



COMMONWEALTH OF PENNSYLVANIA

March 28, 2014

E-FILED

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Petition of PECO Energy Company for Approval of its Default Service Program
for the Period From June 1, 2015 Through May 31, 2017
Docket No. P-2014-2409362**

Dear Secretary Chiavetta:

I am delivering for filing today the **Notice of Intervention, Answer, Verification, Public Statement, and Notice of Appearance**, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding.

Two copies have been served today on all known parties in this proceeding. A Certificate of Service to that effect is enclosed.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Rose Triscari".

Elizabeth Rose Triscari
Assistant Small Business Advocate
Attorney ID No. 306921

Enclosures

cc: Parties of Record
Brian Kalic

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY COMPANY :
FOR APPROVAL OF ITS DEFAULT : Docket No. P-2014-2409362
SERVICE PROGRAM FOR THE PERIOD :
FROM JUNE 1, 2015 THROUGH MAY 31, 2017:**

**NOTICE OF INTERVENTION
OF THE SMALL BUSINESS ADVOCATE**

1. The Intervenor is:

John R. Evans
Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
jorevan@pa.gov

2. The name and address of the Intervenor's attorney is:

Elizabeth Rose Triscari
Assistant Small Business Advocates
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
etriscari@pa.gov

3. The respondent utility is:

PECO Energy Company
2301 Market Street
Philadelphia, PA

4. The Intervenor is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Pennsylvania Public Utility Commission (“Commission”).

5. This Intervention is filed regarding the Petition of PECO Energy Company for Approval of Its Default Service Program for the Period From June 1, 2015 Through May 31, 2017 (“Petition”) that was filed with the Commission on March 10, 2014.

6. In view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- A. Direct the Office of Administrative Law Judge to holding hearings on the Petition and prepare an initial decision; and
- B. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,


Elizabeth Rose Triscari
Assistant Small Business Advocate
Attorney ID No. 306921

Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)

Dated: March 28, 2014

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY COMPANY :
FOR APPROVAL OF ITS DEFAULT : Docket No. P-2014-2409362
SERVICE PROGRAM FOR THE PERIOD :
FROM JUNE 1, 2015 THROUGH MAY 31, 2017:**

**PUBLIC STATEMENT
OF THE SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interests of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 ("Act"). The Act further provides that the Small Business Advocate is to issue publicly a written statement setting forth concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Pennsylvania Public Utility Commission ("Commission") or any other agency or court. This public statement relates to the Small Business Advocate's intervention in the above-captioned Commission proceeding.

On March 10, 2014, PECO Energy Company ("PECO" or "Company") filed a petition for approval of its third Default Service Program ("DSP III") to provide default service from June 1, 2015 through May 31, 2017.

The Small Business Advocate is intervening in the above-captioned proceeding in order to protect the interests of the Company's small business customers. A thorough inquiry by the Commission into all of the elements of the Company's petition is necessary to ensure that the Company's proposals for procuring electricity are in accord

with the Public Utility Code and with the Commission's regulations and policy statement regarding default service.

In view of the foregoing, the Small Business Advocate is requesting that the petition be subject to investigation and evidentiary hearings before the Commission. The Small Business Advocate will ask the Commission to deny or modify any aspect of the Company's proposal that is not proven by the Companies to be in accord with the Public Utility Code and with the Commission's regulations and policy statement regarding default service.

Dated: March 28, 2014

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY COMPANY :
FOR APPROVAL OF ITS DEFAULT : Docket No. P-2014-2409362
SERVICE PROGRAM FOR THE PERIOD :
FROM JUNE 1, 2015 THROUGH MAY 31, 2017:**

**ANSWER OF THE OFFICE OF SMALL BUSINESS ADVOCATE
TO PETITION OF PECO ENERGY COMPANY FOR
APPROVAL OF ITS THIRD DEFAULT SERVICE PROGRAM**

PROCEDURAL HISTORY

On or about March 10, 2014, PECO Energy Company (“PECO” or “the Company”) filed the Petition of PECO Energy Company for Approval of Its Default Service Program for the Period From June 1, 2015 Through May 31, 2017 (“Petition”) with the Pennsylvania Public Utility Commission (“Commission”) pursuant to Section 2807(e) of the Public Utility Code, the Default Service Regulations,¹ and the Commission’s Policy Statement on Default Service. The Petition seeks approval of PECO’s proposed third Default Service Program (“DSP III”) to secure default service supply for the Company’s customers for the period from June 1, 2015 through May 31, 2017.

