

COMMONWEALTH OF PENNSYLVANIA



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April 28, 2015

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

RE: Commonwealth of Pennsylvania, by Attorney General  
KATHLEEN G. KANE, Through the Bureau of Consumer  
Protection,

And

TANYA J. McCLOSKEY, Acting Consumer Advocate,  
Complainants

v.

IDT Energy, Inc.

Respondent

Docket No. C-2014-2427657

Secretary Chiavetta:

Enclosed please find the Answer of Joint Complainants Commonwealth of Pennsylvania, Bureau of Consumer Protection and the Office of Consumer Advocate to the Petition to Intervene of Anthony Ferrare, in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Kristine E. Robinson".

Kristine E. Robinson  
Assistant Consumer Advocate  
PA Attorney I.D. #316479

Enclosures

cc: Honorable Elizabeth Barnes, ALJ  
Honorable Joel Cheskis, ALJ  
Certificate of Service

\*185194

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-2014-2427657
	:	
TANYA J. McCLOSKEY, Acting Consumer	:	
Advocate,	:	
	:	
Complainants	:	
	:	
v.	:	
	:	
IDT Energy, Inc.,	:	
	:	
Respondent	:	
	:	

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**ANSWER OF JOINT COMPLAINANTS COMMONWEALTH OF PENNSYLVANIA,  
BUREAU OF CONSUMER PROTECTION  
AND OFFICE OF CONSUMER ADVOCATE  
TO THE PETITION TO INTERVENE OF ANTHONY FERRARE**

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On April 8, 2015, Petitioner Anthony Ferrare, on behalf of himself and all others similarly situated by and through his counsel, Jonathan Shub, Esquire and Kohn Swift & Graf, P.C., Scott George, Esquire and Seeger Weiss, LLP and Troy M. Frederick, Esquire and Marcus & Mack, P.C., filed a Petition to Intervene (Petition) and a Public Statement in the above-captioned proceeding. Pursuant to 52 Pa. Code Section 5.66, the Commonwealth of Pennsylvania, by Attorney General Kathleen G. Kane through the Bureau of Consumer Protection (OAG) and the Acting Consumer Advocate Tanya J. McCloskey (OCA) (collectively Joint Complainants) provide the following Answer to the Petition. For the reasons set forth

below, Joint Complainants submit that Administrative Law Judges Elizabeth Barnes and Joel H. Cheskis (ALJs) should deny the Petition.

## **I. INTRODUCTION**

On June 20, 2014, the Joint Complainants filed a Joint Complaint with the Public Utility Commission (Commission) pursuant to, *inter alia*, the Public Utility Code, 66 Pa. C.S. Ch. 28, and the Commission's regulations, 52 Pa. Code Ch. 54, 56 and 111. The Joint Complaint includes seven separate counts and alleges that IDT Energy, Inc. (Respondent, IDT or the Company) violated Pennsylvania law and Commission orders and regulations. Specifically, the seven Counts in the Joint Complaint are: (1) misleading and deceptive promises of savings; (2) misleading and deceptive Welcome Letter and advertisements; (3) slamming; (4) lack of good faith handling of complaints; (5) failing to provide accurate pricing information; (6) prices nonconforming to disclosure statement; and (7) failure to comply with the Telemarketer Registration Act (TRA). With respect to relief, the Joint Complainants request that the Commission find, *inter alia*, that Respondent violated the Public Utility Code and the Commission's regulations and Orders; provide restitution to Respondent's customers; impose a civil penalty; order Respondent to make various modifications to its practices and procedures; and revoke or suspend Respondent's Electric Generation Supplier (EGS) license, if warranted. The Bureau of Investigation and Enforcement (I&E) intervened in the proceeding on July 31, 2014, and the Office of Small Business Advocate (OSBA) intervened on July 10, 2014.

On July 10, 2014, IDT filed Preliminary Objections to the Joint Complaint and an Answer with New Matter to the Joint Complaint generally denying the alleged violations. On July 21, 2014, the Joint Complainants filed an Answer to Preliminary Objections. On July 30, 2014, Joint Complainants filed a Reply to IDT's New Matter. By Order dated August 20, 2014,

the ALJs granted in part and denied in part IDT's Preliminary Objections. Specifically, the ALJs found: 1) that the Commission lacks jurisdiction to hear complaints under the TRA even though compliance with these Acts is required by the Commission regulations; 2) that the Commission lacks jurisdiction to determine if the prices charged to customers conformed to the disclosure statement provided to the customer; and 3) that the Commission lacks jurisdiction to consider the equitable remedy of restitution, but could order refunds pursuant to 66 Pa. C.S. § 1312.

