
Garrett P. Lent

glent@postschell.com
717-612-6032 Direct
717-731-1985 Direct Fax
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 PBF Holding Company 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

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

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

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

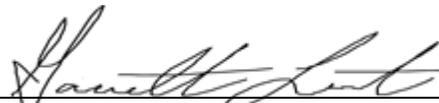
NOTICE TO PLEAD

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.

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

Admitted Pro Hac Vice

Date: August 7, 2025


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

Counsel for Laurel Pipe Line Company, L.P.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**MOTION TO COMPEL ANSWERS TO INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED BY LAUREL PIPE LINE COMPANY, L.P.
ON PBF HOLDING COMPANY LLC – SET 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 PBF Holding Company LLC (“PBF”). The Motion to Compel requests that Administrative Law Judge Eranda Vero (the “ALJ”) direct PBF to provide full and complete responses to Questions 5 and 6 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, Sheetz, PBF, and PBF filed a response to the Preliminary Objections of Laurel.

4. On July 18, 2025, Laurel served Set I Discovery and Set II Discovery on Complainants. A copy of Laurel Set I Discovery and Laurel Set II Discovery to Complainants is provided as Appendix A hereto.

5. Complainants timely objected to Set I Discovery and Set II Discovery on July 28, 2025. Complainants lodged objections to Instructions No. 15 and 16, and Question No. 1 of the Set I Discovery and Instructions No. 15 and 16 and Question No. 8 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. On August 6, 2025, PBF served its responses to the Set II Discovery.

8. Counsel for Laurel spoke to PBF’s counsel regarding possible resolution of the objections on August 7, 2025. Counsel were not able to resolve the objections to Questions 5 and 6. Discussion 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 Question No. 5 and 6 of the Set II Discovery.

II. ARGUMENT

A. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 5 OF THE SET II DISCOVERY.

10. Set II, Request No. 5 provides as follows:

5. Please provide all management level presentations from 2019 to the present that discuss Midwestern refineries.

11. PBF objects to Request No. 5 on the basis of scope, relevance, and burdensomeness.

On August 6, 2025, PBF served responses indicating that while there is responsive information, it declines to provide it out of concerns of relevance and the highly confidential nature of the documents.

12. The information sought is within the scope of the proceeding. Although the concerns are raised due to the highly confidential information contained in the responsive information, this proceeding is subject to a protective order. Other refineries that PBF operates are within the scope of the proceeding and relevant to the claims raised in the proceeding. The presentations are relevant to testing whether PBF has actual documents and facts that are consistent or inconsistent with the facts relied upon or assumed by the Complainants' joint expert witnesses. This goes to the veracity and weight of his conclusions and is relevant to the proceeding.

13. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 5 of Set II discovery.

B. PBF SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 6 OF THE SET II DISCOVERY.

14. Set II, Request No. 6 provides as follows:

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

15. PBF objects to Request No. 6 on the basis of scope, relevance, and burdensomeness, but indicated it would respond notwithstanding its objections. On August 6, 2025, PBF served responses indicating that while there is responsive information, it declines to provide it out of concerns of relevance and the highly confidential nature of the documents.

16. The information sought is within the scope of the proceeding. Although the concerns are raised due to the highly confidential information contained in the responsive information, this proceeding is subject to a protective order. Other refineries that PBF operates are within the scope of the proceeding and relevant to the claims raised in the proceeding. The presentations are relevant to testing whether PBF has actual documents and facts that are consistent or inconsistent with the facts relied upon or assumed by the Complainants' joint expert witnesses. This goes to the veracity and weight of his conclusions and is relevant to the proceeding.

17. For the reasons more fully explained above, PBF should be compelled to provide a full and complete response to Request No. 6 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 PBF Holding Company LLC to fully answer Nos. 5 and 6 of the Set II Discovery.

Respectfully submitted,



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

Admitted Pro Hac Vice

Date: August 7, 2025

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

Counsel for Laurel Pipe Line Company, L.P.

Appendix A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.
ON PBF HOLDING COMPANY, LLC – SET 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 the PBF Holding Company, LLC (“PBF”), 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
PBF– SET II**

1. With regard to Dr. Morris’s discussion of North America Petroleum Supply in Exhibit JRM-1 at 24:1-45:15,
 - a. Please provide in machine readable form the grade of each batch of crude oil processed through the PBF Refinery at Delaware City from 2019 to the present.
 - b. Please provide in machine readable form the origin of each batch of crude oil processed through the PBF Refinery at Delaware City from 2019 to the present.
 - c. Please provide in machine readable form the means by which each batch of crude oil processed through the PBF Refinery at Delaware City was delivered to the refinery from 2019 to the present.
2. With regard to Dr. Morris’s discussion of refined product prices in Exhibit JRM-1 at 61:1-62:5 please provide by day, location, grade, quantity, and counterparty the price at which PBF sold refined product produced at the Delaware City refinery from 2019 to the present.
3. Please provide all management level presentations from 2019 to the present that discuss issues related to transit time on Laurel.
4. Please provide all management level presentations from 2019 to the present that discuss where to source supply to terminals used by PBF.
5. Please provide all management level presentations from 2019 to the present that discuss Midwestern refineries.
6. Please provide all management level presentations from 2019 to the present that discuss East Coast refineries.

