

**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)	

MOTION OF MONROE ENERGY LLC FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 5.103 of the Rules of Administrative Practice and Procedure of the Pennsylvania Public Utilities Commission¹ (the “Commission”), and Rule 301(b) of the Pennsylvania Bar Admission Rules, Counsel of Record for Monroe Energy LLC (“Monroe”), Christopher A. Ruggiero, Esq., Vice President, General Counsel, and Secretary of Monroe, respectfully moves the Presiding Administrative Law Judge for entry of an Order granting admission *pro hac vice* to Richard E. Powers, Jr., Esq., as counsel for Monroe for all purposes in relation to these proceedings (“Motion”).

In support of this Motion, the Movant, Christopher A. Ruggiero, avers as follows:

1. Pursuant to PUC Rule 1.24(b)(1), the Movant has entered his appearance as counsel of record for Monroe in this proceeding, is an active member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 80775), and is the Vice President, General Counsel, and Secretary of Monroe, whose principal office is in Trainer, Pennsylvania.
2. Richard E. Powers, Jr. is a Partner at the law firm of Venable LLP, which maintains its principal office at 575 7th Street, N.W. Washington, DC 20004.

¹ The Rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission shall hereafter be cited in this Motion as “PUC Rule.”

3. Richard E. Powers, Jr. is a 1977 graduate of Notre Dame Law School. He has been a member in good standing of the Bar of the State of Texas since 1977 and of the Bar of the District of Columbia since 1979.

4. Richard E. Powers, Jr. has experience and particular expertise in various aspects of regulatory and energy law, has appeared in numerous proceedings before the Federal Energy Regulatory Commission, federal courts, the California State Public Utilities Commission, and other regulatory agencies. Mr. Powers has represented Delta Air Lines, Inc. (“Delta”), the parent company of Monroe, in energy regulatory matters for more than a decade and has an extensive knowledge of Delta’s operations, energy utilization activities, and regulatory history.

5. Wherefore, Christopher A. Ruggiero, Movant and Counsel of Record for Monroe, respectfully moves for admission of Richard E. Powers, Jr., *pro hac vice*, on behalf of Monroe for all permissible purposes in relation to these proceedings.

Date: January 26, 2017.

Respectfully submitted,

/s/ Christopher A. Ruggiero
Christopher A. Ruggiero (Pa. I.D. No. 80775)
Vice President, General Counsel & Secretary
Monroe Energy, LLC
4101 Post Road
Trainer, PA 19061
Phone: (610) 364-8409
Fax: (610) 364-8404

Counsel for Monroe Energy, LLC

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Docket No. A-2016-2575829

**STATEMENT OF CHRISTOPHER A. RUGGIERO
SPONSOR OF RICHARD E. POWERS, JR. FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Christopher A. Ruggiero, Esq., a member of the bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 80775), is moving for the admission *pro hac vice* of Richard E. Powers, Jr., Esq. in the above-captioned proceeding. In support of the Motion, I, the sponsor, submit this verified statement, pursuant to Pa. R.C.P. 1012.1:

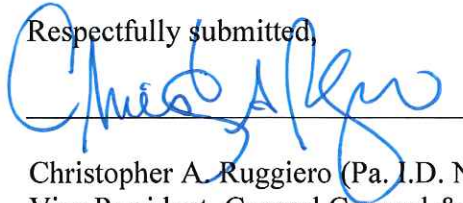
1. I have worked with Mr. Powers and have known of Mr. Powers for several years in his capacity as a partner specializing in oil and gas pipeline regulation at the law firm of Venable, LLP. I have had sufficient opportunity during that time to conduct a reasonable investigation regarding Mr. Powers and can state that Mr. Powers is a reputable and competent attorney.

2. Any proceeds from the settlement of a cause of action in which the candidate is granted admission *pro hac vice* shall be received, held, distributed, and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

3. I shall remain the attorney of record in this case, as required by the Rules of Civil Procedure.

4. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information, and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Respectfully submitted,



Christopher A. Ruggiero (Pa. I.D. No. 80775)
Vice President, General Counsel & Secretary
Monroe Energy, LLC
4101 Post Road
Trainer, PA 19061
Phone: (610) 364-8409
Fax: (610) 364-8404

Counsel for Monroe Energy, LLC

Date: January 26, 2017.

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF Delaware : ss.

Sworn to me this 26th day of January, 2017.



Notary Public of the Commonwealth of Pennsylvania

Printed Name: Dawn A. Womack

My Commission Expires: August 17, 2018



COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
DAWN A. WOMACK, Notary Public
Trainer Boro., Delaware County
My Commission Expires August 17, 2018

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**VERIFIED STATEMENT OF RICHARD E. POWERS, JR.
FOR ADMISSION *PRO HAC VICE***

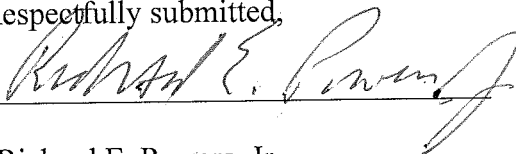
Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103, Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Christopher A. Ruggiero, Esq., a member of the bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 80775), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of said sponsor's Motion, I, the candidate, submit this verified statement, pursuant to Pa. R.C.P. 012.1:

1. I am admitted to practice in and am a member in good standing of the bars of the State of Texas, having been admitted in 1977, and of the District of Columbia, having been admitted in 1979. I have never been suspended, disbarred, or otherwise disciplined nor am I currently the subject of any disciplinary proceeding.
2. I shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.
3. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during the appearance in the matter for which admission *pro hac vice* is being sought.
4. I consent to the appointment of the sponsoring attorney, Christopher A. Ruggiero, Esq., as the agent upon whom service of process shall be made for all actions, including

disciplinary actions, that may arise out of the practice of law in the matter for which admission *pro hac vice* is sought.

5. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that these statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsification to authorities).

Respectfully submitted,

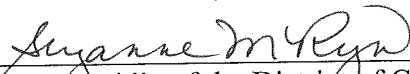


Richard E. Powers, Jr.
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Facsimile: (202) 344-8300
repowers@venable.com

Date: January 24, 2017.

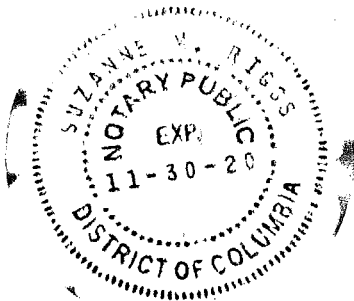
District of Columbia: SS

Sworn to me this 24th day of January, 2017.



Notary Public of the District of Columbia

Printed Name: SUZANNE M. RIGGS
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires November 30, 2020
My Commission Expires: _____



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).

VIA E-MAIL AND FIRST CLASS MAIL

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Christopher A. Ruggiero
Counsel for Monroe Energy, LLC

Dated this 26th day of January, 2017 in Trainer, Pennsylvania.