



COMMONWEALTH OF PENNSYLVANIA
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July 30, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (filing room)
PO Box 3265
Harrisburg, PA 17105-3265

Re: Commonwealth of Pennsylvania, by Attorney General Kathleen G. Kane,
Through the Bureau of Consumer Protection and Tanya J. McCloskey,
Acting Consumer Advocate v Respond Power: Docket No. C-2014-2427659;
JOINT REPLY TO NEW MATTER

Dear Secretary Chiavetta:

Enclosed please find the Joint Reply to the New Matter filed in the above-captioned docket. Copies of this document 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 my office.

Sincerely,

A handwritten signature in cursive script that reads "Nicole Beck".

Nicole R. Beck
Deputy Attorney General

Enclosures

cc: Honorable Elizabeth H. Barnes (*with enclosures*)
Honorable Joel H. Cheskis (*with enclosures*)
Certificate of Service (*with enclosures*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Commonwealth of Pennsylvania, by Attorney	:	
General KATHLEEN G. KANE, Through the	:	
Bureau of Consumer Protection,	:	
	:	
And	:	Docket No. C-2014-2427659
	:	
TANYA J. McCLOSKEY, Acting Consumer	:	
Advocate,	:	
	:	
Complainants	:	
	:	
v.	:	
	:	
Respond Power, LLC,	:	
	:	
Respondent	:	

JOINT REPLY OF THE COMMONWEALTH OF PENNSYLVANIA
AND THE OFFICE OF CONSUMER ADVOCATE
TO THE NEW MATTER OF
RESPOND POWER, LLC

Pursuant to Section 5.63 of the Pennsylvania Public Utility Commission’s (Commission) regulations regarding Replies to New Matter, 52 Pa. Code § 5.63, the Commonwealth of Pennsylvania, by Attorney General Kathleen G. Kane through the Bureau of Consumer Protection (BCP) and the Acting Consumer Advocate Tanya J. McCloskey (OCA) (collectively referred to as Joint Complainants), provide the following Reply to the New Matter of Respond Power, LLC (Respondent or Respond Power), in the above-captioned proceeding. The Joint Complainants incorporate herein all paragraphs and allegations in their Joint Complaint filed in this action and aver the following:

104. Respondent's introduction paragraph requires no responsive pleading. By way of further answer, to the extent that an answer may be required, the Joint Complainants incorporate paragraphs 1 through 103 in their Joint Complaint and the allegations contained therein.

105. Denied. It is specifically denied that Joint Complainants have ignored market conditions in January 2014 and have, in fact, presented the affidavit of Dr. Steven L. Estomin, wherein he states that the cost to serve the average residential heating customer in January 2014 should not have exceeded approximately \$0.23 per kWh. See Joint Complaint at Count VIII and App. C. It is also denied that the Commission's Review of Rules, Policies and Consumer Education Measures Regarding Variable Rate Retail Electric Products, Docket No. M-2014-2406134, Order (adopted Feb. 20, 2014/entered March 4, 2014) (March 4 Order Seeking Comments)¹ is of any relevance to the allegations in the Joint Complaint. By way of further answer, the March 4 Order Seeking Comments does not absolve Respondent of the allegations in the Joint Complaint. It is explicitly denied that any statements made by the Commission in the March 4 Order Seeking Comments have any binding effect on the instant proceeding, as the facts alleged in the Joint Complaint are specific to the conduct of Respond Power.

It is, therefore, not appropriate to rely on Commission statements in the March 4 Order Seeking Comments as authority that Respond Power's Disclosure Statement, on its face, or in conjunction with the deceptive and misleading statements regarding savings and EDC affiliation made by Respondent's salespeople and in Respondent's welcome letters and inserts do not violate State law and the Commission's regulations and orders.

¹ Of note, the Commission sought Comments from interested parties in its March 4 Order Seeking Comments. On April 3, 2014, the OCA submitted Comments jointly with AARP, the Pennsylvania Utility Law Project and Community Legal Services, Inc. to the March 4 Order Seeking Comments. The Commission has not acted on the Comments submitted by interested parties to the March 4 Order Seeking Comments.

106. After reasonable investigation, Joint Complainants are without sufficient knowledge or information to form a belief as to the veracity of the averments set forth herein. Same are therefore denied and strict proof thereof is demanded at hearings in this matter.

107. After reasonable investigation, Joint Complainants are without sufficient knowledge or information to form a belief as to the veracity of the averments set forth herein. Same are therefore denied and strict proof thereof is demanded at hearings in this matter.

