
Garrett P. Lent

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File #: 200842

August 7, 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 II 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

GPL/dmc
Attachment

cc: The Honorable Eranda Vero (*via email; w/attachment*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL ONLY

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Pro hac vice*

Date: August 7, 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. :

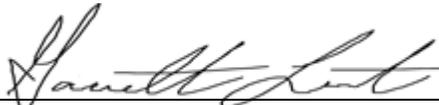
NOTICE TO PLEAD

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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Admitted Pro Hac Vice

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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 II**

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 Second Set of Interrogatories and Requests for Production of Documents (“Set II 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 in accordance with Instructions 15 and 16 and to Questions 1, 5(a), 5(d), 5(f), 5(g)(i), 5(g)(iii), 7(a)(b)(c), 9(a)(b), 10(a)(b), 12(a)(b), 13, 14, 15, 16, 17, 18, 19, and 20 of the Set II 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 July 18, 2025, Laurel served Set II Discovery on Sheetz. A copy of Laurel Set II Discovery to Sheetz is provided as Appendix A hereto.

5. LHT timely objected to Set II Discovery on July 28, 2025. LHT lodged objections to Instructions No. 15 and 16 and Questions 1, 5(a), 5(d), 5(f), 5(g)(i), 5(g)(ii), 5(g)(iii), 5(h), 7(a)(b)(c), 9(a)(b), 10(a)(b), 12(a)(b), 13, 14, 15, 16, 17, 18, 19, and 20 of the Set II Discovery. A copy of Complainants’ Objections is provided as Appendix B hereto.

6. On July 29, 2025, LHT and Sheetz filed a Petition for Interim Emergency Relief in the above-captioned matter. The parties to that matter reached a settlement in principle on August 5, 2025.

7. Also on August 6, 2025, LHT served its responses to the Set II Discovery.

8. Counsel for Laurel emailed Complainants’ counsel proposals regarding possible resolution of the objections on August 6, 2025. Discuss of possible resolution of the objections remains ongoing, and Laurel remains willing to discuss reasonable resolutions of the objections. While Laurel is filing the instant Motion to preserve its right to compel responses to valid discovery requests, if the parties are able to resolve the objections Laurel will withdraw its Motion with respect to any such discovery requests.

9. Laurel hereby files its Motion to Compel Complainants to respond to Questions 1, 5(a), 5(d), 5(f), 5(g)(i), 5(g)(iii), 7(a)(b)(c), 9(a)(b), 10(a)(b), 12(a)(b), 13, 14, 15, 16, 17, 18, 19, and 20 of the Set II Discovery.

II. ARGUMENT

A. LHT SHOULD BE COMPELLED TO COMPLY WITH INSTRUCTIONS NO. 15 AND 16 OF THE SET II DISCOVERY.

10. The instructions to Set II Discovery includes the following instructions:

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..

11. LHT objects to the Instructions No 15 & 16 in Set II Discovery as unreasonably burdensome.

12. Laurel agrees not to compel this instruction and will not require a privilege log subject to confirmation by counsel that all non-privileged information has been provided.

B. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 1 OF THE SET II DISCOVERY.

13. Request No. 1 provides as follows:

1. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit SH-1. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).

14. LHT objects to Request No. 1 to the extent that it seeks information not in the witness's possession as he might have been influenced by information no longer in her possession.

15. 52 Pa. Code § 5.349(a) provides,

A party may serve on another party a request for either of the following:

(1) To produce and permit the party making the request, or someone acting on the party's behalf, to inspect and copy designated documents—including writings, drawings, graphs, charts, photographs, computer records and other compilations of data from which information can be obtained, translated, if necessary, by the respondent through detection devices into reasonable usable form—or to inspect a copy, test or sample tangible things which constitute or contain matters within the scope of §§ 5.321(b), 5.323 and 5.324 (relating to scope; hearing preparation material; and discovery of expert testimony) and which are in the possession, custody or control of the party upon whom the request is served.

16. Laurel's request presumes that the materials relied upon by the witness are likely to still be in the possession of the witness. LHT has inferred from the request that it seeks the entire universe of information that a witness may have, prior to their participation in the case, learned that may have had a bearing on the witness's testimony. The question is not so broad. LHT should be compelled to produce, in accordance with regulation, those identified materials that were relied on during the witness's preparation of her testimony.