The Office of Small Business Advocate (“OSBA”) filed a Notice of Intervention and Public Statement on March 28, 2014.

The OSBA files the following Answer in response to the corresponding numbered averments in the Company’s Petition.

¹ All capitalized terms used herein and not otherwise defined shall have the meaning ascribed to them in the Petition.

ANSWER

Un-numbered paragraphs on pages one, two, and three

The first un-numbered paragraph describes the filing made by the Company, and constitutes a prayer for relief to which no response is required.

The second un-numbered paragraph makes several assertions about the success of PECO's second default service program ("DSP II"). To the extent a response is deemed necessary, the averments of this paragraph are denied.

The third un-numbered paragraph states several conclusions of law to which no response is required, including that the Company's DSP III is "In accordance with the Competition Act, the Commission's Default Service Regulations, and the Default Service Policy Statement" and is designed to enable PECO to obtain a "prudent mix" of procurement contracts and thereby ensure that default service customers have access to an "adequate and reliable" supply of generation at "least cost over time." To the extent a response to any of these conclusions of law is deemed necessary, those averments are denied.

I. INTRODUCTION

1. Admitted.
2. Admitted.
3. The averments of this paragraph cite provisions of section 2807(e) of the Competition Act, 66 Pa. C.S. § 2807(e), which, being a writing, speaks for itself, and therefore no response is required.

4. The averments of this paragraph cite provisions of section 54.185 of the Commission's Default Service Regulations, 52 Pa. Code §54.185, which, being a writing, speaks for itself, and therefore no response is required.

5. The averments of this paragraph cite to *Default Service and Retail Electric Markets*, Docket No. L-2009-2095604, Order entered October 4, 2011, which, being a writing, speaks for itself, and therefore no response is required.

6. The averments of this paragraph cite to *Investigation of Pennsylvania's Retail Electricity Market: End State of Default Service*, Docket No. I-2011-2237952, Order entered February 15, 2013 ("End State Order"), which, being a writing, speaks for itself, and therefore no response is required. The last sentence of this paragraph states that PECO's limited changes to its default service program and the products previously approved by the Commission in its DSP II complies with the End State Order, which is a conclusion of law to which no response is required. To the extent a response is deemed necessary, the averments of this sentence are denied.

7. Paragraph 7 contains a statement of the contents of the Petition, which requires no response.

8. The averments of this paragraph requests that the Commission act upon the Petition by a certain date, and as such, the averments of this paragraph constitute a prayer for relief to which no response is required.

II. PECO'S DEFAULT SERVICE PROCUREMENT AND IMPLEMENT PLANS

A. Procurement Classes, Program Term and Supply Portfolio

9. The averments of this paragraph describe PECO'S DSP II, to which no response is required.

10. The averments of this paragraph outline the Company's proposal to maintain the same division of default service customers in DSP III as in DSP II, and as such, these averments constitute a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

11. The averments of this paragraph make an assertion about the success of the DSP II procurement strategy and the Company's proposal to maintain the procurement strategy established in DSP II, and as such, these averments constitute a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

12. The averments of this paragraph describe the nature of full-requirements, load-following contracts and are admitted.

13. The averments of this paragraph describe PECO'S current default service portfolio for the Residential class, to which no response is required.

14. The averments of this paragraph outline the Company's proposal for the Residential class supply portfolio; to procure a mix of one-year and two-year fixed price full requirements, load-following products for 96% of the supply and the remaining 4% "long-term" products and spot purchases, and as such, these averments constitute a prayer for relief to which

no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

15. The first two sentences of this paragraph describe that the Company does not propose further procurement of block energy products for the Residential class, and as such, these averments constitute a prayer for relief to which no response is required. The last sentence of this paragraph avers that the mix of products proposed satisfies the Public Utility Code's "prudent mix" requirement, which is a conclusion of law to which no response is required. To the extent a response is deemed necessary to any of the averments in this paragraph, the averments of this paragraph are denied.