108. It is specifically denied that Respondent adjusted its variable prices consistent with the terms and conditions of its Disclosure Statement in early 2014. It is further denied that the Commission approved Respondent's Disclosure Statement. After reasonable investigation, Joint Complainants are without sufficient knowledge or information to form a belief as to the veracity of the remaining averments set forth herein. Same are therefore denied and strict proof thereof is demanded at hearings in this matter.

109. Denied as stated. Respondent's allegations constitute conclusions of law which require no response and are, therefore, deemed denied. To the extent that an answer may be required, it is admitted that as a creature of statute, the Commission has those powers granted to it by the General Assembly, one power of which is to enforce the Public Utility Code and the Commission's regulations and Orders. See 66 Pa. C.S. § 501.

110. Denied as stated. This paragraph states conclusions of law to which no response is required. By way of further answer, the Commission has those powers granted to it by the General Assembly, one power of which is to enforce the Public Utility Code and the Commission's regulations and Orders. See 66 Pa. C.S. § 501. EGSs are considered public utilities for the purposes described in Section 2809 of the Public Utility Code (relating to

requirements for EGSs). See 66 Pa. C.S. § 102. See also Delmarva Power & Light Co. v. Pa. PUC, 870 A.2d 901, 909-10 (Pa. 2005). Section 2809(e) of the Public Utility Code states:

Form of regulation of electric generation suppliers. – The commission may forbear from applying requirements of this part which it determines are unnecessary due to competition among electric generation suppliers. In regulating the service of electric generation suppliers, the commission shall impose requirements necessary to ... assuring that 52 Pa. Code Ch. 56 (relating to standards and billing practices for residential utility service) are maintained.

66 Pa. C.S. § 2809(e). Section 2809(e) allows the Commission to forbear from applying the Public Utility Code but does not limit the Commission in this instance. Moreover, with regard to standards and billing practices, the Commission must impose requirements assuring they are maintained by EGSs. 66 Pa. C.S. § 2809(e).

111. Denied as stated. This paragraph states conclusions of law to which no response is required. The conclusion of law that the Commission has no authority to regulate generation service, however, is not supported by Respondent's citation to 66 Pa. C.S. § 2806(a). Section 2806(a) of the Public Utility Code provides that "[t]he generation of electricity shall no longer be regulated as a public utility service or function *except as otherwise provided for in this chapter.*" 66 Pa. C.S. § 2806(a). (Emphasis added). Joint Complainants incorporates Paragraph 110 above herein. Chapter 54 of the Commission's regulations also relates to EGSs' billing practices. See 52 Pa. Code Ch. 54. Section 54.43(f) states that "[a] licensee is responsible for any fraudulent deceptive or other unlawful marketing or billing acts performed by the licensee, its employes (*sic*), agents or representatives." 52 Pa. Code § 54.43(f).

The case cited by Respond Power in support of the conclusion of law that the Commission has no authority to limit EGS prices is currently before the Commonwealth Court, and therefore, it is not appropriate to cite as binding precedent. See McCloskey v. Pa. PUC, 569 C.D. 2014 (Advanced Form Brief submitted on July 10, 2014). Additionally, it is denied that

any Commission statements in the March 4 Order Seeking Comments have any binding effect on the instant proceeding, as the facts alleged in the Joint Complaint are specific to the conduct of Respond Power.

112. Denied as stated. This paragraph states conclusions of law to which no response is required. By way of further answer, Joint Complainants are not asserting that the Commission has the authority to regulate EGS prices. Instead, the Joint Complainants seek Commission review of Respondent's deceptive marketing practices of promising, *inter alia*, savings over the Price to Compare (PTC) and then billing customers at prices greatly in excess of the PTC. See Joint Complaint at Counts I-IV and App. C. As explained in Paragraph 110 above, the Commission has the authority under the Public Utility Code to regulate EGS billing practices. 66 Pa. C.S. § 2809(e). One can file a formal complaint with the Commission, alleging violation of a statute that the Commission has jurisdiction to administer. Lasko v. Windstream Pennsylvania, LLC, 2011 Pa. PUC LEXIS 696, *7. That is exactly what Joint Complainants have done in this matter.