17. For the reasons more fully explained above, LHT should be compelled to provide a full and complete response to Request No. 1 of Set II discovery.

C. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 5A, 5D, 5F5, AND 5G(I)(II)(III) OF THE SET II DISCOVERY.

18. Request No. 5 provides as follows:

5. With reference to Ms. Huzicko's discussion of the 8 terminals that LHT owns that are primarily supplied by Laurel Pipeline and the 3 terminals that LHT owns that are primarily supplied by Buckeye Pipeline found in Exhibit SH-1 at 3:4-7:

a) Please confirm that LHT does not operate any terminals outside of the Commonwealth of Pennsylvania.

d) Please provide the daily inventory by product type and grade at each of the 11 terminals from 2016 to the present.

f) Please provide Bill of Lading data in machine readable form showing the location to which trucks are delivering.

g) With regard to the 8 terminals that are primarily supplied by Laurel Pipeline:

i. Please identify the quantity of product delivered to each the terminal under an intrastate PUC tariff and the quantity of product delivered to each terminal under a FERC tariff.

ii. Please provide a narrative description of the other means of supply available at each terminal.

iii. Please identify the quantity of product delivered to each terminal by one of the means identified in subpart (ii).

19. LHT objects to Request No. 5 on various grounds, as follow:

20. LHT objects to Request No. 5(a) on the basis that the request is irrelevant, immaterial, and not likely to lead to admissible evidence, arguing it seeks information outside the Commission's jurisdiction. However, information about the terminals both inside and outside Pennsylvania, however, is highly relevant to the issues the witness discusses.

21. LHT objects to Request No. 5(d) on the basis that that the request is irrelevant, immaterial, and not likely to lead to admissible evidence, and unreasonably burdensome. However, the request is relevant as LHT is making claims about pre and post bidirectional operations and the scope of the request is tailored to both. Laurel, however, would accept a response covering responsive information from 2019 to the present.

22. LHT objects to Request No. 5(f) on the basis that the request is vague and would impose an unreasonable investigation. This request, however, describes the specific information

it is searching for and is therefore not vague. LHT does not describe or provide any detail regarding why providing this information would impose an unreasonable investigation.

23. LHT objects to Request No. 5(g)(i) on the basis that the request is irrelevant, immaterial, and not likely to lead to admissible evidence, and would impose an unreasonable investigation. The quantities of product delivered to terminals, however, go to the heart of LHT's Complainant and are therefore relevant. LHT does not describe why compiling such information would impose an unreasonable investigation and simply points to the Respondent to find the information itself. LHT has not demonstrated the investigation would be unreasonable.

24. LHT objects to Request No. 5(g)(iii) on the basis that it is vague. It also incorporated "the above request" in part g to its objection, but does not state to which subpart of part g it refers. This request is relevant as the quantity of product delivered to LHT's terminals primarily supplied by Laurel goes directly to the arguments LHT raises in its Complaint. Further, the question is not vague, as it is referring to the volume delivered, which is clear.

25. For the reasons more fully explained above, LHT should be compelled to provide a full and complete response to Request No. 5A, 5F, 5D, and 5G(i)(iii) of Set I discovery.

D. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 7A, 7B AND 7C OF THE SET II DISCOVERY.

26. Request No. 7 provides as follows:

7. With reference to Ms. Huzicko's discussion of the refineries and other supply sources supplying the terminals, found in Exhibit SH-1 at 3:10-4:6:

a. Please identify each refinery that has supplied each LHT terminal from 2019 to the present.

b. Please provide all supply contracts through which refined product has been supplied to an LHT terminal from 2019 to the present.

c. Please provide in machine readable form, the quantity of refined product separated by supply source and terminal that LHT has held at its terminals.

27. LHT objects to Request No. 7(a), (b) and (c) on the basis that the request is irrelevant, immaterial, and not likely to lead to admissible evidence, and would impose an unreasonable investigation.

28. LHT argues that the request is irrelevant, immaterial, and not likely to lead to admissible evidence in the proceeding because Laurel may have access to some of the information and does not need the “granular” information in the possession of LHT. This does, not render the request irrelevant. The information is relevant to LHT’s claims of economic harm and, in particular, the documentary support that LHT is relying upon in order to claim it has suffered and will suffer economic harm due to bidirectional service. Furthermore, LHT’s objection concedes that it does have access to information with greater detail than that available to Laurel, which it should be compelled to provide.