On September 8, 2014, Joint Complaints filed a Petition for Interlocutory Review and Answer to Material Questions with the Commission. Specifically, Joint Complaints sought for the Commission to answer the following questions: (1) Does the Commission have authority and jurisdiction to determine whether a violation of the TRA has occurred when considering whether the Commission's regulations—which require compliance with these laws—have been violated; (2) Does the Commission have the authority and jurisdiction to determine whether the prices charged to customers by an EGS conform to the EGS disclosure statement regarding pricing; and (3) Does the Commission have the authority and jurisdiction to order equitable remedies including restitution. Also on September 8, 2014, IDT filed a Petition for Interlocutory Review and Answer to Material Question with the Commission seeking for the Commission to answer whether it has the authority under Section 1312 of the Public Utility Code to order electric generation suppliers to issue refunds to customers. On September 18, 2014, the Joint Complainants filed a Brief in Support of their Material Questions, and IDT filed a Brief in Opposition. Also on September 18, 2014, IDT filed a Brief in Support of its Material Question and Joint Complainants filed a Brief in Opposition to IDT's Material Question.

Pursuant to the litigation schedule adopted at the Prehearing Conference on August 25, 2014, Joint Complainants served consumer direct testimony from over 200 consumer witnesses

on October 31, 2014. Hearings for cross-examination of the consumer witnesses were initially scheduled for December 8-12, 2014. On November 26, 2014, IDT filed a Motion for Continuance of the evidentiary hearings. IDT's Motion for Continuance was granted by Order dated December 9, 2014, and the evidentiary hearings were rescheduled for February 17-20, 2015.

On December 18, 2014, the Commission issued an Order (December 18 Order) in which it addressed the Petitions for Interlocutory Review and Answer to Material Question(s) filed by the Joint Complainants and IDT. The Commission determined that while it does not have the authority under Section 1312 of the Public Utility Code to order electric generation suppliers to issue refunds to customers, the Commission can direct EGSs to issue refunds for "slamming" or direct refunds when a customer has, otherwise, been switched to an EGS without the customer's consent pursuant to 52 Pa. Code § 57.177(b) or direct refunds for over billing. December 18 Order at 16-18. Additionally, the Commission determined that while it does not have the authority or jurisdiction to determine whether a violation of the TRA has occurred, it does have the authority and jurisdiction to determine whether IDT has violated its regulations at 52 Pa. Code § 111.10, which requires EGSs to comply with the TRA provisions, except for the registration requirement. Id. at 23. The Commission also determined that it has the authority and jurisdiction to determine whether the prices charged to customers by an EGS conform to the EGS disclosure statement regarding pricing, but it does not have the authority and jurisdiction to order equitable remedies including restitution. Id. at 24-26.

On January 27, 2015, a Further Prehearing Conference was convened, and a litigation schedule was adopted for the submission of expert and other non-consumer testimony. Hearings for cross-examination of the consumer witnesses were held on February 17-20, 2015. Joint

Complainant and Intervenors' Direct Testimony of non-consumer witnesses is due on April 30, 2015.

On April 8, 2015 Anthony Ferrare, on behalf of himself and all others similarly situated, filed a Petition to Intervene. For the reasons set forth below, Joint Complainants submit that the ALJs should deny the Petition. Should the ALJs grant the Petition, however, Joint Complainants submit that Mr. Ferrare may intervene on behalf of himself only and must take the record in this matter as it stands.

## **II. ANSWER**

### **A. LEGAL STANDARD**

The Commission's procedural regulations, codified at 52 Pa. Code § 5.72, provide the eligibility requirements for a person to intervene in a Commission proceeding, as follows:

(a) *Persons.* A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

- (1) A right conferred by statute of the United States or of the Commonwealth.
- (2) An interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.
- (3) Another interest of such nature that participation of the petitioner may be in the public interest.

