



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Main Fax  
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com  
717-612-6034 Direct  
717-731-1985 Direct Fax  
File #: 162860

February 21, 2017

**VIA HAND DELIVERY**

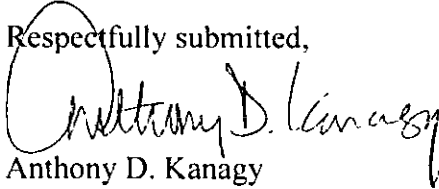
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**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**

Dear Secretary Chiavetta:

Attached please find the Answer of Laurel Pipe Line Company, L.P. to the Protest of Monroe Energy LLC 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

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

FEB 21 2017

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 :

PA. PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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ANSWER OF LAUREL PIPE LINE COMPANY, L.P.  
TO THE PROTEST OF MONROE ENERGY LLC

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TO THE ADMINISTRATIVE LAW JUDGE ERANDA VERO:

Laurel Pipe Line Company, L.P. ("Laurel") hereby files this Answer to the Protest filed by Monroe Energy LLC ("Monroe") for the purposes of addressing and clarifying the allegations and assertions contained in Monroe's Protest. Laurel files this Answer pursuant to Section 5.61 of the Pennsylvania Public Utility Commission's ("Commission") regulations, 52 Pa. Code § 5.61. In support thereof, Laurel respectfully represents the following:

**I. BACKGROUND**

On November 14, 2016, Laurel filed the *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* at Docket No. A-2016-2575829 ("Application"). Therein, Laurel requested any and all approvals that the Commission deemed necessary to change the direction of flow on the western portion of Laurel's petroleum products pipeline system. Application, at p. 1.<sup>1</sup>

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<sup>1</sup> Laurel requested, in the alternative, that if no approvals are required, a ruling to that effect be issued by the Commission.

On November 16, 2016, the Commission issued a Secretarial Letter requiring Laurel to publish the enclosed notice of the Application in a newspaper of general circulation in the area involved and to file proof of publication with the Commission on or before December 19, 2016. The November 16, 2016 Secretarial Letter also scheduled publication of the notice in the *Pennsylvania Bulletin* in the December 3, 2016 issue, and set the deadline to file formal protests and petitions to intervene on December 19, 2016.

On December 6, 2016, the Commission issued a Secretarial Letter supplementing its prior November 16, 2016 Secretarial Letter and the Notice published in the December 3, 2016 edition of the *Pennsylvania Bulletin*. Therein, the Commission granted Gulf's Petition to Intervene, and granted, in part, Gulf's Motion to Extend the Deadline for Protests and set the new deadline for formal protests and petitions to intervene in the proceeding at 4:30 p.m. on February 1, 2017. The Commission also directed Laurel to serve a copy of its Application by December 19, 2016, on the following entities: (1) current customers using the subject pipeline; (2) former customers who used the subject pipeline during the period from January 1, 2015, through the date of filing; and (3) prospective and committed customers Laurel expects to use the subject pipeline if the flow direction of the line is changed.

On December 15, 2016, Laurel filed Affidavits for Proof of Publication indicating that the Public Notice for the Application had been published in five newspapers.<sup>2</sup>

On December 17, 2016, the Commission published a supplemental Notice of Laurel's Application, in accordance with its December 6, 2016 Secretarial Letter, noticing that the deadline for all Protests and Petitions to Intervene was extended until February 1, 2016.

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<sup>2</sup> The Public Notice was published in all five newspapers on December 6, 2016. As such, it reflected the version of the Public Notice that was included in the Commission's November 16, 2016 Secretarial Letter.

On December 19, 2016, Laurel served a copy of its Application on the three groups of entities described in the Commission's December 6, 2016 Secretarial Letter, and filed a copy of its letter indicating such service with the Commission.

Monroe filed a Petition to Intervene in this proceeding on January 3, 2017. Thereafter, on February 1, 2017, Monroe filed a formal Protest.