16. The first sentence of this paragraph describes PECO's current default service portfolio for the Small Commercial class, namely, laddered one-year fixed price full requirements products, to which no response is required. The remaining averments of this paragraph outline the Company's proposal to make no changes to the Small Commercial class supply portfolio, and as such, these averments constitute a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

17. The averments of this paragraph outline the Company's proposal to maintain the current Medium Commercial class supply portfolio of six-month fixed-price full requirements products without overlap, and as such, these averments constitute a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

18. The averments of this paragraph request a waiver of the End State Order to maintain the Medium Commercial class supply portfolio of fixed-price contracts pending the completion of advanced meter infrastructure (“AMI”) deployment for the entire Medium Commercial class, and as such, these averments constitute a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

19. The averments of this paragraph outline the Company’s proposal to continue to procure all Large Commercial and Industrial class default service supply thought spot-priced full requirements contracts, and as such, these averments constitute a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

20. The averments of this paragraph state the term of PECO’s DSP III, June 1, 2015 through May 31, 2017, and that such term is consistent with the Commission’s recommendations, and are admitted.

21. The first sentence of this paragraph states that the proposed portfolios for the Large Commercial and Industrial and Medium Commercial classes do not include any supply products that extend beyond the end of the DSP III period, and as such, these averments constitute a prayer for relief to which no response is required. The second sentence describes the timing of recommended solicitations for Residential and Small Commercial class supply products that extend beyond the end of the DSP III period, and as such, these averments constitute a prayer for relief to which no response is required. The remaining averments of this paragraph make assertions about the appropriateness of such an approach and its consistency

with the approach approved by the Commission in DSP II, and as such, are conclusions of law to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

22. This paragraph contains a summary of the proposed procurement plan for each customer class, and as such, constitutes a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

23. The averments of this paragraph outline the Company's proposal to use the most recent version of the uniform SMA, and as such, constitute a prayer for relief to which no response is required. The OSBA is without sufficient first-hand knowledge or information to form a belief concerning the truth of any averment regarding the consistency of the uniform SMA and PECO's current SMA, and as such, the averments of this paragraph are denied.

24. The averments of this paragraph describe PECO's proposal to revise the allocation of responsibility for PJM meter error correction charges and generation deactivation charges during DSP III and to assume responsibility for collecting generation deactivation charges associated with its default service load from default service customers under PECO's bypassable default service transmission rate, and as such, constitute a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

B. Competitive Bid Solicitation Process and Independent Evaluator

25. The averments of this paragraph outline the Company's plan to solicit bids for default service supply beginning in February 2015 and extending over the DSP III term, and as

such, these averments constitute a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

26. The first two sentences of this paragraph outline the Company's plan to obtain bids for default service supply through a request for proposals ("RFP") process conducted by NERA as independent third-party evaluator and also describe proposed changes to the RFP rules for DSP III to conform to the universal SMA. The third sentence describes PECO's proposal to maintain the DSP II 50% "load cap." As such, these averments constitute a prayer for relief, to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

27. The averments of this paragraph state several conclusions of law regarding PECO's proposed competitive procurement process to which no response is required. The averments of this paragraph also request that the Commission approve the revised SMA as an affiliated interest agreement, and as such, these averments constitute a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

C. Consistency With Regional Transmission Organization Requirements

28. The averments of this paragraph state several conclusions of law to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

D. AEPS Compliance

29-30. The averments of these paragraphs outline PECO's plans with regards to its Alternative Energy Portfolio Standards ("AEPS") requirements, and as such, these averments

constitute a prayer for relief, to which no response is required. The OSBA is without sufficient first-hand knowledge or information to form a belief concerning the truth of any averment that PECO is currently meeting its AEPS requirements, and any such averment is denied.

III. CONTINGENCY PLANS

31-32. The averments of these paragraphs outline the Company's proposed contingency plans in the event PECO does not obtain sufficient supply through its procurement processes or experiences a supplier default under the SMA, and as such, these averments constitute a prayer for relief, to which no response is required. Any averment that these proposed contingency plans are in accordance with the Commission's Default Service Regulations is a conclusion of law to which no response is required. To the extent a response is deemed necessary, the averments of these paragraphs are denied.

