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AUG 13 2018



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, HARRISBURG, PA 17120

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU
IN REPLY PLEASE
REFER TO OUR FILE

July 24, 2018

Docket No. A-2018-3003480
Utility Code: 1221195

CERTIFIED

ERIC GREENBURG MANAGING DIRECTOR
SOLUTION ENERGY LLC
142 MINEOLA AVE #3F
ROSLYN HEIGHTS NY 11577

~~RECEIVED
JUL 23 2018
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU~~

RE: Natural Gas Supplier License Application

Dear Mr. Greenburg:

On July 18, 2018, Solution Energy, LLC's application for a Natural Gas Supplier license was accepted for filing and docketed with the Public Utility Commission. The application was incomplete. In order for us to complete our analysis of your application, the Energy Industry Group requires answers to the attached question(s).

Please be advised that you are directed to forward the requested information to the Commission within **30** days of receipt of this letter. Failure to respond may result in the application being denied. As well, if Solution Energy, LLC has decided to withdraw its application, please reply notifying the Commission of such a decision.

Please forward the information to the Secretary of the Commission at the address listed below. When submitting documents, all documents requiring notary stamps must have original signatures. Please note that some responses may be e-filed to your case, <http://www.puc.pa.gov/efiling/default.aspx>. A list of document types allowed to be e-filed can be found at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.

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

Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

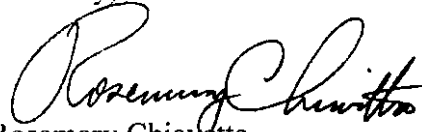
I, Eric Greenburg, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the

statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities). *egf*

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

In addition, to expedite completion of the application, please also e-mail the information to Jeremy Haring at jharing@pa.gov. Please direct any questions to Jeremy Haring, Bureau of Technical Utility Services, at jharing@pa.gov (preferred) or (717) 783-6175.

Sincerely,



Rosemary Chiavetta
Secretary

Enclosure

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JUL 26 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Docket No. A-2018-3003480
Solution Energy, LLC
Data Requests

1. Reference Application, Section 2.b, Formation Documents – Applicant failed to provide limited liability company formation documentation. Please provide the missing documentation. ✓ see attached including page 2 with signature.
2. Reference Application, Section 2.b, Chief Officers – Applicant failed to provide its chief officers names and addresses. Please provide an updated application page with the requested information. ✓ - see page 6 of application.
3. Reference Application, Section 4.c, Description of Proposed Services – The applicant failed to provide a description of proposed services in the application package. Please submit an updated application page including the services which the applicant proposes to offer. ✓ see page 8 of application.
4. Reference Application, Section 4.d, Proposed Service Area – Applicant failed to provide bonding letters for Peoples Natural Gas Company LLC - Equitable Division, PECO Energy Company, National Fuel Gas Distribution Corporation, Valley Energy, Peoples Natural Gas Company, LLC, UGI Utilities, Inc., UGI-Penn Natural Gas, UGI-Central Penn Gas, and Peoples Gas Company, LLC. Please provide the missing documentation. will send as they arrive.
A 1 letter for all 3 peoples entities included in this package.
5. Reference Application, Section 7.f, Taxation – Applicant failed to provide a Corporate Box Number or Revenue ID Number. Please resubmit a complete Tax Certification Statement. ✓ We are a dual member LLC and we file our taxes as a Partnership.
6. Reference Application, Section 8.d, Oversight of Marketing – Applicant failed to provide an explanation of ethical procedures. Please file an updated Application page with the information requested. ✓ see page 13 of application
7. Reference Application, Section 11, Affidavits – The Affidavits submitted are incomplete. Please provide Affidavits with Eric Greenberg's name in the space for "Affiant" and Solution Energy, LLC in the spaces for the "Name of Applicant". Please resubmit notarized Application and Operations Affidavits. ✓ see attached Appendix A & B.