7. Please provide all management level presentations from 2019 to the present that discuss pro-rationing on Colonial.
8. 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.
9. 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 PBF HOLDING COMPANY LLC
TO CERTAIN INTERROGATORIES AND REQUESTS FOR PRODUCTION
PROPOUNDED BY LAUREL PIPELINE COMPANY, L.P., SET II**

PBF Holding Company LLC (“PBF”) hereby submits its Objections to certain Interrogatories and Requests for Production of Documents of Laurel Pipe Line Company, L.P. (“Laurel” or the “Company”) to Set II (“Discovery”), pursuant to 52 Pa. Code §§ 5.342 and 5.361. As explained below, PBF objects to Complainants Set II, Numbers 1-9, because these questions seek information that is not relevant to the issues raised in the above-captioned matter, not likely to lead to the discovery of relevant or admissible evidence in the above-captioned matter, would require PBF to conduct an unreasonable investigation. In support thereof, PBF states as follows:

I. INTRODUCTION

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.

On January 22, 2025, Laurel was served by the Commission with the above-captioned Complaint.

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.

On February 21, 2025, Complainants filed a response to the Preliminary Objections of Laurel.

On March 3, 2025, the Complainants submitted an Answer to New Matter.

On March 12, 2025, a Motion Judge Assignment Notice was issued assigning Administrative Law Judge Eranda Vero (the “ALJ”) as the presiding officer in this proceeding.

On April 21, 2025, the ALJ issued an order overruling Laurel’s Preliminary Objections and indicating that the matter will be set for a hearing.

On July 15, 2025, the Joint Complainants submitted the testimony of various witnesses, including experts, Dr. John Morris and Mr. Tom Miesner. PBF did not present company witnesses.

On July 17, 2025, Laurel propounded the Discovery.

Under 52 Pa. Code § 5.341(c), a party may propound interrogatories that relate to matters that can be inquired into under Section 5.321. Section 5.321(c), in turn, provides that a party is entitled to obtain discovery of any matter not privileged that is relevant to a pending proceeding and reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). In addition, under Section 5.361(a), discovery that “would require the making of an unreasonable investigation by...a party” is not permitted.

For the reasons explained below, Laurel's Set II, Numbers 1-9 seek information that is irrelevant, not likely to lead to the discovery of relevant information and would require PBF to conduct an unreasonable investigation, and, therefore, is impermissible discovery under the Commission's regulations. In accordance with the Commission's regulations, PBF hereby objects to Laurel's Set II, Numbers 1-9.

II. OBJECTIONS

A. Objection to Complainants Set II, Instructions 15 & 16.

Laurel's Set II, Instructions Numbers 15 and 16 provide as follows:

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.

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 of 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 PBF's efforts to respond to discovery requests, which specifically inquire in to matters which are exempt from discovery under the Commission's regulations, by imposing a requirement on PBF that is not contemplated by the Commissions regulations.

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

B. Objection to Laurel Set II Data Requests 1-9.

- 2.1 With regard to Dr. Morris's discussion of North America Petroleum Supply in Exhibit JRM-1 at 24:1-45:15,
- a. Please provide in machine readable form the grade of each batch of crude oil processed through the PBF Refinery at Delaware City from 2019 to the present.
 - b. Please provide in machine readable form the origin of each batch of crude oil processed through the PBF Refinery at Delaware City from 2019 to the present.
 - c. Please provide in machine readable form the means by which each batch of crude oil processed through the PBF Refinery at Delaware City was delivered to the refinery from 2019 to the present.

OBJECTION: Pursuant to Section 5.321(c), a party may obtain discovery of any matter not privileged that is relevant to a pending proceeding and that is reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). However, discovery which "would require the making of an unreasonable investigation by...a party" is not permitted. 52 Pa. Code § 3.61(a)(4).