IV. RATE DESIGN AND COST RECOVERY

33. The averments of these paragraphs describe the Company's proposal to continue its existing rate design approved by the Commission in DSP II, with one change to the reconciliation process and as such, these averments constitute a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of these paragraphs are denied.

34. The first averment of this paragraph describes PECO's current practice of quarterly reconciliation of the GSA for residential, small commercial, and medium commercial customers and on a monthly basis for large commercial and industrial customers, to which no

response is required. The second averment states that PECO proposes to continue to adjust the cost of generations supply in this manner, which is a prayer for relief to which no response is required.

35. The first averment of this paragraph describes PECO's current GSA reconciliation methodology of comparing actual default service supply costs to billed revenue and reconciling the differences in these amounts quarterly, to which no response is required. The second averment states that the timing of reconciliation in combination with billing cycle lag and seasonal variations can result in substantial swings in the over/under collection component of the GSA. The OSBA is without sufficient first-hand knowledge or information to form a belief concerning the truth of this averment, and as such, this averment is denied. The third averment proposes to reconcile the over/under collection component of the GSA on a semi-annual basis in order to reduce "swings" for residential and commercial customers. The OSBA is without sufficient first-hand knowledge or information to form a belief concerning the truth of this averment, and as such, this averment is denied.

36. The averments of this paragraph describe the Company's proposal to make limited tariff changes related to recovery of costs incurred by PECO to implement any additional retail market enhancements directed by the Commission during DSP III, and as such, these averments constitute a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

37. The averments of this paragraph request that the Commission expressly affirm that PECO has a right to full and current recovery of all costs of DSP III, and as such, these

averments constitute a conclusion of law and a prayer for relief to which no response is required.

To the extent a response is deemed necessary, the averments of this paragraph are denied.

V. RETAIL MARKET ENHANCEMENTS

38. The averments of this paragraph describe programs implemented under DSP II and PECO's proposal to continue offering the Standard Offer Program using the same method of cost recovery as under DSP II, and as such, these averments constitute a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of this paragraph are denied.

39. The averments of this paragraph describe PECO's proposal to implement three additional programs, specifically, Seamless Moves, Instant Connect, and Customer Account Number Access for EGSs, and as such, these averments constitute a prayer for relief to which no response is required. To the extent a response is deemed necessary, the averments of these paragraphs are denied.

40. This paragraph states that the Commission is currently reviewing the program design and cost recovery mechanisms for these additional programs in separate proceedings. The OSBA is without sufficient first-hand knowledge or information to form a belief concerning the truth of this averment, and as such, this averment is denied.

VI. PROCEDURAL ISSUES AND COMMISSION APPROVAL

41. The averments of this paragraph constitute a proposed procedural schedule for this proceeding, to which no response is required. To the extent a response is deemed necessary,

these averments are denied. The OSBA will work diligently with the other parties to this proceeding to come up with a mutually agreeable procedural schedule.

VII. NOTICE

42-44. The averments of these paragraphs regarding notice requirements constitute a prayer for relief, and as such, no response is required. To the extent a response is deemed necessary, these averments are denied.

VII. CONCLUSION

The averments of this un-numbered paragraph constitute a prayer for relief and conclusions of law. Therefore, no response is required. To the extent a response is deemed necessary, these averments are denied.

WHEREFORE, the OSBA respectfully requests that the Commission refer PECO's Petition to the Office of Administrative Law Judge for hearings and the preparation of an Initial Decision.

Respectfully submitted,


Elizabeth Rose Triscari
Assistant Small Business Advocate
Attorney ID No. 306921

For:

John R. Evans
Small Business Advocate

Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)

Dated: March 28, 2014

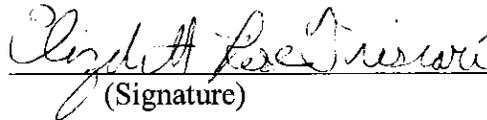
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for :
Approval of Its Default Service Plan for the : **Docket No. P-2014-2409362**
Period from June 1, 2015 through May 31, 2017 :

VERIFICATION

I, Elizabeth Rose Triscari, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

Date: March 28, 2014



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

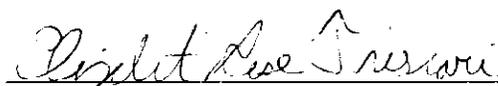
**PETITION OF PECO ENERGY COMPANY :
FOR APPROVAL OF ITS DEFAULT : Docket No. P-2014-2409362
SERVICE PROGRAM FOR THE PERIOD :
FROM JUNE 1, 2015 THROUGH MAY 31, 2017:**

NOTICE OF APPEARANCE

The Office of Small Business Advocate, pursuant to 52 Pa. Code § 1.24, hereby enters the appearance of Elizabeth Rose Triscari, in the above-captioned proceeding.