29. LHT also argues that this would impose an unreasonable investigation, but does not provide details on why this investigation would be unreasonable. The data and information and the documents sought by this request are normally maintained in the course of business and should be readily available to LHT.

30. For the reasons more fully explained above, LHT should be compelled to provide a full and complete response to Request No. 7 of Set II discovery.

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

31. Request No. 9 provides as follows:

9. With regard to Ms. Huzicko's statement that she knows "from interactions with other shippers ... have experienced a shift in norms in the Pennsylvania market" in Exhibit SH-1 at 5:2-3:

a) Please identify by name and job title each shipper with whom she has interacted who indicated to her that they had such experience.

b) Please provide all Documents, including but not limited to email, letters, or instant message communications that cause Ms. Huzicko to reach such a conclusion.

32. LHT objects to Request No. 9 on the basis that this would unreasonably burden and embarrass LHT.

33. The witness here has included in her testimony descriptions of her interactions with shippers. It does not unreasonably burden LHT to identify the shippers discussed in the witness's testimony, particularly where interactions with the unnamed shippers are described in the testimony. LHT claims that providing this information will adversely impact the witness and LHT's commercial reputation, however, LHT has, by its testimony, invited this inquiry. It should not be permitted to refer to interactions with shippers, and then be shielded from identifying them. Moreover, the Protective Order issued in this proceeding will allow for appropriate protections of such Documents sought, to the extent that those Documents contain non-public information that qualifies for protection under the Protective Order.

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

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

35. Set II, Request No. 10 provides as follows:

10. With reference to Ms. Huzicko's claim that additional cuts produce additional transmix in Exhibit SH-1 at 5:13-23,

a) Please provide in machine readable form, the quantity of transmix generated at each terminal owned or operated by LHT by day from 2017 to the present.

b) Please provide in machine readable form, the quantity product downgrades generated at each terminal owned or operated by LHT by day from 2017 to the present.

36. LHT objects to Request No. 10(a) on the basis that providing the information would be unreasonably burdensome and to Request No. 10(b) on the basis that the request is ambiguous and unreasonably vague, and that it would impose an unreasonable investigation.

37. LHT argues that the information in 10(a) would be unreasonably burdensome, but does not articulate with any specificity why they would be burdened by providing this information. The witness specifically asserted that additional cuts produce additional transmix and, therefore, it is reasonable to expect that LHT has information showing transmix increasing. If it does not, then it can state that it does not. To the extent that the basis is due to the period of information requested, Laurel is willing to limit the request to the period of January 1, 2019 to present.

38. LHT indicates that Request 10(b) is ambiguous and unreasonably vague, however, because it does not understand the phrase “quantity product downgrades.” This term is self-explanatory, and can be understood to mean the quantity of products that have been downgraded due to the increase in transmix which Witness Huzicko asserts occurs at the referenced passage.

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

G. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 12A AND 12B OF THE SET II DISCOVERY.

40. Request No. 12A and 12B provides as follows:

12. With reference to Ms. Huzicko's statement that "LHT is also not always able to buy even small quantities from the Midwest suppliers on a regular basis":

a) Please provide in machine readable form the quantity of all refined products LHT has purchased from Midwest suppliers from 2019 to the present.

b) Please provide all emails or other correspondence between LHT in which it sought to purchase any quantity of refined product from a Midwest supplier.

41. LHT objects to Request No. 12A and 12B: (a) on the basis that the request is ambiguous and irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence in this proceeding, and that it would cause an unreasonable investigation and (b) on the basis that the request is unreasonably burdensome as it does not specify a time frame and would impose an unreasonable investigation

42. Regarding 12(a), the quantity of all refined products LHT purchased from other suppliers is directly relevant to the issues raised in the Complaint. LHT's attempt to narrow the issue to "total flows" would severely limit Laurel's ability to investigate claims made by the witness in her testimony. Furthermore, the information sought is information that should be maintained and is readily available to LHT. Therefore, it does not require an unreasonable information.

43. As it concerns 12(b), again, the Complainants do not describe with particularity why this request would be burdensome, except to suggest it requires a time limitation. The time limitation applicable to subpart (b) can be understood to be the same period of time set forth in subpart(a). Laurel will withdraw its Motion if the information sought is provided over this period.