## II. ANSWER

"[T]he purpose of a protest is to alert the agency and other parties of its existence and the nature of the objection." *Re Philadelphia Electric Company*, 57 Pa. PUC 161, 165 (Opinion and Order entered April 15, 1983) (noting that under the former Section 35.23 of the Commission's regulations, protests serve to provide notice of the existence and nature of an objection to a filing before the Commission). The Commission's regulations further only require a protest to: "(1) Set out clearly and concisely the facts from which the alleged interest or right of the protestant can be determined; (2) State the grounds of the protest; (3) Set forth the facts establishing the protestant's standing to protest." 52 Pa. Code § 5.52(a) (emphasis added). Clearly, a protest does not necessitate a detailed inventory of every assertion or argument a party might raise as a result of an application, and subsequent discovery and/or testimony. It only serves to notify the Commission and the parties an objection to the filing exists and describe the nature of the objection.

Indeed, Monroe's Protest advances facts and legal arguments that extend beyond the expected content to be included in a protest submitted to the Commission. Therefore, in order to address and clarify the factual allegations and assertions contained in Monroe's Protest, as well as preserve the record with respect to facts surrounding Laurel's Application, Laurel represents the following:

**A. Background**

1–15. As paragraph numbers 1 through 15 of Monroe’s Protest merely restate the procedural history of the case, no response is required.<sup>3</sup>

**B. Protest**

16. Through its Protest, Monroe seeks to prevent consumers in Western and Central Pennsylvania from receiving lower priced petroleum products from Midwestern refineries to protect the Eastern refineries market share and to limit competition. Laurel, however, has demonstrated in its Application and Direct Testimony the Western and Central Pennsylvania consumers will benefit from its proposal, which will provide them with increased access to generally lower-priced Midwestern petroleum products. Therefore, Laurel’s proposal is in the public interest and should be approved.

17. To the extent that Monroe adopts and incorporates the Affidavit of Daniel S. Arthur that was attached to the protest of Gulf Operating, LLC (“Affidavit”) as a part of its protest, Laurel similarly adopts and incorporates the responses to the Affidavit contained in its Answer to the Protest of Gulf Operating, LLC, filed in the above-captioned docket on February 21, 2017. As discussed therein, and below, Mr. Arthur’s analysis is based on inconsistent and flawed assumptions, and should be rejected

**i. Laurel’s Application Should Be Granted**

**a. Laurel’s Proposal Does Not Qualify as an Abandonment under the Public Utility Code or the Commission’s Regulations**

18. Laurel’s proposal does not constitute an abandonment of service. Monroe’s attempts to misconstrue the plain language of Laurel’s Certificate of Public Convenience and the

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<sup>3</sup> Laurel notes that the first sentence of paragraph 3 of Monroe’s Protest states that the Application will “dramatically modify” Laurel’s pipeline transportation service.” 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.

Pennsylvania Public Utility Code (“Code”) are unavailing and should be denied. For the reasons explained in the Application, as well as those below, Laurel’s application does not qualify as an abandonment for which Commission approval is required.

19. As paragraph 19 of Monroe’s Protest merely contains recitations of provisions of the Code, no response is required.

20. Monroe is correct that Laurel does not dispute its status as a Pennsylvania public utility. Laurel’s predecessor in interest applied for and received a Certificate of Public Convenience for the service it now offers in 1957. *See In re Application of Laurel Pipeline Company*, Docket No. 84093, Folder 2 (Report and Order entered March 18, 1957). However, Monroe is incorrect that the proposal contemplated by the Application constitutes an abandonment under the Code.

21. As Laurel explained in its Application, all existing origin points will continue to accept shipments and deliveries will continue at all existing delivery points on the Laurel pipeline system. *See Application*, at pp. 10-11. Moreover, despite Monroe’s claims, Laurel’s Certificate of Public Convenience broadly authorizes Laurel to provide petroleum and petroleum products transportation service in and across the Commonwealth of Pennsylvania. Monroe’s interpretation of Laurel’s Certificate of Public Convenience misconstrues the plain language of certificate. The only directional description contained in the certificate explicitly references the location of Laurel’s facilities; it does not describe or otherwise limit the direction of service to be provided over those facilities.

