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Garrett P. Lent

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File #: 200842

August 11, 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**

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Dear Secretary Homsher:

Enclosed for filing in the above-referenced proceeding is the Motion to Compel Responses to Lucknow-Highspire Terminals, LLC, Set III 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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LLC and Sheetz, Inc.*

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*Attorneys for PBF Holding Company LLC  
Pro hac vice*

Date: August 11, 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. :

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**NOTICE TO PLEAD**

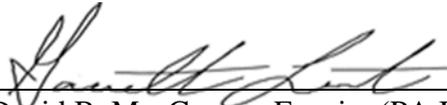
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YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY 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)  
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Fax: (202) 661-6970  
E-mail: cbarr@postschell.com

*Admitted Pro Hac Vice*

Date: August 11, 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)  
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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 III**

**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 III Discovery”) directed to Lucknow-Highspire Terminals LLC, (“LHT”). Laurel files this Motion to Compel LHT to provide full and complete responses in accordance with Instructions 15 and 16 of the Set III Discovery as is required by 52 Pa. Code § 5.342(a)(4), pending consultation with opposing counsel regarding resolutions. 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 21, 2025, Laurel served Set III Discovery on LHT. A copy of Laurel Set III Discovery to LHT is provided as Appendix A hereto.

5. LHT timely objected to Set III Discovery on July 31, 2025. LHT lodged objections to Instructions No. 15 and 16 and of the Set III Discovery. A copy of LHT’s 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. Counsel for Laurel emailed LHT’s counsel proposals regarding possible resolution of the objections on August 11, 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.

8. Laurel hereby files its Motion to Compel Complainants to respond in accordance with to Instructions 15 and 16 of the Set III Discovery.

## **II. ARGUMENT**

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

9. The instructions to Set III 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.

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

11. Laurel will not require a privilege log subject to confirmation by counsel that all non-privileged information has been provided, but preserves this motion to compel pending such consultation.

**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 of Set III Discovery, pending consultation with opposing counsel regarding resolutions.

Respectfully submitted,



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*Admitted Pro Hac Vice*

David B. MacGregor, Esquire (PA ID #28804)  
Anthony D. Kanagy, Esquire (PA ID #85522)  
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Date: August 11, 2025

*Counsel for Laurel Pipe Line Company, L.P.*

# Appendix A

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS PROPOUNDED  
BY LAUREL PIPE LINE COMPANY, L.P.  
ON LUCKNOW-HIGHPSIRE TERMINALS, LLC – SET III**

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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 III.

**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 III**

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1. Please reference Exhibit SH-1, 4:11-12. Please provide all Documents prepared by or on behalf of LHT that reference an increase in late deliveries on the Laurel pipeline system since Fall 2019.
2. Please reference Exhibit SH-1, 4:11-12. Please provide all Documents prepared by or on behalf of LHT that reference an increase in average transit times on the Laurel pipeline system since Fall 2019.
3. Please reference Exhibit SH-1, 4:12-14. Please provide all Documents prepared by or on behalf of LHT that reference LHT carrying more inventory in terminals as “safety stock” since Fall 2019.
4. Please reference Exhibit SH-1, 4:15-16. Please provide all Documents prepared by or on behalf of LHT that discuss more frequent delivers that have caused more cuts since Fall 2019.
5. Please reference Exhibit SH-1, 4:15-16. Please provide all Documents prepared by or on behalf of LHT that discuss more frequent delivers that have caused more product losses since Fall 2019.
6. Please reference Exhibit SH-1, 10:18-20. Please identify any petroleum products pipeline tariff of which Ms. Huzicko is aware that includes “legally enforceable maximum transit times between origin/destination points for all origin/destination points” on the pipeline.
7. Please reference Exhibit SH-1, 10:20-22. Please identify any petroleum products pipeline tariff of which Ms. Huzicko aware that includes a maximum transit time set for each origin/destination pair equal to no more than 125% of a historical average transit time.
8. Please reference Exhibit SH-1, 10:22-11:1. Please identify any petroleum products pipeline tariff of which Ms. Huzicko is aware that includes a 10% discount on tariff charges for each day of delay in excess of a maximum transit time.

# 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.	:	

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

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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 III. 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

By: 

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*Counsel for Lucknow-Highspire Terminals, LLC*

# **EXHIBIT 1**

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

**Docket No. C-2025-3053018**

---

The instructions to Set III 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 LHT’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 LHT that is not contemplated by the Commission’s regulations.

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