52 Pa. Code § 5.72. In order for a potential intervenor to present an "interest" in the proceeding, and therefore, confer standing, he must show that his interest is a "substantial, immediate and direct interest, as interpreted by Pennsylvania appellate courts." See e.g. PPL Electric Util. Corp. Universal Service and Energy Conservation Plan for 2011 through 2013, Docket No. M-2010-

2179796, Order at 3 (May 5, 2011) (PPL USECP 2011-2013), citing William Penn Parking Garage v. City of Pittsburgh, 464 Pa. 168, 346 A.2d 269 (1975).

Additionally, 52 Pa. Code Section 5.74(b) provides, in pertinent part, as follows:

(b) Petitions to intervene shall be filed:

(1) No later than the date fixed for the filing of responsive pleadings in an order or notice with respect to the proceedings but not less than the notice and protest period established under §§ 5.14 and 5.53 (relating to applications requiring notice; and time of filing) absent good cause shown.

It is well established that allowance of intervention is a matter within the discretion of the Commission. City of Pittsburgh v. Pa. PUC, 33 A.2d 641 (Pa. Super. 1943); NAACP, Inc. v. Pa. PUC, 290 A.2d 704 (Pa. Cmwlth. 1972).

#### **B. RESPONSE TO PETITION TO INTERVENE & PUBLIC STATEMENT**

In his Petition, Petitioner Ferrare asserts that he is eligible to intervene and has an interest in intervening in this proceeding pursuant to 52 Pa. Code § 5.72(a)(2) and (3). Petition at ¶ 2. Petitioner Ferrare states that he contracted with IDT in August of 2013 to purchase electricity for his home, and he began receiving electricity supply service from the Company in September of 2013. Petition at ¶ 3. According to the Petition, Petitioner Ferrare is a Plaintiff in a lawsuit (Class Action) seeking damages for himself and all others similarly situated in the United States District Court for the Eastern District of Pennsylvania, Docket Number 2:14-CV-04658-AB, for conduct that is the subject of this proceeding. Petition at ¶ 4. Petitioner Ferrare seeks to intervene in this proceeding to protect his rights and the rights of other putative class members in the pending Class Action. Petition at ¶ 6.

Petitioner Ferrare's eligibility to intervene in this proceeding on his own behalf is governed by 52 Pa. Code § 5.72(a)(2). Thus, Petitioner Ferrare must show that his interest, which is substantial, immediate and direct, will be directly affected and may be bound by the

action of the Commission in the proceeding. See 52 Pa. Code § 5.72(a)(2); PPL USECP 2011-2013 at 3. Joint Complainants submit that Petitioner Ferrare does not meet the requirements for intervention in this proceeding, because his interest in protecting his rights in the pending Class Action will not be affected by an action of the Commission in this proceeding. Further, Mr. Ferrare's causes of action in the Class Action are not within the Commission's jurisdiction. Additionally, Petitioner Ferrare provides no explanation for his late filed Petition.

Joint Complainants further submit that Petitioner Ferrare lacks standing to intervene on behalf of others similarly situated, as it is well settled at the Commission that a person may not claim standing to intervene in a proceeding to vindicate the rights of a third party that has an opportunity to be heard. See e.g. PECO Energy Company Universal Services Three-Year Plan 2007 – 2009 Submitted in Compliance with 52 Pa. Code § 54.74, Docket No. M-00061945, Order at 3 (Apr. 9, 2008). The OCA and OAG have adequately and zealously represented and will continue to represent the public interest as it relates to the rights of IDT's former, current and future customers in this proceeding in accordance with their statutory authority. Additionally, there is no provision in the Public Utility Code or the Commission's regulations for a class action before the Commission.

Petitioner Ferrare does not meet the requirements for intervention and therefore, his Petition should be denied.

**1. Petitioner Ferrare's Interest in Protecting His Rights in The Pending Class Action Is Not Directly Affected by An Action of the Commission in This Proceeding.**

Petitioner Ferrare's Petition to Intervene in this proceeding on his own behalf is governed by 52 Pa. Code § 5.72(a)(2).<sup>1</sup> As such, Petitioner Ferrare must meet the following requirements in order for his Petition to be granted:

(a) *Persons.* A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

...

(2) An interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.