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

H. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 13, 14, 15, 16, 17, 18, 19 AND 20 OF THE SET II DISCOVERY.

45. Request No. 13-20 provides as follows:

13. Please provide all management level presentations from 2019 to the present that discuss issues related to transit time on Laurel.

14. Please provide all management level presentations from 2019 to the present that discuss where to source supply to the LHT terminals.
15. Please provide all management level presentations from 2019 to the present that discuss Mid-western refineries.
16. Please provide all management level presentations from 2019 to the present that discuss East Coast refineries.
17. Please provide all management level presentations from 2019 to the present that discuss supplying refined product from Colonial Pipeline.
18. Please provide all management level presentations from 2019 to the present that discuss pro-rationing on Colonial Pipeline.
19. Please provide all management level presentations from 2019 to the present that discuss supplying refined product delivered by waterborne vessel into an East Coast port.
20. Please provide all management level presentations from 2019 to the present that discuss supplying refined product delivered by waterborne on the Ohio River.

46. LHT objects to Request Nos. 13-20 on the basis that the request is ambiguous and vague as LHT does not know what “management level” means, and would cause an unreasonable investigation

47. LHT does not describe why this would cause an unreasonable investigation.

48. LHT may have its own definitions of items like “management level” and LHT should be compelled to find those presentations. To the extent that additional specificity is required, Laurel submits that it is appropriate to interpret “management level” as the level within the LHT organizational structure at which decisions regarding its use of refined petroleum products pipelines are made.

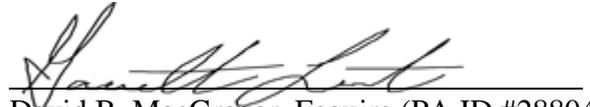
49. LHT indicated it would provide responses pending objection, but did not do so in their discovery responses.

50. For the reasons more fully explained above, LHT should be compelled to provide a full and complete response to Request No. 13-20 of Set II 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 in accordance with Instructions 15 and 16 and to Questions 1, 5(a), 5(d), 5(f), 5(g)(i), 5(g)(iii), 7(a)(b)(c), 9(a)(b), 10(a)(b), 12(a)(b), 13, 14, 15, 16, 17, 18, 19, and 20 of Set II Discovery.

Respectfully submitted,



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Admitted Pro Hac Vice

Date: August 7, 2025

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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-HIGHPSIRE TERMINALS, LLC – SET II**

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-Highpsire Terminals, LLC (“LHT”), Set II.

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 II**

1. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit SH-1. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).
2. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit SH-2. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).
3. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit SH-3. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).
4. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit SH-4. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).
5. With reference to Ms. Huzicko's discussion of the 8 terminals that LHT owns that are primarily supplied by Laurel Pipeline and the 3 terminals that LHT owns that are primarily supplied by Buckeye Pipeline found in Exhibit SH-1 at 3:4-7:
 - a. Please confirm that LHT does not operate any terminals outside of the Commonwealth of Pennsylvania.
 - b. Please identify the 8 terminals that are primarily supplied by Laurel Pipeline.
 - c. Please identify the 3 terminals that are primarily supplied by Buckeye Pipeline.
 - d. Please provide the daily inventory by product type and grade at each of the 11 terminals from 2016 to the present.
 - e. Please provide the shell capacity, working capacity, and truck rack capacity at each terminal.

- f. Please provide Bill of Lading data in machine readable form showing the location to which trucks are delivering.
 - g. With regard to the 8 terminals that are primarily supplied by Laurel Pipeline:
 - i. Please identify the quantity of product delivered to each the terminal under an intrastate PUC tariff and the quantity of product delivered to each terminal under a FERC tariff.
 - ii. Please provide a narrative description of the other means of supply available at each terminal.
 - iii. Please identify the quantity of product delivered to each terminal by one of the means identified in subpart (ii).
 - h. With regard to the 8 terminals that are primarily supplied by Laurel Pipeline:
 - i. Please identify the quantity of product delivered to each the terminal under an intrastate PUC tariff and the quantity of product delivered to each terminal under a FERC tariff.
 - ii. Please provide a narrative description of the other means of supply available at each terminal.
 - iii. Please identify the quantity of product delivered to each terminal by one of the means identified in subpart (ii).
7. With reference to Ms. Huzicko's discussion of the refineries and other supply sources supplying the terminals, found in Exhibit SH-1 at 3:10-4:6:
- a. Please identify each refinery that has supplied each LHT terminal from 2019 to the present.
 - b. Please provide all supply contracts through which refined product has been supplied to an LHT terminal from 2019 to the present.
 - c. Please provide in machine readable form, the quantity of refined product separated by supply source and terminal that LHT has held at its terminals.

