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August 5, 2025

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

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 Secretary Homsher:

Attached for filing with the Pennsylvania Public Utility Commission is the Joint Motion to Modify the Procedural Schedule and Request for Shortened Answer Period of Monroe Energy, LLC, Lucknow-Highspire Terminals, LLC, Sheetz, Inc., and PBF Holding Company LLC.

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.

Very truly yours,

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

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

c: Administrative Law Judge Eranda Vero
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).

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Adeolu A. Bakare

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

Dated this 5th day of August, 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.	:	

**MOTION TO MODIFY THE PROCEDURAL SCHEDULE, AND
REQUEST FOR SHORTENED ANSWER PERIOD**

TO: Administrative Law Judge Vero

Pursuant to Section 5.103 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code § 5.103, Monroe Energy, LLC ("Monroe"), Lucknow Highspire Terminals, LLC ("LHT"), Sheetz, Inc. ("Sheetz"), and PBF Holding Company LLC ("PBF") (collectively "Complainants") hereby file this Motion to Modify the Procedural Schedule in the above-captioned proceeding. Complainants respectfully request that Your Honor modify the dates for the evidentiary hearing in this proceeding. The modification is necessary to ensure a discovery period after the filing date for rebuttal testimony by Laurel Pipe Line Company, L.P. ("Laurel") that provides Complainants sufficient time to explore what will be Laurel's case in chief. Even with the modification, the time requested for Complainants to conduct discovery of Laurel's testimony and exhibits will be approximately half the time that has been afforded to Laurel to conduct discovery of Complainants' testimony and exhibits.

I. BACKGROUND

On May 9, 2025, Your Honor convened a prehearing conference at which the parties proposed and discussed dates for the procedural schedule in this proceeding. Subsequent to the prehearing conference, on May 16, 2025, the Complainants and Laurel submitted proposals for a procedural schedule, based on their understanding at the time of the potential scope of this litigation. On May 21, 2025, Your Honor issued an Order Establishing Litigation Schedule that did not accept completely the dates proposed by either the Complainants or Laurel. The current Litigation Schedule sets a filing date of August 29, 2025 for Respondent Rebuttal Testimony and September 9-12, 2025, less than two weeks later, for Evidentiary Hearings.

II. MOTION FOR MODIFICATION

Since the initial establishment of a procedural schedule, Complainants and Laurel have engaged in extensive discovery. Laurel served a round of discovery on each of the four Complainants prior to the filing of Complainants' direct testimony. As Your Honor knows, Complainants' objections to a portion of that discovery prompted Laurel to file a motion to compel, which Your Honor addressed in an order issued June 10, 2025. Following the filing of Complainants' direct testimony on July 15, 2025, Laurel has served the following discovery on Complainants:

- Sheetz Set II: Served on July 17, 2025, Objections served July 28, 2025, Responses due August 6, 2025.
- LHT Set II: Served on July 17, 2025, Objections served July 28, 2025, Responses due August 6, 2025.
- Monroe Set II: Served on July 17, 2025, Objections served July 28, 2025, Responses due August 6, 2025.
- PBF Set II: Served on July 17, 2025, Objections served July 28, 2025, Responses due August 6, 2025.
- Complainants Set I: Served on July 17, 2025, Objections due July 28, 2025, Responses due August 6, 2025.

- Sheetz Set III: Served on July 21, 2025, Objections served July 31, 2025, Responses due August 11, 2025.
- LHT Set III: Served on July 21, 2025, Objections served July 31, 2025, Responses due August 11, 2025.
- Monroe Set III: Served on July 21, 2025, Objections served July 31, 2025, Responses due August 11, 2025.
- Complainants Set II: Served on July 21, 2025, Objections due July 31, 2025, Responses due August 11, 2025.
- Sheetz Set IV: Served on July 25, 2025, Objections due August 4, 2025, Responses due August 14, 2025.
- LHT Set IV: Served on July 25, 2025, Objections due August 4, 2025, Responses due August 14, 2025.
- Monroe Set IV: Served on July 25, 2025, Objections due August 4, 2025, Responses due August 14, 2025.
- PBF Set III: Served on July 25, 2025, Objections due August 4, 2025, Responses due August 14, 2025.

Between the filing of Complainants' direct testimony and the start of evidentiary hearings, Laurel will have had nearly two months to conduct discovery of Complainants' positions. Laurel's opportunity to conduct discovery stands in sharp contrast to Complainants' right to conduct discovery of the testimony and exhibits that Laurel is scheduled to file on August 29, 2025, which will be the first manifestation of Laurel's positions on the many issues in this proceeding. Under the currently applicable timelines for discovery, and given that the rebuttal testimony will be served on August 29, a Friday before the start of the Labor Day Weekend, the earliest date on which Complainants could review and digest all of the rebuttal testimony and issue discovery to Laurel would be Tuesday, September 2. Laurel's objections to that discovery would be due on September 12, which is currently scheduled as the final day of evidentiary hearings, and Laurel's responses to discovery would be due September 22, ten days after the final day of evidentiary hearings. Complainants also evaluated whether the typical shortened discovery procedures (which are currently not in place for this proceeding) would be feasible, and they would not be. Under

shortened response times, which are typically five days from service for objections and ten days from service for responses, Laurel's objections would be due September 8, the day before the start of evidentiary hearings, and responses would be due September 12, the final day of evidentiary hearings. The current schedule effectively precludes the Complainants from engaging in any discovery of the testimony and exhibits that comprise Laurel's case in chief.

While Complainants should rightfully be entitled to the same discovery period for Laurel's case in chief that Laurel received to conduct discovery of the Complainants' case in chief, the Complainants are instead proposing below a modified procedural schedule that provides a minimally reasonable opportunity for Complainants to review, digest, and conduct reasonable discovery on Laurel's rebuttal testimony and exhibits. This schedule would provide Complainants at least a few working business days after receiving Laurel's testimony and exhibits to review those documents, consult with their expert and company witnesses, and prepare and serve discovery requests on the same timeline under which Laurel served its discovery requests to Complainants after the Complainants filed their testimony and exhibits. If a motion to compel does not become necessary, the discovery timeline would conclude with responses being served on or about September 29. The earliest start of the evidentiary hearings could then be October 7, if the discovery process of Laurel's rebuttal testimony and exhibits goes smoothly. Accordingly, Complainants respectfully request that Your Honor modify the procedural schedule to move the start date for evidentiary hearings to no earlier than October 7, 2025. The time between the end date of evidentiary hearings and the due dates for initial and reply briefs could remain the same, with the exact dates for those filings to be reset after the evidentiary hearing dates are reset.

The requested modification of the schedule would allow Complainants time to meaningfully review Laurel's rebuttal testimony and serve discovery, while also giving Laurel the

opportunity to comprehensively review and respond to that discovery. A modification of the schedule would ensure the record is as complete as possible and promote efficiency during the evidentiary hearings. Complainants recognize the Commission's interest in ensuring a timely hearing; however, a modification of the schedule is warranted to ensure the participants have sufficient time and due process to properly litigate their claims. Accordingly, Complainants submit that good cause exists to grant the requested modification of the procedural schedule.

In the interest of efficiency, Complainants also request that any answers to this motion be due no later than 5 business days after filing, i.e., no later than August 11, 2025, and that Your Honor rule as soon as possible thereafter.

IV. CONCLUSION

For the reasons stated above, Complainants respectfully request that an order be issued setting a near-term deadline for answers (e.g., August 11), and that an order be issued soon thereafter granting the requested modification of the procedural dates in this proceeding.

Respectfully submitted,

By: 

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Dated: August 5, 2025