
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 Sheetz, Inc., 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. :

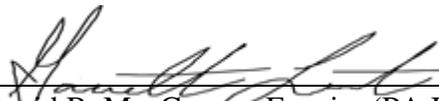
NOTICE TO PLEAD

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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Date: August 7, 2025


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Counsel for Laurel Pipe Line Company, L.P.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**MOTION TO COMPEL ANSWERS TO INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED BY LAUREL PIPE LINE COMPANY, L.P.
ON SHEETZ INC – 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 Sheetz INC (“Sheetz”). The Motion to Compel requests that Administrative Law Judge Eranda Vero (the “ALJ”) direct Sheetz to provide full and complete responses to Questions 1-9, 10(a), 11(a), 12(a), and 14 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. Sheetz timely objected to Set II Discovery on July 28, 2025. Sheetz lodged objections to Instructions No. 15 and 16 and Questions 1-9, 10(a), 11(a), 12(a), and 14 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, Sheetz served its responses to the Set II Discovery.

8. Counsel for Laurel emailed Sheetz’ counsel proposals regarding possible resolution of the objections on August 6, 2025. 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 Questions 1-9, 10(a), 11(a), 12(a), and 14 of the Set II Discovery.

II. ARGUMENT

A. SHEETZ 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. Sheetz 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. SHEETZ SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NOS. 1-9 OF THE SET II DISCOVERY.

13. Request Nos. 1-9 provides as follows:

1. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-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 JDJ-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 JDJ-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 JDJ-4. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).

5. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-5. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).

6. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-6. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).

7. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-7. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).

8. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-8. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).

9. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-9. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel)..

14. Sheetz objects to Request Nos. 1-9 to the extent that they seek information not in the witness's possession as he might have been influenced by information no longer in his 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. Sheetz has inferred from the request that it seeks the entire universe of information that a witness may have, prior to his participation in the case, learned that may have had a bearing on his testimony. The question is not so - Sheetz should be compelled to produce, in accordance with regulation, those materials that were relied on during the witness's preparation of his testimony.

17. For the reasons more fully explained above, Sheetz should be compelled to provide a full and complete response to Requests No. 1-9 of Set II discovery.

C. SHEETZ SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 10A, 10B, 10C, AND 10D OF THE SET II DISCOVERY.

18. Request No. 10 provides as follows:

10. With regard to Mr. Jadlocki's discussion of Sheetz's operations and the states in which it operates in Exhibit JDJ-1 at 2:11-21.

a) Please identify each terminal facility in which Sheetz stores refined product in Pennsylvania, Maryland, West Virginia, Virginia or Ohio.

b) For each facility identified in response to subpart (a) please provide the quantity of re-fined product stored at the facility by day from 2017 to the present.

c) For each facility identified in response to subpart (a) please identify the supplier and quantity supplied at each terminal from 2017 to the present.

d) For each of the stores located in Pennsylvania, Maryland, West Virginia, Virginia or Ohio please provide the address of each store in machine readable form and identify the terminal from which

refined product is obtained; to the extent a store is supplied by more than one terminal please identify all terminals that supply the store and provide the percentage of product supplied by each store.

19. Sheetz objections to Set II, No. 10 note that, “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 and immaterial because the issues here concern only Pennsylvania terminals. 52 Pa. Code § 5.321(c).” They further argue that these interrogatories are burdensome and would cause to be made an unreasonable investigation.

20. Both the data at terminals inside and outside of Pennsylvania is highly relevant to the issues the witness raises. Specifically, the witness says that they have changed their operational parameters because of the uncertainty caused by Laurel bi-directional status; this testimony is not limited to the claim that they have changed operations in Pennsylvania alone. Compelling this response would ensure that Laurel has the ability to test this claim.

21. Further, this request merely asks for information about Sheetz’s own operations and shipment quantities, is not burdensome as claimed. Furthermore, given that Sheetz has specifically claimed that it changed its operations in response to bi-directional service on the Laurel pipeline, both information before and after bi-directional service has been implemented is necessary to test this claim. Requiring a party to provide the information underlying claims they advance in their testimony does not call for an unreasonable investigation.