Documents in this proceeding should now be served on the following:

Elizabeth Rose Triscari
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300 North Second Street – Suite 1102
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(717) 783-2831 (fax)
etriscari@pa.gov



Elizabeth Rose Triscari
Assistant Small Business Advocate
Attorney ID No. 306921

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(717) 783-2525
(717) 783-2831 (fax)

Dated: March 28, 2014

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for :
Approval of Its Default Service Plan for the : **Docket No. P-2014-2409362**
Period from June 1, 2015 through May 31, 2017 :

CERTIFICATE OF SERVICE

I certify that I am serving two copies of the Notice of Intervention, Answer, Verification, Public Statement, and Notice of Appearance, on behalf of the Office of Small Business Advocate, by e-filing, e-mail, and/or first-class mail (unless otherwise noted) upon the persons addressed below:

Hon. Cynthia W. Fordham
Administrative Law Judge
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(First-class Mail Only)

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Keller, TX 76248

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Andrew Ruskay d/b/a

Guaranteed Electric Brokers

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Best Power, LLC

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(First-class Mail Only)

Better Cost Control

d/b/a Ardor Energy

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Newton, MA 02462

(First-class Mail Only)

BidURenergy

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(First-class Mail Only)

AP Gas & Electric (PA), LLC
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(First-class Mail Only)

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(First-class Mail Only)

Best Energy, LLC
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Chicago, IL 60606
(First-class Mail Only)

Best Practice Energy, LLC
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Wakefield, RI 02849
(First-class Mail Only)

Better Cost Energy

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(First-class Mail Only)

Alpha Buyer, LLC
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(First-class Mail Only)

AEP Energy, Inc.
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Chicago, IL 60606
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Affinity Energy Management, LLC
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Borough of Columbia
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Bel Air, MD 21014
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BTU Energy, LLC
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C Group Energy Services, LLC
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118 Lakeview Trail
Conyngham, PA 18219
(First-class Mail Only)

Castlebridge Energy Group
1414 Key Highway - #300 M
Baltimore, MD 21230
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CCES, LLC
155 Gibbs Greet - #425
Rockville, MD 20850
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Champion Energy Services, LLC
1500 Rankin Road - #200
Houston, TX 77073
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Choice Energy Services
5151 San Fillipe - #2200
Houston, TX 77056
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Chrislynn Energy Services, Inc.
301 Appleridge Court
Gibsonia, PA 15044
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Lewes, DE 19958
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Commerce Energy, Inc.
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LaPalma, CA 90623
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Community Energy, Inc.
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Houston, TX 77252-2197
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Baltimore, MD 21202
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Current Choice, Inc.
46 Munroe Road
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The Woodlands, TX 77393-1204
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Buffalo, NY 14202
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Silver Spring, MD 20910
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West Chester, PA 19380
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1500 Oxford Drive - #210
Bethel Park, PA 15102
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ConEdison Solutions, Inc.

100 Summit Lake Drive - #410
Valhalla, NY 10595

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Constellation Energy Power Choice, Inc.

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Chicago, IL 60661

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Clearwater, FL 33755

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Customer Acquisition Specialists

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Clearwater, FL 33757

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990 Pinecrest Drive
Sugar Grove, IL 60554

(First-class Mail Only)

Direct Energy Business, LLC

1001 Liberty Avenue
Pittsburgh, PA 15222

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Direct Energy Services, LLC

7385 North State Route 10
Westerville, OH 43082

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Discount Power, Inc.

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Shelton, CT 06484

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Dome-Tech, Inc.

510 Thornall Street
Edison, NJ 08837

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DPL Energy Resources, Inc.

