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File #: 162860

September 15, 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

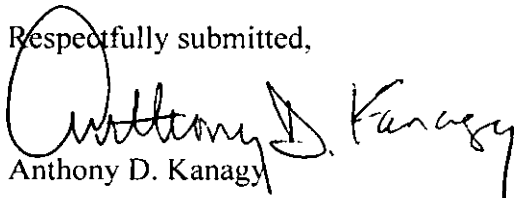
**Re: Application of Laurel Pipe Line Company, L.P. for All Necessary Authority, Approvals, and Certificates of Public Convenience To Change the Direction of Petroleum Products Transportation Service to Delivery Points West of Eldorado, Pennsylvania - Docket No. A-2016-2575829**

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

Dear Secretary Chiavetta:

Enclosed please find a Public Version and a **Highly Confidential** Version of the Motion to Compel Answers to Highly Confidential Interrogatories and Requests for Production of Documents Propounded by Laurel Pipe Line Company, L.P. on Monroe Energy, LLC – Set III, for filing in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

  
Anthony D. Kanagy

ADK/jl  
Enclosure

cc: Certificate of Service  
Honorable Eranda Vero

ALLENTOWN HARRISBURG LANCASTER PHILADELPHIA PITTSBURGH PRINCETON WASHINGTON, D.C.

A PENNSYLVANIA PROFESSIONAL CORPORATION

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BEFORE THE  
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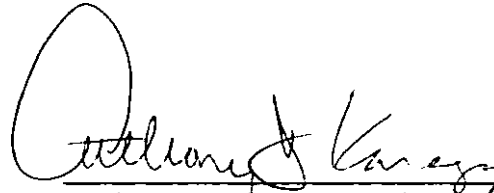
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Application of Laurel Pipe Line Company, :  
 L.P. for All Necessary Authority, Approvals, :  
 and Certificates of Public Convenience To : Docket No. A-2016-2575829  
 Change the Direction of Petroleum Products :  
 Transportation Service to Delivery 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. :

**NOTICE TO PLEAD**

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.



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Date: September, 15, 2017

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

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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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.	:	

**MOTION TO COMPEL ANSWERS TO HIGHLY CONFIDENTIAL  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
PROPOUNDED BY LAUREL PIPE LINE COMPANY, L.P.  
ON MONROE ENERGY, LLC – SET III**

**TO ADMINISTRATIVE LAW JUDGE ERANDA VERO:**

Laurel Pipe Line Company, L.P. ("Laurel" or the "Company") hereby files, pursuant to 52 Pa. Code § 5.342, this Motion to Compel Answers to its HIGHLY CONFIDENTIAL Third Set of Interrogatories and Requests for Production of Documents ("Set III Discovery") directed to Monroe Energy, LLC ("Monroe"). The Motion to Compel requests that Administrative Law Judge Eranda Vero (the "ALJ") direct Monroe to provide full and complete responses to Instruction and Definition No. 1 and Request No. 2 of the HIGHLY CONFIDENTIAL Set III Discovery as is required by 52 Pa. Code § 5.342(a)(4). In support of this Motion, Laurel states as follows:

**I. INTRODUCTION**

1. On November 14, 2016, Laurel filed the above-captioned Application with the Pennsylvania Public Utility Commission ("Commission") at Docket No. A-2016-2575829. The Application sought all necessary, authority, approvals and Certificates of Public Convenience, to the extent required, authorizing Laurel to change the direction of its petroleum products

**PUBLIC VERSION - HIGHLY CONFIDENTIAL MATERIALS REDACTED**

transportation service over a portion of its system west of Eldorado, Pennsylvania, and confirming that Laurel may, in its discretion, reinstate the current direction of service in the future without further Commission approval.

2. On July 14, 2017, Monroe served Monroe Statement No. 1, the Direct Testimony of Tracy Sadowski.

3. On July 27, 2017, Laurel served a Notice of Deposition on Monroe, and provided notice of its intent to depose Ms. Sadowski on subjects related to Monroe's participation in this proceeding, the issues raised in her direct testimony, and matters discussed in Monroe's responses to interrogatories. On August 17, 2017, Tracy Sadowski was deposed.

4. On August 25, Laurel served HIGHLY CONFIDENTIAL Set III Discovery on Monroe. A copy of Laurel Set III Discovery to Monroe is provided as Appendix A hereto.

