
 - d) Identify all instances where PBF communicated “operational challenges” related to existing bidirectional service to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

RESPONSE: Without waiving its prior objections to subsections (a) and (b):

- a) PBF will address the question through pre-served written direct testimony.
- b) PBF will address the question through pre-served written direct testimony.
- c) PBF has no record of communicating operational challenges to a designated “escalation contact.” The Complaint does not allege that PBF communicated operational challenges to the “escalation contact” as referred to in ¶ 3. That provision does not require such communication after the first year of the Settlement.
- d) See Attachment 23c-1.

Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700 Washington, DC 20006, 202-530-6424 and Andrew Bernstein, Associate General Counsel, Commercial, Compliance and HR, PBF Energy Inc., 1 Sylvan Way, 2nd floor, Parsippany, NJ 07054, 973-254-4513

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27. Reference Complaint ¶ 24 where the Complainants allege that “transit times have increased;...”
- a) Please define “increased” as PBF understands that term to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
 - b) Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
 - c) Identify all instances where PBF communicated that transit times have “increased” related to existing bidirectional service to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
 - d) Identify all instances where PBF communicated that transit times have “increased” related to existing bidirectional service to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

RESPONSE: Without waiving its objections to subsections (a) and (b):

- a) PBF will address the question through pre-served written direct testimony.
- b) PBF will address the question through pre-served written direct testimony.
- c) PBF has no record of communicating increased transit times to a designated “escalation contact.” The Complaint does not allege that PBF communicated that transit times have increased to the “escalation contact” as referred to in ¶ 3. By way of further answer, the Settlement does not require such communication after the first year of the Settlement.
- d) See Attachment 23c-1.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

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28. Reference Complaint ¶ 24 where the Complainants allege that “concerns about deliverability have certainly impacted on the willingness of shippers to use the Laurel Pipeline.”
- a) Please define “concerns about deliverability” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
 - b) Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
 - c) Identify all instances where PBF communicated “concerns about deliverability” related to existing bidirectional service to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
 - d) Identify all instances where PBF communicated “concerns about deliverability” related to existing bidirectional service to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

RESPONSE: Without waiving its prior objections to subsections (a), (b) and (d):

- a) PBF will address the question through pre-served written direct testimony.
- b) PBF will address the question through pre-served written direct testimony.
- c) PBF has no record of communicating concerns about delivery to a designated “escalation contact.” The Complaint does not allege that PBF communicated “concerns about deliverability” related to existing bidirectional service to the “escalation” contact under the Settlement. By way of further answer, the Settlement does not require such communication after the first year of the Settlement prior to filing a complaint.
- d) See Attachment 23c-1.

Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700 Washington, DC 20006, 202-530-6424 and Andrew Bernstein, Associate General Counsel, Commercial, Compliance and HR, PBF Energy Inc., 1 Sylvan Way, 2nd floor, Parsippany, NJ 07054, 973-254-4513

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29. Reference Complaint ¶ 24 where the Complainants allege that “concerns about deliverability have certainly impacted on the willingness of shippers to use the Laurel Pipeline.”
- a) Please define “impacted on the willingness of shippers” as PBF understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by PBF to provide this definition.
 - b) Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.
 - c) Identify all instances where PBF communicated existing bidirectional service “impacted on the willingness of shippers” to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).
 - d) Identify all instances where PBF communicated existing bidirectional service “impacted on the willingness of shippers” to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complaint, and provide copies of any such communication(s).

RESPONSE: Without waiving its prior objections to this interrogatory:

- a) PBF will address the question through pre-served written direct testimony.
- b) PBF will address the question through pre-served written direct testimony.
- c) PBF has no record of communicating increased transit times to a designated “escalation contact.” The Complaint does not allege that PBF communicated “concerns about deliverability” related to existing bidirectional service to the “escalation” contact under the Settlement. By way of further answer, the Settlement does not require such communication after the first year of the Settlement prior to filing a complaint.
- d) See Attachment 32-1.

Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700 Washington, DC 20006, 202-530-6424 and Andrew Bernstein, Associate General Counsel, Commercial, Compliance and HR, PBF Energy Inc., 1 Sylvan Way, 2nd floor, Parsippany, NJ 07054, 973-254-4513

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30. Identify all instances where PBF communicated any concerns, issues, problems or questions related to the existing bidirectional operation of Laurel’s pipe line system to the “escalation” contact under Settlement ¶ 3 prior to the filing of the Complaint, and provide copies of any such communication(s).