52 Pa. Code § 5.72(a)(2).

For intervention, a potential intervenor must show that his interest is "substantial, immediate and direct." See PPL USECP 2011-2013 at 3, citing William Penn Parking Garage. The Commission uses the following description in guiding its determination of whether an interest is substantial, immediate and direct:

A "substantial" interest is an interest in the outcome of the litigation which surpasses the common interest of all citizens in procuring obedience to the law. A "direct" interest requires a showing that the matter complained of caused harm to the party's interest. An "immediate" interest involves the nature of the causal connection between the action complained of and the injury to the party challenging it and is shown where the interest the party seeks to protect is within the zone of interest sought to be protected by the statute or the constitutional guarantee in question.

Id., citing George v. Pa. PUC, 735 A.2d 1282 (Pa. Cmwlth. 1999).

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<sup>1</sup> Petitioner Ferrare is not a Commonwealth agency pursuant to 52 Pa. Code § 5.72(b), and neither a statute of the United States nor of the Commonwealth confers on him a right to intervene pursuant to 52 Pa. Code § 5.72(a)(1). Further, although Petitioner Ferrare states that he is eligible to intervene pursuant to 52 Pa. Code § 5.72(a)(3), Petitioner Ferrare has not identified another interest of such nature that his participation may be in the public interest pursuant to 52 Pa. Code § 5.72(a)(3).

In the Petition, Petitioner Ferrare states that he contracted with IDT in August of 2013 to purchase electricity for his home, and he began receiving electricity supply service from the Company on October 31, 2013. Petition at ¶ 3. Attached to the Petition as Exhibit A is the First Amended Class Action Complaint, wherein it is alleged that as a result of the conduct of IDT, Petitioner Ferrare incurred hundreds of dollars in overcharges from January 2014 until March 2014. See Petition at Exh. A, ¶¶ 5, 22-24. According to the Petition, Petitioner Ferrare is a Plaintiff in the Class Action seeking damages for himself and all others similarly situated. Petition at ¶ 4. Petitioner Ferrare seeks to intervene in this proceeding to protect his rights in the pending Class Action and the rights of other putative class members. Petition at ¶ 6. Petitioner Ferrare does not provide any further information in his Petition or Public Statement regarding his specific individual interest in the Joint Complainants' action against IDT or whether his individual interest is substantial, immediate and direct.

Joint Petitioners submit that Petitioner Ferrare's interest in protecting his rights in the pending Class Action will not be directly affected by this proceeding as required for intervention pursuant to 52 Pa. Code § 5.72(a)(2). The Commission has already determined that it lacks the jurisdiction to rule on parties' responsibilities under a private agreement or the authority to award damages under that agreement. See Appvion, Inc. v. FirstEnergy Solutions Corp., Docket No. C-2014-2445500, Order at 10 (January 15, 2015); See also Commonwealth of Pennsylvania, by Attorney General KATHLEEN G. KANE, Through the Bureau of Consumer Protection, And TANYA J. McCLOSKEY, Acting Consumer Advocate v. Blue Pilot Energy, LLC, Docket No. C-2014-2427655, Order at 19 (December 11, 2014). Thus, this proceeding does not prevent Petitioner Ferrare from pursuing his claims against the Company through the Class Action or by

filing a Formal Complaint at the Commission. Therefore, he does not meet the Commission's eligibility requirements for intervention.

Additionally, Petitioner Ferrare did not file his Petition until April 8, 2015, almost ten months into this case. Neither his Petition nor his Public Statement identified any reason for Petitioner Ferrare's failure to file his Petition at an earlier time. Because Petitioner Ferrare does not meet the eligibility requirements to intervene in this proceeding and did not file his Petition timely, Joint Complainants submit that the ALJs should deny his Petition.

Joint Complainants also note that in the event the Petition is granted, the Commission has determined that an intervening party who files an untimely Petition to Intervene must take the record as it stands at the time the Petition to Intervene is granted. See Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement v. UGI Utilities, Inc., Docket No. C-2012-2308997, Order at 13 (Feb. 19, 2013); See also Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement v. West Penn Power Company, Docket No. C-2012-2307244, Order at 5 (Aug. 29, 2013); See also Commonwealth of Pennsylvania, by Attorney General KATHLEEN G. KANE, Through the Bureau of Consumer Protection, And TANYA J. McCLOSKEY, Acting Consumer Advocate v. Energy Services Providers, Inc. d/b/a/ Pennsylvania Gas & Electric, Docket No. C-2014-2427656, Order at 6 (April 23, 2015) (PaG&E Order). Joint Complainants submit that if the ALJs grant Mr. Ferrare's Petition, he should also be required to abide by the litigation schedule that has already been established in this proceeding.