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

D. SHEETZ SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 11A OF THE SET II DISCOVERY.

23. Request No. 11(a) provides as follows:

11. With regard to Mr. Jadlocki's statement that a pipeline outage "allows Midwest refiners to immediately increase product costs" as well as his discussion of Gulf Coast and other alternatives in Exhibit JDJ-1 at 4:21-5-9:

a) Please provide in machine readable form, all prices at which Sheetz has purchased re-fined product in the Midwest, Gulf Coast and East Coast from 2019 to the present.

24. Sheetz objects to Request No. 11(a) on the grounds that the term Objects on the basis that the request is irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence in this proceeding with respect to Sheetz, arguing Laurel already has the information, so it would lead to an unreasonable investigation.

25. Sheetz provides no explanation regarding why this would require unreasonable investigation by Sheetz. It states that the Laurel should have some of this information, but does not indicate why this makes the investigation unreasonable.

26. Further, this information is relevant to the issues the witnesses raises in his testimony, as cited in the interrogatory, and Laurel needs the information the witness here analyzed to arrive at his conclusion. Specifically, Sheetz's claims regarding cost increases require validation by information within its possession that such cost increases have actually occurred.

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

E. SHEETZ SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 12A AND 12C OF THE SET II DISCOVERY.

28. Request No. 12 provides as follows:

12. With regard to Exhibit JDJ-6, discussed in Exhibit JDJ-1 at 8:12-9:3:

a) Please provide in machine readable form the data maintained by "PSM Application – Sheetz Petroleum Back Office System of

Record that is subject to outside industry audits" in the original form in which that data was maintained.

c) Please provide the same type of data for the same time period provided in response to subpart (a) for all terminals or stores located in Maryland, West Virginia, Virginia or Ohio.

29. Sheetz objects to Request No. 12(a) arguing that the request is ambiguous and unreasonably vague because it is unclear what is being sought and to 12(c) on the basis that the request is irrelevant, immaterial, and outside the scope of the proceeding because this proceeding is focused on Pennsylvania destinations only.

30. With regard to 12(a), Sheetz argues the request is vague and if all PSM data is sought, the request would be burdensome and would require unreasonable investigation, however, Sheetz fails to articulate why this would be the case. The information sought is specifically referenced in Exhibit JDJ-6 as the source of this information; it cannot be the case that a reference to the source of data identified in vague.

31. With regard to 12(c), Sheetz argues that the request is irrelevant, immaterial, and outside the scope of the proceeding, however, this information is relevant to the issues the witnesses raises in his testimony, as cited in the interrogatory, and Laurel needs the information the witness here analyzed to arrive at his conclusion.

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

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

33. Request No. 14 provides as follows:

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

34. Sheetz objects to Request No. 11 Objects that the request is vague because Sheetz does not know what “management level” means in this context. It also claims that because the request is vague, to find the information impose an unreasonable investigation. The request fails, however, to describe why this would require an unreasonable investigation.

35. Parties may have their own definitions of items like “management level” and Sheetz 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 Sheetz organizational structure at which decisions regarding its use of refined petroleum products pipelines are made.

36. For the reasons more fully explained above, Sheetz should be compelled to provide a full and complete response to Request No. 14 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 Sheetz INC to fully answer to Questions 1-9, 10(a), 11(a), 12(a), and 14 of the Set II Discovery as is required by 52 Pa. Code § 5.342(a)(4). of the Set II Discovery.

Respectfully submitted,



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Admitted Pro Hac Vice

Date: August 7, 2025

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Garrett P. Lent, Esquire (PA ID #321566)
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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 SHEETZ, INC. – 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 Sheetz, Inc. (“Sheetz”), 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
SHEETZ, INC. – SET II**

1. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-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 JDJ-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 JDJ-3. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).
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9. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-9. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).