8. With reference Ms. Huzicko's statement that "increased cuts have required increased training and staffing" discussed in Exhibit SH-1 at 3:18-19:
 - a. Please provide copies of all additional training materials developed or otherwise provided to employees associated with additional cuts that occurred after 2019.
 - b. Please identify each additional employee hired as a result of additional cuts.
 - c. Please provide all Documents developed by LHT and provided to appropriate company leadership justifying increased staffing resulting from additional cuts.
9. With regard to Ms. Huzicko's statement that she knows "from interactions with other shippers ... have experienced a shift in norms in the Pennsylvania market" in Exhibit SH-1 at 5:2-3:
 - a. Please identify by name and job title each shipper with whom she has interacted who indicated to her that they had had such an experience.
 - b. Please provide all Documents, including but not limited to email, letters or instant message communications that cause Ms. Huzicko to reach such a conclusion.
10. With reference to Ms. Huzicko's claim that additional cuts produce additional transmix in Exhibit SH-1 at 5:13-23,
 - a. Please provide in machine readable form, the quantity of transmix generated at each terminal owned or operated by LHT by day from 2017 to the present.
 - b. Please provide in machine readable form, the quantity product downgrades generated at each terminal owned or operated by LHT by day from 2017 to the present.
11. With reference Ms. Huzicko's discussion of a backwardated market in Exhibit SH-1 at 6:12-7:4, please provide all sources upon which Ms. Huzicko relied to reach this conclusion.
12. With reference to Ms. Huzicko's statement that "LHT is also not always able to buy even small quantities from the Midwest suppliers on a regular basis":
 - a. Please provide in machine readable form the quantity of all refined products LHT has purchased from Midwest suppliers from 2019 to the present.

- b. Please provide all emails or other correspondence between LHT in which it sought to purchase any quantity of refined product from a Midwest supplier.
- 13. Please provide all management level presentations from 2019 to the present that discuss issues related to transit time on Laurel.
- 14. Please provide all management level presentations from 2019 to the present that discuss where to source supply to the LHT terminals.
- 15. Please provide all management level presentations from 2019 to the present that discuss Mid-western refineries.
- 16. Please provide all management level presentations from 2019 to the present that discuss East Coast refineries.
- 17. Please provide all management level presentations from 2019 to the present that discuss supplying refined product from Colonial Pipeline.
- 18. Please provide all management level presentations from 2019 to the present that discuss pro-rationing on Colonial Pipeline.
- 19. Please provide all management level presentations from 2019 to the present that discuss supplying refined product delivered by waterborne vessel into an East Coast port.
- 20. Please provide all management level presentations from 2019 to the present that discuss supplying refined product delivered by waterborne on the Ohio River.

Appendix B

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET II 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 II. The basis of the objections, of which there are four, are: 1) that the requests are ambiguous, overly broad, and unreasonably vague; 2) that the requests are unreasonably burdensome and/or would require unreasonable investigation; 3) that the requests are irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence in this proceeding; and/or, 4) that disclosure would violate the confidentiality that non-parties to this proceeding attach to the subject communications. As shown in the attached Exhibit 1, LHT objects to the following requests for the reason stated therein: 1, 5 (a, d, f, g), 7 (a-c), 9 (a-b), 10 (a-b), 12 (a-b), 13, 14, 15, 16, 17, 18, 19, and 20.

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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EXHIBIT 1

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

Docket No. C-2025-3053018

The instructions to Sets II include the following instructions:

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.