**2. Petitioner Ferrare May Not Intervene on Behalf of Other Customers Similarly Situated.**

Petitioner Ferrare also seeks to intervene in this proceeding on behalf of "all others similarly situated." It is well settled at the Commission that a person seeking intervention may

not claim standing to vindicate the rights of a third party who has the opportunity to be heard. See PECO Energy Company Universal Services Three-Year Plan 2007 – 2009 Submitted in Compliance with 52 Pa. Code § 54.74, Docket No. M-00061945, Order at 3 (Apr. 9, 2008); See also William MacLuckie v. Palmco Energy PA, LLC, Docket No. C-2014-2402558, Opinion and Order (December 4, 2014); See also PaG&E Order at 6-7. As averred in the Joint Complaint, the OCA received over 500 contacts between February and May 2014 from IDT customers, and the OAG had received over 1,900 consumer complaints from IDT customers between February and June 2014. See Joint Complaint at ¶¶ 17, 18. The Office of Consumer Advocate 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.* Additionally, the Attorney General may bring an action in the name of the Commonwealth to restrain by temporary or permanent injunction, any act or practice declared unlawful by the Consumer Protection Law, when she determines that the proceeding would be in the public interest, as authorized by 73 P.S. § 201-4. The Attorney General, as the chief law officer of the Commonwealth of Pennsylvania pursuant to Article IV § 4.1 of the Pennsylvania Constitution, is further authorized to initiate and maintain this action, and does so, pursuant to the Commonwealth Attorneys Act, 71 P.S. § 732-204.

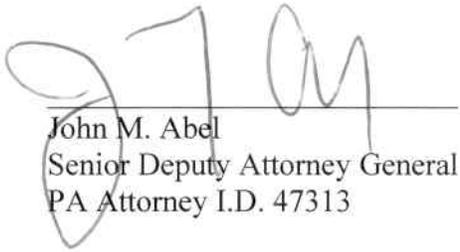
While the Federal Rules of Civil Procedure specifically allow for one or more members of a class to sue or be sued as representative parties on behalf of all members of the class under certain circumstances (see Fed. R.C.P. 23), neither the Public Utility Code nor the Commission's regulations provide for a class action process at the Commission. As such, Joint Complainants submit that even if Petitioner Ferrare met the Commission's requirements to intervene individually in the instant proceeding, he may not intervene on behalf of "all others similarly situated."

Joint Complainants acknowledge that their participation in a proceeding does not necessarily limit the right of an individual consumer from intervening in the proceeding on his or her own behalf if he or she meets the Commission's requirements for intervention. Further, Joint Complainants acknowledge that their participation in a proceeding does not limit individual consumers from pursuing formal complaints before the Commission. As noted above, however, Mr. Ferrare is not permitted to claim standing to intervene in order to vindicate the rights of other consumers. The Commission's statute and regulations do not permit individuals to bring class actions before the Commission. Consequently, Petitioner Ferrare's Petition to Intervene on behalf of "all others similarly situated" should be denied.

### III. CONCLUSION

WHEREFORE, Joint Complainants respectfully request that the ALJs deny the Petition to Intervene of Anthony Ferrare because he does not meet the Commission's intervention requirements.

Respectfully submitted,



John M. Abel  
Senior Deputy Attorney General  
PA Attorney I.D. 47313

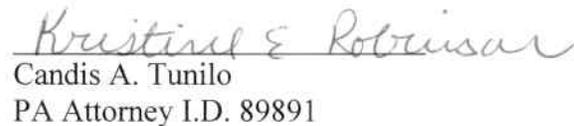
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CERTIFICATE OF SERVICE

Commonwealth of Pennsylvania, by :  
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Through the Bureau of Consumer Protection, :  
: :  
And :  
: :  
TANYA J. McCLOSKEY, Acting Consumer :  
Advocate, :  
Complainants :  
: Docket No. C-2014-2427657  
v. :  
: :  
IDT ENERGY, INC., :  
Respondent :

I hereby certify that I have this day served a true copy of the foregoing document, the Answer of Joint Complainants Commonwealth of Pennsylvania, Bureau of Consumer Protection and Office of Consumer Advocate to the Petition to Intervene of Anthony Ferrare, in the manner and upon the persons listed below:

Dated this 28th day of April 2015.

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