22. This paragraph makes a legal argument based on Monroe’s interpretation of the Public Utility Code, and Laurel disagrees with this legal claim. Every terminal receiving refined petroleum products deliveries via pipeline from Laurel will continue to receive refined petroleum

products delivered via pipeline, and indeed by the same pipeline facilities used to make the deliveries today. Laurel contends that this is not abandonment of service under the Public Utilities Code.

23. Laurel denies Monroe's allegation that Laurel's Certificate of Public Convenience mandates that transportation be provided in a particular direction. The plain language of Laurel's Certificate of Public Convenience demonstrates that the directional references contained therein, merely describe the location of Laurel's facilities and not the direction of service to be provided over those facilities. Indeed, the phrase "extending generally westwardly from a point near the City of Philadelphia to a point in the vicinity of the City of Pittsburgh, thence in a northwestwardly direction to the Pennsylvania boundary line" directly follows and modifies "such facilities." See *In re Application of Laurel Pipeline Company*, Docket No. 84093, Folder 2 (Report and Order entered March 18, 1957). Conspicuously absent from this language is the term "service." Monroe's attempt to present an alternate reading of Laurel's Certificate of Public Convenience lacks an adequate legal or grammatical basis.

24. Monroe's suggestion that Laurel is required to seek Commission approval to change the direction of flow over the western portion of its pipeline system lacks merit. Laurel sought and received the broad authority to transport petroleum products in and across the Commonwealth of Pennsylvania, which authorized Laurel to provide service from both east-to-west and west-to-east. Laurel's proposal is consistent with that authorization and, therefore, does not require Commission approval.

**b. Even if Laurel's Proposal Were to be Considered an Abandonment, Laurel Has Satisfied the Commission's Standard for Approval**

25. Section 1102(a)(2) of the Public Utility Code, 66 Pa. C.S. § 1102(a)(2), requires a public utility to obtain a certificate of public convenience from the Commission "...to abandon

or surrender, in whole or in part, any service...” 66 Pa. C.S. § 1102(a)(2). The Commission “shall grant” a certificate “only if the commission shall find or determine that the granting of such certificate is necessary or proper for the service, accommodation, convenience, or safety of the public.” 66 Pa. C.S. § 1103(a). However, “[o]ur Public Utility Law...does not define in detail the circumstances or conditions under which the Commission may permit abandonment by a carrier of a portion of its service.” *Commuters’ Committee v. Pa. Pub. Util. Comm’n*, 88 A.2d 420, 424 (Pa. Super. 1982).

As stated in the Application, the Commission typically considers several factors when evaluating a public utility’s request to abandon service, including: (a) the use of the service by the public; (b) the prospect of future use by the public; (c) the loss to the utility balanced with the convenience and hardship to the public upon discontinuance of such service; and (d) the availability and adequacy of alternative service. *See Borough of Duncannon v. Pa. Pub. Util. Comm’n*, 713 A.2d 737, 740 (Pa. Commw. 1998) (discussing what are commonly referred to as the “West Penn factors.”). The Commission “must weigh these factors and not focus on mere cost-benefit criteria.” *Borough of Duncannon*, 713 A.2d at 740 (emphasis added).

However, the primary consideration by the Commission is whether the proposed abandonment is in the public interest. *See* 66 Pa. C.S. § 1103(a). Indeed, the “West Penn factors” are non-exclusive and merely “among the factors to be considered in determining the existence or nonexistence of public convenience and necessity in abandonment of service.” *See Commuters’ Committee*, 88 A.2d at 424 (emphasis added) (recognizing non-exclusivity of the aforementioned factors, and applying additional factors in its analysis).



