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## VIA ELECTRONIC FILING

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; MONROE ENERGY LLC'S MOTION FOR EXTENSION OF TIME TO COMPLY WITH ORDER COMPELLING RESPONSE TO LAUREL PIPE LINE COMPANY, L.P.'S SET III DISCOVERY

## Dear Secretary Chiavetta:

Please find enclosed for filing with the Commission Monroe Energy, LLC's Motion for Extension of Time to Comply with Order Compelling Response to Laurel Pipe Line Company, L.P.'s Set III Discovery in the above-referenced matter. Copies of the Motion 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 do not hesitate to contact me.

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

Per Certificate of Service

#### **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 EMAIL AND FIRST CLASS MAIL

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Dated: October 18, 2017

Kevin J. McKeon Todd S. Stewart Whitney E. Snyder

# 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

Docket No. A-2010-23/3629

Affiliated Interest Agreement between

Laurel Pipe Line Company, L.P. and

Docket No. G-2017-2587567

Buckeye Pipe Line Company, L.P.

MONROE ENERGY LLC'S MOTION
FOR EXTENSION OF TIME
TO COMPLY WITH ORDER COMPELLING RESPONSE
TO LAUREL SET III DISCOVERY

#### TO: ADMINISTRATIVE LAW JUDGE ERANDA VERO

Pursuant to 52 Pa. Code § 1.15, Monroe Energy, LLC, (Monroe Energy) respectfully requests Your Honor grant Monroe Energy an additional six days to comply with the October 10, 2017 Order (Order) compelling Monroe Energy to produce copies of all documents in possession of a non-party created since 2012 related to the sale of Monroe's refined petroleum products. Monroe Energy submits that good cause exists for this extension.

The Order requires Monroe Energy to provide the responses by tomorrow, Thursday, October 19, 2017. However, Monroe Energy's counsel, Hawke, McKeon and Sniscak, LLP did not provide Monroe Energy a copy of the order until today, Wednesday, October 18, 2017 because counsel, Ms. Snyder, to whom the order was addressed was out of the office from October 9 through October 18, and due to a staffing mistake, the Order was not provided to Mr. Stewart, counsel who remained in the office. Instead, the Order was placed in Ms. Snyder's mail pile and was unopened until her return to the office this morning. Because the Order was marked

confidential, it was not e-served, and thus counsel was otherwise unaware of the Order's existence.

While Monroe Energy diligently began the process of responding to the request once it received the Order today, due to the nature of the search required, it will be unable to complete the search and produce the required documents by tomorrow. Accordingly, Monroe Energy respectfully requests an extension to comply with the Order until Wednesday, October 25, 2017.

Counsel for Monroe Energy has contacted counsel for Laurel, and Laurel opposes the relief requested. However, Monroe Energy submits that Laurel will not be prejudiced because even if Monroe Energy complied with the Order and served its discovery responses on Thursday, October 19, 2017, Laurel would have less than 24 hours to try to incorporate any responses received into its testimony. Subject to the Commission and Your Honor's evidentiary rules, Laurel can use documents received pursuant to the Order at trial, and thus is not prejudiced by the requested extension.

WHEREFORE, Monroe Energy respectfully requests Your Honor extend the time for Monroe Energy to comply with the Order until Wednesday, October 25, 2017.

## Respectfully submitted,

DATED: October 18, 2017

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