

Kevin J. McKeon 717 703-0801 kjmckeon@hmslegal.com

Todd S. Stewart 717 703-0806 tsstewart@hmslegal.com

Whitney E. Snyder 717 703-0807 wesnyden@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com
October 24, 2017

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 PETITION TO WITHDRAW 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 Petition to Withdraw 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 Petition 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

David B. MacGregor, Esquire
Anthony D. Kanagy, Esquire
Garrett P. Lent, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
dmacgregor@postschell.com
akanagy@postschell.com
glent@postschell.com
Counsel for Laurel Pipe Line Company, L.P.

Christopher J. Barr, Esquire
Jessica R. Rogers, Esquire
Post & Schell, P.C.
607 14th Street, N.W., Suite 600
Washington, DC 20005-2000
cbarr@postschell.com
jrogers@postschell.com
Counsel for Laurel Pipe Line Company, L.P.

Heidi Wushinske Esquire
Michael L. Swindler, Esquire
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265
hwushinske@pa.gov
mswindler@pa.gov

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
John.Povilaitis@BIPC.com
Counsel for PESRM

Karen O. Moury, Esquire
Carl R. Shultz, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
kmoury@eckertseamans.com
cshultz@eckertseamans.com
Counsel for Husky Marketing and Supply
Company

Jonathan D. Marcus, Esquire Daniel J. Stuart, Esquire Marcus & Shapira LLP One Oxford Centre, 35th Floor 301 Grant Street Pittsburgh, PA 15219-6401 jmarcus@marcus-shapira.com stuart@marcus-shapira.com Counsel for Giant Eagle, Inc.

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

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
abakare@mcneeslaw.com
kstark@mcneeslaw.com
Counsel for Gulf Operating, LLC and Sheetz,
Inc.

Andrew S. Levine, Esquire Stradley, Ronon, Stevens & Young, LP 2600 One Commerce Square Philadelphia, PA 19103 alevine@stradley.com Counsel for Sunoco, LLC

EMAIL ONLY (No Confidential Info)

Joseph Otis Minott, Esquire Ernest Logan Welde, Esquire Clean Air Council 135 S. 19th Street, Suite 300 Philadelphia, PA 19103 joe_minott@cleanair.org lwelde@cleanair.org Counsel for Clean Air Council

Dated: October 24, 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

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 PETITION TO WITHDRAW
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 § 5.94, Monroe Energy, LLC, (Monroe Energy) respectfully petitions to withdraw its October 18, 2017 Motion for Extension of Time to Comply with Order Compelling Response to Laurel Set III Discovery (Motion) because as of October 23, 2017 Monroe Energy has completed producing the documents that the October 10, 2017 Order Compelling Response to Laurel Set III Discovery (Order) required. Monroe Energy does not oppose Laurel Pipe Line Company, L.P.'s (Laurel) request in its October 23, 2017 Answer to file Supplemental Written Rejoinder Testimony as to any documents produced after October 19, 2017, which was the deadline for production in the Order. However, Monroe Energy does oppose any supplemental rejoinder testimony addressing documents it produced on October 19, 2017 in compliance with the Order.

¹ Monroe Energy produced Attachments 3.2.1 through 3.2.17 on Thursday, October 19, 2017. See Attachment A. Thereafter, Monroe Energy produced Attachments 3.2.18 through 3.2.23.1-4.

WHEREFORE, Monroe Energy respectfully requests its Motion for Extension of Time to Comply With Order Compelling Response to Laurel Set III Discovery be withdrawn.

Respectfully submitted,

DATED: October 24, 2017

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

kjmckeon@hmslegal.com

tsstewart@hmslegal.com

wesnyder@hmslegal.com

Richard E. Powers, Jr.