10. With regard to Mr. Jadlocki's discussion of Sheetz's operations and the states in which it operates in Exhibit JDJ-1 at 2:11-21:
 - a. Please identify each terminal facility in which Sheetz stores refined product in Pennsylvania, Maryland, West Virginia, Virginia or Ohio.
 - b. For each facility identified in response to subpart (a) please provide the quantity of refined product stored at the facility by day from 2017 to the present.
 - c. For each facility identified in response to subpart (a) please identify the supplier and quantity supplied at each terminal from 2017 to the present.
 - d. For each of the stores located in Pennsylvania, Maryland, West Virginia, Virginia or Ohio please provide the address of each store in machine readable form and identify the terminal from which refined product is obtained; to the extent a store is supplied by more than one terminal please identify all terminals that supply the store and provide the percentage of product supplied by each store.
11. With regard to Mr. Jadlocki's statement that a pipeline outage "allows Midwest refiners to immediately increase product costs" as well as his discussion of Gulf Coast and other alternatives in Exhibit JDJ-1 at 4:21-5-9:
 - a. Please provide in machine readable form, all prices at which Sheetz has purchased refined product in the Midwest, Gulf Coast and East Coast from 2019 to the present.
 - b. Please identify and describe with specificity all instances where Mr. Jadlocki has personal knowledge of a Midwestern refiner raising prices of refined petroleum products following a pipeline outage.
12. With regard to Exhibit JDJ-6, discussed in Exhibit JDJ-1 at 8:12-9:3:
 - a. Please provide in machine readable form the data maintained by "PSM Application – Sheetz Petroleum Back Office System of Record that is subject to outside industry audits" in the original form in which that data was maintained.
 - b. Please provide all workpapers used to translate data from the system referenced to subpart (a) into the form shown in Exhibit JDJ-6.
 - c. Please provide the same type of data for the same time period provided in response to subpart (a) for all terminals or stores located in Maryland, West Virginia, Virginia or Ohio.
13. With regard to Mr. Jadlocki's testimony discussing communicating frustration with Buckeye in Exhibit JDJ-1 at 10:13-11, please provide all communication from 2019 to the present in which employees of Sheetz communicated frustration to buckeye regarding Laure's bi-directional operations.

14. Please provide all management level presentations from 2019 to the present that discuss issues related to transit time on Laurel.
15. Please provide all management level presentations from 2019 to the present that discuss where to source supply to terminals used by Sheetz.
16. Please provide all management level presentations from 2019 to the present that discuss Mid-western refineries.
17. Please provide all management level presentations from 2019 to the present that discuss East Coast refineries.
18. Please provide all management level presentations from 2019 to the present that discuss supplying refined product to Sheetz from Colonial Pipeline.
19. Please provide all management level presentations from 2019 to the present that discuss pro-rationing on Colonial.
20. 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.
21. 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 SHEETZ, INC. 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.*, Sheetz Inc. ("Sheetz") 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 Sheetz, Set II. The basis of the objections, of which there are three, 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; and/or, 3) that the requests are irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence in this proceeding. As shown in the attached Exhibit 1, Sheetz objects to the following requests for the reason stated therein: 10 (a-d), 11 (a), 12 (a, c), and 14.

For the reasons stated herein, Sheetz 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 SHEETZ, INC. TO
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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.

**OBJECTIONS OF SHEETZ, INC. TO
SET II INTERROGATORIES AND REQUESTS FOR
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Docket No. C-2025-3053018

1. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-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 JDJ-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 JDJ-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 JDJ-4. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).
5. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-5. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).
6. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-6. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).
7. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-7. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).
8. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-8. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).
9. Please provide copies of all Documents, studies, analyses, and workpapers upon which you relied in the preparation of Exhibit JDJ-9. Please provide electronic copies of such materials in their native format (e.g., Microsoft Excel).

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SET II INTERROGATORIES AND REQUESTS FOR
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Docket No. C-2025-3053018

OBJECTION:

As written, Interrogatories Set II, Nos. 1-9, demand the production of "all" documents upon which Mr. Jadlocki might have relied, regardless of time and regardless of degree, that was in any way the basis of his testimony. To the extent that such information is not publicly available or otherwise in the possession of Mr. Jadlocki, he is not able to provide such documents. To the extent that the request seeks such information, Sheetz objects on the basis that Mr. Jadlocki 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, Sheetz also objects to said requests.

10. With regard to Mr. Jadlocki's discussion of Sheetz's operations and the states in which it operates in Exhibit JDJ-1 at 2:11-21.
 - a) Please identify each terminal facility in which Sheetz stores refined product in Pennsylvania, Maryland, West Virginia, Virginia or Ohio.

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). The request is irrelevant and immaterial because the issues here concern only Pennsylvania terminals. 52 Pa. Code § 5.321(c). Storage in states other than Pennsylvania is irrelevant, as are any terminals in Pennsylvania that are not connected to Buckeye or Laurel pipelines.

