
Garrett P. Lent

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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**

Dear Secretary Homsher:

Enclosed for filing in the above-referenced proceeding is the Motion to Compel Responses to Lucknow-Highspire Terminals LLC Set I Discovery 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/sa
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

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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.

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Date: May 30, 2025


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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 LUCKNOW-HIGHSPIRE TERMINALS 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 Lucknow-Highspire Terminals LLC, (“LHT”). The Motion to Compel requests that Administrative Law Judge Eranda Vero (the “ALJ”) direct LHT to provide full and complete responses to Questions 7, 8, 9, 10, 11, 14, 15a, 15b, 16a, 16b, 18a, 18b, 18c, 19a,19b, 20a, 20b, 21a, 21c, 22, 23, 24a, 24b, 25a, 25b, 26a, 26b, 27a, 27b, 27c, 27d, 28, 32a, 32b, 32c, 33, 34 (all parts), 35 (all parts), 36, 37, 38, 39b, 40, 41 (all parts), 42, 43 (all parts), 44 (all parts), and 45 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, LHT, Sheetz, and PBF filed a response to the Preliminary Objections of Laurel.

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

5. LHT timely objected to Set I Discovery on May 15, 2025. LHT lodged objections to Request Nos. 7, 8, 9, 10, 11, 14, 15a, 15b, 16a, 16b, 18a, 18b, 18c, 19a, 19b, 20a, 20b, 21a, 21c, 22, 23, 24a, 24b, 25a, 25b, 26a, 26b, 27a, 27b, 27c, 27d, 28, 32a, 32b, 32c, 33, 34 (all parts), 35 (all parts), 36, 37, 38, 39b, 40, 41 (all parts), 42, 43 (all parts), 44 (all parts), and 45. A copy of LHT’s Objections is provided as Appendix B hereto.

6. Counsel for Laurel and LHT 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. 14, 18-20, 36-38, 39a and 42. LHT also indicated that it would provide responses to Nos. 7, 8, 9, 10, 11, 15a, 15b, 16a, 16b, 21a, 21c, 22, 23, 24a, 24b, 25a, 25b, 26a, 26b, 27a, 27b, 27c, 27d, 28, 32a, 32b, 32c, 33, 34 (all parts), 35 (all parts), 39b, 40, 41 (all), 43 (all parts), 44, 45, 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. LHT 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 LHT'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 LHT possesses that form the basis for its allegations (i.e., beliefs) as set forth in the Complaint.

7. Also on May 27, 2025, LHT served its responses to the Set I Discovery. Consistent with its prior indication, LHT maintained its objections to Nos. 14, 18-20, 36-38, 39a and 42 and provided responses subject to and notwithstanding its objections to Nos. 7, 8, 9, 10, 11, 15a, 15b, 16a, 16b, 21a, 21c, 22, 23, 24a, 24b, 25a, 25b, 26a, 26b, 27a, 27b, 27c, 27d, 28, 32a, 32b, 32c, 33, 34 (all parts), 35 (all parts), 39b, 40, 41 (all), 43 (all parts), 44, 45. LHT 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 LHT to respond to Set I, 7, 8, 9, 10, 11, 14, 15a, 15b, 16a, 16b, 18a, 18b, 18c, 19a, 19b, 20a, 20b, 21a, 21c, 22, 23, 24a, 24b, 25a, 25b, 26a, 26b, 27a, 27b, 27c, 27d, 28, 32a, 32b, 32c, 33, 34 (all parts), 35 (all parts), 36, 37, 38, 39b, 40, 41 (all parts), 42, 43 (all parts), 44 (all parts), and 45.

II. ARGUMENT

A. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 7 OF THE SET I DISCOVERY.

9. Laurel – Set I, Request No. 7 provides as follows:

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

10. LHT objects to Request No. 7 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. 7 does not seek privileged information. Request No. 7 seeks to clarify claims made in the Complaint by seeking information about the factual basis for LHT's allegations in its Complaint. Such information and materials would not be exempt from discovery under Sections 5.323(a). If LHT is asserting that their allegations are only based on legal conclusions, then LHT should be required to supply a verified response from a company representative, other than counsel, indicating that LHT 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, LHT'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, LHT should be compelled to provide a full and complete response to Request No. 7. Alternatively, should LHT 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, LHT should be compelled to provide a full and complete response to Request No. 7 of Set I discovery.

B. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 8 OF THE SET I DISCOVERY.

15. Laurel – Set I, Request No. 8 provides as follows:

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

16. LHT objects to Request No. 8 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. 7 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 LHT’s attorneys and the specificity of the objections.

17. For the reasons more fully explained above, LHT should be compelled to provide a full and complete response to Request No. 8 of Set I discovery.

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

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

9. 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. LHT objects to Request No. 9 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, LHT should be compelled to provide a full and complete response to Request No. 9 of Set I discovery.

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

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

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

23. LHT 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. 7 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 LHT’s attorneys and the specificity of the objections.

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

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

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

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

26. LHT objects to Request No. 11 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). Lau-rel adopts and incorporates its arguments with respect to Request No. 7 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 LHT’s attorneys and the specificity of the objections.

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

F. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 14 OF THE SET I DISCOVERY.

28. Laurel – Set I, Request No. 14 provides as follows:

14. 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 LHT understands this term to be used in Complaint ¶ 1.
- b. Provide all Documents relied upon to provide the definition requested in subpart (a).

