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File #: 200842

August 14, 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 Lucknow-Highspire Terminals, LLC, Set IV 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 14, 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. :

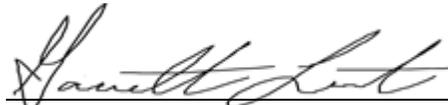
NOTICE TO PLEAD

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 14, 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 LUCKNOW-HIGHSPIRE TERMINALS LLC – SET IV**

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 IV Discovery”) directed to Lucknow-Highspire Terminals LLC, (“LHT”). Laurel files this Motion to Compel LHT to provide full and complete responses to Questions 2, 3, and 4 of the Set IV 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 24, 2025, Laurel served Set IV Discovery on LHT.

5. LHT objected to Set IV Discovery on August 4, 2025. LHT lodged objections to Instructions No. 15 and 16 and Questions 1, 2, 3, and 4 of the Set IV Discovery. LHT indicated that it would respond to Question 1 “to the extent feasible.” A copy of LHT’s Objections is provided as Appendix A 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 14, 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 to Questions 2, 3, and 4 of the Set IV Discovery.

II. ARGUMENT

A. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 2 OF THE SET IV DISCOVERY.

9. Request No. 2 provides as follows:

2. Please reference Exhibit SH-1, 4:19-5:12. Please identify each instance from 2019 to the present in which LHT has failed to move barrels it nominated on Laurel or Buckeye. Please include with this response all documents, including but not limited to emails, instant message logs or letters.

10. LHT objects to Question 2 in Set IV Discovery arguing that it is ambiguous and unreasonably vague due to the phrase, “failed to move barrels,” that the request would, therefore, impose an unreasonable investigation on LHT, and that Laurel should have the information.

11. In her testimony, Ms. Huzicko describes issues with moving product due to the existing bidirectional service. The phrase, “failed to move barrels,” seeks to determine whether the witness is aware of instances where LHT could not move barrels that it had nominated on Laurel or Buckeye. This does not impose an unreasonable investigation on LHT.

12. Further, even if Laurel could access this information, the witness and LHT’s awareness of such information goes to the credibility of the witness’s testimony.

13. For the reasons more fully explained above, LHT should be compelled to provide a full and complete response to Requests No. 2 of Set IV discovery.

B. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 3 OF THE SET IV DISCOVERY.

14. Request No. 3 provides as follows:

3. Please reference Exhibit SH-1, 4:19-5:12. Please identify each instance from 2019 to the present in which LHT has sought to change a nomination (*e.g.* asked Laurel or Buckeye to deliver barrels to a new location). Please include with this response all documents, including but not limited to emails, instant message logs or letters.

15. LHT objects to Question 3 in Set IV Discovery arguing that the request would impose an unreasonable investigation on LHT because Laurel should have the information.

16. In her testimony, Ms. Huzicko describes issues with moving product due to the existing bidirectional service. Further, even if Laurel could access this information regarding changed nominations, the witness and LHT's awareness of such information goes to the credibility of the witness's testimony. This does not impose an unreasonable investigation on LHT.

17. For the reasons more fully explained above, LHT should be compelled to provide a full and complete response to Requests No. 3 of Set IV discovery.

C. LHT SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 3 OF THE SET IV DISCOVERY.

18. Request No. 4 provides as follows:

4. Please reference Exhibit SH-1, 4:19-5:12. Please identify each instance from 2019 to the present in which Laurel or Buckeye has sought to change a nomination (*e.g.* asked LHT to deliver barrels to a new location). Please include with this response all documents, including but not limited to emails, instant message logs or letters.

19. LHT objects to Question 4 in Set IV Discovery arguing that the request would impose an unreasonable investigation on LHT because Laurel should have the information.

20. In her testimony, Ms. Huzicko describes issues with moving product due to the existing bidirectional service. Even if Laurel could access this information regarding changed nominations, the witness and LHT's awareness of such information goes to the credibility of the witness's testimony. This does not impose an unreasonable investigation on LHT.

