



Todd S. Stewart  
717.703.0800  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Regulation is a maze. We can show you the way!

---

501 Corporate Circle, Suite 302, Harrisburg, PA 17110 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

August 21, 2025

**VIA ELECTRONIC FILING**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

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; **MOTION OF MONROE ENERGY, LLC, LUCKNOW-HIGHSPIRE TERMINALS, LLC, SHEETZ, INC. AND PBF HOLDING COMPANY LLC FOR LEAVE TO ANSWER AND ANSWER TO LAUREL'S ANSWER TO JOINT MOTION TO MODIFY THE PROCEDURAL SCHEDULE**

Dear Secretary Homsher:

Enclosed for filing with the Commission is the Motion of Monroe Energy, LLC, Lucknow-Highspire Terminals, LLC, Sheetz, Inc. and PBF Holding Company LLC ("Complainants") For Leave to Answer and Answer to Laurel's Answer to Joint Motion to Modify the Procedural Schedule in the above-captioned matter. Copies of the Motion have been served in accordance with the attached Certificate of Service.

If you have any questions, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Todd S. Stewart", is written over a large, stylized blue scribble that extends across the signature line and into the space above it.

Todd S. Stewart  
*Counsel for Monroe Energy, LLC*

TSS/jld

Enclosure

cc: Administrative Law Judge Eranda Vero (via electronic mail – [evero@pa.gov](mailto:evero@pa.gov))  
Per Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA ELECTRONIC MAIL**

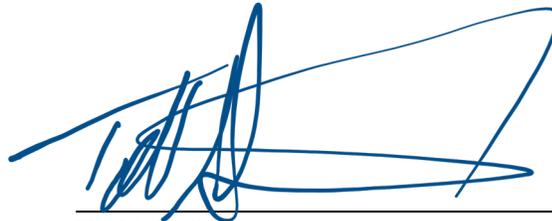
David B. MacGregor  
Anthony D. Kanagy  
Garrett P. Lent  
Alice W. Wade  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)  
[alice.wade@postschell.com](mailto:alice.wade@postschell.com)  
*Counsel for Laurel Pipe Line Company, L.P.*

Randall S. Rich  
Pierce Atwood LLP  
1875 K Street, NW, Suite 700  
Washington, DC 20006  
(202) 530-6424  
[rrich@pierceatwood.com](mailto:rrich@pierceatwood.com)  
*Counsel for PBF Holding Company LLC  
Pro hac vice*

Robert A. Weishaar, Jr.  
Adeolu A. Bakare  
McNees Wallace & Nurick, LLC  
100 Pine Street  
Harrisburg, PA 17101  
[bweishaar@mcneeslaw.com](mailto:bweishaar@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
*Counsel for Lucknow Highspire Terminals,  
LLC and Sheetz, Inc.*

Adeolu A. Bakare  
McNees Wallace & Nurick, LLC  
100 Pine Street  
Harrisburg, PA 17101  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
*Counsel for Lucknow Highspire Terminals,  
LLC and Sheetz, Inc.*

Christopher J. Barr  
Post & Schell, P.C.  
607 14<sup>th</sup> Street, N.W., Suite 600  
Washington, DC 20005-2006  
[cbarr@postschell.com](mailto:cbarr@postschell.com)  
*Admitted Pro Hac Vice*



Todd S. Stewart

DATED: August 21, 2025

**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.	:	

---

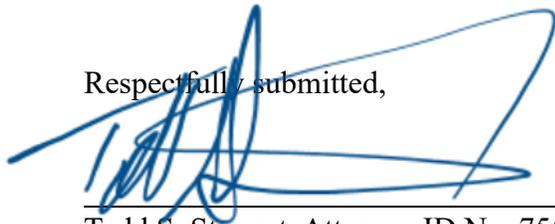
**NOTICE TO PLEAD**

---

To: Laurel Pipe Line Company, L.P.

Pursuant to 52 Pa. Code §§ 5.62 and 5.63, you are hereby notified that Monroe Energy, LLC, Lucknow-Highspire Terminals, LLC, Sheetz, Inc. and PBF Holding Company LLC have filed a Motion for Leave to Answer. You may submit a response to the Motion within **twenty (20) days**. If no response is filed, the motion can be granted, without requiring other proof. All pleadings, such as a response to the attached Motion for Leave to Answer, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on the undersigned counsel for Laurel Pipe Line Company, L.P.