29. LHT objects to Request No. 14 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. 7 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 LHT’s attorneys and the specificity of the objections.

31. LHT 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, LHT should be compelled to define it.

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

G. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 15A AND 15 B OF THE SET I DISCOVERY.

33. Laurel – Set I, Request No. 15A and 15B provides as follows:

15. 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 LHT’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 LHT believe Buckeye must provide in order for Laurel to avoid providing unreasonable and inadequate service? Fully explain any response.

34. LHT objects to Request No. 15A and 15B to the extent they seeks 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. 7 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 LHT’s attorneys and the specificity of the objections.

36. For the reasons more fully explained above, LHT should be compelled to provide a full and complete response to Request No. 15 of Set I discovery.

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

37. Laurel – Set I, Request No. 16A and 16B provides as follows:

16. In 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 LHT 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 LHT 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. LHT objects to Request No. 16A and 16B to the extent they 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. 7 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 LHT’s attorneys and the specificity of the objections.

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

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

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

18. 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 LHT 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 LHT understands that term to be used in Complaint. Provide all Documents relied upon by LHT to provide this definition..
- c. Please identify and explain the basis for LHT’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.

41. LHT objects to Request No. 18A, 18B, and 18C 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. 7 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 LHT’s attorneys and the specificity of the objections.

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

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

43. Laurel – Set I, Request No. 19A and 19B provides as follows:

19. 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 LHT believes that Buckeye has a “duty to provide reasonable service under Section 1501 of the Code, and provide all Documents relied upon by LHT to form the basis for this belief.
- b. Fully identify and explain why LHT 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 LHT to form the basis for this belief.

44. LHT objects to Request No. 19A and 19B on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT’s attorneys. 52 Pa. Code §§ 5.323(a). Laurel adopts and incorporates its arguments with respect to Request No. 7 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 LHT's attorneys and the specificity of the objections.

45. For the reasons more fully explained above, LHT should be compelled to provide a full and complete response to Request No. 19 of Set I discovery.

K. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 20 OF THE SET I DISCOVERY.

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

20. 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 LHT 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 LHT to form the basis for this belief.
- b. Fully identify and explain why LHT 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 LHT to form the basis for this belief.

47. LHT objects to Request No. 20A on the grounds that it calls for the mental impressions and opinions or conclusions of LHT's attorneys and 20B on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT'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. 7 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 LHT's attorneys and the specificity of the objections.

48. 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

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

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.

49. If LHT 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 LHT, then LHT should be required to supply a verified response from a company representative, other than counsel, indicating that LHT 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. 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

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

L. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 21A AND 21C OF THE SET I DISCOVERY.

51. Laurel – Set I, Request No. 21 provides as follows:

21. 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 LHT believes will occur, and provide all Documents relied upon by LHT to form the basis for this belief.

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.”).

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

52. LHT objects to Request No. 21A and 21C on the grounds calls for the disclosure of the mental impressions and opinions or conclusions of LHT’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. 7 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 LHT’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT’s experts.

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

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

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

22. 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 LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief:

55. LHT objects to Request No. 22 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT’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. 7 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 LHT’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT’s experts.

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

N. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 23 OF THE SET I DISCOVERY.

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

23. 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 LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.

58. LHT objects to Request No. 23 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT’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. 7 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 LHT’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT’s experts.

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

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

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

24. 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 LHT understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.
- b. Identify and explain the basis for LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.
- c. Identify all instances where LHT 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 LHT 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).

61. LHT objects to Request No. 24A and 24B on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT'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. 7 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 LHT's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT's experts.

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

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

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

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

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

- c. Identify all instances where LHT 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 LHT 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).

64. LHT objects to Request No. 25A and 25B on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT’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. 7 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 LHT’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT’s experts.

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

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

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

26. 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 LHT understands that term to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.
- b. Identify and explain the basis for LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.
- c. Identify all instances where LHT 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 LHT 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).

67. LHT 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 LHT’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. 7 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 LHT’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT’s experts.

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

R. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 27A, 27B AND 27C OF THE SET I DISCOVERY.

69. Laurel – Set I, Request No. 27 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 LHT understands that term to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.
- b. Identify and explain the basis for LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.
- c. Identify all instances where LHT 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 LHT 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).

70. LHT 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 LHT’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. LHT objects to request No. 27C and 27D on the grounds that the question is so, “awkwardly worded as to be incomprehensible, vague, and ambiguous.”

71. Laurel adopts and incorporates its arguments with respect to Request No. 7 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 LHT's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT's experts.

72. 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.

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

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

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

28. Identify all instances where LHT 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).

75. LHT objects to Request No. 28 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT'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.

7 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 LHT's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT's experts.

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

T. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 32 OF THE SET I DISCOVERY.

77. Laurel – Set I, Request No. 32 provides as follows:

32. 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 LHT'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 LHT to provide a response.
- c. What is LHT'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 LHT to provide a response.

78. LHT objects to Request No. 32 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT'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. 7 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 LHT's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT's experts.

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

U. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 33 OF THE SET I DISCOVERY.

80. Laurel – Set I, Request No. 33 provides as follows:

33. 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 LHT's belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.

81. LHT objects to Request No. 33 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT'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. 7 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 LHT's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT's experts.