OBJECTION:

The Commission’s regulations broadly exempt privileged materials and documents from discovery. 52 Pa. Code §§ 5.321(c) and 5.323(a); see also 52 Pa. Code § 5.361(a)(3) (prohibiting discovery which relates to a matter which is privileged). However, the Commission’s regulations do not require a party to provide the provenance of every piece of information covered by privilege including what amounts to a log for that evidence noting every person who may have reviewed it. In addition, the Commission’s regulations prohibit discovery which would cause unreasonable burden to a party. 52 Pa. Code § 5.361(a)(4). Laurel’s Set I, Instructions, Numbers 15 and 16 seek to unreasonably burden Complainant’s efforts to respond to discovery requests, which specifically inquire into matters which are exempt from discovery under the Commission’s regulations, by imposing a requirement on Complainants that is not contemplated by the Commission’s regulations.

Based on the foregoing, Complainants object to Complainants’ Set I and Set II, Instruction Numbers 15 & 16 as unreasonably burdensome. Subject to the foregoing objection, Complainants intend to respond to appropriate discovery requests that do not seek privileged information, or ask Complainants to provide legal conclusions, legal opinions and/or legal research. Notwithstanding these general objections, Complainants are willing to provide responses subject to the specific Objections raised below.

1. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit SH-1. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
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OBJECTION:

A party may not ask interrogatories that would cause unreasonable burden or expense or "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code §§ 5.361(a)(2), (4).

As written, this request appears to demand the production of "all" documents upon which Ms. Huzicko might have relied, regardless of time and regardless of degree, that was in any way the basis of her testimony. To the extent that such information is not publicly available or otherwise in the possession of Ms. Huzicko, she is not able to provide such documents. To the extent that the request seeks such information, LHT objects on the basis that Ms. Huzicko has no possession of the information. Moreover, to the extent that any request in Set II purports to require the production of such materials as described herein, LHT also objects to said requests.

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

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5. With reference to Ms. Huzicko's discussion of the 8 terminals that LHT owns that are primarily supplied by Laurel Pipeline and the 3 terminals that LHT owns that are primarily supplied by Buckeye Pipeline found in Exhibit SH-1 at 3:4-7:

a) Please confirm that LHT does not operate any terminals outside of the Commonwealth of Pennsylvania.

OBJECTION:

A party may obtain discovery only on matters relevant to the subject matter and issues in the proceeding, and thus reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). As this request seeks information on LHT's operations beyond the jurisdiction of this Commission, the request is irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence in this proceeding. 52 Pa. Code § 5.321(c).

d) Please provide the daily inventory by product type and grade at each of the 11 terminals from 2016 to the present.

OBJECTION:

A party may not ask interrogatories that would cause unreasonable burden or expense 52 Pa. Code § 5.361(a)(2). Additionally, a party may obtain discovery only on matters relevant to the subject matter and issues in the proceeding, and thus reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). The request is irrelevant, immaterial, not likely to lead to the discovery of admissible evidence in this proceeding, and is unreasonably burdensome. 52 Pa. Code §§ 5.321(c) and 5.361(a)(2). The discovery requested detailed daily inventory data over a nine-year period. Production of the requested data would impose unreasonably burdensome duties upon LHT's staff.

f) Please provide Bill of Lading data in machine readable form showing the location to which trucks are delivering.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code §§ 5.361(a)(2), (4). The request

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is vague and would impose an unreasonable investigation on LHT. The question does not provide sufficient specificity for LHT to reasonably respond.

g) With regard to the 8 terminals that are primarily supplied by Laurel Pipeline:

- i. Please identify the quantity of product delivered to each the terminal under an intrastate PUC tariff and the quantity of product delivered to each terminal under a FERC tariff.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code § 5.361(a)(4). Additionally, a party may obtain discovery only on matters relevant to the subject matter and issues in the proceeding, and thus reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). The request is irrelevant, immaterial, not likely to lead to the discovery of admissible evidence in this proceeding, and would impose an unreasonable investigation on LHT. Product flowing through the Laurel Pipeline impacts delivery times regardless of origin point, since the intrastate and interstate flows pass through the same pipeline. Additionally, Laurel should already have access to this information. Directing LHT to compile the requested data would constitute an unreasonable investigation as LHT is not best positioned to do so. 52 Pa. Code § 5.361(a)(4).

g) With regard to the 8 terminals that are primarily supplied by Laurel Pipeline:

- ii. Please provide a narrative description of the other means of supply available at each terminal.

