

**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)	Docket No. A-2016-2575829
Change the Direction of Petroleum Products)	
Transportation Service to Delivery Points)	
West of Eldorado, Pennsylvania)	

PETITION TO INTERVENE OF MONROE ENERGY, LLC

Pursuant to Section 5.71 and 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") regulations, 52 Pa. Code §§ 5.71 and 5.74, Monroe Energy, LLC ("Monroe") hereby files this Petition to Intervene in the above-captioned proceeding. In support therefore, Monroe asserts the following:

1. The name and address of Monroe's attorney is:

Christopher A. Ruggiero (Pa. I.D. No. 80775)
Vice President, General Counsel & Secretary
Monroe Energy, LLC
4101 Post Road

Phone: (610) 364-8409
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2. On November 14, 2016, Laurel Pipe Line Company, L.P. ("Laurel" or "Applicant") filed its Application 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, with the Commission pursuant to various provisions of the Pennsylvania Public Utility Code ("Application"). *See* Pa. C.S. § 101, *et seq.*

3. On November 16, 2016 the Commission issued a Secretarial Letter directing Laurel to publish notice of the Application in a newspaper having general circulation in the area involved and file proof of publication with the Commission by December 19, 2016. The Secretarial Letter also confirmed that the Commission would publish notice of the Application in

the *Pennsylvania Bulletin* on December 3, 2016, with formal protests and petitions to intervene due to the Commission by December 19, 2016.

4. On November 22, 2016, Gulf Operating, LLC (“Gulf Operating”) filed its Petition to Intervene and Motion to Extend the Deadline for Protests. In December 6, 2016, the Commission granted Gulf Operating’s motions and rescheduled the deadline for submitting interventions and protests for February 1, 2017. On December 6, 2016, the Commission also issued a Secretarial Letter reflecting its decision on Gulf Operating’s motions.

5. As set forth in the Application, Laurel currently transports petroleum products from points of origin near Philadelphia, Pennsylvania, to destination points across the Commonwealth, terminating west of Pittsburgh, Pennsylvania. *See* Application at 2. In addition to the intrastate shipments, Laurel assigns a portion of its capacity to Buckeye Pipe Line Company, L.P. (“Buckeye”) for interstate transportation service from origin points in New Jersey and Delaware to destination points in Pennsylvania. *Id.* As stated in the Application, Laurel and Buckeye are general partners with Buckeye Partners, L.P., although the Application does not clarify the ownership structure between these affiliate entities. *Id.* at 4.

6. The Application proposes to dramatically modify the jurisdictional pipeline transportation service currently provided by Laurel by eliminating service to all points west of Eldorado (near Altoona) from the east. *Id.* at 9. Laurel proposes to continue using the pipeline facilities west of Eldorado, and for future receipt of interstate deliveries originating from origin points in the Midwest and the Pittsburgh area. *Id.*

7. Monroe is a wholly-owned subsidiary of Delta Air Lines, Inc. (“Delta”). Monroe operates the Trainer refinery and related assets located near Philadelphia, Pennsylvania. These facilities include pipelines and terminal assets that allow the refinery to supply gasoline,

distillates, and jet fuel produced at the Trainer refinery near Philadelphia to various sites in Pennsylvania, including without limitation Pittsburgh. As such, Monroe has a strong interest in ensuring that petroleum products transportation west through the Laurel pipeline continues unimpeded. Approval of the Application would eliminate the availability of pipeline transportation service from points near Philadelphia to markets west of Eldorado, including particularly the Pittsburgh market area. This market loss will significantly impact Monroe and Monroe's customers in the Pittsburgh area who depend on refined products from the Trainer refinery and Monroe's other facilities.

8. Monroe intends to file a formal protest on or before the protest due date, identifying the full scope of issues and adverse impacts from the Application. Monroe requires party status in order to monitor the proceeding. Therefore, consistent with 52 Pa. Code § 5.72(1), Monroe has a significant interest in this proceeding that is not represented by any other party of record. Therefore, Monroe qualifies for and should be granted intervenor status in this proceeding.

WHEREFORE, Monroe Energy, LLC respectfully requests that the Pennsylvania Public Utility Commission grant the Petition to Intervene and provide Monroe Energy, LLC with full-party status in this proceeding.

Respectfully submitted,



Christopher A. Ruggiero (Pa. I.D. No. 80775)

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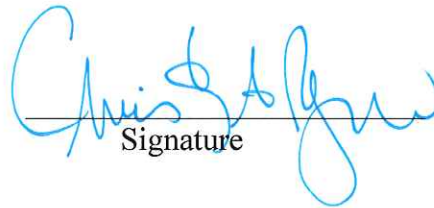
Counsel for Monroe Energy, LLC

Dated: January 3, 2017

VERIFICATION

I, Christopher A. Ruggiero, Vice President, General Counsel, and Secretary of Monroe Energy, LLC, hereby state that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

January 3, 2017


Signature

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving 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).

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Christopher A. Ruggiero
Counsel for Monroe Energy, LLC

Dated this 3rd day of January, 2017 in Trainer, Pennsylvania.