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August 12, 2025

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

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

Dear Secretary Homsher:

Attached for filing with the Pennsylvania Public Utility Commission is Lucknow-Highspire Terminals, LLC's Answer to Laurel Pipe Line Company, L.P.'s Motion to Compel in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a horizontal line.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

c: Administrative Law Judge Eranda Vero
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

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Counsel to Lucknow-Highspire Terminals,
LLC and Sheetz, Inc.

Dated this 12th day of August, 2025, in Harrisburg, Pennsylvania.

**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.	:	

**LUCKNOW-HIGHSPIRE TERMINALS, LLC ANSWER TO
LAUREL PIPE LINE COMPANY, L.P.’S
MOTION TO COMPEL**

Lucknow-Highspire Terminals, LLC (“LHT”) hereby Answers the Motion to Compel Answers to Interrogatories and Requests for Production of Documents Propounded by Laurel Pipeline Company, L.P. (“Laurel”) on August 7, 2025. Laurel seeks, through the objected-to interrogatories, information that is not subject to discovery under the Commission’s Regulations.

LHT answers Laurel by stating and averring as follows:

1. Admitted in part, Denied in Part. It is admitted that on January 21, 2025, Monroe, LHT, Sheetz, Inc., (“Sheetz”) and PBF Holding Company LLC (“PBF”) filed a Formal Complaint with the Pennsylvania Public Utility Commission (“PUC” or “Commission”). It is denied that such filing “initiated” this process; rather it was Laurel and its affiliate Buckeye that precipitated the instant matter by filing a Petition for Declaratory Order with the Federal Energy Regulatory Commission (“FERC”), which in turn precipitated the instant Complaint in order to preserve the present intrastate service on the Laurel pipeline.

2. Admitted.
3. Admitted. By way of further Answer, LHT notes that Laurel's Preliminary Objections were denied by Order of Presiding Administrative Law Judge Eranda Vero issued April 21, 2025.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted. Counsel for LHT has provided counsel for Laurel with the required confirmation that all non-privileged information has been provided.
13. Admitted.
14. Admitted.
15. Admitted.
16. Denied. The statements in ¶ 16 of the Motion are a request for relief that is neither warranted nor permitted.
17. Denied. The statements in ¶ 17 of the Motion are a request for relief that is neither warranted nor permitted.
18. Admitted.
19. Admitted.

20. Denied. LHT denies that information about terminal operations outside of Pennsylvania is likely to lead to admissible evidence relevant to the issues discussed in Complainants Exhibit SH-1. There is no dispute that the Laurel Pipeline is the only pipeline connecting Western and Central Pennsylvania markets to Eastern origin supply points. The existence of other LHT terminals outside of Pennsylvania has no bearing on the question of whether Eastern origin suppliers remain able to access markets in Western and Central Pennsylvania via pipeline.
21. Denied. The request for daily inventory by product type is not relevant to the testimony from Ms. Huzicko, which addresses “overall market conditions and price competitiveness of East versus West supply”. *See* Complainants Exhibit SH-1 at 2. Compiling daily inventory volumes, by product, for all LHT terminals is a substantial production that imposes an unreasonable burden on top of being untethered to the issues addressed in Ms. Huzicko’s testimony.
22. Denied. Notwithstanding the denial, LHT has answered LHT has answered Laurel’s Set II Interrogatory No. 5(f).
23. Denied. The arguments from ¶ 20 of this Answer are incorporated herein as if stated in full. Additionally, Laurel already has access to PUC-jurisdictional and FERC-jurisdictional product movements on its own pipeline, as LHT has already confirmed that only Laurel and Buckeye pipelines connected to its terminals. Requiring LHT to compile delivery information for products delivered solely through Laurel or its affiliate Buckeye’s pipelines is unduly burdensome and would require an unreasonable investigation.

24. Denied. Notwithstanding the objection, LHT has answered Laurel's Interrogatory Set II No. 5(g)(iii)
25. Denied. The statements in ¶ 25 of the Motion are a request for relief that is neither warranted nor permitted.
26. Admitted.
27. Admitted.
28. Denied. As set forth in the ¶ 20 of this Answer, LHT has alleged that Laurel's proposal to extend bi-directional service to Sinking Spring will adversely impact the petroleum products supply market by restricting access to Eastern origin suppliers. The individual supply relationships are irrelevant to the question of whether shippers have access to both Midwest and Eastern origin suppliers. Further, Laurel, as the pipeline operator, is in the best position to know the volumes coming in from the Midwest and the volumes coming in from Eastern origins suppliers. Requiring LHT to identify the individual refiners it has purchased product from, the supply contracts through which it purchased such products, and the quantity of products purchased by supply source serves only to task the limited staff at LHT with substantial data compilations that are far more granular than the market supply issues raised in the Complaint and addressed in Complainants' Exhibit SH-1.
29. Denied. See ¶ 28 of this Answer.
30. Denied. The statements in ¶ 30 of the Motion are a request for relief that is neither warranted nor permitted.
31. Admitted.
32. Admitted.

33. Denied. Notwithstanding the denial, LHT intends to submit an errata to Complainants Exhibit SH-1 striking the phrase “and I know from interactions with other shippers that they have experienced,”. With that revision, the requested discovery regarding communications with other shippers is not relevant to the Complaint or the testimony submitted by LHT.
34. Denied. The statements in ¶ 34 of the Motion are a request for relief that is neither warranted nor permitted.
35. Admitted.
36. Admitted.
37. Denied. The request is unduly burdensome and would require an unreasonable investigation. The information requested is not maintained by LHT and LHT cannot isolate the various impacts on tank volumes and product quality to provide the requested information because LHT does not have segregated transmix tanks. However, LHT is willing to prepare a response confirming it does not have the requested information.
38. Denied. The response in ¶ 37 of this Answer is incorporated herein as if stated in full.
39. Denied. The statements in ¶ 39 of the Motion are a request for relief that is neither warranted nor permitted.
40. Admitted.
41. Admitted.
42. Denied. Notwithstanding the denial, LHT will answer Laurel’s Interrogatory No. 12(a) and provide the volumes purchased from the Midwest from 2020 to date. As bi-directional service only began in October of 2019, LHT does not have material records of supply purchases from the Midwest for 2019.

43. Denied. The response to ¶ 28 of this Answer is incorporated herein as if stated in full.

44. Denied. The statements in ¶ 44 of the Motion are a request for relief that is neither warranted nor permitted.

45. Admitted.

46. Admitted.

47. Denied.

48. Denied

49. Admitted. Notwithstanding the objection, LHT is willing to answer Laurel's Set II Interrogatories Nos. 13-20 to confirm it does not possess responsive documents.

50. Denied. The statements in ¶ 50 of the Motion are a request for relief that is neither warranted nor permitted.

WHEREFORE, Lucknow-Highspire Terminals, LLC respectfully requests that Your Honor deny Laurel's Motion to Compel.

Respectfully submitted,

By: 

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