82. For the reasons more fully explained above, LHT should be compelled to provide a full and complete response to Request No. 33 of Set I discovery.

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

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

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

- f. Please define “reasonably continuous service” as LHT understands that phrase to be used in Complaint ¶ 28, and provide all Documents relied upon by LHT to provide this definition.
- g. Identify and explain the basis for LHT’s belief that Laurel will not provide “reasonably continuous service” service, and provide all Documents relied upon by LHT to form the basis for this belief.

84. LHT objects to all parts of Request No. 34 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT’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. 7 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 LHT’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT’s experts.

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

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

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

- 35. Reference Complaint ¶ 29.
 - a. Please Identify, explain and quantify all loss of profit and revenues that LHT 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 LHT believes will be impacted due to the subject matter of the Complaint.
- c. Identify, explain and quantify all increased wholesale prices for gasoline that LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 LHT believes will be impacted due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response

87. LHT objects to all parts of Request No. 35 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT'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.

88. Laurel adopts and incorporates its arguments with respect to Request No. 7 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 LHT's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT's experts.

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

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

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

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

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

92. LHT objects to Request No. 36 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT's attorneys and/or experts. 52 Pa. Code

§§ 5.323(a) and 5.324. adopts and incorporates its arguments with respect to Request No. 7 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 LHT’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT’s experts.

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

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

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

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

95. LHT objects to Request No. 37 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT’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. 7 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 LHT’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT’s experts.

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

Z. LHT 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.

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

98. LHT objects to Request No. 39 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT’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. 7 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 LHT’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT’s experts.

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

AA. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 40 OF THE SET I DISCOVERY.

100. Laurel – Set I, Request No. 40 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 LHT is seeking as relief in this proceeding

101. LHT objects to Request No. 40 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT’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. 7 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 LHT’s attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT’s experts.

102. For the reasons more fully explained above, LHT should be compelled to provide a full and complete response to Request No. 40 of Set I discovery.

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

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

41. Reference Complaint ¶ 35.

- a. Please Identify, explain and quantify all loss of profit and revenues that LHT 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 LHT believes will be impacted due to the subject matter of the Complaint.

- c. Identify, explain and quantify all increased wholesale prices for gasoline that LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 LHT believes will be threatened due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.

104. LHT objects to all parts of Request No. 41 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT’s attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Further, LHT objections on the grounds that the questions are vague, that responding would be unreasonably burden, and that they would require unreasonable investigation by LHT. 52 Pa. Code § 5.361(a)(2), (4).

105. Laurel adopts and incorporates its arguments with respect to Request No. 7 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 LHT's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT's experts.

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

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

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

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

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

109. LHT objects to Request No. 40 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT'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. 7 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 LHT's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs

47-48 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 LHT's experts.

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

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

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

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

112. LHT objects to Request No. 43 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT'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. 7 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 LHT's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT's experts.

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

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

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

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

115. LHT objects to Request No. 44 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT'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. 7 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 LHT's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT's experts.

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

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

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

45. 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.”.

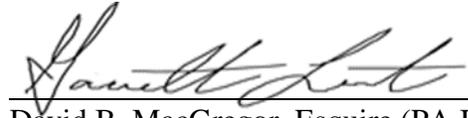
118. LHT objects to Request No. 45 on the grounds that it calls for the disclosure of the mental impressions and opinions or conclusions of LHT's attorneys and/or experts. 52 Pa. Code §§ 5.323(a) and 5.324. Laurel adopts and incorporates its arguments with respect to Request No. 7 of the Set I discovery, 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 LHT's attorneys and the specificity of the objections. Laurel adopts and incorporates its arguments with respect to Request No. 20 of the Set I discovery, in paragraphs 47-48 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 LHT's experts.

119. For the reasons more fully explained above, LHT should be compelled to provide a full and complete response to Request No. 45 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 Lucknow-Highspire Terminals LLC, to fully answer 7, 8, 9, 10, 11, 14, 15a, 15b, 16a, 16b, 18a, 18b, 18c, 19a,19b, 20a, 20b, 21a, 21c, 22, 23, 24a, 24b, 25a, 25b, 26a, 26b, 27a, 27b, 27c, 27d, 28, 32a, 32b, 32c, 33, 34 (all parts), 35 (all parts), 36, 37, 38, 39b, 40, 41 (all parts), 42, 43 (all parts), 44 (all parts), and 45 of the Set I Discovery.

Respectfully submitted,



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Date: May 30, 2025

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 LUCKNOW-HIGHSIRE TERMINALS, 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 Lucknow-Highspire Terminals, LLC (“LHT”), 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
LUCKNOW-HIGHPSIRE TERMINALS, 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. Please identify each person LHT 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.