RESPONSE: Without waiving its prior objection to this interrogatory, PBF has no record of communicating increased transit times with a designated “escalation contact.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

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31. Identify all instances where PBF communicated any concerns, issues, problems or questions related to the existing bidirectional operation of Laurel's pipe line system to any individual responsible for the operations of the Laurel pipe line system prior to the filing of the Complain[t], and provide copies of any such communication(s).

RESPONSE: See Attachment 23c-1.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

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32. Identify any informal complaint filed by PBF with the Commission related to the existing bidirectional operation of Laurel's pipe line system, and provide copies of such informal complaint.

RESPONSE: No such informal complaint exists and if it did exist, it would be in Laurel's possession. However, PBF filed comments with the Commission on Laurel's proposed reversal in Docket No. A-2016-2575859. Attachment 32-1 is a copy of that letter from the Commission's website.

Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700 Washington, DC 20006, 202-530-6424 and Andrew Bernstein, Associate General Counsel, Commercial, Compliance and HR, PBF Energy Inc., 1 Sylvan Way, 2nd floor, Parsippany, NJ 07054, 973-254-4513

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ATTACHMENT 32.1



PBF HOLDING COMPANY LLC.
1 Sylvan Way, 2nd floor
Parsippany, NJ 07054
PH 973-455-7500
www.pbfenergy.com

June 28, 2017

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth
Keystone Building
2nd Floor, Room N201
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

RECEIVED

JUN 28 2017

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Application of Laurel Pipe Line Company, L.P. ("Laurel") 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-2016-275829)

2575829

Dear Secretary Chiavetta:

PBF Holding Company LLC ("PBF Holding") is one of the largest independent petroleum refiners and suppliers of unbranded transportation fuels, heating oil, petrochemical feedstocks, lubricants and other petroleum products in the United States. We sell our products throughout the Northeast, Midwest, Gulf Coast and West Coast of the United States, as well as in other regions of the United States and Canada, and are able to ship products to other international destinations. We own and operate five domestic oil refineries and related assets in the Midwest, East Coast, Gulf Coast and West Coast. We are making this submission in connection with the above-referenced application relating to the Laurel pipeline which we utilize to serve Pennsylvania markets.

In particular, our Delaware City refinery has consistently served customers in the Pittsburgh market through the Laurel pipeline, the only line that supplies Pittsburgh from the east. The reversal of the Laurel pipeline between Altoona and Pittsburgh will restrict the ability of East Coast suppliers to provide fuel via pipeline to Pittsburgh. PBF Holding believes the impact on the Pittsburgh market will be negative – it will effectively remove East Coast pipeline supplies, lowering competition that keeps fuel prices favorable for consumers.

PBF Holding does not support Laurel's plans to reverse the direction of transportation on the Pittsburgh to Altoona segment of the Laurel pipeline. If the primary driver of the reversal is to provide Midwest refiners pipeline access to Altoona, it will be at the expense of the much larger Pittsburgh market; East Coast suppliers who currently serve the Pittsburgh market would then only have pipeline access to Altoona. Midwest suppliers, such as Marathon Petroleum Corporation, currently have the ability to supply the Pittsburgh market via existing pipelines as well as barges and trucks. If the Laurel pipeline is reversed, these suppliers will increase their market share with the additional pipeline capacity that will be taken from East Coast refiners and re-allocated to them. Our modeling suggests, based on historical pricing, the Pittsburgh market

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is best served under the current arrangement of Laurel pipeline originating in Philadelphia and terminating in Pittsburgh. Changing that supply dynamic will lead to a less competitive environment overall to the detriment of Pennsylvania businesses and consumers.

In summary, despite the fact that PBF Holding owns refineries in the Midwest and Gulf Coast that would potentially benefit, PBF Holding does not support Laurel's plans to reverse the direction of the Pittsburgh to Altoona segment of the Laurel pipeline due to the anti-competitive impact that such a reversal would have in the region.

We appreciate this opportunity to provide this information for the Commission's consideration.

