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File #: 162860

February 21, 2017

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
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**

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Dear Secretary Chiavetta:

Attached please find the Answer of Laurel Pipe Line Company, L.P. to the Petition to Intervene of Sheetz, Inc. in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/skr  
Enclosure

cc: Certificate of Service  
Honorable Eranda Vero

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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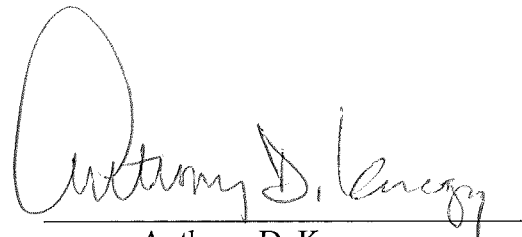
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Date: February 21, 2017



Anthony D. Kanagy

**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 :

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**ANSWER OF LAUREL PIPE LINE COMPANY, L.P.  
TO THE PETITION TO INTERVENE  
OF SHEETZ, INC.**

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TO THE HONORABLE ADMINISTRATIVE LAW JUDGE ERANDA VERO:

Laurel Pipe Line Company, L.P. (“Laurel”) hereby files this Answer to the Petition to Intervene (“Petition”) filed by Sheetz, Inc. (“Sheetz”) for the purposes of addressing and clarifying the allegations and assertions contained in Sheetz’s Petition.<sup>1</sup> Laurel files this Answer pursuant to Sections 5.61 and 5.66 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code §§ 5.61 and 5.66. In support thereof, Laurel respectfully represents the following:

**I. ANSWER TO PETITION TO INTERVENE**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted in part; denied in part. The first two sentences in paragraph 5 are admitted. Laurel denies the final sentence in paragraph 5. As stated in the Application, and

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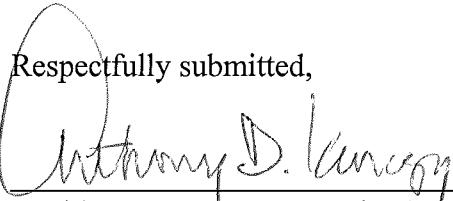
<sup>1</sup> Laurel has concurrently filed a separate Answer to Sheetz’s Protest in the above-captioned proceeding.

clarified throughout the pleadings, Buckeye Partners, L.P. is an indirect general partner of Laurel, as well as an indirect general partner of Buckeye. Buckeye Partners, L.P. is the parent of the general partner of both Laurel and Buckeye. Laurel further denies the suggestion that the Application does not provide adequate clarity as to the ownership structure between Laurel and the stated affiliates.

6. Admitted in part; denied in part. The first sentence of paragraph 6 calls for a legal conclusion to which no response is required. However, Laurel denies that the change in direction of service proposed by its Application “dramatically modifies” the service provided by Laurel. Deliveries on Laurel’s pipeline system will continue at all origin points and at all destination points; the only change is the direction of deliveries west of Eldorado. The second sentence of paragraph 6 is admitted.

7. Admitted in part; denied in part. After a reasonable investigation, Laurel lacks sufficient information to form a reasonable belief as to the assertions in the first, second, third, and fourth sentences of paragraph seven, and therefore denies the same. The fifth sentence of paragraph 7 is admitted. The final two sentences of paragraph 7 are denied as stated. While Laurel does not contest that Sheetz has demonstrated an interest sufficient to grant it intervenor status in this proceeding, Laurel denies the extent of that interest as represented by Sheetz in its Petition, consistent with Laurel’s responses in this Answer. Moreover, Laurel intends to demonstrate that independent fuel retailers, like Sheetz, will benefit from the increased access to generally lower-priced Midwestern products that is contemplated in the Application.

**WHEREFORE**, Laurel Pipe Line Company, L.P. does not object to the Petition to Intervene of Sheetz, Inc., subject to Laurel Pipe Line Company, L.P.'s responses to the allegations contained therein.

Respectfully submitted,  


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Date: February 21, 2017

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