1065 Woodman Drive
Dayton, OH 45432

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Duke Energy Retail Sales, LLC

139 East Fourth Street
Mail Drop EA600

Cincinnati, OH 45202

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DWP Energy Holdings, LLC

604 Arizona Avenue - #209
Santa Monica, CA 90401

(First-class Mail Only)

Early Bird Power, LLC

One Adam Street
Milton, MA 02186

(First-class Mail Only)

EGP Energy Solutions, LLC

300 East Lombard Street - #840
Baltimore, MD 21202

(First-class Mail Only)

Electric Advisors, Inc.

5272 River Road - #440
Bethesda, MD 20816

(First-class Mail Only)

Employers' Energy Alliance of PA

2171 West 38th Street
Erie, PA 16508

(First-class Mail Only)

Discount Energy Group, LLC

22809 Pacific Coast Highway - #100
Malibu, CA 90265

(First-class Mail Only)

Diversegy, LLC

2720 North Stemmons Freeway - #900
Dallas, TX 75207

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Dominion Retail

P. O. Box 298
Pittsburgh, PA 15230-0298

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414 South Main Street - #200
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Pittsburgh, PA 15219
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Boulder, CO 80301
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Spokane, WA 99201
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Tyler, TX 75703
(First-class Mail Only)

EMEX, LLC
2825 Wilcrest Drive - #450
Houston, TX 77042
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30600 Telegraph Road - #3350
Bingham Farms, MI 48025-4533
(First-class Mail Only)

Energetix, Inc.
50 Methodist Hill Drive - #1500
Rochester, NY 14623
(First-class Mail Only)

Energy Auction Exchange, LLC
3557 West 9800 South - #250
South Jordan, UT 84095
(First-class Mail Only)

Energy Consultants, LLC
209 Plymouth Avenue
West Berlin, NJ 08091
(First-class Mail Only)

Energetix, Inc.
50 Methodist Hill Drive - #1500
Rochester, NY 14623
(First-class Mail Only)

Energy Auction Exchange, LLC
3557 West 9800 South - #250
South Jordan, UT 84095
(First-class Mail Only)

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209 Plymouth Avenue
West Berlin, NJ 08091
(First-class Mail Only)

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1408 Sweet Home Road - #8
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651 Holiday Drive - #300
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Upper Darby, PA 19082

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190 Welles Street - #110
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Sandwich, MA 02563

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Monroeville, PA 15146

(First-class Mail Only)

Global Vision Energy, LLC
1738 Creekview Drive
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1301 McKinney - #1250
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341 White Pond Drive - Suite B-3
Akron, OH 44320
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Galt Energy
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Global Energy Concepts, LLC
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Sparta, NJ 07871
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Florham Park, NJ 07932
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Austin, TX 78768
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Hess Small Business Services, LLC
One Hess Plaza
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Canada
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Downingtown, PA 19335
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Chicago, IL 60654
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Liberty Power Holdings
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Metromedia Power, Inc.
60 Industrial Way West - Suite F
Eatontown, NJ 07724
(First-class Mail Only)

Mid-American Energy Company
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Des Moines, IA 50306-0657
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Mint Energy, LLC
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1210 Heather Knoll Lane
Media, PA 19063
(First-class Mail Only)

Muirfield Energy, Inc.
425 Metro Plaza North - #550
Dublin, OH 43017-5347
(First-class Mail Only)

National Utility Service, Inc.
1 Maynard Drive
Park Ridge, NJ 07656-1879
(First-class Mail Only)

Nationwide New Energy Management
P. O. Box 3077
McKinney, TX 75070
(First-class Mail Only)

Negawatt Business Solutions
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NextEra Energy Services Pennsylvania
P. O. Box 14000
Juno Beach, FL 33408-0420
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(First-class Mail Only)

Mitchell Energy Management
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Wilmington, DE 19803-2204
(First-class Mail Only)

Mondre Energy, Inc.
1800 JFK Blvd. - #1504
Philadelphia, PA 19103
(First-class Mail Only)

MP2 Energy NE, LLC
Waterway Avenue - #625
The Woodlands, TX 77380
(First-class Mail Only)