**(I) An Inability to Earn Adequate Revenue is Only One of Many Factors The Commission May Consider**

26. As explained in paragraph 25, above, this factor is one of the non-exclusive factors to be considered in determining the existence or nonexistence of public convenience. Therefore, to the extent that Laurel has not demonstrated an inability to earn adequate revenue from its jurisdictional operations, this factor must simply be weighed against the significant public benefits that would accrue to Western and Central Pennsylvania consumers and the minimal costs to Pittsburgh and Philadelphia associated with the proposed change in direction of service that are demonstrated in Laurel's Application. *See Borough of Duncannon*, 713 A.2d at 740; *see also Commuters' Committee*, 88 A.2d at 424.

**(II) Insufficient Demand is Only One of Many Factors The Commission May Consider.**

27. As explained in paragraph 25, above, this factor is also one of the non-exclusive factors to be considered in determining the existence or nonexistence of public convenience. Therefore, to the extent that Laurel has not demonstrated insufficient demand for its jurisdictional pipeline service, this factor must simply be weighed against the significant public benefits that would accrue to Western and Central Pennsylvania consumers and the minimal costs to Pittsburgh and Philadelphia associated with the proposed change in direction of service that are demonstrated in Laurel's Application. *See Borough of Duncannon*, 713 A.2d at 740; *see also Commuters' Committee*, 88 A.2d at 424.

In further answer, deliveries to Pittsburgh on the Laurel pipeline have declined in recent years and continue to decline, despite Monroe's assertion that Laurel's system remains in adequate demand. *See Laurel St. No. 1*, at p. 15. The Affidavit ignores these trends on the Laurel system, as well as broader demand trends that will likely lead the utilization of Laurel's system to continue to decline, without the proposed reversal. *See Laurel St. No. 5*, at pp. 17-20.

**(III) Laurel Has Experienced Declines in Usage Due to Increased Amounts of Product Moving into Pittsburgh from the West and Declining Shipments from the East; Laurel's Proposal Addresses This Decline and Benefits Pennsylvania Consumers.**

28. As explained in paragraph 25, above, this factor is also one of the non-exclusive factors to be considered in determining the existence or nonexistence of public convenience. *See Borough of Duncannon*, 713 A.2d at 740; *see also Commuters' Committee*, 88 A.2d at 424. However, upon proper evaluation, it is clear that the benefits associated with Laurel's proposal are significant and the impacts asserted by Monroe are minimal.

29. Recent trends demonstrate that demand for westbound transportation over Laurel's system has been decreasing and will continue to decrease in the future. Laurel's proposal would proactively help insulate the Western and Central Pennsylvania consumers from the negative effects of these trends, including increased prices for petroleum products and decreasing supply reliability.

30. Laurel denies the averments in this paragraph. Even a preliminary review of Monroe's Protest and the supporting Affidavit of Mr. Arthur demonstrates that Monroe's contentions about the allegedly harmful impacts of Laurel's proposal on current shippers, Pittsburgh-area consumers, and the general public are inaccurate and lacking rational support, and that the specific claims of harm are either unproven or are overstated. Laurel's proposal would in fact: diminish the negative effects of pipeline constraints (*e.g.*, Colonial pipeline) on Central and Western Pennsylvania, thereby improving pricing and supply reliability; avoid the environmental harm and waste associated with new pipeline construction; and have no effect on access to low-Reid Vapor Pressure ("RVP") gasoline supplies for the Pittsburgh area. Additionally, Monroe's assertion that alternatives, *i.e.* trucking, will harm Pennsylvania's infrastructure and the environment is unfounded.

31. Moreover, to the extent that the Philadelphia-area refinery and petroleum products distribution industries assert that they will be adversely impacted by Laurel's proposal—these adverse impacts are attributable to the less competitive nature of East Coast petroleum products sources, and ultimately the less competitive nature of the East Coast refineries relative to refineries in the Midwest and U.S. Gulf Coast. The purpose of the Public Utility Code is not to prevent Laurel from taking steps to benefit Western and Central Pennsylvania consumers, simply because such steps might have an impact, however small, on economically less viable refineries.