With regard to the Commission Orders and Initial Decisions cited by Respondent, Joint Complainants submit that these cases were prosecuted by *pro se* complainants and are limited to the facts of the individual proceedings. They are not binding on the instant matter. By way of further response, exceptions were filed to the Initial Decisions in MacLuckie v. Palmco Energy PA, LLC and Yaglidereliler Corp. v. Blue Pilot Energy, LLC. As such, Respondent's reliance on these cases is misplaced. In Russell v. Respond Power, Docket No. C-2014-2417551, Order on Preliminary Objections (July 3, 2014), the Administrative Law Judge (ALJ) stated that the Commission cannot award monetary damages. As explained below, Joint Complainants do not seek damages but instead seek restitution, which the Commission may order. Therefore,

Respondent's reliance on the Order on Preliminary Objections in Russell is misplaced. Additionally, Respondent's reliance on the Order in Tustin v. Respond Power, Docket No. C-2014-2417552, Order on Preliminary Objections (June 27, 2014), is misplaced, as the ALJ denied Respond Power's preliminary objections in the matter.

By way of further answer, the Commission has the authority to order equitable relief and has done so in other instances. See 66 Pa. C.S. § 103(c); OCA v. Utility.com, Inc., 212 P.U.R.4th 255 (2001) (Utility.com Final Order). In the Utility.com case, the OCA sought refunds of overpayments for service not received and for "lost savings" on behalf of customers. Utility.com Final Order at 262. In the Recommended Decision, ALJ Turner opined:

The ALJ opined that lost savings could be viewed as damages for breach of contract, and noted that the Commission does not exercise its jurisdiction over matters of damages. However, the ALJ notes that "the provisions of [the Public Utility Code] are cumulative and in addition to [the] rights of action and remedies" that exist under other statutory or common law. 66 Pa. C.S. § 103. Therefore, based on OCA's arguments, the ALJ recommends that the Commission find that it does have jurisdiction over lost savings.

See OCA v. Utility.com, Inc., 2001 Pa PUC LEXIS 32, *23 (June 4, 2001). The Commission sustained the OCA's claims for refunds and lost savings.² Utility.com Final Order at 262. The Commission has ordered equitable relief in other cases as well. See e.g. Pa. PUC v. Reed, 1972 Pa. PUC LEXIS 40; 46 Pa. PUC 19 (1972) (Commission directed Respondent, who was authorized to transport as a class D carrier, to refund overcharges to his customers); Ely v. Pennsylvania Water, Docket No. C-20055616, Order at 1 (July 10, 2006) (Commission determined this was a classic case for the application of equitable estoppel when Respondent damaged Complainants' asphalt driveway while replacing a water line on the neighboring property and made countless verbal assurances that the driveway would be restored); C.S.

² The Commission noted that there were no funds remaining from Utility.com's bond to pay refunds and lost savings and encouraged the OCA to seek alternative means of collection of these funds. Utility.com Final Order at 262.

Warthman Funeral Home, et. al. v. GTE North, Inc., Docket No. C-00924416 (June 4, 1993)
(Complainants were permitted to introduce into evidence the letter and promise of Respondent that it would provide toll free calling to support a claim of equitable estoppel).

113. Denied as stated. This paragraph states conclusions of law to which no response is required. By way of further answer, it is specifically denied that the Commission is limited in their jurisdiction over prices as stated in this paragraph. As explained in Paragraph 110 above, the Commission has those powers granted to it by the General Assembly, one power of which is to enforce the Public Utility Code and the Commission's regulations and Orders. See 66 Pa. C.S. § 501. The Commission has the authority under the Public Utility Code to regulate EGS standards and billing practices. 66 Pa. C.S. § 2809(e). Section 2809(e) allows the Commission to forbear from applying the Public Utility Code but does not limit the Commission in this instance. As alleged in the Joint Complaint, Respondent's prices billed did not reflect its marketed prices and the agreed upon prices in its Disclosure Statement. See Joint Complaint at Counts II, VII, VIII, and App. C.

114. Denied as stated. This paragraph states conclusions of law to which no response is required. As explained in Paragraphs 110 and 112 above, the Commission has the authority under the Public Utility Code to regulate EGS standards billing practices. See 66 Pa. C.S. § 2809(e). By way of further answer, as discussed in Paragraph 112 above, the Commission has the authority to order equitable relief and has done so in other instances. See 66 Pa. C.S. § 103(c); Utility.Com Final Order. By way of further answer, the conclusion of law that the Public Utility Code does not authorize the Commission to direct the issuance of a refund to a customer who has entered into a private contract with an EGS is not supported by Respondent's citation to Ruhl v. Dominion Retail, Inc., Docket No. C-2008-2061229, Initial Decision (March 20, 2009)

and Final Order (Sept. 24, 2009); Delmarva Power & Light Co. v. Pa. PUC, 870 A.2d 901 (Pa. 2005); and Lytle v. T.W. Phillips Gas & Oil Co., 2002 Pa. PUC LEXIS 44.