PBF objects to Laurel Set I, No. 12 because question identifies over 20 pages of Dr. Morris' testimony to allege support for the requests. PBF is not specifically addressed and would only be addressed by the discussion of the Mid-Atlantic region on 27:7-19 of the testimony. The requests (a-c) are overly burdensome and appear designed to harass PBF as a complainant. Nothing Dr. Morris sets forth in the testimony is predicate to Laurel's question, nor justifies the request (a-c) with respect to individual batches, the grades for each batch, the origin of the crude in each batch, or the transportation of crude to PBF's Refinery at Delaware City for a six-year period. PBF has shipped thousands of batches of different grades of product through the Laurel pipeline since 2019. The detailed information sought is irrelevant and unlikely to lead to the development of admissible evidence in this proceeding, which is about the availability of east to west capacity through Laurel pipeline. It certainly is not related even tangentially to Dr. Morris' testimony at 24:1-45:15. Notwithstanding this objection, PBF will provide a list of (a) the grades of crude oil refined at PBF, (b) the states and countries of origin of the crude refined at PBF, and (c) the means of delivery of crude to PBF for the period from January 1, 2023 to the present.

2.2 With regard to Dr. Morris’s discussion of refined product prices in Exhibit JRM-1 at 61:1-62:5 please provide by day, location, grade, quantity, and counterparty the price at which PBF sold refined product produced at the Delaware City refinery from 2019 to the present.

OBJECTION: Pursuant to Section 5.321(c), a party may obtain discovery of any matter not privileged that is relevant to a pending proceeding and that is reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). However, discovery which “would require the making of an unreasonable investigation by...a party” is not permitted. 52 Pa. Code § 3.61(a)(4).

Dr. Morris’ testimony at 61:1-62:5 addresses average annual delivered prices of gasoline from the Philadelphia area to Coraopolis, El Dorado, and Sinking Spring. Question 13 goes far beyond Dr. Morris’ testimony in terms of specific days, batches, quantities, counterparty and price of all refined products produced by PBF at the Delaware City refinery over a six-year period and is overbroad, irrelevant, and unlikely to lead to the development of admissible evidence. The request is overly burdensome and appears designed to harass PBF as a complainant. PBF has sold millions of barrels of refined product, including but not limited to gasoline, to markets located on the Laurel pipeline since 2019. The detailed information pricing information sought is irrelevant and unlikely to lead to the development of admissible evidence in this proceeding as Dr. Morris relies on market prices and so does PBF.

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

OBJECTION: Pursuant to Section 5.321(c), a party may obtain discovery of any matter not privileged that is relevant to a pending proceeding and that is reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). However, discovery which “would require the making of an unreasonable investigation by...a party” is not permitted. 52 Pa. Code § 3.61(a)(4). The time period of this request is excessively burdensome and is unlikely to lead to the discovery of admissible evidence. Whether or not PBF’s management discussed transit times on the Laurel Pipeline is not indicative of any fact at issue in this case. Notwithstanding this objection, PBF will provide any responsive information from 2023 to the present.

2.4 Please provide all management level presentations from 2019 to the present that discuss where to source supply to terminals used by PBF.

OBJECTION: See objection to Question 2.3. In addition, this question is unclear. Is Laurel referring to crude oil terminals upstream of DCRC or products terminals downstream of DCRC? Notwithstanding this objection, we will provide any responsive information from 2023 to the present.

2.5 Please provide all management level presentations from 2019 to the present that discuss Midwestern refineries.

OBJECTION: See objection to Section 2.3. PBF further objects to the scope of the question as it operates a “Midwestern refinery” and that refinery is irrelevant to this proceeding. Notwithstanding this objection, we will provide any responsive information from 2023 to the present.

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

OBJECTION: See objection to 2.3. Notwithstanding this objection, we will provide any responsive information from 2023 to the present.

2.7 Please provide all management level presentations from 2019 to the present that discuss rationing on Colonial.

OBJECTION: See objection to 2.3. Notwithstanding this objection, we will provide any responsive information from 2023 to the present.

2.8 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: See objection to 2.3. Notwithstanding this objection, we will provide any responsive information from 2023 to the present.

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

OBJECTION: See objection to 2.3. In addition, this question is irrelevant and unlikely to lead to the production of admissible evidence. DCRC is located on the Delaware River and there is no direct water route to move refined product by barge from the Delaware River to the Ohio River. Notwithstanding this objection, we will provide any responsive information from 2023 to the present.

III. CONCLUSION

WHEREFORE, pursuant to 52 Pa. Code § 5.342(e), PBF objects to Laurel's Set II, Instructions 15 and 16 and Data Request Numbers 1-9, which seek information that is not relevant to the issues raised in the above-captioned matter, not likely to lead to the discovery of relevant or admissible evidence in the above-captioned matter, misstate the testimony upon which they purport to be premised, and/or would require PBF to conduct an unreasonable investigation.

Respectfully submitted,



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

**Attorneys for
PBF HOLDING COMPANY LLC**

July 28, 2025