
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**

Dear Secretary Homsher:

Enclosed for filing in the above-referenced proceeding is the Motion to Compel Responses to Sheetz, Inc., 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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*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. :

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Admitted Pro Hac Vice

Date: August 11, 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 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 Third Set of Interrogatories and Requests for Production of Documents (“Set III 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 in accordance with Instructions 15 and 16, pending consultation with opposing counsel regarding resolution, and provide full and complete responses to Questions 1, 7(a), and 21, of the Set III 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 21, 2025, Laurel served Set III Discovery on Sheetz. A copy of Laurel Set III Discovery to Sheetz is provided as Appendix A hereto.

5. Sheetz timely objected to Set III Discovery on July 31, 2025. Sheetz lodged objections to Instructions No. 15 and 16 and Questions 1, 7(a), 21 of the Set III 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. Counsel for Laurel emailed Sheetz’ counsel proposals regarding possible resolution of the objections on August 9, 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 Instructions 15 and 16 and to Questions 1, 7(a), and 21 of the Set III Discovery.

II. ARGUMENT

A. SHEETZ 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. Sheetz 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.

B. SHEETZ SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NOS. 1 OF THE SET III DISCOVERY.

12. Request Nos. 1 provides as follows:

1. Please reference Exhibit JDJ-1, 3:15-16. Identify all pipeline outages on the Laurel pipeline system that Mr. Jadlocki is aware of from 2019-present. For each identified outage, provide the basis, duration, and line segment impacted.).

13. Sheetz objects to Request No. 1 arguing that the request is irrelevant because the witness’s awareness of outages is immaterial, that Laurel should have that information, and that it would impose an unreasonable investigation. Sheetz indicated it will answer as feasible.

14. The witness’s knowledge of the outages he references are relevant and material to both the witness’s testimony and the issues raised in the Complaint. The witness brings up specific

instances of outages in 2025 in his testimony and claims they are increasing. Exhibit JDJ-1, at 5. Whether the witness has knowledge of historical outages is directly relevant to the credibility of his claims and his credibility as a witness. That Laurel may have access to some of this information should not excuse the witness from answering as the central issue here is on what information the witness bases his claims. Further, probing a witness's knowledge of the issue does not impose an unreasonable investigation.

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

C. SHEETZ SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 7A OF THE SET III DISCOVERY.

16. Request No. 7A provides as follows:

7. With Please reference Exhibit JDJ-1, 4:22-5:2.

a) Identify every outage on the Laurel pipeline system from 2019-present that has allowed "Midwest refiners to immediate increase product costs."

17. Sheetz objects to Set III, No. 7A arguing the request is irrelevant and immaterial because all outages and subsequent product increases are "merely a subset of information", that Laurel should have that information, and that it would impose an unreasonable investigation.

18. Mr. Jadlocki claims in his testimony that Midwest refiners increase their product costs in response to outages being announced. Exhibit JDJ-1, 4:22-5:2. The information sought is directly relevant to that claim and Laurel must have the opportunity to assess the basis for this claim. That Laurel may have access to some of this information should not excuse the witness from answering as the central issue here is on what information the witness bases his claims. Further, probing a witness's knowledge of the issue and basis for his claim does not impose an unreasonable investigation.

19. For the reasons more fully explained above, Sheetz should be compelled to provide a full and complete response to Request No. 7A of Set III discovery.

D. SHEETZ SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 21 OF THE SET III DISCOVERY.

20. Request No. 21 provides as follows:

21. Please reference Exhibit JDJ-1, 11:16-12:1. Provide all communications discussing whether or not to file a complaint with the PUC related to existing bidirectional service from 2019 to December 31, 2024.

21. Sheetz objects to Request No. 21 arguing that this information is covered by attorney client privilege and asks for attorney work product. They also argue it is irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence in this proceeding.

22. While Laurel acknowledges that communications regarding the filing of a Formal Complaint with attorneys is privileged, the Complainants should be compelled to provide all non-privileged information responsive to this request. Mr. Jadlocki here testifies to the reasons Sheetz did not previously file a Complaint with the Commission. This information, included by Sheetz in testimony, is relevant, and Sheetz should be compelled to provide those communications not made with attorneys.

23. For the reasons more fully explained above, Sheetz should be compelled to provide a full and complete response to Request No. 21 of Set III 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 in accordance with Instructions 15 and 16, pending consultation with opposing counsel regarding resolution, and fully answer Questions 1, 7A, and 21 of the Set III Discovery as is required by 52 Pa. Code § 5.342(a)(4). of the Set III Discovery.

Respectfully submitted,



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Admitted Pro Hac Vice

Date: August 11, 2025

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Counsel for Laurel Pipe Line Company, L.P.

