



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

December 20, 2016

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Application of Laurel Pipe Line Company, L.P. for All Necessary Authority,  
Approvals, and Certificates of Public Convenience To Change the Direction  
of Petroleum Products Transportation Service to Delivery Points West of  
Eldorado, Pennsylvania  
Docket No. A-2016-2575829

Dear Ms. Chiavetta:

Enclosed for filing is the Notice of Intervention on behalf of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission in the above-referenced case. Copies have been served on the parties of record in accordance with the Certificate of Service.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adam D. Young", is written over the typed name and title.

Adam D. Young  
Senior Prosecutor  
PA Attorney ID No. 91822

cc: As per Certificate of Service



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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Laurel Pipe Line Company, L.P. for All Necessary Authority, Approvals, And Certificates of Public Convenience To Change the Direction of Petroleum Products Transportation Service to Delivery Points West of Eldorado, Pennsylvania	: : : : : : : :	Docket No. A-2016-2575829
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**NOTICE OF INTERVENTION OF THE  
BUREAU OF INVESTIGATION AND ENFORCEMENT**

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Pursuant to 52 Pa. Code §§ 5.71-76, the Bureau of Investigation and Enforcement (I&E) of the Pennsylvania Public Utility Commission (Commission) hereby gives Notice of Intervention in the above-captioned proceeding. In support thereof, I&E states as follows:

**INTRODUCTION:**

1. The Pennsylvania Public Utility Commission (PUC or Commission) with a mailing address of P.O. Box 3265, Harrisburg, PA 17105-3265, is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate pipeline operators pursuant to Section 501(a) of Act 127, 58 P.S. § 801.501(a).

2. Act 129 of 2008, 66 Pa.C.S. § 308.2, authorizes the Commission to establish bureaus, offices and positions to, *inter alia*, take appropriate enforcement

actions that are necessary to insure compliance with the Public Utility Code and Commission regulations and orders. 66 Pa.C.S. § 308.2(a)(11).

3. In accordance with Act 129, the Commission established I&E to serve as the prosecutory bureau for the purposes of representing the public interest in ratemaking and service matters, and enforcing compliance with the Public Utility Code, 66 Pa.C.S. §§ 101 *et seq.*, and Commission regulations, 52 Pa. Code §§ 1.1 *et seq.* See *Implementation of Act 129 of 2008; Organization of Bureaus and Offices*, Docket No. M-2008-2071852 (Order entered August 11, 2011).

4. Pursuant to the Commission's regulations at 52 Pa. Code § 59.33(b), the Commission's Gas Safety Division, which is part of I&E, also has the authority to enforce Federal gas pipeline safety regulations set forth in 49 U.S.C.A. §§ 60101, *et seq.* and implemented in 49 C.F.R. Parts 191-193, 195 and 199, 49 C.F.R. §§ 191-193, 195 and 199.

5. I&E, through its prosecutors, has standing and authority to participate in all Commission proceedings and to initiate enforcement actions and prosecutions in the public interest. *Id.* at 5.

6. The names and contact information for I&E's prosecutors are as follows:

Adam D. Young, Esq.  
Senior Prosecutor  
PA Attorney ID No. 91822  
[adyoung@pa.gov](mailto:adyoung@pa.gov)  
717.772.8582

Michael L. Swindler, Esq.  
Deputy Chief Prosecutor  
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717.783.6369

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**BACKGROUND:**

7. On November 14, 2016, Laurel Pipe Line Company, L.P. (Laurel or Company) filed an application, pursuant to various provisions of the Pennsylvania Public Utility Code, requesting all necessary authority, approvals and Certificates of Public Convenience from the Commission to the extent required, authorizing Laurel to change the direction of its petroleum products transportation service over a portion of its system west of Eldorado, Pennsylvania.

8. In its Application, Laurel requests, inter alia, that the Commission either determine by final order that approval is not required for this change in service, or grant all necessary approvals and permit Laurel to change the direction of its petroleum products transportation service to delivery points west of Eldorado, Pennsylvania.

**INTERVENTION:**

9. As the bureau within the Commission that is responsible for ensuring compliance with the Public Utility Code and Commission regulations and orders, as well

as applicable Federal statutes and regulations, I&E is intervening in this proceeding to protect the public interest.

Respectfully submitted,



Adam D. Young, Esq.  
Senior Prosecutor  
PA Attorney ID No. 91822

Michael L. Swindler, Esq.  
Deputy Chief Prosecutor  
PA Attorney ID No. 43319

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
(717) 772-8582

Date: December 20, 2016

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Laurel Pipe Line Company, L.P. for All Necessary Authority, Approvals, And Certificates of Public Convenience To Change the Direction of Petroleum Products Transportation Service to Delivery Points West of Eldorado, Pennsylvania	: : : : : : : : :	Docket No. A-2016-2575829
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**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).

Service by First Class Mail:

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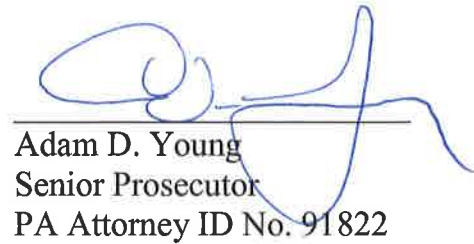
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Senior Prosecutor  
PA Attorney ID No. 91822

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Dated: December 20, 2016