Very truly yours,



Matthew C. Ludey
President

cc: Ms. Gladys M. Brown, Chairman
Mr. Andrew G. Place, Vice Chairman
Mr. John F. Coleman, Jr., Commissioner
Mr. Robert F. Powelson, Commissioner
Mr. David W. Sweet, Commissioner

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33. Identify any formal complaint filed by PBF, prior to the Complaint, with the Commission related to the existing bidirectional operation of Laurel's pipe line system, and provide copies of such formal complaint.

RESPONSE: No such formal complaint exists and if it did exist, it would be in Laurel's possession.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

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34. Reference Complaint ¶ 24 where the Complainants allege that “it is true that east-to-west volumes have slightly declined in the past several years”.
- a) Identify the time period that comprises “the past several years.”
 - b) What is PBF’s understanding of the amount by which intrastate “east-to-west” volumes have declined over the Laurel pipe line system for the period identified in subpart (a)? Provide all Documents relied upon by PBF to provide a response.
 - c) What is PBF’s understanding of the amount by which interstate “east-to-west” volumes have declined over the Laurel pipe line system for the period identified in subpart (a)? Provide all Documents relied upon by PBF to provide a response.

RESPONSE: Without waiving its objection to this interrogatory:

- a) The time period during which bi-directional service has been in place.
- b) PBF will provide the requested information through pre-served written direct testimony.
- c) See Response to 34 (b). PBF currently is unaware of any Documents in its possession that are responsive to this request.

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35. Reference Complaint ¶ 24 where the Complainants allege that “operational challenges are at least one cause of this decline in east-to-west volumes”. Identify and explain the basis for PBF’s belief regarding this allegation, and provide all Documents relied upon by PBF to form the basis for this belief.

RESPONSE: Without waiving its prior objection to this interrogatory PBF will address the question through pre-served written direct testimony. See Attachment 23c-1.

Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700 Washington, DC 20006, 202-530-6424 and Andrew Bernstein, Associate General Counsel, Commercial, Compliance and HR, PBF Energy Inc., 1 Sylvan Way, 2nd floor, Parsippany, NJ 07054, 973-254-4513

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36. Reference Complaint ¶ 28 where the Complainants allege that “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.”
- a) Please define “adversely impact and impair” as PBF understands that phrase to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
 - b) Please define “safe” as PBF understands that term to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
 - c) Identify and explain the basis for PBF’s belief that Laurel will not provide “safe” service, and provide all Documents relied upon by PBF to form the basis for this belief.
 - d) Please define “adequate” as PBF understands that term to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
 - e) Identify and explain the basis for PBF’s belief that Laurel will not provide “adequate” service, and provide all Documents relied upon by PBF to form the basis for this belief.
 - f) Please define “reasonably continuous service” as PBF understands that phrase to be used in Complaint ¶ 28, and provide all Documents relied upon by PBF to provide this definition.
 - g) Identify and explain the basis for PBF’s belief that Laurel will not provide “reasonably continuous service” service, and provide all Documents relied upon by PBF to form the basis for this belief.

RESPONSE: Without waiving its prior objection to this interrogatory PBF will address the question through pre-served written direct testimony.

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37. Reference Complaint ¶ 29.

- a) Identify, explain and quantify all loss of profit and revenues that PBF believes it will incur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- b) Identify, explain, and provide copies of all firm petroleum products delivery agreements that PBF believes will be impacted due to the subject matter of the Complaint.
- c) Identify, explain and quantify all increased wholesale prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- d) Identify, explain and quantify all increased retail prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- e) Identify, explain and quantify all increased wholesale prices for diesel fuel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- f) Identify, explain and quantify all increased retail prices for diesel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- g) Identify, explain and quantify all fuel availability constraints for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- h) Identify, explain and quantify all fuel availability constraints for diesel fuel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- i) Identify, explain and quantify “the nature and level of intrastate pipeline transportation service currently available under Laurel's existing tariff” that PBF believes will be impacted due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.

RESPONSE: Without waiving its prior objection to this interrogatory PBF will provide the requested information through pre-served written direct testimony.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

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38. Reference Complaint ¶ 29. Identify and explain all forms of relief that PBF is seeking under Count No. 1 of the Complaint.

RESPONSE: Objection submitted.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**

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39. Reference Complaint ¶ 33. Identify and explain all “written assurances and guarantees in any tariffs, agreements, shipper manuals or other legally binding documents” that PBF is seeking as relief in this proceeding.