5. Monroe objected to Set III Discovery on September 5, 2017. Monroe objected to Instruction and Definition No. 1, and Request Nos. 2, 3, 4, 7 and 8(c). A copy of Monroe's Objections is provided as Appendix B hereto.

6. Counsel for Laurel and Monroe discussed the objections by voice message on September 12, 2017. Counsel for Laurel and Monroe further discussed the objections by telephone on September 13, 2017. Monroe agreed to provide unredacted versions of the documents requested in Request Nos. 3 and 4. Monroe also agreed to answer Request Nos. 7 and 8(c), provided that it has until Friday, September 22, 2017 to do so. As such, Laurel is not seeking to compel responses to Request Nos. 3, 4, 7 and 8(c) at this time.

7. Laurel hereby files its Motion to Compel Monroe to respond to HIGHLY CONFIDENTIAL Set III, Instruction and Definition No. 1 and Request No. 2.

II. ARGUMENT

A. MONROE'S OBJECTION TO INSTRUCTION AND DEFINITION NO. 1 SHOULD BE DENIED.

8. Laurel Set III, Instruction and Definition No. 1 states as follows:

1. The "Responding Party," "you," or "your" means the party to which these discovery requests are propounded and/or all attorneys, agents, affiliates, subsidiaries, employees, consultants, members, constituents, and representatives acting on behalf of the Responding Party.

9. Monroe objects to Instruction and Definition No. 1 to the extent that it seeks information in the possession of an affiliate that is not a party to this proceeding. It argues that this instruction violates Section 5.341(a) and/or Section 5.321(c) of the Commission's regulations.

10. Monroe's objection should be denied. While Section 5.341(a) and Section 5.321(c) of the Commission's regulations, 52 Pa. Code §§ 5.341(a) and 5.321(c), may limit discovery to discovery to a "party," Monroe concedes that a "representative acting on behalf of the Responding Party is subject to discovery" under these regulations. *See* Objections, p. 2.

11. [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL INFORMATION]

12. Furthermore, in her direct testimony, Ms. Sadowski stated that "Monroe Energy likely could no longer sell products into this [the Pittsburgh] market if the proposed reversal were approved." Monroe Stmt. No. 1, p. 8. [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL INFORMATION]

14. For the reasons more fully explained above, Monroe should be compelled to provide a full and complete response to the HIGHLY CONFIDENTIAL Set III discovery, in accordance with Instruction and Definition No. 1.

**B. MONROE SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE WITH RESPECT TO REQUEST NO. 2 OF THE SET III DISCOVERY.**

15. Laurel – Set III, Request No. 2 provides as follows:

[BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[REDACTED]

[END HIGHLY CONFIDENTIAL INFORMATION]

16. Monroe objects to Request No. 2 of the Set III discovery on the same grounds that it objects to Instruction and Definition No. 1.

17. Regarding Monroe's objection to Request No. 2, Laurel adopts and incorporates its arguments with respect to Instruction and Definition No. 1 of the Set III discovery, in paragraphs 8-14 *supra*, as if they were fully stated herein. [BEGIN HIGHLY

CONFIDENTIAL INFORMATION] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL INFORMATION] Therefore, this objection should be denied and a full and complete response should be compelled.

III. CONCLUSION

WHEREFORE, for the foregoing reasons, Laurel Pipe Line Company, L.P. respectfully requests that Administrative Law Judge Eranda Vero grant this Motion to Compel and order Monroe Energy, LLC to provide full and complete responses to Instruction and Definition No. 1 and Request No. 2 of the HIGHLY CONFIDENTIAL Set III Discovery.

Respectfully submitted,

*Anthony D. Kanagy*

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Date: September 15, 2017

Counsel for Laurel Pipe Line Company

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# Appendix A

(CONTAINS HIGHLY  
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# Appendix B

(CONTAINS HIGHLY  
CONFIDENTIAL MATERIALS)

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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).

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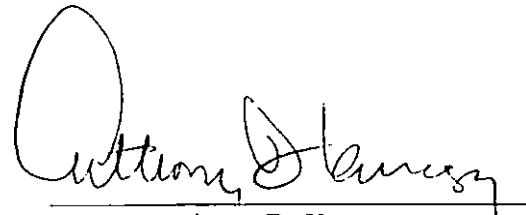
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Date: September 15, 2017



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