5. Please identify each person LHT 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.
6. Please provide copies of all exhibits LHT individually intends to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of Monroe's direct case, please identify the witness who will be sponsoring the exhibit.
7. Please identify the sentence(s), phrase(s), or word(s) in Laurel's certificate of public convenience that LHT believes prohibit Laurel from providing intrastate service in any direction other than east-to-west in Pennsylvania.
8. Please identify the sentence(s), phrase(s), or word(s) in Laurel's Tariff Pa. PUC No. 83 for intrastate service that LHT believes prohibit Laurel from providing intrastate service in any direction other than east-to-west in Pennsylvania.
9. 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.
10. Please identify the sentence(s), phrase(s), or word(s) in Laurel's certificate of public convenience that LHT believes require Laurel maintain an amount of capacity over any segment of its Pennsylvania pipe line system.
11. Please identify the sentence(s), phrase(s), or word(s) in Laurel's Tariff Pa. PUC No. 83 for intrastate service that LHT believes require Laurel maintain a specific amount of capacity over any segment of its Pennsylvania pipe line system.
12. What is Monroe'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.
13. What is LHT'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.
14. 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 LHT understands this term to be used in Complaint ¶ 1.
 - b) Provide all Documents relied upon to provide the definition requested in subpart (a).
15. 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 LHT ’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 LHT believe Buckeye must provide in order for Laurel to avoid providing unreasonable and inadequate service? Fully explain any response.
16. 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 LHT 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 LHT 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”.
17. 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 LHT ’s understanding that Buckeye is a Pennsylvania public utility? Fully explain any response.
 - b) Is it LHT ’s understanding that Buckeye is a party to this proceeding? Fully explain any response.

18. 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 LHT 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 LHT understands that term to be used in Complaint ¶ 23. Provide all Documents relied upon by Monroe to provide this definition.
 - c) Please identify and explain the basis for LHT’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.
19. 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 LHT believes that Buckeye has a “duty to provide reasonable service under Section 1501 of the Code, and provide all Documents relied upon by LHT to form the basis for this belief.
 - b) Fully identify and explain why LHT 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 LHT to form the basis for this belief.
20. 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 LHT 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 LHT to form the basis for this belief.
 - b) Fully identify and explain why LHT 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 LHT to form the basis for this belief.
21. 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 LHT believes will occur, and provide all Documents relied upon by LHT to form the basis for this belief.

- b) Please define “operational certainty” as LHT understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.
 - c) Identify, explain and quantify all reductions to “operational certainty” that LHT believes will occur, and provide all Documents relied upon by LHT to form the basis for this belief.
 - d) Identify, explain and quantify all increases to costs that LHT believes will occur, and provide all Documents relied upon by LHT to form the basis for this belief.
22. 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 LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.
23. 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 LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.
24. 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 LHT understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.
 - b) Identify and explain the basis for LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.
 - c) Identify all instances where LHT 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 LHT 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).
25. Reference Complaint ¶ 24 where the Complainants allege that “transit times have increased;...”

- a) Please define “increased” as LHT understands that term to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.
 - b) Identify and explain the basis for LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.
 - c) Identify all instances where LHT 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 LHT 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).
26. 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 LHT understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.
 - b) Identify and explain the basis for LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.
 - c) Identify all instances where LHT 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 LHT 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).
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 LHT understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.
 - b) Identify and explain the basis for LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.

- c) Identify all instances where LHT 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 LHT 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).
28. Identify all instances where LHT 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).
 29. Identify all instances where LHT 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).
 30. Identify any informal complaint filed by LHT with the Commission related to the existing bidirectional operation of Laurel’s pipe line system, and provide copies of such informal complaint.
 31. Identify any formal complaint filed by LHT, 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.
 32. 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 LHT’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 LHT to provide a response.
 - c) What is LHT’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 LHT to provide a response.
 33. 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 LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.
 34. 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 LHT understands that phrase to be used in Complaint ¶ 28, and provide all Documents relied upon by LHT to provide this definition.
- b) Please define “safe” as LHT understands that term to be used in Complaint ¶ 28, and provide all Documents relied upon by LHT to provide this definition.
- c) Identify and explain the basis for LHT’s belief that Laurel will not provide “safe” service, and provide all Documents relied upon by LHT to form the basis for this belief.
- d) Please define “adequate” as LHT understands that term to be used in Complaint ¶ 28, and provide all Documents relied upon by LHT to provide this definition.
- e) Identify and explain the basis for LHT’s belief that Laurel will not provide “adequate” service, and provide all Documents relied upon by LHT to form the basis for this belief.
- f) Please define “reasonably continuous service” as LHT understands that phrase to be used in Complaint ¶ 28, and provide all Documents relied upon by LHT to provide this definition.
- g) Identify and explain the basis for LHT’s belief that Laurel will not provide “reasonably continuous service” service, and provide all Documents relied upon by LHT to form the basis for this belief.

35. Reference Complaint ¶ 29.

- a) Identify, explain and quantify all loss of profit and revenues that LHT 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 LHT believes will be impacted due to the subject matter of the Complaint.
- c) Identify, explain and quantify all increased wholesale prices for gasoline that LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 LHT believes will be impacted due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.
36. Reference Complaint ¶ 29. Identify and explain all forms of relief that LHT is seeking under Count No. 1 of the Complaint.
37. Reference Complaint ¶ 33. Identify and explain all “written assurances and guarantees in any tariffs, agreements, shipper manuals or other legally binding documents” that LHT is seeking as relief in this proceeding.
38. Reference Complaint ¶ 33. Identify and explain all “written assurances and guarantees in any tariffs, agreements, shipper manuals or other legally binding documents” that LHT is seeking as relief in this proceeding.
39. Reference Complaint ¶ 33.
- a) Please define “abandoned in part” as LHT understands that phrase to be used in Complaint ¶ 33, and provide all Documents relied upon by LHT to provide this definition.
 - b) Identify and explain the basis for LHT’s belief that Laurel’s existing east-to-west intrastate service will be “abandoned in part”, and provide all Documents relied upon by LHT to form the basis for this belief.
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 LHT is seeking as relief in this proceeding.