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SECRETARY'S BUREAU

2. BUSINESS ENTITY FILINGS AND REGISTRATION

a. **FICTITIOUS NAME:** *(Select appropriate statement and provide supporting documentation as listed.)*

The Applicant will be using a fictitious name or doing business as ("d/b/a")

Provide a copy of the Applicant's filing with Pennsylvania's Department of State Pursuant to 54 Pa. C.S. §311.

Or

The Applicant will not be using a fictitious name.

b. **BUSINESS ENTITY AND DEPARTMENT OF STATE FILINGS:**

(Select appropriate statement and provide supporting documentation. As well, understand that Domestic means being formed within Pennsylvania and foreign means being formed outside Pennsylvania.)

The Applicant is a sole proprietor.

- If the Applicant is located outside the Commonwealth, provide proof of compliance with 15 Pa. C.S. §4124 relating to Department of State filing requirements.

Or

The Applicant is a:

- domestic general partnership (*)
- domestic limited partnership (15 Pa. C.S. §8511)
- foreign general or limited partnership (15 Pa. C.S. §4124)
- domestic limited liability partnership (15 Pa. C.S. §8201)
- foreign limited liability general partnership (15 Pa. C.S. §8211)
- foreign limited liability limited partnership (15 Pa. C.S. §8211)

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Give name, d/b/a, and address of partners. If any partner is not an individual, identify the business nature of the partner entity and identify its partners or officers.
- Provide the state in which the business is organized/formed and provide a copy of the Applicant's charter documentation.
- * If a corporate partner in the Applicant's domestic partnership is not domiciled in Pennsylvania, attach a copy of the Applicant's Department of State filing pursuant to 15 Pa. C.S. §4124.

or

The Applicant is a:

- domestic corporation (15 Pa. C.S. §1308)
- foreign corporation (15 Pa. C.S. §4124)
- domestic limited liability company (15 Pa. C.S. §8913)
- foreign limited liability company (15 Pa. C.S. §8981)
- Other (Describe):

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above. *see attached for Articles of Org. including page 2 with signatures*
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation. *NY - see attached for Articles of Org.*
- Give name and address of officers.
 - 1) Eric Greenberg - Managing Director - 6 Attey Pond Ct., Dix Hill, NY 11746*
 - 2) Ronald Blotman - CEO - 114 Erie Ave., Atlantic Beach, NY 11509*

3. AFFILIATES AND PREDECESSORS

(both in state and out of state)

a. **AFFILIATES:** Give name and address of any affiliate(s) currently doing business and state whether the affiliate(s) are jurisdictional public utilities. If the Applicant does not have any affiliates doing business, explicitly state so. Also, state whether the applicant has any affiliates that are currently applying to do business in Pennsylvania.

b. **PREDECESSORS:** Identify the predecessor(s) of the Applicant and provide the name(s) under which the Applicant has operated within the preceding five (5) years, including address, web address, and telephone number, if applicable. If the Applicant does not have any predecessors that have done business, explicitly state so.

c. **PROPOSED SERVICES:** Describe in detail the natural gas supply services which the Applicant proposes to offer. *We plan to act as a broker, marketer in the PA markets. Hope to help our clients save money by switching to third party suppliers at lower rates than the utility is offering.*

d. **PROPOSED SERVICE AREA:** Check the box of each Natural Gas Distribution Company for which the Applicant proposes to provide service.

- | | |
|---|---|
| <input type="checkbox"/> Columbia | <input type="checkbox"/> Philadelphia Gas Works |
| <input type="checkbox"/> National Fuel Gas | <input type="checkbox"/> UGI Central Penn |
| <input type="checkbox"/> PECO | <input type="checkbox"/> UGI Penn natural |
| <input type="checkbox"/> Peoples Gas – Equitable Div. | <input type="checkbox"/> UGI Utilities |
| <input type="checkbox"/> Peoples Natural Gas | <input type="checkbox"/> Valley Energy |
| <input type="checkbox"/> Peoples Gas Company | <input type="checkbox"/> All of the above |

e. **CUSTOMERS:** Applicant proposes to provide services to:

- Residential Customers
- Small Commercial Customers - (Less than 6,000 Mcf annually)
- Residential and Small Commercial as Mixed Meter **ONLY (CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE)**
- Large Commercial Customers - (6,000 Mcf or more annually)
- Industrial Customers
- Governmental Customers
- All of above (Except Mixed Meter)
- Other (Describe):

f. **START DATE:** Provide the approximate date the Applicant proposes to actively market within the Commonwealth.

b.) **NGDCs:** Pursuant to Sections 1.57 and 1.58 of the Commission's Regulations, 52 Pa. Code §§1.57 and 1.58, provide Proof of Service of the Application and attachments upon each of the Natural Gas Distribution Companies the Applicant proposed to provide service in. Upon review of the Application, further notice may be required pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14. Contact information for each NGDC is as follows.

<p>Columbia Gas of PA, Inc. Michele Caddell 290 W. Nationwide Blvd. Columbus, OH 43215 PH: 614.460.6841 FAX: 614.460.8447 e-mail: mcaddell@nisource.com</p>	<p style="text-align: right;">(✓)</p>
<p>Peoples Natural Gas Company LLC – Equitable Division Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>National Fuel Gas Distribution Corp. David D. Wolford 6363 Main Street Williamsville, NY 14221 PH: 716.857.7483 FAX: 716.857.7479 e-mail: wolfordd@natfuel.com</p> <p style="text-align: right;">(✓) 0 Source</p>
<p>Peoples Natural Gas Company LLC Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>PECO Carlos Thillet, Manager, Gas Supply and Transportation 2301 Market Street, S9-2 Philadelphia, PA 19103 PH: 215.841.6452 Email: carlos.thillet@exeloncorp.com</p> <p style="text-align: right;">(✓) 0</p>
<p>Peoples Gas Company LLC Carol Scanlon 375 North Shore Drive Pittsburgh, PA 15212 PH: 412.208.6931 FAX: 412.208.6577 e-mail: Carol.Scanlon@peoples-gas.com</p>	<p>Philadelphia Gas Works Nicholas LaPergola 800 West Montgomery Avenue Philadelphia, PA 19122 PH: 215.684.6278 email: pgwchoicesupply@pgworks.com</p> <p style="text-align: right;">(✓)</p>
<p>UGI Central Penn David Lahoff 2525 N. 12th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@ugi.com</p>	<p>UGI David Lahoff 2525 N. 12th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@ugi.com</p> <p style="text-align: right;">(✓) 0</p>
<p>Valley Energy Inc. Ed Rogers 523 South Keystone Avenue Sayre, PA 18840-0340 PH: 570.888-9664 FAX: 570.888.6199 email: erogers@ctenterprises.org</p>	<p>UGI Penn Natural David Lahoff 2525 N. 12th Street, Suite 360 Reading, PA 19612-2677 PH: 610.796.3520 Email: dlahoff@ugi.com</p> <p style="text-align: right;">(✓) 0</p>

This bonding letter for all 3 PA entities (PEOPLES)



375 North Shore Drive
Pittsburgh, Pennsylvania 15212

www.peoples-gas.com

Carol Scanlon
Manager, Rates and Regulatory Affairs

Peoples Service Company LLC
Phone: 412-208-6931
Email: Carol.Scanlon@peoples-gas.com

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May 10, 2018

AUG 13 2018

Eric Greenberg
Managing Director
Solution Energy, LLC
142 Mineola Ave. #3F
Roslyn Heights, NY 11577

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dear Mr. Greenberg:

We are pleased that Solution Energy, LLC has applied for a license to provide natural gas services on the Peoples Group of Companies. Specifically you have requested to be licensed as a supplier on the distribution systems of Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division, and Peoples Gas Company LLC (formerly Peoples TWP) (“the Companies”).