RESPONSE: Objection submitted.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
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40. Reference Complaint ¶ 33. Identify and explain all “written assurances and guarantees in any tariffs, agreements, shipper manuals or other legally binding documents” that PBF is seeking as relief in this proceeding.

RESPONSE: Objection submitted.

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41. Reference Complaint ¶ 33.

- a) Please define “abandoned in part” as PBF understands that phrase to be used in Complaint ¶ 33, and provide all Documents relied upon by PBF to provide this definition.
- b) Identify and explain the basis for PBF’s belief that Laurel’s existing east-to-west intrastate service will be “abandoned in part”, and provide all Documents relied upon by PBF to form the basis for this belief.

RESPONSE: Without waiving its objection to this interrogatory:

- a) See Response to Question 16.
- b) PBF will address the question through pre-served written direct testimony.

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42. Reference Complaint ¶ 34. Identify and explain all changes to Laurel’s “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” that PBF is seeking as relief in this proceeding.

RESPONSE: Without waiving its prior objection to this interrogatory PBF will provide the requested information through pre-served written direct testimony.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
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43. Reference Complaint ¶ 35.

- a) Identify, explain and quantify all loss of profit and revenues that PBF believes it will incur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- b) Identify, explain, and provide copies of all firm petroleum products delivery agreements that PBF believes will be impacted due to the subject matter of the Complaint.
- c) Identify, explain and quantify all increased wholesale prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- d) Identify, explain and quantify all increased retail prices for gasoline that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- e) Identify, explain and quantify all increased wholesale prices for diesel fuel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- f) Identify, explain and quantify all increased retail prices for diesel that PBF believes will occur due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- g) Identify, explain and quantify “the adequacy of fuel supplies” for gasoline that PBF believes will be threatened due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
- h) Identify, explain and quantify “the adequacy of fuel supplies” for diesel that PBF believes will be threatened due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.

RESPONSE: Without waiving its prior objection to this interrogatory PBF will provide the requested information through pre-served written direct testimony.

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Washington, DC 20006, 202-530-6424**

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44. Reference Complaint ¶ 29. Identify and explain all forms of relief that PBF is seeking under Count No. 1 of the Complaint.

RESPONSE: Objection submitted.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
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45. Reference Response to POs ¶ 17.

- a) Please define “alteration of service less than permanent flow reversal” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
- b) Fully explain the basis for PBF’s belief that an “alteration of service” is an abandonment of service, and provide all Documents relied upon by PBF to form this belief.
- a) Please define “sufficiently diminish flows” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
- b) Please define “sufficiently diminish flows to constitute an abandonment” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
- c) Fully explain the basis for PBF’s belief that “sufficiently diminishing flows” is an abandonment of service, and provide all Documents relied upon by PBF to form this belief.

RESPONSE: Without waiving its prior objection to this interrogatory PBF will address the question through pre-served written direct testimony.

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Washington, DC 20006, 202-530-6424**

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46. Reference Response to POs ¶ 30.

- a) Please define “sufficient operational challenges” as PBF understands that phrase to be used in Response to POs ¶30, and provide all Documents relied upon by PBF to provide this definition.
- b) Please define “sufficient operational challenges to constitute an abandonment of service” as PBF understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by PBF to provide this definition.
- c) Fully explain the basis for PBF’s belief that “sufficiently operational challenges” are an abandonment of service, and provide all Documents relied upon by PBF to form this belief.

RESPONSE: Without waiving its prior objection to this interrogatory PBF will address the question through pre-served written direct testimony.

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Washington, DC 20006, 202-530-6424**

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47. Reference Response to POs ¶ 33 where the Complainants state “Complainants claim that Laurel's expansion of bi-directional service conflicts with the 40,000 to 60,000 bpd of capacity allocated to Buckeye under the Capacity Use Agreement, which is a contract related to rates, raises an inconsistency between the proposed expansion of bi-directional service and Laurel's tariff.” Identify the specific paragraph of the Complaint that alleges “Laurel's expansion of bi-directional service conflicts with the 40,000 to 60,000 bpd of capacity allocated to Buckeye under the Capacity Use Agreement.”

RESPONSE: Without waiving its prior objection to this interrogatory, see Complaint ¶ 28 referencing Laurel’s failure to obtain requisite Commission authorizations.

**Provided By: Randall S. Rich, Partner, Pierce Atwood LLP, 1875 K Street, NW, Suite 700
Washington, DC 20006, 202-530-6424**