OBJECTION:

A party may not ask interrogatories that would cause unreasonable burden or expense. 52 Pa. Code § 5.361(a)(2). A party may obtain discovery only on matters relevant to the subject matter and issues in the proceeding, and thus reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). Requiring LHT to provide a description of every possible method of delivery fuel to a terminal, including emergency scenarios, would require analyses of multiple scenarios. The request is irrelevant, immaterial, and not likely to lead to the discovery of

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
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admissible evidence in this proceeding. 52 Pa. Code § 5.321(c). Notwithstanding this objection, LHT will provide a narrative description of the other means of supply to each terminal that are used in regular, non-emergency circumstances.

g) With regard to the 8 terminals that are primarily supplied by Laurel Pipeline:

- iii. Please identify the quantity of product delivered to each terminal by one of the means identified in subpart (ii).

OBJECTION:

As this interrogatory expands upon the request in Interrogatory Set II, No. 5(g), the above objection to said Interrogatory is incorporated herein as if stated in full. Additionally, this request is unreasonably vague because the request does not provide a timeframe or specify between daily, monthly, or annual volumes. Therefore, responding to the request would impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4).

h) With regard to the 8 terminals that are primarily supplied by Laurel Pipeline:

- i. Please identify the quantity of product delivered to each the terminal under an intrastate PUC tariff and the quantity of product delivered to each terminal under a FERC tariff.
- ii. Please provide a narrative description of the other means of supply available at each terminal.
- iii. Please identify the quantity of product delivered to each terminal by one of the means identified in subpart (ii).

OBJECTION:

The request is duplicative of earlier questions.

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
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7. With reference to Ms. Huzicko's discussion of the refineries and other supply sources supplying the terminals, found in Exhibit SH-1 at 3:10-4:6:
 - a. Please identify each refinery that has supplied each LHT terminal from 2019 to the present.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code § 5.361(a)(4). Additionally, a party may obtain discovery only on matters relevant to the subject matter and issues in the proceeding, and thus reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). Additionally, Laurel's own data will show all LHT shipments, including origin and destination points. Therefore, the request would impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4). The request is irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence in this proceeding with respect to LHT, as Laurel already has information on the geographic source (Midwest or East) of deliveries to LHT and more granular information identify the producing refinery has no bearing on the disputes raised in this proceeding because all LHT's individual purchases are merely a subset of the aggregate market data relevant to the matters raised In the Complaint. 52 Pa. Code § 5.321(c).

- b) Please provide all supply contracts through which refined product has been supplied to an LHT terminal from 2019 to the present.

OBJECTION:

See the objection to Interrogatory Set II, No. 7(a), which is incorporated herein as if stated in full.

- c) Please provide in machine readable form, the quantity of refined product separated by supply source and terminal that LHT has held at its terminals.

OBJECTION:

See the objection to Interrogatory Set II, No. 7(a), which is incorporated herein as if stated in full.

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9. With regard to Ms. Huzicko's statement that she knows "from interactions with other shippers ... have experienced a shift in norms in the Pennsylvania market" in Exhibit SH-1 at 5:2-3:
- a) Please identify by name and job title each shipper with whom she has interacted who indicated to her that they had such experience.

OBJECTION:

A party may not ask interrogatories that would cause unreasonable burden or expense. 52 Pa. Code § 5.361(a)(2). Disclosure of the requested would unreasonably embarrass and burden LHT by violating the confidentiality that non-parties to this proceeding attach to the subject communications and harming LHT's and Ms. Huzicko's commercial reputation. 52 Pa. Code § 5.361(a)(2).

- b) Please provide all Documents, including but not limited to email, letters, or instant message communications that cause Ms. Huzicko to reach such a conclusion.

OBJECTION:

See the objection to Interrogatory Set II, No. 9(a), which is incorporated herein as if stated in full.

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10. With reference to Ms. Huzicko's claim that additional cuts produce additional transmix in Exhibit SH-1 at 5:13-23,
- a) Please provide in machine readable form, the quantity of transmix generated at each terminal owned or operated by LHT by day from 2017 to the present.

OBJECTION:

A party may not ask interrogatories that would cause unreasonable burden. 52 Pa. Code § 5.361(a)(2). Providing the requested information "by-day" would impose is unreasonably burdensome for LHT. 52 Pa. Code § 5.361(a)(2).

