



February 13, 2017

By eFiling

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 Secretary Chiavetta:

Enclosed please find the Prehearing Conference Memorandum of Clean Air Council in the above captioned matter. Copies of this letter and the attached petition have been eFiled and a copy has been sent electronically to the service list.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Otis Minott".

Joseph Otis Minott, Esquire

A handwritten signature in black ink, appearing to read "Ernest Logan Welde".

Ernest Logan Welde, Esquire

Attorneys for Clean Air Council

**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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PREHEARING CONFERENCE MEMORANDUM OF CLEAN AIR COUNCIL

On February 7, 2017, a Prehearing Conference Order was issued by the Honorable Eranda Vero, Administrative Law Judge. The Order set forth specifications to direct the course of litigation and ordered parties to provide information about certain aspects of the proceedings to be resolved at the Prehearing Conference, scheduled for February 14, 2017. In response, Clean Air Council (“CAC”), hereby files this Prehearing Conference Memorandum.

I. Background

On November 14, 2016, Laurel Pipe Line Company, L.P. ("Laurel"), filed with the Pennsylvania Public Utility Commission ("Commission") its Application for authority, approvals and Certificates of Public Convenience ("CPC") to change the direction of petroleum products transportation service to delivery points west of Eldorado, Pennsylvania ("Application"). 66 Pa. C. S. §§ 101, *et seq.*

On November 16, 2016, the Commission issued a Secretarial Letter directing Laurel to publish notice of the Application and file proof of publication by December 19, 2016. The Application was published in the *Pennsylvania Bulletin* on December 3, 2016.

On November 22, 2016, Gulf filed a Petition to Intervene and Motion to Extend Deadline for Protests.

On December 6, 2016, the Commission issued a Secretarial Letter extending the deadline for filing formal protests and petitions to intervene in this proceeding to February 1, 2017.

On December 8, 2016, Philadelphia Energy Solutions Refining and Marketing LLC ("PESRM") filed a Petition to Intervene.

On December 20, 2017, the Commission's Bureau of Investigation & Enforcement ("BI&E") filed a Notice of Intervention.

On January 3, 2017, Monroe Energy, LLC ("Monroe") filed a Petition to Intervene.

On January 31, 2017, Husky Marketing & Supply Co. ("Husky") filed a Petition to Intervene.

On February 1, 2017, Sheetz filed a Petition to Intervene in this proceeding. On that same date, both Gulf and Sheetz filed Protests to Laurel's Application. On that same day, Giant Eagle Inc. ("Giant Eagle"), Clean Air Council, and Sunoco LLC filed Petitions to Intervene. Giant Eagle's Petition to Intervene included a Protest.

On February 7, 2017, Laurel filed a Motion to Consolidate the Commission's consideration of the Capacity Agreement with Laurel's Application.

On February 13, 2017, Gulf, Sheetz, Monroe, PESRM, and Giant Eagle filed a Joint Answer to Laurel's Motion to Consolidate.

A Prehearing Conference has been scheduled in this proceeding for February 14, 2017.

II. Issues to be Presented

Based upon its initial review of these proposals CAC has identified the following issues that have the potential to impact CAC members:

- a. Whether the proposed reversal of flow is in the public interest;
- b. Whether this reversal is part of a larger plan to reverse a larger portion, or the entire pipeline;
- c. Whether additional equipment, or pumping stations will be required along the route in order to reverse the flow;
- d. Whether Laurel has the authority, under its current permit to change the direction of flow;
- e. Impact on CAC members who live near the pipeline and will suffer deleterious effects if additional equipment is installed.

Clean Air Council reserves the right to raise other issues as those may arise.

III. Witnesses

Clean Air Council has not identified a witness that it may call, however, CAC reserves the right to call a witness, or witnesses

IV. Motion to Consolidate

Clean Air Council does not object to consolidation.

V. Proposed Schedule

Clean Air Council will work with all parties to establish a reasonable schedule.

VI. Settlement

Clean Air Council will engage in settlement discussions with any and all parties in an attempt to resolve or narrow the issues in this proceeding.

VII. Public Input Hearings

Due to the potential impact on all affected rate payers, including CAC members, CAC suggests that at least three (3) public hearings be held in order to allow the maximum input from affected community members. CAC would request that at least one hearing be held in Philadelphia, one in Pittsburgh and one in Harrisburg. The public's input in this proposal is extremely critical and should be considered by the Commission.

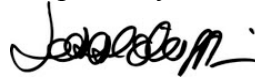
VIII. Service on Clean Air Council

Electronic service only of all documents should be served on CAC as follows:

Joseph Otis Minott, Esq.
E-Mail: joe_minott@cleanair.org
Logan Welde, Esq.
E-Mail: lwelde@cleanair.org
Telephone: 215-567-4004 - 126

WHEREFORE, Clean Air Council respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,



Joseph Otis Minott, Esq., PA ID 36463
Logan Welde, Esq., PA ID: 315012
135 S. 19th Street, Suite 300
Philadelphia, Pennsylvania 19103

February 13, 2017

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Clean Air Council's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email and/or First Class Mail

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Ernest Logan Welde, Esquire