32. Monroe also relies on Mr. Arthur's flawed and internally inconsistent analysis of the alternatives available to Pittsburgh-area market participants to receive petroleum products to incorrectly project that Laurel's proposal will negatively affect Pittsburgh shippers, refiners and consumers. Mr. Arthur and Monroe project that the reversal could "increase delivery costs to Pittsburgh consumers by \$68 million annually. *See* Monroe Protest, at ¶ 32; Arthur Affidavit, at ¶ 20. And Monroe and Mr. Arthur project that the proposed reversal "will reduce annual revenues for Philadelphia refiners by at least \$10 million." *See* Monroe Protest, at ¶ 31; Arthur Affidavit, at ¶ 32. Laurel believes that both the claims of consumer harm and the claims of harm to the refineries are incorrect, and that the evidence will show that consumers will benefit, that the refineries will not be significantly harmed, and that the benefit to consumers will greatly exceed any minor harm to the refineries.

Moreover, Monroe effectively concedes that an area benefits when it is supplied by multiple sources. Importantly, even with Laurel's proposed reversal, Pittsburgh remains supplied by a multitude of sources that possess ample capacity to supply the market in the event of a disruption or constraint on one, or more, of those sources. *See* Laurel St. No. 5, at pp. 22-25. However, Central Pennsylvania is not supplied in this manner. As explained in the Direct

Testimony of Michael J. Webb, price premiums resulting from constraints on the Colonial pipeline, which alone transports substantial amounts of petroleum products that supply Eastern and Central Pennsylvania, have negatively impacted Central Pennsylvania in the past. *See* Laurel St. No. 5, at p. 21. Ensuring that Midwest supplies can reach Central Pennsylvania would decrease the region's dependence on a pipeline that is subject to frequent constraints and disruptions. Therefore, from a reliability standpoint, Laurel's proposal will have minimal to non-existent impacts on Western Pennsylvania, and substantial positive impacts on Central Pennsylvania.

33. Like Gulf, Monroe also relies on a fatally flawed analysis by Mr. Arthur to conclude that the reversal will result in increased truck traffic between Altoona and Pittsburgh. First, Mr. Arthur's analysis does not consider whether, or to what extent, truck traffic into Western Pennsylvania would be offset by the reversal—*i.e.* Mr. Arthur ignores the question of whether current truck movements to Western Pennsylvania from Ohio, and current truck movements into the Altoona area and points east from Sunoco's Delmont, Pennsylvania terminus, could be ended by the reversal, with an accompanying reduction in overall truck movements. Moreover, Mr. Arthur's analysis assumes without proof that independent retailers or other market participants will continue to purchase East Coast products despite additional supplies of Midwestern sourced products becoming available at a generally lower-price. These claims are merely unsupported speculation.

To the extent that statistics regarding accidents or safety incidents involving vehicles are even relevant to this proceeding, these asserted impacts rest on the same flawed analysis forwarded by Mr. Arthur to support supposed environmental and infrastructure impacts due to increased truck traffic. In addition, these impacts are far too attenuated to be considered as

impacts associated with Laurel's reversal. Laurel does not own or operate trucks for purposes of transporting petroleum products, and to the extent that a shipper or recipient of products shipped on Laurel's system decides to avail themselves of this available alternative, such entities are responsible for the safe operation of those trucks.

34. Finally, as indicated in its Application and Direct Testimony, Laurel will complete the engineering work associated with its proposed flow reversal in compliance with the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration ("PHMSA") safety regulations, and by adopting PHMSA's Flow Reversal Guidance. Moreover, to the extent that any such pipeline safety concerns exist, Laurel will work with PHMSA to ensure that the proper protections are in place.

**(IV) Available Alternatives to Replace Shipped Volumes on Laurel's Pipeline are Reasonable and Sufficient.**

35. Laurel's Application and Direct Testimony demonstrate that numerous alternatives will be available for both Philadelphia-area and Pittsburgh-area market participants upon completion of the proposed change in direction of flow.