Since Solution Energy, LLC is not currently serving customers on the Peoples systems, we have determined at this time that Solution Energy, LLC does not need a bond or other financial security requirement to provide these services to the Company’s customers.

If a Pool is established, and customers are enrolled which alters the creditworthiness requirement or the Company’s exposure to Solution Energy, LLC provision of services on the Peoples’ system changes in the future, the Companies may deem it appropriate to require a bond or other financial instrument.

If you have any questions feel free to contact me at 412-208-6931 or by email at Carol.Scanlon@peoples-gas.com.

Sincerely,

Carol Scanlon
Manager, Rates and Regulatory Affairs
Peoples Natural Gas Company LLC

Cc: Stephen Kelly
Mina Speicher

c. **DOOR TO DOOR SALES:** Will the Applicant be implementing door to door sales activities?

- Yes
 No

If yes, will the Applicant be using verification procedures?

- Yes
 No

If yes, describe the Applicant's verification procedures.

d. **OVERSIGHT OF MARKETING:** Explain all methods Applicant will use to ensure all marketing is performed in an ethical manner, for both employees and subcontractors.

Delton Energy, LLC is made up of 2 employees - Eric Greenberg and Ronald Glideman. We have been energy brokers in most deregulated states for 10 years now. All aspects of our business are checked and then double checked to ensure ethical standards of the highest level. We only deal with top tier suppliers - most of which are underlying utilities in their own right.

e. **OFFICERS:** Identify Applicant's chief officers, and include the professional resumes for any officers directly responsible for operations. All resumes should include date ranges and job descriptions containing actual work experience.

9. DISCLOSURE STATEMENT:

(Not applicable for an applicant applying for a license exclusively as a broker/marketer.)

DISCLOSURE STATEMENTS: If proposing to serve Residential and/or Small Commercial (less than 6,000 Mcf annually) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix E to this Application.

- Natural gas should be priced in clearly stated terms to the extent possible. Common definitions should be used. All consumer contracts or sales agreements should be written in plain language with any exclusions, exceptions, add-ons, package offers, limited time offers or other deadlines prominently communicated. Penalties and procedures for ending contracts should be clearly communicated.

Appendix A

APPLICATION AFFIDAVIT

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JUL 28 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

[Commonwealth/State] of New York :

ss.

County of Nassau :

Eric Greenberg, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the Managing Director (Office of Affiant) of Solution Energy, LLC (Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That the Applicant herein Solution Energy, LLC has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as a natural gas supplier pursuant to 66 Pa. C.S. § 2208 (c)(1).

That the Applicant herein Solution Energy, LLC has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein Solution Energy, LLC acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

That the Applicant herein Solution Energy, LLC acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

[Signature]
Signature of Affiant

Sworn and subscribed before me this 26th day of July, 2018.

[Signature]
Signature of official administering oath

My commission expires November 01, 2018

NATALIE M. NAU
Notary Public, State of New York
No. 01NA6230499
Qualified in Nassau County
Commission Expires Nov. 01, 2018

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AUG 13 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RECEIVED

AUG 13 2018

Appendix B

OPERATIONS AFFIDAVIT

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

~~RECEIVED~~

~~JUL 28 2018~~

~~PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU~~

[Commonwealth/State] of New York :

ss.

County of Nassau :

Eric Greenberg, Affiant, being duly [sworn/affirmed] according to law,
deposes and says that:

[He/she is the Managing Director (Office of Affiant) of Solution Energy, LLC
(Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That Solution Energy, LLC, the Applicant herein, acknowledges that [Applicant] may have obligations pursuant to this Application consistent with the Public Utility Code of the Commonwealth of Pennsylvania, Title 66 of the Pennsylvania Consolidated Statutes; or with other applicable statutes or regulations including Emergency Orders which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.

That Solution Energy, LLC, the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render natural gas supply service within the Commonwealth of Pennsylvania and that the Applicant will abide by all applicable federal and state laws and regulations and by the decisions of the Pennsylvania Public Utility Commission.