Respectfully submitted,



---

Todd S. Stewart, Attorney ID No. 75556  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
(717) 236-1300  
(717) 236-4841 (fax)  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

*Counsel for Monroe Energy, LLC*

DATED: August 21, 2025

**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 OF  
MONROE ENERGY, LLC, LUCKNOW-HIGHSPIRE TERMINALS, LLC,  
SHEETZ, INC. AND PBF HOLDING COMPANY LLC  
FOR LEAVE TO ANSWER AND ANSWER TO LAUREL’S ANSWER  
TO JOINT MOTION TO MODIFY THE PROCEDURAL SCHEDULE**

---

**TO: Administrative Law Judge Eranda Vero**

Monroe Energy, LLC, Lucknow Highspire Terminals, LLC, Sheetz, Inc., and PBF Holding Company LLC (“Complainants”) hereby submit this Motion for Leave to file an Answer to the Answer submitted by Laurel Pipeline Company, L.P. (“Laurel”) in the above-captioned matter, pursuant to 52 Pa. Code § 5.103. While the Commission’s Regulations do not ordinarily permit the filing of answers to answers, answers to new matter are permitted and certain contentions in Laurel’s Answer are novel. Consistent with the approach for addressing new matter, and consistent with fundamental notions of due process, Complainants should be given the opportunity to, and hereby do, respond.

## **I. MOTION FOR LEAVE TO ANSWER**

Permitting Complainants to address Laurel's Answer and the affirmative relief demanded therein is necessary to prevent Laurel's novel assertions from being left un rebutted and to ensure that the Complainants' Motion and Laurel's Answer are considered on a level playing field – with both sides being given the opportunity to address the assertions. The critical matter in question is Laurel's demand that, if the Presiding Administrative Law Judge were inclined to grant the relief requested in the Complainants' Motion, which is reasonable under the circumstances described therein, that Laurel and its affiliate, Buckeye, be permitted to engage in bi-directional service between Eldorado and Sinking Spring, without a certificate of public convenience or, ostensibly, any Commission permission or approval, effective November 1, 2025, while this proceeding is still pending. Stated differently, Laurel proposes that if the hearing—which addresses the question of whether a certificate of public convenience is necessary for Laurel/Buckeye to expand bi-directional service to Sinking Spring—is delayed, that Laurel be permitted to engage in bi-directional service between Eldorado and Sinking Spring without a certificate of public convenience or any further approvals by the Commission. Laurel's demand is absurd to say the least, as it would result in the sacrifice of due process and a partial substantive determination of the legal issues in this matter as the price for allowing Complainants' sufficient time to exercise their due process rights. Allowing a response to be heard prior to considering such a condition, one that would essentially demand a material substantive finding in favor of Laurel at this juncture, is the least that due process requires.

## **II. ANSWER**

Laurel's Answer posits several reasons to support its contention that the schedule should not be modified.

First, Laurel contends that Complainants did not challenge the procedural schedule when initially imposed and that Complainants should not be permitted to seek a change now, even though circumstances have dramatically changed as detailed in Complainants' Motion. Laurel's Answer does not address, at all, how Complainants will have any discovery opportunities of Laurel's case-in-chief, much less discovery opportunities that are even remotely comparable to those that Laurel has had of the Complainants' case-in-chief. This gross disparity in discovery opportunities is underscored by the voluminous and contentious discovery of Complainants' case-in-chief, in which Laurel has engaged for over a month.

Second, Laurel's Answer argues that no certificate of public convenience is required to expand bi-directional service and that the ALJ has so found, claiming that the ALJ has also made it clear that "the Complaint contains no allegations regarding the permissibility of bi-directional service in the context of Laurel's certificate of public convenience." Laurel Answer ¶ 16. The quoted statement was made in the context of denying a motion to compel because Laurel's questions demanded a legal opinion, which is not permitted. It is incorrect, however, to state that Complainants have not raised allegations regarding Laurel's need for a certificate of public convenience for bi-directional service that amounts to a partial abandonment of east-to-west service on the Laurel Pipeline. Rather, the entirety of Count II of the Complaint addresses that very topic. The issue of the need for a CPC for the expansion of bi-directional service remains very much alive and the grant of Laurel's required counter relief of ruling that a bi-directional service expansion can occur without the need for such a determination is simply wrong factually and as a matter of law.