Joseph R. Hicks

Venable LLP

575 7th Street, NW

Washington, D.C. 20004

repowers@Venable.com

(Pro Hac Vice Admission Application

Pending)

repowers@venable.com

jrhicks@venable.com

Attorneys for Monroe Energy, LLC

ATTACHMENT A

PUBLIC VERSION

HIGHLY CONFIDENTIAL FIRST SUPPLEMENTAL RESPONSE OF MONROE ENERGY, LLC

TO HIGHLY CONFIDENTIAL INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY LAUREL PIPE LINE COMPANY, L.P. – SET III No. 2

| 2. To the extent not already provided, please provide a copy of all documents |
|---|
| related to the sale of Monroe |
| refined petroleum products , including strategy an |
| marketing memoranda, studies and analyses, and all documents relating to the |
| negotiation of prices for refined products |
| |
| RESPONSE: |
| 2. See the following HIGHLY CONFIDENTIAL Attachments: |
| Attachment 3.2.1 – |
| Attachment 3.2.2 – |
| Attachment 3.2.3 – |
| Attachment 3.2.4 – |
| Attachment 3.2.5 – |
| Attachment 3.2.6 – |
| Attachment 3.2.7 – |
| Attachment 3.2.8 – |
| Attachment 3.2.9 - |
| Attachment 3.2.10 – |
| Attachment 3.2.11 – |
| Attachment 3.2.12 – |

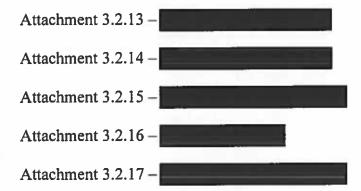
PUBLIC VERSION

HIGHLY CONFIDENTIAL FIRST SUPPLEMENTAL RESPONSE OF MONROE ENERGY, LLC

TO HIGHLY CONFIDENTIAL INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY LAUREL PIPE LINE COMPANY, L.P. – SET III No. 2

HIGHLY CONFIDENTIAL FIRST SUPPLEMENTAL RESPONSE:

2. See the following HIGHLY CONFIDENTIAL Attachments:



Jennifer L. Deitch

From: Whitney Snyder

Sent: Thursday, October 19, 2017 5:29 PM

To: Jennifer L. Deitch; 'akanagy@postschell.com'; 'dmacgregor@postschell.com';

'glent@postschell.com'; Todd Stewart; Kevin McKeon; hwushinske@pa.gov;

'mswindler@pa.gov'; Barr, Christopher; 'jrogers@postschell.com'; Alan M. Seltzer; John F. Povilaitis; Karen O. Moury; 'Carl R. Schultz'; 'Jonathan D. Marcus'; 'Daniel J. Stuart'; 'Robert A. Weishaar, Jr.'; 'Susan E. Bruce'; 'Adeolu A. Bakare'; 'Kenneth R. Stark';

alevine@stradley.com

Subject: RE: Application of Laurel Pipe Line Company, L.P.; Docket No. A-2016-2575829

Attachments: Monroe Energy First Supp Resp to Set III No 2.pdf; Attachments.html

Counsel,

In compliance with Administrative Law Judge Vero's October 10, 2017 Order Compelling Response to Laurel Set III Request No. 2, attached please find Monroe Energy's HIGHLY CONFIDENTIAL First Supplemental Response to Laurel Set III No. 2 and a link to the HIGHLY CONFIDENTIAL document production below. To avoid delay, this response and document production are being served now, but the cover letter and certificate of service will be filed and served tomorrow. Monroe Energy has been informed that most if not all responsive materials have now been produced, but that searches will continue for additional responsive materials. Monroe Energy will produce any additional responsive materials, if any are located, as soon as possible.

ShareFile Attachments

Expires November 18, 2017

First Supplemental Response

2.2 MB

Download Attachments

Whitney Snyder uses ShareFile to share documents securely. Learn More.

Whitney E. Snyder

Hawke McKeon & Sniscak LLP www.hmslegal.com 100 N. Tenth Street Harrisburg, PA 17101 717-236-1300 wesnyder@hmslegal.com

THIS E-MAIL MAY CONTAIN PRIVILEGED, CONFIDENTIAL, COPYRIGHTED, OR OTHER LEGALLY PROTECTED INFORMATION, IF YOU ARE NOT THE INTENDED RECIPIENT (EVEN IF THE E-MAIL ADDRESS ABOVE IS YOURS), YOU MAY NOT USE, COPY, OR RETRANSMIT IT, IF YOU HAVE RECEIVED THIS BY MISTAKE PLEASE NOTIFY US BY RETURN E-MAIL, THEN DELETE, THANK YOU.