That Solution Energy, LLC, the Applicant herein, certifies to the Commission that it is subject to, will pay, and in the past has paid, the full amount of taxes imposed by Articles II and XI of the Act of March 4, 1971 (P.L. 6, No. 2), known as the Tax Reform Act of 1971 and any tax imposed by Chapter 22 of Title 66. The Applicant acknowledges that failure to pay such taxes or otherwise comply with the taxation requirements of Chapter 28 shall be cause for the Commission to revoke the license of the Applicant. The Applicant acknowledges that it shall report to the Commission its jurisdictional natural gas sales for ultimate consumption, for the previous year or as otherwise required by the Commission. The Applicant also acknowledges that it is subject to 66 Pa. C.S. §506 (relating to the inspection of facilities and records).

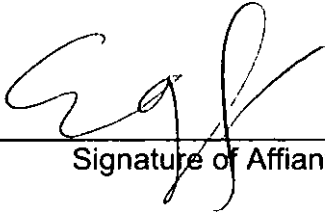
Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing that information to the Pennsylvania Public Utility Commission.

Appendix B (Continued)

That Solution Energy, LLC, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506 and the standards and billing practices of 52 PA. Code Chapter 56.

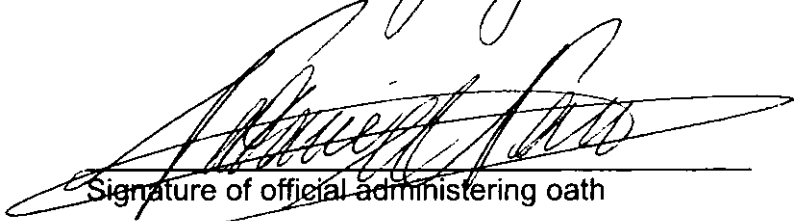
That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Office of Communications or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the law.

That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.



Signature of Affiant

Sworn and subscribed before me this 26th day of July, 2018.



Signature of official administering oath

My commission expires November 01, 2018

NATALIE M. NAU
Notary Public, State of New York
No. 01NA6230499
Qualified in Nassau County
Commission Expires Nov. 01, 2018

ARTICLES OF ORGANIZATION

OF

SOLUTION ENERGY LLC

Under Section 203 of the Limited Liability Company Law

THE UNDERSIGNED, being a natural person of at least eighteen (18) years of age and acting as the organizer of the limited liability company (the "company") hereby being formed under Section 203 of the Limited Liability Company Law of the State of New York certifies that:

FIRST: The name of the limited liability company is:

SOLUTION ENERGY LLC

SECOND: The purpose of the limited liability company is:

To engage in any lawful act or activity for which limited liability companies may be organized under the LLCL.

THIRD: The county within the State of New York in which the office of the limited liability company is to be located is Suffolk.

FOURTH: The Secretary of State is designated as the agent of the Company upon whom process against the Company may be served. The post office address to which the Secretary of State shall mail a copy of any process served upon the Company is:

6 Alley Pond Court
Dix Hills, NY 11746

FIFTH: The Company is to be managed by one or more members.

SIXTH: The Company shall have the power to indemnify, to the full extent permitted by the LLCL, as amended from time to time, all persons whom it is permitted to indemnify pursuant thereto.

IN WITNESS WHEREOF, the undersigned has subscribed this certificate and hereby affirms the foregoing as true under the penalties of perjury.

Dated: June 23, 2008

A handwritten signature in black ink, appearing to read 'S. Schuster', written over a horizontal line.