National Energy Management, LLC
12407 North Mo Pack Expressway
Suite 100-348
Austin, TX 78758
(First-class Mail Only)

National 1 Energy, LLC
2701 East President George Bush Hwy
Suite #210
Plano, TX 75074
(First-class Mail Only)

Natures Current, LLC
95 Fairmount Avenue
Philadelphia, PA 19123
(First-class Mail Only)

New River Group
4041 North High Street - #202
Columbus, OH 43214
(First-class Mail Only)

Noble Americas Energy Solutions
401 West A Street - #500
San Diego, CA 92101
(First-class Mail Only)

North American Power and Gas, LLC
20 Glover Avenue
Norwalk, CT 06850
(First-class Mail Only)

North Shore Energy Consulting, LLC
7160 Chagrin Road - #100
Chagrin Falls, OH 44023
(First-class Mail Only)

Northeast Energy Advisors, LLC
10900 Perry Highway - #210
Pittsburgh, PA 15090
(First-class Mail Only)

NRGING, LLC
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Alexandria, VA 22310
(First-class Mail Only)

Option One Energy, LLC
321 North Clark Street - 5th Floor
Chicago, IL 60654
(First-class Mail Only)

Palmco Power PA
1350 60th Street
Brooklyn, NY 11219
(First-class Mail Only)

Park Power, LLC
150 N. Radnor Chester Road - Ste. A-130
Radnor, PA 19087
(First-class Mail Only)

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Burlington, MA 01803
(First-class Mail Only)

Pepco Energy Services, Inc.
1300 North 17th Street - #1600
Arlington, VA 22209
(First-class Mail Only)

PES Brokers, Inc.
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Richmond, TX 77469
(First-class Mail Only)

Platinum Advertising II, LLC
4911 East Street Road - Suite A
Trevose, PA 19053
(First-class Mail Only)

Power Brokers, LLC
2929 Carlisle Street - #375
Dallas, TX 75204
(First-class Mail Only)

Northeast Energy Partners, LLC
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Enfield, CT 06082
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On-Demand Energy, Inc.
500 Cherrington Parkway - #400
Moon Township, PA 15108
(First-class Mail Only)

Options Consulting Services
7300 International Drive
Holland, OH 43528
(First-class Mail Only)

Paragon Advisors, LLC
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Madison, CT 06443
(First-class Mail Only)

Patch Energy Services, LLC
11030 Marth Ann Court
Fairfax Station, VA 22039
(First-class Mail Only)

Pennell & Wiltberger, Inc.
10 Melrose Avenue - #430
Cherry Hill, NJ 08003
(First-class Mail Only)

Perigee Energy, LLC
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Sugar Land, TX 77478
(First-class Mail Only)

Planet Energy (PA)
5255 Yonge Street - #1500
Toronto, ON MZN 6P4
Canada
(First-class Mail Only)

Plymouth Rock Energy, LLC
1074 Broadway
Woodmere, NY 11598
(First-class Mail Only)

Power Management Co. LLC
1600 Moseley Road
Victor, NY 14564
(First-class Mail Only)

Power Target, LLC
211 Black Angus Court
Millersville, MD 21108
(First-class Mail Only)

Premier Energy Group, LLC
1275 Bound Brook Road - #6
Middlesex, NJ 08846
(First-class Mail Only)

Priority Power Management, LLC
310 West Wall - #500
Midland, TX 79701
(First-class Mail Only)

Pro-Star Energy Services, LLC
1021 Main Street - #1575
Houston, TX 77002
(First-class Mail Only)

Public Power, LLC
1055 Washington Blvd. - 7th Floor
Stamford, CT 06901
(First-class Mail Only)

Reliable Power Alternatives Corp.
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Garden City, NY 11530
(First-class Mail Only)

Reliant Energy Northeast
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Houston, TX 77002
(First-class Mail Only)

Resource Energy Systems, LLC
4 High Ridge Park - #202
Stamford, CT 06905
(First-class Mail Only)

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Manheim, PA 17545

(First-class Mail Only)

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Chicago, IL 60604

(First-class Mail Only)

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Lehigh Valley, PA 18002

(First-class Mail Only)

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Grove City, PA 16127

(First-class Mail Only)

Prospect Resources, Inc.