41. Reference Complaint ¶ 35.

- a) Identify, explain and quantify all loss of profit and revenues that LHT 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 LHT believes will be impacted due to the subject matter of the Complaint.
- c) Identify, explain and quantify all increased wholesale prices for gasoline that LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 LHT believes will be threatened due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.

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

43. Reference Response to POs ¶ 17.

- a) Please define “alteration of service less than permanent flow reversal” as LHT understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by LHT to provide this definition.

- b) Fully explain the basis for LHT’s belief that an “alteration of service” is an abandonment of service, and provide all Documents relied upon by LHT to form this belief.
 - a) Please define “sufficiently diminish flows” as LHT understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by LHT to provide this definition.
 - b) Please define “sufficiently diminish flows to constitute an abandonment” as LHT understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by LHT to provide this definition.
 - c) Fully explain the basis for LHT’s belief that “sufficiently diminishing flows” is an abandonment of service, and provide all Documents relied upon by LHT to form this belief.
44. Reference Response to POs ¶ 30.
- a) Please define “sufficient operational challenges” as LHT understands that phrase to be used in Response to POs ¶30, and provide all Documents relied upon by LHT to provide this definition.
 - b) Please define “sufficient operational challenges to constitute an abandonment of service” as LHT understands that phrase to be used in Response to POs ¶ 17, and provide all Documents relied upon by LHT to provide this definition.
 - c) Fully explain the basis for LHT’s belief that “sufficiently operational challenges” are an abandonment of service, and provide all Documents relied upon by LHT to form this belief.
45. 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

**¹BEFORE 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 LUCKNOW-HIGHSPIRE TERMINALS, 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.*, Lucknow-Highspire Terminals, LLC ("LHT") 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 LHT, 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 LHT, 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 LHT's expectation that such testimony will be provided.

As shown in the attached Exhibit 1, LHT Objects to the following requests as for the reason stated therein: 7, 8, 9, 10, 11, 14, 15a, 15b, 16a, 16b, 18a, 18b, 18c, 19a,19b, 20a, 20b, 21a, 21c, 22, 23, 24a, 24b, 25a, 25b, 26a, 26b, 27a, 27b, 27c, 27d, 28, 32a, 32b, 32c, 33, 34 (all parts), 35 (all parts), 36, 37, 38, 39b, 40, 41 (all parts), 42, 43 (all parts), 44 (all parts), and 45.

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

Respectfully submitted,

McNees Wallace & Nurick LLC

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Counsel for Lucknow-Highspire Terminals, LLC

EXHIBIT 1

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

7. Please identify the sentence(s), phrase(s), or word(s) in Laurel's certificate of public convenience that LHT 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 LHT's attorneys. 52 Pa. Code § 5.323 (a).

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

8. Please identify the sentence(s), phrase(s), or word(s) in Laurel's Tariff Pa. PUC No. 83 for intrastate service that LHT 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 LHT's attorneys. 52 Pa. Code § 5.323 (a).

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
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BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

9. 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.

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

10. Please identify the sentence(s), phrase(s), or word(s) in Laurel's certificate of public convenience that LHT 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 LHT's attorneys. 52 Pa. Code § 5.323 (a).

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

11. Please identify the sentence(s), phrase(s), or word(s) in Laurel's Tariff Pa. PUC No. 83 for intrastate service that LHT 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 LHT's attorneys. 52 Pa. Code § 5.323 (a).

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
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BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

14. 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 LHT understands this term to be used in Complaint ¶ 1.

OBJECTION:

The response calls for the disclosure of the mental impressions and legal theories of LHT's attorneys. 52 Pa. Code § 5.323 (a). Without waiving its Objection, LHT 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).

15. 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 LHT'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 LHT'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 LHT believe Buckeye must provide in order for Laurel to avoid providing unreasonable and inadequate service? Fully explain any response.

OBJECTION:

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
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BY LAUREL PIPE LINE COMPANY, L.P.**

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
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Docket No. C-2025-3053018

16. 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 LHT 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 LHT's attorneys. 52 Pa. Code § 5.323 (a).

- b) Identify with specificity the "clear precedent" that LHT 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 LHT's attorneys. 52 Pa. Code § 5.323 (a).

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
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BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

18. 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 LHT 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 LHT's attorneys. 52 Pa. Code § 5.323 (a).

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

OBJECTION:

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

- c) Please identify and explain the basis for LHT'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 LHT's attorneys. 52 Pa. Code § 5.323 (a).

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
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BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

19. 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 LHT believes that Buckeye has a "duty to provide reasonable service under Section 1501 of the Code, and provide all Documents relied upon by LHT to form the basis for this belief.

OBJECTION:

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

- b) Fully identify and explain why LHT 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 LHT to form the basis for this belief.

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
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20. 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 LHT 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 LHT to form the basis for this belief.

OBJECTION:

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

- b) Fully identify and explain why LHT 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 LHT to form the basis for this belief.

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
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BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

21. 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 LHT believes will occur, and provide all Documents relied upon by LHT to form the basis for this belief.

OBJECTION:

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

- b) Please define "operational certainty" as LHT understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.
- c) Identify, explain and quantify all reductions to "operational certainty" that LHT believes will occur, and provide all Documents relied upon by LHT to form the basis for this belief.