Scott J. Schuster
Sole Organizer
283 Washington Avenue
Albany, NY 12206

FILING RECEIPT

=====
ENTITY NAME: SOLUTION ENERGY LLC

DOCUMENT TYPE: ARTICLES OF ORGANIZATION (DOM LLC)

COUNTY: SUFF

=====
FILED:06/24/2008 DURATION:***** CASH#:080624000039 FILM #:080624000037

FILER:

SERVICO INC.
P.O. BOX 871

ALBANY, NY 12201

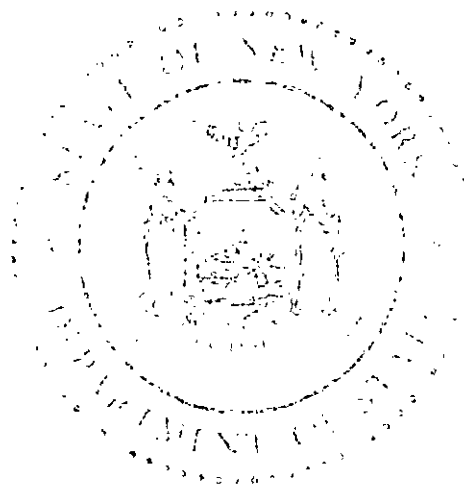
ADDRESS FOR PROCESS:

THE LLC
6 ALLEY POND COURT
DIX HILLS, NY 11746

REGISTERED AGENT:

EXIST DATE

06/24/2008



=====
SERVICE COMPANY: SERVICO - 35

SERVICE CODE: 35 *

FEES 225.00

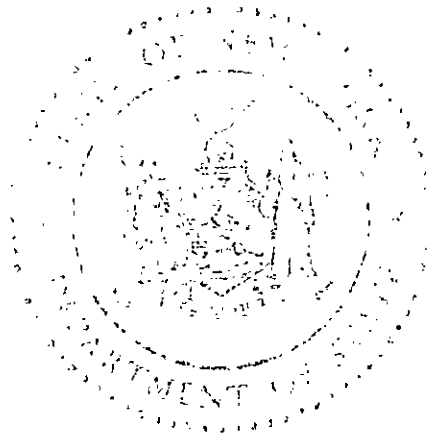
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TAX 0.00
CERT 0.00
COPIES 0.00
HANDLING 25.00

PAYMENTS 225.00

CASH 0.00
CHECK 0.00
CHARGE 0.00
DRAWDOWN 225.00
 OPAL 0.00
 REFUND 0.00

State of New York
Department of State } ss:

I hereby certify, that SOLUTION ENERGY LLC a NEW YORK Limited Liability Company filed Articles of Organization pursuant to the Limited Liability Company Law on 06/24/2008, and that the Limited Liability Company is existing so far as shown by the records of the Department.



*WITNESS my hand and the official seal
of the Department of State at the City of
Albany, this 18th day of May two
thousand and eighteen.*

A handwritten signature in black ink, appearing to read "B. Fitzgerald", written over a faint circular stamp.

*Brendan W. Fitzgerald
Executive Deputy Secretary of State*

PRIORITY®

★ MAIL ★

SOLUTION ENERGY

142 Mineola Ave. Suite 3A
Roslyn Heights, NY 11577

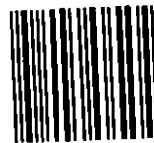
FLAT RATE ENVELOPE

ONE RATE ★ ANY WEIGHT*

APPLY PRIORITY MAIL POSTAGE HERE



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17120

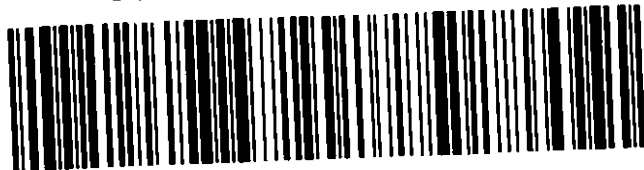
U.S. POSTAGE
PAID
ROSLYN HEIGHTS, NY
11577
AUG 13, 18
AMOUNT

\$6.70

R2305K134037-5

EXPECTED DELIVERY DAY: 08/15/2018

USPS TRACKING NUMBER



9505 5154 4006 8225 1137 96

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
20 North Street, Keystone Building 2nd Floor
Harrisburg, PA 17120

EP14H July 2013 Outer Dimension: 10 x 5