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FEDERAL MARITIME COMMISSION

**BEFORE THE  
FEDERAL MARITIME COMMISSION**

Docket No. 11-18

**VALERO REFINING - TEXAS, L.P.**

**COMPLAINANT**

v.

**PORT OF CORPUS CHRISTI AUTHORITY OF NUECES COUNTY, TEXAS**

**RESPONDENTS**

**MOTION TO CONSOLIDATE**  
**PROCEEDING WITH DOCKET NO. 11-15**

Valero Refining - Texas, L.P. ("Valero"), by and through the undersigned, respectfully requests that this matter be consolidated for all purposes with the proceeding in Docket No. 11-15 pursuant to Commission Rule 148. The Complaint in this action was filed today.

Consolidation is proper because both proceedings will involve substantially the same issues of law and fact and because consolidation will assist the parties in reaching an expeditious resolution of both matters. In particular, Valero and CITGO Refining & Chemicals Company L.P., the complainant in Docket No. 11-15, are each alleging that the Port of Corpus Christi Authority of Nueces County, Texas ("the Port") has assessed wharfage and other charges that are excessive and not reasonably related to the value of services rendered to them, that through the application of such charges they

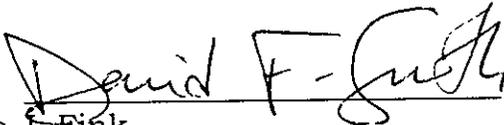
have been forced to subsidize costs associated with services provided to other users of port facilities, that such other users therefore receive greater levels of service and benefit from the PCCA at lower cost, and that the PCCA has refused to negotiate any modification of its wharfage and other fees and charges.

The undersigned counsel also represents the complainant in Docket No. 11-15, CITGO Refining and Chemicals Company L.P., and CITGO has no objection to this motion. Undersigned counsel has also conferred with counsel for the respondent in Docket No. 11-15, Port of Corpus Christi Authority of Nueces County, Texas, who has indicated they have no objection to the motion.

For the all of the foregoing reasons, Valero respectfully requests that this motion be granted.

Respectfully submitted,

By:

  
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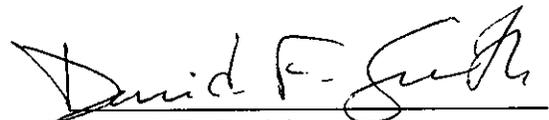
*Attorneys for Valero Refining -  
Texas, L.P.*

Dated: October 20, 2011

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20th day of October, 2011, I have served the forgoing Consent Motion to Consolidate Proceeding with Docket No. 11-15 upon the following counsel of record by e-mail and first class mail, postage prepaid:

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Authority of Nueces County, Texas  
In Docket No. 11-15*

  
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