OBJECTION:

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

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
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22. 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 LHT's belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
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23. 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 LHT's belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
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BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

24. 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 LHT understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.

OBJECTION:

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

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

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
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Docket No. C-2025-3053018

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

OBJECTION:

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

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

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
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26. 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 LHT understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.

OBJECTION:

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

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

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
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Docket No. C-2025-3053018

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 LHT understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.

OBJECTION:

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

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

OBJECTION:

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

- c) Identify all instances where LHT 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 LHT 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.

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

28. Identify all instances where LHT 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 LHT's attorneys and/or experts. 52 Pa. Code § 5.323 (a).

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

32. 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 LHT'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 LHT to provide a response.
 - c) What is LHT'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 LHT to provide a response.

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

33. 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 LHT's belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

34. 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 LHT understands that phrase to be used in Complaint ¶ 28, and provide all Documents relied upon by LHT to provide this definition.
 - b) Please define "safe" as LHT understands that term to be used in Complaint ¶ 28, and provide all Documents relied upon by LHT to provide this definition.
 - c) Identify and explain the basis for LHT's belief that Laurel will not provide "safe" service, and provide all Documents relied upon by LHT to form the basis for this belief.
 - d) Please define "adequate" as LHT understands that term to be used in Complaint ¶ 28, and provide all Documents relied upon by LHT to provide this definition.
 - e) Identify and explain the basis for LHT's belief that Laurel will not provide "adequate" service, and provide all Documents relied upon by LHT to form the basis for this belief.
 - f) Please define "reasonably continuous service" as LHT understands that phrase to be used in Complaint ¶ 28, and provide all Documents relied upon by LHT to provide this definition.
 - g) Identify and explain the basis for LHT's belief that Laurel will not provide "reasonably continuous service" service, and provide all Documents relied upon by LHT to form the basis for this belief.

OBJECTION (all):

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

35. Reference Complaint ¶ 29.

- a) Identify, explain and quantify all loss of profit and revenues that LHT 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 LHT believes will be impacted due to the subject matter of the Complaint.
- c) Identify, explain and quantify all increased wholesale prices for gasoline that LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 LHT believes will be impacted due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.

OBJECTION (all):

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

The response calls for the disclosure of the mental impressions and legal theories of LHT's attorneys and/or experts. 52 Pa. Code § 5.323 (a). Additionally, the questions seek comprehensive and undefined future analysis of pricing and supply impacts such that the questions are excessively vague and would impose an unreasonably burdensome investigation on LHT. 52 Pa. Code § 5.361(a)(4).

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

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

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

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

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

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

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

39. Reference Complaint ¶ 33.

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

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

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 LHT is seeking as relief in this proceeding.

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

41. Reference Complaint ¶ 35.

- a) Identify, explain and quantify all loss of profit and revenues that LHT 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 LHT believes will be impacted due to the subject matter of the Complaint.
- c) Identify, explain and quantify all increased wholesale prices for gasoline that LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 LHT believes will be threatened due to the subject matter of the Complaint, and provide all Documents relied upon to provide a response.

OBJECTION (All):

The response calls for the disclosure of the mental impressions and legal theories of LHT's attorneys and/or experts. 52 Pa. Code § 5.323 (a). Additionally, the questions seek comprehensive and undefined future analysis of pricing and supply impacts such that the questions are excessively vague and would impose an unreasonably burdensome investigation on LHT. 52 Pa. Code § 5.361(a)(4).

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

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

OBJECTION:

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

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

OBJECTION (all):

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

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

OBJECTION (all):

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET I INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

45. 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 LHT's attorneys and/or experts. 52 Pa. Code § 5.323 (a).

Appendix C



McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Adeolu A. Bakare
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Direct Fax: 717.260.1744
abakare@mcneeslaw.com

May 27, 2025

VIA E-MAIL

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Christopher J. Barr, Esq.
Post & Schell, P.C.
607 14th Street, N.W., Suite 600
Washington, DC 20005-2000

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

Dear Counsel:

Attached please find Responses of Lucknow-Highspire Terminals, LLC to Set I Interrogatories and Requests for Production of Documents Propounded by Laurel Pipe Line Company, L.P., in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a white background.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

c: Matthew L. Homsher, Secretary (via electronic filing, letter and certificate only)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA EMAIL

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Adeolu A. Bakare

Counsel to Lucknow-Highspire Terminals,
LLC and Sheetz, Inc.

Dated this 27th day of May, 2025, in Harrisburg, Pennsylvania.

**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
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
BY LAUREL PIPE LINE COMPANY, L.P., SET I**

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

NOTE: All responses are based on information that has been reviewed as of the date of the response. We reserve all rights to supplement the response if and as additional information becomes available.

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 and will notify Laurel when such are known.
- b) LHT will address this question in its pre-served written direct testimony.
- c) LHT will address this question in its pre-served written direct testimony.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

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) LHT will address this question in its pre-served written direct testimony.
- c) LHT will address this question in its pre-served written direct testimony.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow Highspire Terminals, LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

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:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

4. Please identify each person LHT 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) LHT has not yet confirmed its fact witnesses and will notify Laurel when such are known.
- b) LHT will address this question in its pre-served written direct testimony.
- c) LHT will address this question in its pre-served written direct testimony.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

5. Please identify each person LHT 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) LHT does not presently intend to retain its own expert witness but will notify Laurel if that changes and when such are known.
- b) See response to 5. a.
- c) See response to 5. a.

