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May 11, 2026

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

VIA ELECTRONIC FILING

RE: Application of MIPC, LLC for Approval of the Abandonment of all Pennsylvania Jurisdictional Pipeline Service; Docket No. A-2026-3061592

Dear Secretary Homsher:

Attached please find the Objections of MIPC, LLC ("MIPC") to the Energy Industry Group's ("EIG") Request for Data.

As shown by the attached Certificate of Service, all parties 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 light blue horizontal line.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

Counsel to MIPC, LLC

c: 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 MIPC, LLC

Dated this 11th day of May, 2026, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of MIPC, LLC for approval of the :
abandonment of all Pennsylvania jurisdictional :
pipeline service. : Docket No. A-2026-3061592
:

OBJECTIONS TO THE ENERGY INDUSTRY GROUP'S REQUEST FOR DATA

Pursuant to 52 Pa. Code §§ 5.342, 5.349, and 5.361(a)(2), MIPC, LLC ("Company" or "MIPC") hereby objects to the Data Requests propounded by the Energy Industry Group ("EIG") as follows:

MIPC Objections to EIG, Data Request Question No. 5

5. a. Provide per-barrel cost comparisons for transporting crude oil, gasoline, or petroleum products via third-party pipeline, rail, truck, and barge.
- b. Identify any capacity constraints or operational limitations associated with such alternatives.

Objection

The Commission's Regulations prohibit data requests that would cause unreasonable burden or expense or "[w]ould require the making of an unreasonable investigation by the deponent, a party or witness." 52 Pa. Code §§ 5.361(a)(2), (4). MIPC objects to EIG Data Request Nos. 5a and 5b on the basis that producing pricing and operational data for various third-party service alternatives would require MIPC to engage in extensive market research. This effort would impose an unreasonable burden, particularly as the sole customer utilizing MIPC's pipeline for intrastate transportation of petroleum products would retain access to the pipeline following approval of the the abandonment application. Additionally, the questions seek pricing and operational data that is excessively vague in terms of scope and timeframe and would thus impose an unreasonably burdensome investigation on MIPC. 52 Pa. Code § 5.361(a)(4).

Notwithstanding the above objection, MIPC will attempt to respond to EIG Data Request Nos. 5a and 5b.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By  _____

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Dated: May 11, 2026