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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 Sheetz, Inc.'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).

**VIA EMAIL**

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Adeolu A. Bakare

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

Dated this 12<sup>th</sup> 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.	:	

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**SHEETZ ANSWER TO  
LAUREL PIPE LINE COMPANY, L.P.’S  
MOTION TO COMPEL**

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Sheetz, Inc. 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.

Sheetz answers Laurel by stating and averring as follows:

1. Admitted in part, Denied in Part. It is admitted that on January 21, 2025, Monroe, Lucknow-Highspire Terminal, LLC (“LHT”), 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, Sheetz 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 Sheetz 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. Notwithstanding the denial, Sheetz has responded to Laurel’s

Set II Interrogatories Nos. 1-9 and provided Laurel with the materials in its possession that were relied upon during the witnesses' formulation of his testimony.

18. Admitted.

19. Admitted.

20. Denied. Sheetz denies that information about terminal operations outside of Pennsylvania is likely to lead to admissible evidence relevant to the issues discussed in Complainants Exhibit JDJ-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 Sheetz's volumes in 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 information on the specific terminals supplying each of Sheetz's retail locations across five states is unlikely to lead to admissible evidence relevant to Sheetz's testimony. Sheetz references its operations in states outside of Pennsylvania only in the background section of its testimony. Complainants Exhibit JDJ-1 at 2. Sheetz subsequently confirms that 40% of its retail outlets are in Pennsylvania. *Id.* Further, all of the claims raised by Sheetz relate to its ability to source gasoline and diesel products "to multiple terminal destinations in Pennsylvania." *Id. at* 2. Compiling data related to the specific supply source for each terminal, the daily volumes for each terminal used by Sheetz, as well as the specific terminal(s) that have supplied each individual retail outlet is a considerable production that imposes an unreasonable burden on top of being untethered to the issues addressed in Mr. Jadlocki's testimony.

22. Denied. The statements in ¶ 22 of the Motion are a request for relief that is neither warranted nor permitted.

23. Admitted.

24. Admitted.

25. Denied. The arguments from ¶ 20 of this Answer are incorporated as if fully stated herein. As set forth in the ¶ 20 of this Answer, Sheetz 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 origin suppliers. The individual prices for each of Sheetz's product transactions has no bearing on the broader market dynamics raised on the Complaint and addressed in Mr. Jadlocki's testimony. Laurel claims that it "needs the information the witness here analyzed to arrive at his conclusion" but is seeking information far beyond that. *See* Motion to Compel at 7. To the extent Laurel seeks the information analyzed by the witness, that information has been provided.

26. Denied. See ¶ 25 of this Answer.

27. The statements in ¶ 27 of the Motion are a request for relief that is neither warranted nor permitted.

28. Admitted.

29. Admitted.

30. Denied. Notwithstanding the objection, Sheetz has responded to Laurel's Set II Interrogatory Nos. 12(a) and 12(b).

31. Denied. With regard to Interrogatory No. 12(c), the arguments in ¶ 21 of this Answer and incorporated herein as if stated in full.

32. Denied. The statements in ¶ 32 of the Motion are a request for relief that is neither warranted nor permitted.

33. Denied.

34. Admitted

35. Admitted. Notwithstanding the objection, Sheetz answered Laurel's Set II Interrogatories No. 14 and confirmed it does not possess responsive documents.

**WHEREFORE**, Sheetz, Inc. respectfully requests that Your Honor deny Laurel's Motion to Compel.

Respectfully submitted,

By: 

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