Provided By:

Adeolu Bakare, McNeese Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

6. Please provide copies of all exhibits LHT individually intends to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of LHT'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, LHT has not yet identified any exhibits that it individually intends to offer at hearings but will provide such to Laurel when known.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

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

RESPONSE:

Without waiving the prior objections, Laurel's certificate of public convenience speaks for itself.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

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

RESPONSE:

Without waiving the prior objections, Laurel's tariff speaks for itself.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

9. 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 the prior objections, pursuant to a settlement agreement between certain parties, some of which are complainants in this case, capacity on the Laurel pipeline has been used for bi-directional service since 2019.

Provided By:

Darwin Brewster, Senior Vice President - Commercial Operations, Lucknow-Highspire Terminals, LLC

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
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 certificate of public convenience that LHT believes require Laurel maintain an amount of capacity over any segment of its Pennsylvania pipe line system.

RESPONSE:

Without waiving the prior objections, neither the Complaint, nor the Answer to New Matter, nor the Answer to Preliminary Objections makes such a representation. The Capacity Agreement does, however, have such restrictions.

Provided By:

Adeolu Bakare, McNeas Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

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

RESPONSE:

Without waiving the prior objections, 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.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

12. What is LHT’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:

LHT is without sufficient knowledge at present to allow it to opine on the total capacity available on the Laurel pipeline between Altoona and Coraopolis, but understands that the capacity agreement between Buckeye and Laurel limits the capacity available for Buckeye to provide interstate service on that segment to 40,000 bpd in throughput capacity.

Provided By:

Darwin Brewster, Senior Vice President - Commercial Operations, Lucknow-Highspire Terminals, LLC.

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13. What is LHTs 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:

LHT is without sufficient knowledge at present to allow it to opine on the total capacity available on the Laurel pipeline between Altoona and Sinking Springs, but understands that the capacity agreement between Buckeye and Laurel limits the capacity available for Buckeye to provide interstate service on that segment to 45,000 bpd in throughput capacity.

Provided By:

Darwin Brewster, Senior Vice President - Commercial Operations, Lucknow-Highspire Terminals, LLC.

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15. 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 LHT’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 LHT believe Buckeye must provide in order for Laurel to avoid providing unreasonable and inadequate service? Fully explain any response.

RESPONSE:

- a) Without waiving the prior objections, no, rather the statement 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 LHT. 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) Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.

Provided By:

Darwin Brewster, Senior Vice President - Commercial Operations, Lucknow-Highspire Terminals, LLC.

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

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16. 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 LHT 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 LHT 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 the prior objections, LHT will address this question in its pre-served written direct testimony.

Provided By:

Adeolu Bakare, McNeese Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
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17. 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 LHT’s understanding that Buckeye is a Pennsylvania public utility? Fully explain any response.
 - b) Is it LHT’s understanding that Buckeye is a party to this proceeding? Fully explain any response.

RESPONSE:

- a) LHT 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) No. But that does not mean that Buckeye’s actions in furtherance of its plan to expand bi-directional service on the Laurel pipeline, which it also operates, are not pertinent to this proceeding that 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:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

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

RESPONSE:

- a) Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.
- b) Operational certainty is the state of a system operating as, in this case, LHT expects it to operate based on the tariffs, procedures, experience and reasonable needs of its ratepaying customers. 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) Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.
- d) LHT will address this question in its pre-served written direct testimony. At a minimum LHT’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 LHT in terms of relationships with its customers and accommodations that may need to be made in response to missed delivery windows.

Provided By:

Darwin Brewster, Senior Vice President - Commercial Operations, Lucknow-Highspire Terminals, LLC.

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.
4899-3771-4246, v. 2

**RESPONSES OF
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22. 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 LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.

RESPONSE:

Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
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23. 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 LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.

RESPONSE:

Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
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24. 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 LHT understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.
 - b) Identify and explain the basis for LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.
 - c) Identify all instances where LHT 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 LHT 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:

- a) Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.
- b) Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.
- c) LHT is in the process of extracting and reviewing documents. If and when LHT identifies any such communications, and subject to the terms of a Protective Order and execution of the necessary Non-Disclosure Certificates, LHT will provide the requested information. Additionally, the Complaint does not allege that LHT 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) LHT is in the process of extracting and reviewing documents. If and when LHT identifies any such communications, and subject to the terms of a Protective Order and execution of the necessary Non-Disclosure Certificates, LHT will provide the requested information.

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25. Reference Complaint ¶ 24 where the Complainants allege that “transit times have increased;...”
- a) Please define “increased” as LHT understands that term to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.
 - b) Identify and explain the basis for LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.
 - c) Identify all instances where LHT 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 LHT 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:

- a) Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.
- b) Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.
- c) LHT is in the process of extracting and reviewing documents. If and when LHT identifies any such communications, and subject to the terms of a Protective Order and execution of the necessary Non-Disclosure Certificates, LHT will provide the requested information. Additionally, the Complaint does not allege that LHT 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) LHT is in the process of extracting and reviewing documents. If and when LHT identifies any such communications, and subject to the terms of a Protective Order and execution of the necessary Non-Disclosure Certificates, LHT will provide the requested information.

