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August 15, 2017

VIA ELECTRONIC FILING

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

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

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Answer of the Indicated Parties (Gulf Operating, LLC, Philadelphia Energy Solutions Refining & Marketing, LLC, Sheetz, Inc., Monroe Energy, LLC, and Giant Eagle, Inc.) to the Motion to Compel Answers to Interrogatories and Requests for Production of Documents Propounded by Laurel Pipe Line Company, L.P., Set II in the above-captioned proceedings. Copies will be served in accordance with the attached Certificate of Service.

Respectfully submitted,



Daniel J. Stuart
Counsel for Giant Eagle, Inc.
Sent on behalf of the Indicated Parties

DJS/glo
Enclosure

cc: Certificate of Service

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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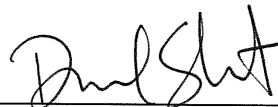
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on behalf of the Indicated Parties*

Dated this 15th day of August, 2017, in Pittsburgh, Pennsylvania.

**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	:	
	:	
Laurel Pipe Line Company, L.P. - Pipeline	:	
Capacity Agreement with Buckeye Pipe Line	:	Docket No. G-2017-2587567
Company, L.P.	:	

**ANSWER OF THE INDICATED PARTIES
TO THE MOTION TO COMPEL ANSWERS TO INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED BY LAUREL PIPE LINE COMPANY, L.P., SET II**

TO ADMINISTRATIVE LAW JUDGE ERANDA VERO:

Pursuant to 52 Pa. Code § 5.342, the Indicated Parties¹ hereby file their Answer to the Motion to Compel Answers to Interrogatories and Requests for Production of Documents Propounded by Laurel Pipe Line Company, L.P. on the Indicated Parties, Set II (“Set II Discovery”) filed by Laurel Pipe Line Company, L.P. (“Laurel”) (“Motion” or “Motion to Compel”). Laurel’s Motion to Compel a Response to Set II Discovery Request Number 23 should be denied.

¹ The Indicated Parties include Gulf Operating, LLC, Philadelphia Energy Solutions Refining & Marketing, LLC, Sheetz, Inc., Monroe Energy, LLC, and Giant Eagle, Inc.

I. BACKGROUND AND ANSWER

1. On July 14, 2017, the Indicted Parties served Indicated Parties Statement Number 4, the Direct Testimony of Steven W. Rickard.

2. On July 21, 2017, Laurel served Set II Discovery Requests on the Indicated Parties directed at Mr. Rickard's testimony.

3. The Indicated Parties objected to Laurel's Set II Discovery on July 31, 2017 ("Objections"). A copy of the Indicated Parties' Objections is attached as Appendix B to Laurel's Motion to Compel.

4. The Indicated Parties objected to Request Number 23.

5. However, in their responses, the Indicated Parties responded to Request Number 23, which is the only request at issue in Laurel's Motion. A copy of the Indicted Parties' response to Request Number 23 is attached hereto as Exhibit 1.

6. The Indicated Parties, therefore, believe that Laurel's Motion to Compel is moot and should be denied as such.

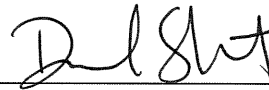
7. On August 15, 2017, counsel for the Indicated Parties contacted counsel for Laurel to seek Laurel's agreement that the Motion to Compel was moot. As of the deadline for this filing, the parties were unable to agree that the present Motion is moot.

8. As the attached response to Number 23 demonstrates, the Indicated Parties have responded to Request Number 23. As such, the Indicated Parties respectfully request that the Administrative Law Judge deny the Motion to Compel as moot.

II. CONCLUSION

WHEREFORE, for the foregoing reasons, the Indicated Parties respectfully request that Administrative Law Judge Eranda Vero deny Laurel's Motion to Compel the Indicated Parties to respond to Set II Discovery Request Number 23 as moot.

Respectfully submitted,



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*Counsel for Giant Eagle, Inc., and
signing on behalf of the Indicated Parties*

Dated: August 15, 2017

EXHIBIT 1

Indicated Parties
Responses to Interrogatories and
Requests for Production of Documents
of Laurel Pipe Line Company, L.P. – Set II
Respondent: Steven W. Rickard
Dated: August 10, 2017
Docket Nos. A-2016-2575829, G-2017-2587567

- LAU-IP-II-23** Please reference Mr. Rickard's statement on page 15, lines 15-19 of Indicated Parties Statement No. 4.
- (a) Please identify the number of unnecessary vehicles that a tanker truck taking the referenced Interstate 99 to Interstate 81 via US 30 route from Altoona to Harrisburg would be exposed to by traveling through Chambersburg, PA.
 - (b) Please identify the number of unnecessary impediments that a tanker truck taking the referenced Interstate 99 to Interstate 81 via US 30 route from Altoona to Harrisburg would be exposed to by traveling through Chambersburg, PA

Response to LAU-IP-II-23

- (a) In his testimony, Mr. Rickard did not use the term "unnecessary vehicles." He simply intended for his testimony to convey that having the tanker trucks travel through the middle of Chambersburg would put them in a location where they would be on the road with and in closer proximity to more moving vehicles than if they had taken a route that did not require travel directly through the middle of towns.
- (b) In his testimony, Mr. Rickard did not use the term "unnecessary impediments." He simply intended for his testimony to convey that having the tanker trucks travel through the middle of Chambersburg would put them in a location where they would be likely be exposed to more impediments (such as disabled vehicles, vehicles parked along the roadway, etc.) than they would have been had they taken a route that did not require them to travel directly through the middle of towns.