Ruhl v. Dominion Retail, Inc., Docket No. C-2008-2061229, Initial Decision (March 20, 2009) and Final Order (Sept. 24, 2009), is not binding in this matter, as the cited Order granting preliminary objections and dismissing the formal complaint is limited to the allegations in Mr. Ruhl's formal complaint. Mr. Ruhl's allegations are not relevant to or binding on Joint Complainants' allegations in the Joint Complaint.

Also, Respondent's citation to Delmarva Power & Light Co., 870 A.2d 901, does not support Respondent's position, as Delmarva involved assessments under 66 Pa. C.S. § 510, not contracts between EGSs and customers.

Finally, in Lytle v. T.W. Phillips Gas & Oil Co., 2002 Pa. PUC LEXIS 44, the Commission stated that the private contracts between T.W. Phillips and the credit card companies are not a proper subject for review by the Commission and the Commission would not be able to determine whether T.W. Phillips violated the terms of those private contracts with credit card companies. Lytle v. T.W. Phillips Gas & Oil Co., 2002 Pa. PUC Lexis 44, *9, Docket No. C-2002-7322, Order (Aug. 16, 2002). The Commission did not make a determination that the contract to supply natural gas between T.W. Phillips and Mr. Lytle was a private contract outside of the jurisdiction of the Commission to review.

115. Denied. Respondent's allegations constitute conclusions of law, which require no response and are, therefore, denied. By way of response, the Commission's regulations themselves incorporate the Unfair Trade Practices and Consumer Protection Law, (Consumer Protection Law) 73 P.S. § 201-1, *et seq.*, and therefore, the Commission is required to make determinations pursuant to the Consumer Protection Law in order to determine if the Respondent

violated the Commission's regulations. See 52 Pa. Code §§ 54.122(3) and 111.12(d)(1). See also 52 Pa. Code § 111.1 (EGSs shall comply with the standards set forth in the regulations). In determining whether Respondent violated its regulations, the Commission must determine whether the conduct alleged constitutes a violation of State or Federal law, including the Consumer Protection Law, or Commission regulation or order. 52 Pa. Code §§ 54.43(f) and 111.12(d)(1). See also Elkin v. Bell Telephone Co. of Pennsylvania, 491 Pa. 123, 133, 420 A.2d 371, 376 (1980).

As a preliminary inquiry, the Commission must invoke the statute and case law under the Consumer Protection Law, interpret it, and apply it harmoniously where appropriate. See Duquesne Light Co. v. Borough of Monroeville, 449 Pa. 573, 298 A.2d 252 (1972); Pettko v. Pennsylvania American Water Co., 39 A.3d 473, 484 (Pa. Commw. Ct. 2012). Moreover, since the adjudication of Pa. PUC v. The Bell Telephone Co. of Pa., 71 Pa. PUC 338, in 1989 and MAPSA v. PECO Energy Co., Docket No. P-00981615, in 1999, the Commission added the requirement that EGSs comply with the Consumer Protection Law to the Commission's regulations.

Furthermore, the Commonwealth Court decided Harrisburg Taxicab & Baggage Co. v. Pa. PUC, wherein the Court held that the Commission's decision to incorporate another agency's regulations into the Commission's own regulations is in no way inappropriate and such overlap does not divest the Commission of its statutory authority or duty. Harrisburg Taxicab & Baggage Co. v. Pa. PUC, 786 A.2d 288, 292-93 (Pa. Commw. Ct. 2001) (Harrisburg Taxicab). See also City of Philadelphia v. Pa. PUC, 702 A.2d 1139 (Pa. Commw. Ct. 1997). By allowing the Commission to adjudicate these disputes in the first instance, all rights of the parties will be

preserved, as well as providing any subsequent reviewing court the benefit of the Commission's opinion. County of Erie v. Verizon North, Inc., 879 A.2d 357 (Pa. Commw. Ct. 2005).