Provided By:

Darwin Brewster, Senior Vice President - Commercial Operations, Lucknow-Highspire Terminals, LLC.

Adeolu Bakare, McNeese Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

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26. 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 LHT understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.
 - b) Identify and explain the basis for LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.
 - c) Identify all instances where LHT 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 LHT 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:

- a) Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.
- b) Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.
- c) LHT is in the process of extracting and reviewing documents. If and when LHT identifies any such communications, and subject to the terms of a Protective Order and execution of the necessary Non-Disclosure Certificates, LHT will provide the requested information. Additionally, the Complaint does not allege that LHT communicated “concerns about deliverability” related to existing bidirectional service to the “escalation” contact under ¶ of 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) LHT is in the process of extracting and reviewing documents. If and when LHT identifies any such communications, and subject to the terms of a Protective Order and execution of the necessary Non-Disclosure Certificates, LHT will provide the requested information.

Provided By:

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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 LHT understands that phrase to be used in Complaint ¶ 24, and provide all Documents relied upon by LHT to provide this definition.
 - b) Identify and explain the basis for LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.
 - c) Identify all instances where LHT 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 LHT 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:

- a) Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.
- b) Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.
- c) LHT is in the process of extracting and reviewing documents. If and when LHT identifies any such communications, and subject to the terms of a Protective Order and execution of the necessary Non-Disclosure Certificates, LHT will provide the requested information. Additionally, the Complaint does not allege that LHT communicated “concerns about deliverability” related to existing bidirectional service to the “escalation” contact under ¶ of 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) LHT is in the process of extracting and reviewing documents. If and when LHT identifies any such communications, and subject to the terms of a Protective Order and execution of the necessary Non-Disclosure Certificates, LHT will provide the requested information.

Provided By:

**RESPONSES OF
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28. Identify all instances where LHT 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 the prior objections, LHT is in the process of extracting and reviewing documents. If and when LHT identifies any such communications, and subject to the terms of a Protective Order and execution of the necessary Non-Disclosure Certificates, LHT will provide the requested information.

Provided By:

Darwin Brewster, Senior Vice President - Commercial Operations, Lucknow-Highspire Terminals, LLC.

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29. Identify all instances where LHT 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).

RESPONSE:

LHT is in the process of extracting and reviewing documents. If and when LHT identifies any such communications, and subject to the terms of a Protective Order and execution of the necessary Non-Disclosure Certificates, LHT will provide the requested information.

Provided By:

Darwin Brewster, Senior Vice President - Commercial Operations, Lucknow-Highspire Terminals, LLC.

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

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

RESPONSE:

There is no such informal complaint and, if there were, it would be in Laurel's possession.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

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31. Identify any formal complaint filed by LHT, 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:

There is no such formal complaint and, if there were, it would be in Laurel's possession.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

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32. 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 LHT’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 LHT to provide a response.
 - c) What is LHT’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 LHT to provide a response.

RESPONSE:

- a) Without waiving the prior objections, “the past several years” means, generally, the time period during which bi-directional service has been in place.
- b) Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.
- c) Without waiving the prior objections, see Response to 32.b.

Provided By:

Darwin Brewster, Senior Vice President - Commercial Operations, Lucknow-Highspire Terminals, LLC.

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

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33. 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 LHT’s belief regarding this allegation, and provide all Documents relied upon by LHT to form the basis for this belief.

RESPONSE:

Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

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

RESPONSE:

Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.

Provided By:

Darwin Brewster, Senior Vice President - Commercial Operations, Lucknow-Highspire Terminals, LLC.

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

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35. Reference Complaint ¶ 29.

- a) Identify, explain and quantify all loss of profit and revenues that LHT 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 LHT believes will be impacted due to the subject matter of the Complaint.
- c) Identify, explain and quantify all increased wholesale prices for gasoline that LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 the prior objections, LHT will address this question in its pre-served written direct testimony.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

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LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

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 LHT is seeking as relief in this proceeding.

RESPONSE:

Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

41. Reference Complaint ¶ 35.

- a) Identify, explain and quantify all loss of profit and revenues that LHT 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 LHT believes will be impacted due to the subject matter of the Complaint.
- c) Identify, explain and quantify all increased wholesale prices for gasoline that LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 LHT 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 the prior objections, LHT will address this question in its pre-served written direct testimony.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

43. Reference Response to POs ¶ 17.

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

RESPONSE:

Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
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DOCKET NO. C-2025-3053018

44. Reference Response to POs ¶ 30.

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

RESPONSE:

Without waiving the prior objections, LHT will address this question in its pre-served written direct testimony.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

**RESPONSES OF
LUCKNOW-HIGHSPIRE TERMINALS, LLC
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO LAUREL PIPE LINE COMPANY, L.P., SET I**

DOCKET NO. C-2025-3053018

45. 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 the prior objections, see Complaint ¶ 28 referencing Laurel’s failure to obtain requisite Commission authorizations.

Provided By:

Adeolu Bakare, McNees Wallace & Nurick LLC, Counsel to Lucknow-Highspire Terminals, LLC.

VERIFICATION

I, Adeolu A. Bakare, Counsel to Lucknow-Highspire Terminals, LLC, hereby state that the facts set forth above in the Responses to Interrogatories and Requests for Production of Documents By Laurel Pipe Line Company, L.P., Set I, are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 27, 2025



Adeolu A. Bakare
Attorney