21. For the reasons more fully explained above, LHT should be compelled to provide a full and complete response to Requests No. 4 of Set IV 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 Lucknow-Highspire Terminals LLC, to fully answer and respond to Questions 2, 3, and 4 of Set IV Discovery, pending consultation with opposing counsel regarding resolutions.

Respectfully submitted,



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Date: August 14, 2025

Counsel for Laurel Pipe Line Company, L.P.

APPENDIX A



McNees Wallace & Nurick LLC
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August 4, 2025

VIA E-MAIL

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Washington, DC 20005-2000

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 Counsel:

Attached please find Objections of Lucknow-Highspire Terminals, LLC to Set IV Interrogatories and Requests for Production of Documents Propounded by Laurel Pipe Line Company, L.P., 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.

Sincerely,

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

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

c: Matthew L. Homsher, Secretary (via electronic filing, letter and certificate only)
Certificate of Service

**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 LUCKNOW-HIGHSPIRE TERMINALS, LLC TO
SET IV 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.*, 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 IV. The basis of the objections, of which there are three, are: 1) that the requests would require unreasonable investigation; 2) that the requests are ambiguous, overly broad, and unreasonably vague; and/or 3) that the requests are unreasonably burdensome. LHT objects to the following requests for the reasons stated therein: 1, 2, 3, and 4.

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

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

Docket No. C-2025-3053018

The instructions to Set IV 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 IV, 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.

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

Docket No. C-2025-3053018

1. For each of the 11 terminals referenced in the testimony of Ms. Huzicko's Exhibit SH-1 at 3:4-71:
 - a. Please provide all outage reports from 2019 to the present associated with each terminal.
 - b. Please identify each instance from 2019 to the present in which the terminal was unable to supply product.
 - c. For each instance identified in subpart (b) please describe the cause of the outage, the nature of the outage, the duration of the outage and the grade(s) of the product involved.
 - d. Please identify all instances from 2019 to the present in which a lack of supply from Laurel caused the terminal to have insufficient supply to meet the needs of its customers.
 - e. Please identify all instances from 2019 to the present in which a lack of supply for some reason not identified in response to subpart (d) caused the terminal to have insufficient supply to meet the needs to its customers.

OBJECTION:

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 take LHT an unreasonable amount of time to compile the requested data. Notwithstanding, LHT will provide a response to the extent feasible.

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

Docket No. C-2025-3053018

2. Please reference Exhibit SH-1, 4:19-5:12. Please identify each instance from 2019 to the present in which LHT has failed to move barrels it nominated on Laurel or Buckeye. Please include with this response all documents, including but not limited to emails, instant message logs or letters.

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 LHT does not understand what is meant by the phrase "failed to move barrels." The request would, therefore, impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4). To the extent the movement is of barrels through the Laurel Pipeline, then Laurel has or should have the requested information.

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

Docket No. C-2025-3053018

3. Please reference Exhibit SH-1, 4:19-5:12. Please identify each instance from 2019 to the present in which LHT has sought to change a nomination (*e.g.* asked Laurel or Buckeye to deliver barrels to a new location). Please include with this response all documents, including but not limited to emails, instant message logs or letters.

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). Laurel's own data will show any instance when LHT sought a nomination change. Therefore, the request would impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4).

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

Docket No. C-2025-3053018

4. Please reference Exhibit SH-1, 4:19-5:12. Please identify each instance from 2019 to the present in which Laurel or Buckeye has sought to change a nomination (*e.g.* asked LHT to deliver barrels to a new location). Please include with this response all documents, including but not limited to emails, instant message logs or letters.

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). Laurel's own data will show any instance when Laurel or Buckeye sought a nomination change. Therefore, the request would impose an unreasonable investigation on LHT. 52 Pa. Code § 5.361(a)(4).