116. Denied as stated. Respondent's allegations constitute conclusions of law which require no response and are, therefore, deemed denied. To the extent that an answer may be required, the exception that the Respondent relies on is Section 2245(d)(1) of the Telemarketer Registration Act, (TRA) 73 P.S. § 2241, *et seq.*, which states that a written contract is not needed if the sale of the good or service is regulated under other laws of the Commonwealth. 73 P.S. § 2245(d)(1). However, EGSs are subject to all requirements of the TRA, except the requirement that they register with the OAG.

On February 8, 2010, Attorney General Thomas W. Corbett issued an advisory opinion in response to then Commission Chairman James H. Cawley's request for an "opinion regarding the applicability of the [TRA] to electric generation suppliers as defined in the Electricity Generation Customer Choice and Competition Act." See Request for Opinion, 2010 Pa. AG LEXIS 1 (Feb. 8, 2010) (AG Opinion). In response to Chairman Cawley's question whether the EGSs are excluded from the definition of "telemarketer" in the TRA, AG Corbett replied:

[E]lectric generation suppliers engaged in telemarketing are telemarketers for all purposes of the [Telemarketer Registration] Act except the requirement of Section 3(a), 73 P.S. § 2243(a), that telemarketers register with this Office, from which electric generation suppliers are excluded because they are licensed by the PUC under the Competition Act, 66 Pa. C.S. § 2809(a). Agents of suppliers, such as individuals and businesses initiating or receiving calls pursuant to contracts with suppliers, are not excluded from the definition of "telemarketer" and therefore must register.

AG Opinion at *4-5. Clearly, it is intended that all provisions of the TRA, except the registration requirement, apply to EGSs. Furthermore, the Commission incorporated the TRA into its regulations, and it, therefore, has the authority to make determinations pursuant to the TRA in order to determine if Respondent violated the Commission's regulations. See 52 Pa. Code §

111.10(a)(1); Harrisburg Taxicab, 786 A.2d at 292-93. As such, the Commission does have jurisdiction to determine if Respondent violated the TRA as part of determining whether Respondent violated the Commission's regulation requiring compliance with the TRA.

117. Denied as stated. This paragraph states conclusions of law to which no response is required. Joint Complainants submit, however, that Respondent has misstated Joint Complainants' authority to bring this action. As stated in the Joint Complaint, the OCA is the agency authorized by law to represent the interests of utility consumers before the Commission, as provided in 71 P.S. § 309-1, *et seq.* The Attorney General is authorized by the Consumer Protection Law to bring an action in the name of the Commonwealth of Pennsylvania to restrain by temporary or permanent injunction unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce as provided in 73 P.S. § 201-4.

Joint Complainants are not bringing this action on behalf of individual consumers. Rather, Joint Complainants merely used information provided by individual consumers to formulate the Joint Complaint. In this action, Joint Complainants seek to represent the interests of consumers and the public interest, as they have been authorized to do pursuant to Pennsylvania Law, 71 P.S. § 309-1, *et seq.*; the Consumer Protection Law, 73 P.S. § 201-4; Article IV § 4.1 of the Pennsylvania Constitution; and the Commonwealth Attorneys Act, 71 P.S. § 732-204.

118. Denied as stated. This paragraph states conclusions of law to which no response is required. As explained in Paragraph 117 above, however, Joint Complainants are not seeking to re-litigate Formal Complaints that have already been resolved. The Commission has recognized that where there is one complaint made to the Commission, there are likely substantially more of the same nature that have not been formally made. See e.g. Arthur Rand v.

GTE North, 1999 Pa. PUC LEXIS 55, *9-10 (March 19, 1999). Joint Complainants bring this action to represent the interests of consumers and the public interest at large.

WHEREFORE, Joint Complainants respectfully request that judgment be entered against the Respondent, in favor of the Joint Complainants, and that the Commission grant the Joint Complainants the relief requested in the Joint Complaint.

Respectfully submitted,



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Deputy Attorney General
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DATE: July 30, 2014



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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

COMMONWEALTH OF PENNSYLVANIA, by	:	
Attorney General KATHLEEN G. KANE,	:	
Through the Bureau of Consumer Protection	:	
	:	
And	:	Docket No. C-2014- 2427659
	:	
TANYA J. McCLOSKEY, Acting Consumer	:	
Advocate	:	
	:	
Complainants	:	
v.	:	
	:	
RESPOND POWER, LLC	:	
Respondent	:	
	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Joint Reply of the Attorney General and the Office of Consumer Advocate to the New Matter of Respond Power, in the manner and upon the persons listed below:

Dated this 30th day of July 2014.

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