36-37. In paragraphs 36 through 37, Monroe, advances a methodologically inconsistent and flawed argument to project anticipated harm from Laurel's proposal for Philadelphia area refineries and/or Pittsburgh-area consumers. Monroe uses this analysis to conclude that no viable alternatives for Philadelphia-area refineries or Pittsburgh-area market participants exist. For the reasons more fully explained above, Monroe's assertions regarding the potential harm to Philadelphia refineries and Pittsburgh consumers relies upon a flawed analysis conducted by Mr. Arthur and should be denied. *See* paragraph 32 *supra*.

ii. **Laurel's Application Is Not a Request for a Change in Its Rates; and, is in the Public Interest**

a. **Laurel's Application Is Not a Request for a Change in Its Rates, Subject to 66 Pa. C.S. § 1308 and 52 Pa. Code § 53.52**

38. Paragraph 38 of Monroe's can be summarily addressed by a review of the cited portions of the Public Utility Code and Commission's regulations, and the *Sunoco Tariff Order*.<sup>4</sup> First, the referenced provision of the Public Utility Code, 66 Pa. C.S. § 1308, and the Commission's regulations at 52 Pa. Code § 53.52 only apply to tariff revisions that involve a utility proposing changes to its rates. See 66 Pa. C.S. § 1308 (applicable to "Voluntary changes in rates.") (emphasis added); 52 Pa. Code §§ 53.52-53.56 (describing the "Information Furnished With the Filing of Rate Changes") (emphasis added). Laurel has not proposed to change its rates as a part of its Application; therefore, these provisions of the Code and the Commission's regulations are inapplicable to the Application.

Monroe's reliance on the *Sunoco* order is similarly misplaced. In that proceeding, Sunoco Pipeline L.P. sought to establish rates for resumed service over a previously abandoned route on its pipeline. See *Sunoco*, at p. 3. In effect, Sunoco Pipeline L.P. sought to set rates for an otherwise non-existent service, as the applicable route had previously been abandoned and, as a result, no rates were in effect. Laurel has not proposed to set rates as a part of its Application. Therefore, Sunoco Pipeline L.P.'s proposal in the *Sunoco Tariff Order* is wholly distinguishable from Laurel's proposal in the instant Application.

Based on the foregoing, Laurel submits that Monroe's attempt to construe Laurel's Application in the above-captioned docket as a tariff revision subject to the provisions of the

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<sup>4</sup> *Sunoco Pipeline L.P. Request for Approval of Tariff Pipeline-Pa. P.U.C. No. 16 and Waiver of 52 Pa. Code § 53.52(b)(2) and (c)(1) through (5)*, Docket No. R-2014-2426158, at p. 3 (Order entered Aug. 12, 2014) (referred to as the "*Sunoco*" in PESRM's Protest and this Answer.

Public Utility Code and the Commission's regulations applicable to rate changes should be disregarded in its entirety.

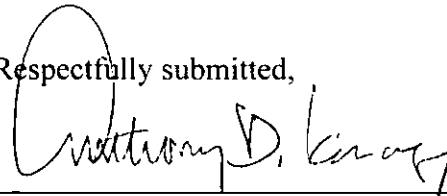
**b. Laurel's Application is in the Public Interest.**

39. Monroe's assertions regarding the benefits, effects and impacts associated with Laurel's Application are overstated, inconsistent, and based on flawed analyses. Laurel's proposal would repurpose the use of existing, underutilized pipeline infrastructure to provide Western and Central Pennsylvania consumers with increased access to generally lower-priced Midwestern petroleum products. In doing so, Laurel's proposal would result in minimal to nonexistent impacts on Pittsburgh-area and Philadelphia-area market participants that currently utilize Laurel's pipeline system because numerous alternatives are available to these entities. Based on the foregoing, as well as the representations in its Application and evidence in its Direct Testimony, Laurel has demonstrated that the proposal contemplated by the Application is in the public interest, and should be approved.