- b) Please provide in machine readable form, the quantity product downgrades generated at each terminal owned or operated by LHT by day from 2017 to the present.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code § 5.361(a)(4). The request is ambiguous and unreasonably vague because LHT is not familiar with the term "quantity product downgrades." The request would, therefore, impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4).

**OBJECTIONS OF LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
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12. With reference to Ms. Huzicko's statement that "LHT is also not always able to buy even small quantities from the Midwest suppliers on a regular basis":
- a) Please provide in machine readable form the quantity of all refined products LHT has purchased from Midwest suppliers from 2019 to the present.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code § 5.361(a)(4). Additionally, a party may obtain discovery only on matters relevant to the subject matter and issues in the proceeding, and thus reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). The request is ambiguous and irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence in this proceeding. 52 Pa. Code § 5.321(c). The matters raised in the Complaint regarding market supply dynamics relate to total flows through the pipeline, not individual transactions. As concerns the portion that is relevant, Laurel should have in its possession all data showing LHT's movements of product from the Midwest. Therefore, the request would impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4).

- b) Please provide all emails or other correspondence between LHT in which it sought to purchase any quantity of refined product from a Midwest supplier.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code § 5.361(a)(4). Additionally, a party may obtain discovery only on matters relevant to the subject matter and issues in the proceeding, and thus reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). The request is unreasonably burdensome because there is no specified time frame. 52 Pa. Code § 5.361(a)(2). As concerns the portion that is relevant, Laurel should have in its possession all data showing LHT's movements of product from the Midwest. The request, therefore, would impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4).

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13. Please provide all management level presentations from 2019 to the present that discuss issues related to transit time on Laurel.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code § 5.361(a)(4). The request is ambiguous and unreasonably vague because LHT is not familiar with the term "management level." The request would, therefore, impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4). Notwithstanding, LHT will provide any information that it deems to be responsive based on its interpretation of "management level."

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14. Please provide all management level presentations from 2019 to the present that discuss where to source supply to the LHT terminals.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code § 5.361(a)(4). The request is ambiguous and unreasonably vague because LHT is not familiar with the term "management level." The request would, therefore, impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4). Notwithstanding, LHT will provide any information that it deems to be responsive based on its interpretation of "management level."

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15. Please provide all management level presentations from 2019 to the present that discuss Mid-western refineries.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code § 5.361(a)(4). The request is ambiguous and unreasonably vague because LHT is not familiar with the term "management level." The request would, therefore, impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4). Notwithstanding, LHT will provide any information that it deems to be responsive based on its interpretation of "management level."

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16. Please provide all management level presentations from 2019 to the present that discuss East Coast refineries.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code § 5.361(a)(4). The request is ambiguous and unreasonably vague because LHT is not familiar with the term "management level." The request would, therefore, impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4). Notwithstanding, LHT will provide any information that it deems to be responsive based on its interpretation of "management level."

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17. Please provide all management level presentations from 2019 to the present that discuss supplying refined product from Colonial Pipeline.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code § 5.361(a)(4). The request is ambiguous and unreasonably vague because LHT is not familiar with the term "management level." The request would, therefore, impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4). Notwithstanding, LHT will provide any information that it deems to be responsive based on its interpretation of "management level."

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18. Please provide all management level presentations from 2019 to the present that discuss pro-rationing on Colonial Pipeline.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code § 5.361(a)(4). The request is ambiguous and unreasonably vague because LHT is not familiar with the term "management level." The request would, therefore, impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4). Notwithstanding, LHT will provide any information that it deems to be responsive based on its interpretation of "management level."

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PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

19. Please provide all management level presentations from 2019 to the present that discuss supplying refined product delivered by waterborne vessel into an East Coast port.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code § 5.361(a)(4). The request is ambiguous and unreasonably vague because LHT is not familiar with the term "management level." The request would, therefore, impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4). Notwithstanding, LHT will provide any information that it deems to be responsive based on its interpretation of "management level."

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

Docket No. C-2025-3053018

20. Please provide all management level presentations from 2019 to the present that discuss supplying refined product delivered by waterborne on the Ohio River.

OBJECTION:

A party may not ask interrogatories that "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code § 5.361(a)(4). The request is ambiguous and unreasonably vague because LHT is not familiar with the term "management level." The request would, therefore, impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4). Notwithstanding, LHT will provide any information that it deems to be responsive based on its interpretation of "management level."