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September 20, 2017

VIA HAND DELIVERY

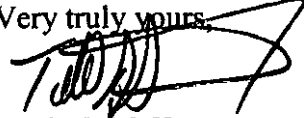
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, Filing Room
400 North Street
Harrisburg, PA 17101

RE: Application of Laurel Pipe Line Company, L.P.; Docket No. A-2016-2575829;
**HIGHLY CONFIDENTIAL ANSWER OF MONROE ENERGY, LLC TO
LAUREL PIPE LINE COMPANY, L.P.'S HIGHLY CONFIDENTIAL
MOTION TO COMPEL RESPONSE TO ITS INTERROGATORY AND
REQUEST FOR PRODUCTION OF DOCUMENTS, SET III, NO. 2**

Dear Secretary Chiavetta:

Please find enclosed for filing with the Commission a Public Version and a **Highly Confidential** Version of the Answer of Monroe Energy, LLC to Laurel Pipe Line Company, L.P.'s Highly Confidential Motion to Compel Response to Interrogatory and Request for Production of Documents, Set III, No. 2 in the above-referenced matter. Copies of the Answer have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please contact our office.

Very truly yours,


Kevin J. McKeon
Todd S. Stewart
Whitney E. Snyder
Counsel for Monroe Energy, LLC

TSS/jld
Enclosure

cc: Administrative Law Judge Eranda Vero (via email and first class mail)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Laurel Pipe Line Company, L.P. :
for Approval to Change Direction of Petroleum : Docket No. A-2016-2575829
Products Transportation Service to Delivery :
Points West of Eldorado, Pennsylvania :

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

**HIGHLY CONFIDENTIAL ANSWER OF MONROE ENERGY, LL
TO LAUREL PIPE LINE COMPANY, L.P.'S
HIGHLY CONFIDENTIAL MOTION TO COMPEL
RESPONSE TO ITS INTERROGATORY AND REQUEST
FOR PRODUCTION OF DOCUMENTS, SET III, NO. 2**

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TO: ADMINISTRATIVE LAW JUDGE ERANDA VERO

Monroe Energy, LLC, ("Monroe"), by and through its counsel in this proceeding, Hawke McKeon & Sniscak LLP, hereby answers Laurel Pipeline Company, L.P.'s ("Laurel") Motion to Compel Answers to its Highly Confidential Third Set of Interrogatories and Requests for Production of Documents, filed September 15, 2017, in the above-captioned matter. In its Motion, Laurel seeks to compel Monroe's parent, Delta Inc. ("Delta"), which is not a party to this proceeding, to provide responses to interrogatories that Laurel propounded on Monroe. For the reasons stated below, the Motion is specious, in contradiction to the Commission's regulations, and should be denied.

I. INTRODUCTION

1. On November 14, 2016, Laurel filed the above-captioned Application seeking authority from the Pennsylvania Public Utility Commission ("Commission") to reverse the flow

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on the Laurel pipe line west of Eldorado, Pennsylvania. Monroe intervened in the above-captioned proceeding and contends that the reversal is an abandonment of service to Monroe, and requires Commission approval.

2. On August 25, 2017, Laurel served Highly Confidential Set III, discovery on Monroe. Monroe objected to the Instructions and Definition of No. 1. It requests Nos. 2, 3, 4, 7 and 8C.

3. Pursuant to a discussion between counsel, the Objections with regard to Nos. 3, 4, 7 and 8C have been resolved. Monroe continues to object to the Instruction and Definition of No. 1 and Request No. 2.

II. SUMMARY of the ARGUMENT

4. In its Motion, Laurel makes a number of false contentions that form the premise for its argument that Delta, Monroe's corporate parent, can and should be compelled to provide answers to interrogatories, when Delta is not a party to this proceeding. The simple response is that the Commission's regulations do not allow Laurel to seek discovery of non-parties via interrogatories or requests for production of documents. That is the purpose of a subpoena. Moreover, Monroe objected to "Instruction and Definition No. 1" and even if it had not, mere Instructions and Definitions cannot subvert the Commission's regulations concerning non-parties. [BEGIN HIGHLY CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL] Laurel's

argument misstates the facts and is wrong.

III. ARGUMENT

5. Laurel's Request No. 2 plainly seeks documents "in the possession of Delta." The Commission's regulations are clear that discovery can only be directed, absent a subpoena, to parties to the specific proceeding, 52 Pa. Code §§ 5.341(a) and 5.321(c).

6. Nonetheless, Laurel contends Monroe did not object to Definition and Instruction No. 1, which defined "you" to include both affiliates and representatives acting on behalf of the party. Laurel states that Monroe's Objection to Instruction and Definition No. 1 is limited to "the extent that it seeks information in the possession of affiliates or subsidiaries," and therefore that Monroe has waived any objection to the latter part of the instruction that includes "representatives acting on behalf of the party." This entire premise is provably false. One simply needs to read the entire objection to see that Monroe objected to the entire definition: "Accordingly, any suggestion by Definitions and Instructions No. 1 that any affiliate or subsidiary or any person not an attorney, agent, employee, consultant, member, constituent, or representative acting on behalf of the Responding Party is subject to discovery violates the express language of the Commission's Regulations." (Monroe Objections, p.2, Attached to Laurel's Motion as Appendix B) (emphasis added). Accordingly, it is plain that Monroe properly objected, has conceded nothing, and Laurel's attempt to weave into its instructions a provision that plainly violates the Commission's regulations at 52 Pa. Code §§ 5.341(a) and 5.321(c), should not be considered. Laurel cites no authority that would permit its instruction to overcome the limitation that discovery be had only from a party, because there is none. Accordingly, its Motion must be denied.

7. As to Laurel's argument that Delta should somehow be considered a party in this proceeding, it is clear that Delta and Monroe are separate corporate entities. Laurel does not

contend otherwise, but rather contends [BEGIN HIGHLY CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (see the HIGHLY CONFIDENTIAL Agreement attached hereto as Appendix A at 12, Section 8.11). [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL]

¹ Laurel's Motion contains multiple references to the transcript of the deposition of Tracy Sadowski, and several extended quotes from the same. This is an inappropriate use of a deposition, 52 Pa. Code § 5.364, in that through its use in the Motion, Laurel seeks to make Ms. Sadowski its witness, which is plainly prohibited. Out of an abundance of caution, and because answering the Motion without responding to the document as it exists would be perilous at best, Monroe wishes to make clear that through its response to such arguments in this Answer it does not waive its right to challenge any inappropriate use of a deposition at any time.

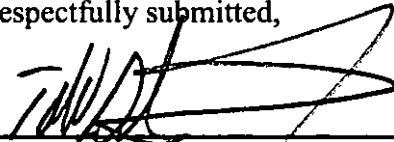
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9. Laurel goes on to suggest that it is entitled to relevant information to evaluate statements made in a deposition. If that is the case, then Laurel has the option of seeking a subpoena, not improperly trying to subvert the Commission's regulations via its Motion to compel.

WHEREFORE, for the reasons stated above and in its Objection, Monroe Energy LLC respectfully submits that Laurel's Motion to Compel is wholly lacking in merit and should be denied.

DATED: September 20, 2017

Respectfully submitted,



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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).

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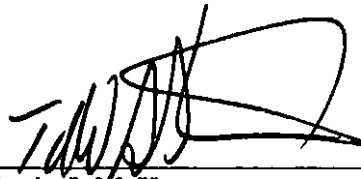
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