Appendix A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED
BY LAUREL PIPE LINE COMPANY, L.P.
ON SHEETZ, INC. – SET III**

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 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
SHEETZ, INC. – SET III**

1. Please reference Exhibit JDJ-1, 3:15-16. Identify all pipeline outages on the Laurel pipeline system that Mr. Jadlocki is aware of from 2019-present. For each identified outage, provide the basis, duration, and line segment impacted.
2. Please reference Exhibit JDJ-1, 3:18-19. Is Mr. Jadlocki aware of the basis for this outage? If so, fully explain the basis for this outage.
3. Please reference Exhibit JDJ-1, 3:20-22. Is Mr. Jadlocki aware of the basis for this outage? If so, fully explain the basis for this outage.
4. Please reference Exhibit JDJ-1, 4:1-3. Is Mr. Jadlocki aware of the basis for this outage? If so, fully explain the basis for this outage.
5. Please reference Exhibit JDJ-1, 4:4-6. Is Mr. Jadlocki aware of the basis for this outage? If so, fully explain the basis for this outage.
6. Please reference Exhibit JDJ-1, 4:7-8. Is Mr. Jadlocki aware of the basis for this outage? If so, fully explain the basis for this outage.
7. Please reference Exhibit JDJ-1, 4:22-5:2.
 - a. Identify every outage on the Laurel pipeline system from 2019-present that has allowed “Midwest refiners to immediate increase product costs.”
 - b. For each outage identified in subpart (b), please identify the Midwest refiner that increased product costs, the product which had its cost increase, and the amount of the increase.
8. Please reference Exhibit JDJ-1, 5:5-7. Please confirm whether Mr. Jadlocki is referring to interstate or intrastate petroleum products transportation service.
9. Please reference Exhibit JDJ-1, 5:11-15. ADMIT/DENY: The outages referenced by Mr. Jadlocki from 3:18-4:8 are not related to existing bidirectional operations over Line 718.
10. Please reference Exhibit JDJ-1, 6:1-12.

- a. Please confirm that the “longer transit times” referenced by Mr. Jadlocki are based upon a comparison of the transit time for “West-to-East Movements” as opposed to “East-to-West Movements.”
 - b. Please confirm that the “longer transit times” referenced by Mr. Jadlocki are not based upon a comparison of the transit time for “West-to-East Movements” in 2019 to the transmit time for “West-to-East Movements” in 2020, 2021, 2022, 2023, 2024, and/or 2025.
 - c. Please confirm that the “longer transit times” referenced by Mr. Jadlocki are not based upon a comparison of the transit time for “East-to-West Movements” in 2019 to the transmit time for “East-to-West Movements” in 2020, 2021, 2022, 2023, 2024, and/or 2025.
11. Please reference Exhibit JDJ-1, 7:4-7 and Exhibit JDJ-4.
- a. Why does Mr. Jadlocki omit 2020 and 2021 from the periods analyzed?
 - b. Please confirm that Mr. Jadlocki is analyzing the transit times for interstate movements from Linden to Altoona.
 - c. Why is Mr. Jadlocki analyzing the transit times for interstate movements from Linden to Altoona as opposed to intrastate movements over the Laurel pipeline system to Altoona?
12. Please reference Exhibit JDJ-1, 8-10 and Exhibit JDJ-4. Why does Mr. Jadlocki omit 2020 and 2021 from the periods analyzed?
13. Please reference Exhibit JDJ-1, 7:14-18.
- a. Please confirm that Mr. Jadlocki is analyzing the transit times for interstate movements from Linden to Altoona.
 - b. Why is Mr. Jadlocki analyzing the transit times for interstate movements from Linden to Altoona as opposed to intrastate movements over the Laurel pipeline system to Altoona?
 - c. Why is Mr. Jadlocki analyzing data from 2020 and 2021?
14. Please reference Exhibit JDJ-1, 7:21-8:4.
- a. Why does Mr. Jadlocki omit 2020 and 2021 from the periods analyzed?
 - b. Please confirm that Mr. Jadlocki is analyzing the transit times for interstate movements from Linden to Altoona.

