



Kevin J. McKeon  
717 703-0801  
[kjmckeon@hmslegal.com](mailto:kjmckeon@hmslegal.com)

Todd S. Stewart  
717 703-0806  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Whitney E. Snyder  
717 703-0807  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

August 9, 2017

**VIA ELECTRONIC MAIL AND  
REGULAR MAIL**

Honorable Eranda Vero  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107

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

Affiliated Interest Agreement between Laurel Pipe Line Company, L.P. and Buckeye Pipe Line Company, L.P.; Docket No. G-2017-2587567

Dear Judge Vero:

On July 27, 2017 Laurel Pipeline Company, L.P. ("Laurel") served Monroe Energy, LLC ("Monroe") with a Notice of Deposition and Request for Production of Documents ("Notice"). In its Notice, Laurel describes eight separate areas of inquiry that it intends to pursue in the deposition, it also requested that Monroe produce all documents not already produced that are related to the subject matter of the eight areas of inquiry. Laurel also asked for a reduction in the amount of notice that would otherwise be required prior to the taking of a deposition.

On August 3, 2017 Monroe served objections to the Notice on Laurel and the parties to this proceeding, and filed a copy of the cover letter and certificate of service with the Commission's Secretary, but neglected to serve Your Honor.

By order dated August 8, 2017, Your Honor required the taking of Ms. Sadowski's deposition. Monroe does not object to that Order. Monroe and Laurel have since settled upon a date and time for the deposition. However, in its Objections, a copy of which is attached, Monroe did object to the 7-day turn-around for documents and objected to the scope of subpart (v) of the notice that would provide inquiry into "Monroe finances and economics", contending

Honorable Eranda Vero  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
August 9, 2017  
Page 2

that those terms are overbroad and vague and would not permit appropriate preparation by the witness. Monroe also objected on the basis that the notice did not address documents or areas of inquiry subject to privilege.

Monroe respectfully requests that Your Honor, consistent with your August 8, 2017 ruling regarding Philadelphia Energy Solutions Refining and Marketing LLC's objections, rule on Monroe's Objections with regard to the scope of the inquiry and the subject of privilege. The Commission's Regulations at 52 Pa. Code § 5.343(d) do allow parties seeking the deposition of another party to request the production of documents, subject to 52 Pa. Code § 5.349(d). Because Monroe's Objection with regard to the production of documents was appropriately served under that section, we do not believe a determination with regard to the request for production of documents is ripe. Thank you for your consideration of this matter.

Respectfully submitted,



---

Kevin J. McKeon (PA ID 30428)  
Todd S. Stewart (PA ID 75556)  
Whitney E. Snyder (PA ID 316625)  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
Phone: (717) 236-1300  
Fax: (717) 236-4841

Christopher A. Ruggiero (PA ID 80775)  
Vice President, General Counsel & Secretary  
Monroe Energy, LLC  
4101 Post Road  
Trainer, PA 19061  
Phone: (610) 364-8409  
Fax: (610) 364-8404

Richard E. Powers, Jr.  
Venable LLP  
575 7th Street, NW  
Washington, D.C. 20004  
repowers@Venable.com  
(Pro Hac Vice Admission Application Pending)  
*Attorneys for Monroe Energy, LLC*

Dated: August 9, 2017

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in the manner indicated below, and in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

### VIA ELECTRONIC MAIL

David B. MacGregor, Esquire  
Anthony D. Kanagy, Esquire  
Garrett P. Lent, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)  
*Counsel for Laurel Pipe Line Company, L.P.*

Christopher J. Barr, Esquire  
Jessica R. Rogers, Esquire  
Post & Schell, P.C.  
607 14<sup>th</sup> Street, N.W., Suite 600  
Washington, DC 20005-2000  
[cbarr@postschell.com](mailto:cbarr@postschell.com)  
[jrogers@postschell.com](mailto:jrogers@postschell.com)  
*Counsel for Laurel Pipe Line Company, L.P.*

John R. Evans  
Small Business Advocate  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101  
[jorevan@pa.gov](mailto:jorevan@pa.gov)

Andrew S. Levine, Esquire  
Stradley, Ronon, Stevens & Young, LP  
2600 One Commerce Square  
Philadelphia, PA 19103  
[alevine@stradley.com](mailto:alevine@stradley.com)  
*Counsel for Sunoco, LLC*

Alan M. Seltzer, Esquire  
John F. Povilaitis, Esquire  
Buchanan Ingersoll & Rooney, PC  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101-1357  
[Alan.Seltzer@BIPC.com](mailto:Alan.Seltzer@BIPC.com)  
[John.Povilaitis@BIPC.com](mailto:John.Povilaitis@BIPC.com)  
*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  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
[cshultz@eckertseamans.com](mailto:cshultz@eckertseamans.com)  
*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  
[jmarcus@marcus-shapira.com](mailto:jmarcus@marcus-shapira.com)  
[stuart@marcus-shapira.com](mailto:stuart@marcus-shapira.com)  
*Counsel for Giant Eagle, Inc.*

Heidi, Wushinske Esquire  
Michael L. Swindler, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265  
[hwushinske@pa.gov](mailto:hwushinske@pa.gov)  
[mwindler@pa.gov](mailto:mwindler@pa.gov)

Robert A. Weishaar, Jr., Esquire  
McNees Wallace & Nurick, LLC  
1200 G Street, NW  
Suite 800  
Washington, DC 20005  
[rweishaar@mcneeslaw.com](mailto:rweishaar@mcneeslaw.com)  
*Counsel for Gulf Operating, LLC and Sheetz, Inc.*

Kevin L. Barley  
Frost Brown Todd LLC  
1 PPG Place, Suite 2800  
Pittsburgh, PA 15222  
[kbarley@fbtlaw.com](mailto:kbarley@fbtlaw.com)  
*Counsel for Marathon Petroleum Corp.*

Susan E. Bruce, Esquire  
Adeolu A. Bakare, Esquire  
Kenneth R. Stark, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108-1166  
[sbruce@mcneeslaw.com](mailto:sbruce@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[kstark@mcneeslaw.com](mailto:kstark@mcneeslaw.com)  
*Counsel for Gulf Operating, LLC and Sheetz, Inc.*

**EMAIL ONLY**

Joseph Otis Minott, Esquire  
Ernest Logan Welde, Esquire  
Clean Air Council  
135 S. 19<sup>th</sup> Street, Suite 300  
Philadelphia, PA 19103  
[joe\\_minott@cleanair.org](mailto:joe_minott@cleanair.org)  
[lwelde@cleanair.org](mailto:lwelde@cleanair.org)  
*Counsel for Clean Air Council*



---

Todd S. Stewart

Dated: August 9, 2017