**III. CONCLUSION**

**WHEREFORE**, Laurel Pipe Line Company, L.P. respectfully requests that the Protest of Monroe Energy LLC be denied.

Respectfully submitted,



Christopher J. Barr, Esquire (DC ID #375372)  
Jessica R. Rogers, Esquire (PA ID #309842)  
Post & Schell, P.C.  
607 14th Street, N.W., Suite 600  
Washington, DC 20005-2000  
Phone: (202) 347-1000  
Fax: (202) 661-6970  
E-mail: cbarr@postschell.com  
E-mail: jrogers@postschell.com

David B. MacGregor, Esquire (PA ID #28804)  
Anthony D. Kanagy, Esquire (PA ID #85522)  
Garrett P. Lent, Esquire (PA ID #321566)  
Post & Schell, P.C.  
17 North Second Street, 12th Floor  
Harrisburg, PA 17101-1601  
Phone: (717) 731-1970  
Fax: (717) 731-1985  
E-mail: dmacgregor@postschell.com  
E-mail: akanagy@postschell.com  
E-mail: glent@postschell.com

Date: February 21, 2017

*Counsel for Laurel Pipe Line Company, L.P.*

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**VERIFICATION**

I, David Arnold, being Vice President, Domestic Pipelines for Buckeye Partners, L.P., hereby state that the information set forth above is true and correct to the best of my knowledge, information and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 21 February 2017



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David Arnold  
Vice President, Domestic Pipelines  
Buckeye Partners, L.P.

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## 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).

### VIA E-MAIL AND FIRST CLASS MAIL

John R. Evans  
Small Business Advocate  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101

Tanya J. McCloskey, Esquire  
Senior Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923

Adam D. Young, Esquire  
Michael L. Swindler, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

Robert A. Weishaar, Jr., Esquire  
McNees Wallace & Nurick LLC  
1200 G Street, NW  
Suite 800  
Washington, DC 20005  
*Counsel for Gulf Operating, LLC  
and Sheetz, Inc.*

Susan E. Bruce, Esquire  
Adeolu A. Bakare, Esquire  
Kenneth R. Stark, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
*Counsel for Gulf Operating, LLC  
and Sheetz, Inc.*

Alan M. Seltzer, Esquire  
John F. Povilaitis, Esquire  
Buchanan Ingersoll & Rooney, PC  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101-1357  
*Counsel for PESRM*

Karen O. Moury, Esquire  
Carl R. Shultz, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
*Counsel for Husky Marketing and  
Supply Company*

Jonathan D. Marcus, Esquire  
Daniel J. Stuart, Esquire  
Marcus & Shapira LLP  
One Oxford Centre, 35<sup>th</sup> Floor  
301 Grant Street  
Pittsburgh, PA 15219-6401  
*Counsel for Giant Eagle, Inc.*

Andrew S. Levine, Esquire  
Stradley, Ronon, Stevens & Young, LP  
2600 One Commerce Square  
Philadelphia, PA 19103  
*Counsel for Sunoco, LLC*

Kevin J. McKeon, Esquire  
Todd S. Stewart, Esquire  
Whitney E. Snyder, Esquire  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
*Counsel for Monroe Energy, LLC*

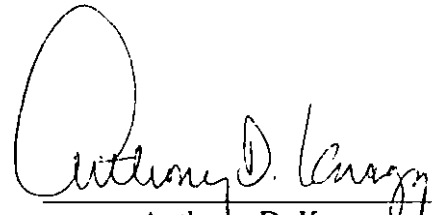
Christopher A. Ruggiero, Esquire  
Vice President, General Counsel &  
Secretary  
Monroe Energy, LLC  
4101 Post Road  
Trainer, PA 19061  
*Counsel for Monroe Energy, LLC*

Richard E. Powers, Jr., Esquire  
Joseph R. Hicks, Esquire  
Venable LLP  
575 7<sup>th</sup> Street, NW  
Washington, DC 20004  
*Counsel for Monroe Energy, LLC*

**VIA E-MAIL ONLY:**

Joseph Otis Minott, Esquire  
Ernest Logan Welde, Esquire  
Clean Air Council  
135 S. 19<sup>th</sup> Street, Suite 300  
Philadelphia, PA 19103  
*Counsel for Clean Air Council*

Date: February 21, 2017

  
\_\_\_\_\_  
Anthony D. Kanagy

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