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Skokie, IL 60076

(First-class Mail Only)

Provident Energy Consulting, LLC

107 Chelsey Drive - #2

P. O. Box 49

Media, PA 19063

(First-class Mail Only)

Reflective Energy Solutions, LLC

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Hackensack, NJ 07601-6204

(First-class Mail Only)

Reliable Power, LLC

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New York, NY 10173

(First-class Mail Only)

Rescom Energy, LLC

20 East Avenue

Bridgeport, CT 06610

(First-class Mail Only)

Respond Power, LLC

100 Dutch Hill Road - #310

Orangeburg, NY 10962

(First-class Mail Only)

RJT Energy Consultants, LLC

110 Washington Avenue - 4th Floor

North Haven, CT 06473

(First-class Mail Only)

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1412 Main Street - #2100

Dallas, TX 75202

(First-class Mail Only)

RPA Energy, Inc.

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Weston, FL 33326

(First-class Mail Only)

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Austin, TX 78729

(First-class Mail Only)

Save Wave Energy, LLC

445 West Erie Street - #110

Chicago, IL 60654

(First-class Mail Only)

School Power, Inc.

315 Fuller Road

P. O. Box 686

Dalton, PA 18414

(First-class Mail Only)

SFE Energy

100 Milverton Drive - #608

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Canada

(First-class Mail Only)

Shiple Choice, LLC

P. O. Box 946

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York, PA 17403

(First-class Mail Only)

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(First-class Mail Only)

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10801 Hammerly Blvd. - #122
Houston, TX 77043
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Satori Enterprises, LLC
815 West Superior Street - #1
Chicago, IL 60642
(First-class Mail Only)

SBR Energy, LLC
523 East Putnam Avenue - #2
Greenwich, CT 06830
(First-class Mail Only)

Secure Energy Solutions, LLC
12 Somers Road
East Longmeadow, MA 01028
(First-class Mail Only)

Shimshek Energy, LLC
1005 South Bee Street
Pittsburgh, PA 15220
(First-class Mail Only)

Shiple Energy Company
415 Norway Street
York, PA 17403
(First-class Mail Only)

SourceOne, Inc.
132 Canal Street
Boston, MA 02114
(First-class Mail Only)

South Shore Trading and Distributors, Inc.
2937 West Estes Avenue
Chicago, IL 60645
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Spark Energy, LP
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Houston, TX 77042
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Sprague Operating Resources, LLC
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220 Main Street South #206
Southbury, CT 06488
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Louisville, KY 40223
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Sunwave Gas and Power Pennsylvania
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Bowie, MD 20716-1397
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The Eric Ryan Corporation
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Ellwood City, PA 16117
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Tobelmann Energy Brokers, Inc.
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Philadelphia, PA 19101-7287
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Dallas, TX 75287
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The Legacy Energy Group, LLC
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Warrenton, VA 20186
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3 Batterymarch Park - 4th Floor
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The Woodlands, TX 77393-165
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Mora, MN 55051

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University of Pennsylvania

100 Pine Street

Harrisburg, PA 17108

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120 Marguerite Drive - #201

Cranberry Township, PA 16066

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2642 Van Ness Avenue - #101

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311 East Nakoma

San Antonio, TX 78216

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U. S. Gas & Electric

290 N. W. 165th Street - Penthouse 5

North Miami Beach, FL 33169

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U. S. Power Trade, LLC

2454 Lakemont Drive

Gibsonia, PA 15044

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1 Meridian Blvd. - #2C01

Wyomissing, PA 19610

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Unified Energy Alliance, LLC

P. O. Box 211

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7328 West University Avenue - Suite C

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220 South 17th Street

Camp Hill, PA 17011-5509

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Urish Popeck & Co., LLC

Three Gateway Center - #2400

Pittsburgh, PA 15222

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Utility Savings Solutions, LLC

304 Pine Court

Selbyville, DE 19975

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Verdigris Energy, LLC

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Washington Gas Energy Services, Inc.

13865 Sunrise Valley Drive - #200

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Viridian Energy PA, LLC
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Whitefence, Inc.
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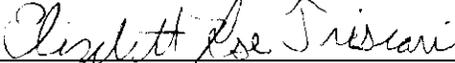
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Date: March 28, 2014


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