- c. Why is Mr. Jadlocki analyzing the transit times for interstate movements from Linden to Altoona as opposed to intrastate movements over the Laurel pipeline system to Altoona?
15. Please reference Exhibit JDJ-1, 8:8-10.
 - a. Why does Mr. Jadlocki analyze transit times from 2022 and 2019 only?
 - b. Please confirm that Mr. Jadlocki is analyzing the transit times for interstate movements from Linden to Altoona.
 - c. Why is Mr. Jadlocki analyzing the transit times for interstate movements from Linden to Altoona as opposed to intrastate movements over the Laurel pipeline system to Altoona?
16. Please reference Exhibit JDJ-1, 8:10-12.
 - a. Please confirm that Mr. Jadlocki is analyzing the transit times for interstate movements from Linden to Altoona.
 - b. Why is Mr. Jadlocki analyzing the transit times for interstate movements from Linden to Altoona as opposed to intrastate movements over the Laurel pipeline system to Altoona?
17. Please reference Exhibit JDJ-1, 8:18-20. Provide all Documents prepared by or on behalf of Sheetz that analyze the “cost consequences” of maintaining additional inventory since Fall 2019.
18. Please reference Exhibit JDJ-1, 9:14-15.
 - a. Identify all “adverse operational impacts” experienced by Sheetz that occurred due to Laurel’s existing bi-directional operations.
 - b. Provide all Documents prepared by or on behalf of Sheetz that analyzed any “adverse operational impacts” identified in response to subpart (a).
19. Please reference Exhibit JDJ-1, 10:10-12. Provide all Documents prepared by or on behalf of Sheetz dated prior to December 1, 2024, that reference, review, analyze or evaluate how “the severity and frequency of these interruptions and delays materially exceeds the pre-2019 levels.”
20. Please reference Exhibit JDJ-1, 10:10-12. Provide all Documents prepared by or on behalf of Sheetz dated prior to December 1, 2024, that reference, review, analyze or evaluate how “the severity and frequency of these interruptions and delays...functionally eliminated the reliable service available to shippers at that time.”

21. Please reference Exhibit JDJ-1, 11:16-12:1. Provide all communications discussing whether or not to file a complaint with the PUC related to existing bidirectional service from 2019 to December 31, 2024.
22. Please reference Exhibit JDJ-1, 12:12-13.
 - a. Please define the phrase “a vast majority of the time” as it is used by Mr. Jadlocki.
 - b. Would Mr. Jadlocki agree that “a vast majority of the time” is not the same as “all of the time”?
23. Please reference Exhibit JDJ-1, 12:13-14.
 - a. Please define the phrase “very likely” as it is used by Mr. Jadlocki.
 - b. If a product is less costly to suppliers, is it “very likely” (as that term is defined and used by Mr. Jadlocki) that the reduce cost will get passed along to consumers in Pennsylvania? Fully explain any response.
 - c. Provide all Documents that discuss under what circumstances it is “very likely” (as that term is defined and used by Mr. Jadlocki) that Sheetz will pass additional costs of products to consumers in Pennsylvania.
24. Please reference Exhibit JDJ-1, 14:5-6. Fully explain the basis for Mr. Jadlocki’s conclusion that “[b]y adding more origin-to-destination touchpoints for bi-directional service, Laurel will only worsen existing challenges across Pennsylvania and further inhibit the ability of Sheetz to effectively utilize the pipeline service.” Provide all Documents relied upon by Mr. Jadlocki to reach this conclusion.
25. Please reference Exhibit JDJ-1, 14:9-11. Fully explain the basis for Mr. Jadlocki’s conclusion that “transporting product from the Midwest all the way through Pennsylvania to Upstate New York will ultimately lead to higher costs for Pennsylvania residents.” Provide all Documents relied upon by Mr. Jadlocki to reach this conclusion.

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 III 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 III. The basis of the objections, of which there are three, are: 1) that the requests would require unreasonable investigation; 2) that the requests are irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence in this proceeding; and/or 3) that disclosure would violate the attorney-client privilege and/or the request asks for privileged attorney work product. As shown in the attached Exhibit 1, Sheetz objects to the following requests for the reason stated therein: 1, 7 (a), and 21.

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
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 Sheetz’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 Sheetz that is not contemplated by the Commission’s regulations.

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

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1. Please reference Exhibit JDJ-1, 3:15-16. Identify all pipeline outages on the Laurel pipeline system that Mr. Jadlocki is aware of from 2019-present. For each identified outage, provide the basis, duration, and line segment impacted.

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 whether Mr. Jadlocki was “aware” of an outage is immaterial. Additionally, Laurel should already have all requested data. Therefore, the request would impose an unreasonable investigation on Sheetz. 52 Pa. Code § 5.361(a)(4). Notwithstanding, Sheetz will provide a response to the extent feasible.

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7. Please reference Exhibit JDJ-1, 4:22-5:2.
- a) Identify every outage on the Laurel pipeline system from 2019-present that has allowed “Midwest refiners to immediate increase product costs.”.

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 all Sheetz individual outages and subsequent product increases are merely a subset of information. The relevant data is aggregate market data. Additionally, Laurel should already have data showing Laurel outages in the specified time frame. Therefore, the request would impose an unreasonable investigation on Sheetz. 52 Pa. Code § 5.361(a)(4).

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21. Please reference Exhibit JDJ-1, 11:16-12:1. Provide all communications discussing whether or not to file a complaint with the PUC related to existing bidirectional service from 2019 to December 31, 2024:

OBJECTION:

The disclosure would violate attorney-client privilege, and the request asks for privileged attorney work product. 52 Pa. Code § 5.361(a)(3). Additionally, the request is irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence in this proceeding. 52 Pa. Code § 5.321(c).