NEW IRS RULES RESTRICT WRITTEN FEDERAL TAX ADVICE FROM LAWYERS AND ACCOUNTANTS, THIS STATEMENT IS INCLUDED IN OUTBOUND EMAILS BECAUSE EVEN INADVERTENT VIOLATIONS MAY BE PENALIZED, NOTHING IN THIS MESSAGE IS INTENDED TO BE USED, OR MAY BE USED, TO AVOID ANY PENALTY UNDER FEDERAL TAX LAWS, THIS MESSAGE WAS NOT WRITTEN TO SUPPORT THE PROMOTION OR MARKETING OF ANY TRANSACTION.

From: Jennifer L. Deitch

Sent: Thursday, October 19, 2017 4:53 PM

To: 'akanagy@postschell.com' <akanagy@postschell.com>; 'dmacgregor@postschell.com' <dmacgregor@postschell.com'; 'glent@postschell.com' <glent@postschell.com>; Todd Stewart <TSStewart@hmslegal.com>; Whitney Snyder <WESnyder@hmslegal.com>; Kevin McKeon <KJMckeon@hmslegal.com>; hwushinske@pa.gov; 'mswindler@pa.gov' <mswindler@pa.gov>; Barr, Christopher <cbarr@postschell.com>; 'jrogers@postschell.com>; Alan M. Seltzer <Alan.Seltzer@BIPC.com>; John F. Povilaitis <John.Povilaitis@BIPC.com>; Karen O. Moury <kmoury@eckertseamans.com>; 'Carl R. Schultz' <cshultz@eckertseamans.com>; 'Jonathan D. Marcus' <jmarcus@marcus-shapira.com>; 'Daniel J. Stuart' <stuart@marcus-shapira.com>; 'Robert A. Weishaar, Jr.' <rweishaar@mcneeslaw.com>; 'Susan E. Bruce' <sbruce@mcneeslaw.com>; 'Adeolu A. Bakare' <abakare@mcneeslaw.com>; 'Kenneth R. Stark' <kstark@mcneeslaw.com>; alevine@stradley.com
Subject: Application of Laurel Pipe Line Company, L.P.; Docket No. A-2016-2575829

Counsel,

In compliance with Administrative Law Judge Vero's October 10, 2017 Order Compelling Response to Laurel Set III Request No. 2 to Monroe, attached please find Monroe Energy's HIGHLY CONFIDENTIAL response and a link to the HIGHLY CONFIDENTIAL document production below. Monroe Energy has been informed that most if not all responsive materials have now been produced, but that searches will continue for additional responsive materials. Monroe Energy will produce any additional responsive materials, if any are located, as soon as possible.

ShareFile Attachments

Expires April 17, 2018

Monroe Energy Response to Laurel Set III No. 2

9.2 MB

Download Attachments

Jennifer Deitch uses ShareFile to share documents securely. Learn More.

Sent on behalf of

Todd S. Stewart | Hawke McKeon & Sniscak LLP

100 North 10th Street | Harrisburg, PA 17101

Phone: 717.703.0806 | Fax: 717.236.4841 | Email: <u>tsstewart@hmslegal.com</u>

Jennifer L. Deitch Administrative Assistant

Hawke McKeon & Sniscak LLP www.hmslegal.com 100 N. Tenth Street Harrisburg, PA 17101 Direct: 717-703-0818 Office: 717-236-1300 Fax: 717-236-4841 ildeitch@hmslegal.com

THIS E-MAIL MAY CONTAIN PRIVILEGED, CONFIDENTIAL, COPYRIGHTED, OR OTHER LEGALLY PROTECTED INFORMATION. IF YOU ARE NOT THE INTENDED RECIPIENT (EVEN IF THE E-MAIL ADDRESS ABOVE IS YOURS), YOU MAY NOT USE, COPY, OR RETRANSMIT IT. IF YOU HAVE RECEIVED THIS BY MISTAKE PLEASE NOTIFY US BY RETURN E-MAIL, THEN DELETE. THANK YOU.

NEW IRS RULES RESTRICT WRITTEN FEDERAL TAX ADVICE FROM LAWYERS AND ACCOUNTANTS. THIS STATEMENT IS INCLUDED IN OUTBOUND EMAILS BECAUSE EVEN INADVERTENT VIOLATIONS MAY BE PENALIZED. NOTHING IN THIS MESSAGE IS INTENDED TO BE USED, OR MAY BE USED, TO AVOID ANY PENALTY UNDER FEDERAL TAX LAWS. THIS MESSAGE WAS NOT WRITTEN TO SUPPORT THE PROMOTION OR MARKETING OF ANY TRANSACTION.