- b) For each facility identified in response to subpart (a) please provide the quantity of re-fined product stored at the facility by day from 2017 to the present.

OBJECTION:

As this interrogatory expands upon the request in Interrogatory Set II, No. 10(a), the above objection to said Interrogatory is incorporated herein as if stated in full. Further, a party may not ask interrogatories that would cause unreasonable burden or expense. 52 Pa. Code § 5.361(a)(2). The request is unduly burdensome because it would require extensive calculations, if data are even available. 52 Pa. Code § 5.361(a)(2).

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SET II INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

c) For each facility identified in response to subpart (a) please identify the supplier and quantity supplied at each terminal from 2017 to the present.

OBJECTION:

As this interrogatory expands upon the request in Interrogatory Set II, No. 10(a), the above objection to said Interrogatory is incorporated herein as if stated in full. Also, 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). Laurel should already have access to information confirming the physical/geographic source of Sheetz's deliveries to each facility. Therefore, responding to this request would impose an unreasonable investigation on Sheetz. 52 Pa. Code § 5.361(a)(4).

d) For each of the stores located in Pennsylvania, Maryland, West Virginia, Virginia or Ohio please provide the address of each store in machine readable form and identify the terminal from which refined product is obtained; to the extent a store is supplied by more than one terminal please identify all terminals that supply the store and provide the percentage of product supplied by each store.

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 overly broad, irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence in this proceeding due to the requests for information on Sheetz's operations in at location outside of Pennsylvania and beyond the Commission's jurisdiction. Additionally, the request is unduly burdensome because it would take Sheetz months to compile the requested data. 52 Pa. Code § 5.361(a)(2).

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Docket No. C-2025-3053018

11. With regard to Mr. Jadlocki's statement that a pipeline outage "allows Midwest refiners to im-mediately increase product costs" as well as his discussion of Gulf Coast and other alternatives in Exhibit JDJ-1 at 4:21-5-9:

a) Please provide in machine readable form, all prices at which Sheetz has purchased re-fined product in the Midwest, Gulf Coast and East Coast 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). Laurel's own data will show all Sheetz shipments, including origin and destination points. Therefore, the request would impose an unreasonable investigation on Sheetz. 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 Sheetz, as Laurel already has information on the geographic source (Midwest or East) of deliveries to Sheetz and more granular information identifying prices for Sheetz has no bearing on the disputes raised in this proceeding because all of Sheetz's individually priced transactions are merely a subset of the aggregate market data relevant to the matters raised in the Complaint. 52 Pa. Code § 5.321(c).

**OBJECTIONS OF SHEETZ, INC. TO
SET II INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

12. With regard to Exhibit JDJ-6, discussed in Exhibit JDJ-1 at 8:12-9:3:
- a) Please provide in machine readable form the data maintained by "PSM Application – Sheetz Petroleum Back Office System of Record that is subject to outside industry audits" in the original form in which that data was maintained.

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 is ambiguous and unreasonably vague because it is unclear what data Laurel seeks. If Laurel is asking for all PSM data, that would be burdensome and would require unreasonable investigation by Sheetz. 52 Pa. Code §§ 5.361(a)(2) and 5.631(a)(4). If Laurel seeks data limited to JDJ-6, Sheetz will provide that data in response to Set II No. 6.

- c) Please provide the same type of data for the same time period provided in response to subpart (a) for all terminals or stores located in Maryland, West Virginia, Virginia or Ohio.

OBJECTION:

As this interrogatory expands upon the request in Interrogatory Set II, No. 12(a), the above objection to said Interrogatory is incorporated herein as if stated in full. Further, 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, and outside the scope of the proceeding because this proceeding is focused on Pennsylvania destinations only, and this request is only for data in JDJ-6. 52 Pa. Code § 5.321(c). Compiling the requested information for multiple states would also impose an unreasonable burden on the company's staff.

**OBJECTIONS OF SHEETZ, INC. TO
SET II INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.**

Docket No. C-2025-3053018

14. 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 Sheetz is not familiar with the term "management level." The request would, therefore, impose an unreasonable investigation on Sheetz. 52 Pa. Code § 5.361(a)(4). Notwithstanding, Sheetz will provide any information that it deems to be responsive based on its interpretation of "management level."