Third, Laurel's Answer also contends that the alleged "delay" that would be caused by moving the hearings to a new date would conflict with the FERC's Order holding Buckeye's

Petition for Declaratory Order proceeding in abeyance during the pendency of this proceeding. That assertion is incorrect as FERC's Order<sup>1</sup> makes it clear that FERC is willing to wait as long as it takes the ALJ and this Commission to resolve the matter.<sup>2</sup> Laurel also contends that the intention of the Complainants is to delay this proceeding to Laurel's detriment. That is not correct. The Complainants' intention is not to delay for delay's sake; rather, the Complainants' sole intention, as explained in the Motion, is to ensure that Complainants have the right to conduct discovery of Laurel's case-in-chief that is comparable in timing and scope to the right Laurel has had to conduct discovery of Complainants' case-in-chief. Complainants did not request a rescheduling of the hearing to November or December; rather, the Complainants suggested new hearing dates in October that would ensure some sense of parallelism in discovery opportunities. The Complainants desire to provide the Commission with a complete and balanced record on which to determine the critical questions of fact and law that are posed in this matter. Laurel had no reason under the existing schedule to expect a Commission ruling on the need for a CPC that is at the heart of this matter, before January 2026, well after its putative November 1 date, and yet it suggests that adding additional time for Complainants to conduct meaningful discovery will unreasonably delay the resolution.

Finally, Laurel demands that if any extension of the procedural schedule is made that it must not be prohibited from expanding the proposed bi-directional service on an operational bases by November 1, 2025. Such a demand would require the resolution of Count II of the Complaint without a hearing or determination of whether a CPC is required for such an action, for which no Commission determination has been made or will be made prior to November 1. Allowing

---

<sup>1</sup> See *Buckeye Pipeline Company, LP*, 192 FERC ¶ 61,046 (2025)

<sup>2</sup> *Id.* at PP 20-21.

expanded bi-directional service to commence November 1 would cause even further delay, as the Complainants would be forced to pursue additional remedies for any such action.

The Complainants have presented a reasonable proposal to extend the procedural schedule to all for adequate time for discovery of Laurel's case-in-chief. As admitted in Laurel's Answer, the initial determination of the schedule was based on the choice between a day or two of live hearings versus written testimony and that, at the time the schedule was set, the intention was to balance both sides' due process opportunities. However, given the mushrooming of information sought by Laurel, it is clear that the notion of just two rounds of testimony—one by Complainants and one by Laurel—with no opportunity for the party with the burden of proof to test the basis of the opposing claims, it has become clear that a modest and commensurate change to the schedule is needed to prevent harm that cannot be fixed by a subsequent appeal. If the record is not fairly made, due process is violated and that bell cannot be unring.

### III. CONCLUSION

For the reasons stated above, Complainants respectfully request that Your Honor accept and consider this Answer, and issue an order granting the requested modification of the procedural dates in this proceeding.

Respectfully submitted,



DATED: August 21, 2025

---

Todd S. Stewart  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
(717) 236-1300  
(717) 236-4841 (fax)  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
*Counsel for Monroe Energy, LLC*



---

Robert A. Weishaar, Jr.  
Adeolu A. Bakare  
McNees Wallace & Nurick, LLC  
100 Pine Street  
Harrisburg, PA 17101  
[bweishaar@mcneeslaw.com](mailto:bweishaar@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
*Counsel for Lucknow Highspire Terminals,  
LLC and Sheetz, Inc.*



---

Randall S. Rich  
Pierce Atwood LLP  
1875 K Street, NW, Suite 700  
Washington, DC 20006  
(202) 530-6424  
[r-rich@pierceanwood.com](mailto:r-rich@pierceanwood.com)  
*Attorneys for PBF Holding Company LLC  
Pro hac vice*