



June 20, 2018

VIA E-FILE

David P. Zambito

Direct Phone 717-703-5892
Direct Fax 215-989-4216
dzambito@cozen.com

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission, et al. v. PECO Energy Company; Docket Nos. R-2018-3000164; C-2018-3001636

PETITION OF THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA FOR LEAVE TO WITHDRAW RATE COMPLAINT

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is The Trustees of the University of Pennsylvania's Petition for Leave to Withdraw Rate Case in the above-referenced proceeding. Copies of this pleading have been provided to the parties per the attached Certificate of Service.

If you have any questions regarding this filing, please direct them to me. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR

By: David P. Zambito
Counsel for *The Trustees of the University of Pennsylvania*


DPZ:kmg
Enclosure

cc: Honorable Deputy Chief Christopher P. Pell
Honorable F. Joseph Brady
Per Certificate of Service

VERIFICATION

I, Faramarz Vakili, hereby state that the facts set forth 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: 6/20/18


Faramarz Vakili
Executive Director of Operations and Maintenance
University of Pennsylvania

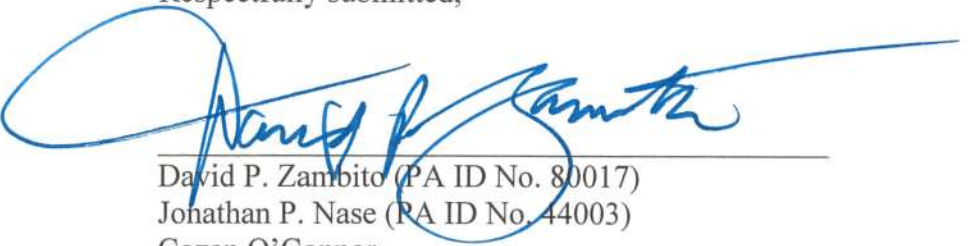
Complaint. Moreover, UPENN believes that its interests are adequately represented by other parties to the proceeding.

6. No party will be harmed by UPENN's withdrawal from these proceedings, as non-company direct testimony is not due until June 26, 2018.

7. Permitting a party to withdraw from a proceeding, when it no longer wishes to pursue its claims, promotes judicial economy and therefore promotes the public interest.

WHEREFORE, for the reasons set forth above, The Trustees of the University of Pennsylvania respectfully request that the Honorable Deputy Chief Administrative Law Judge Pell and the Honorable Administrative Law Judge Brady grant this Petition for Leave to Withdraw Rate Complaint.

Respectfully submitted,



David P. Zambito (PA ID No. 80017)
Jonathan P. Nase (PA ID No. 44003)
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
Tel: (717) 703-5892
Fax: (215) 989-4216
Email: dzambito@cozen.com
jnase@cozen.com

Roman Petyk, Esquire (ID # 59446)
Associate General Counsel
The University of Pennsylvania
Office of General Counsel
2929 Walnut Street
FMC Tower, Suite 400
Philadelphia, PA 19104-5099
Tel: (215) 746-5275
Facsimile: (215) 746-5222
E-mail: roman.petyk@ogc.upenn.edu

Dated: June 20, 2018

Counsel for *The Trustees of the University of Pennsylvania*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, <i>et al.</i>	:	
	:	Docket Nos. R-2018-3000164
v.	:	C-2018-3001636
	:	
PECO Energy Company	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Petition for Leave to Withdraw Rate Complaint**, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL AND FIRST CLASS MAIL:

Romulo L. Diaz, Jr. Esquire
Jack R. Garfinkle, Esquire
W. Craig Williams, Esquire
Michael S. Swerling, Esquire
PECO Energy Company
2301 Market Street
P.O. Box 8699
Philadelphia, PA 19101
E-mail: romulo.diaz@exeloncorp.com
E-mail: jack.garfinkle@exeloncorp.com
E-mail: craig.williams@exeloncorp.com
E-mail: michael.swerling@exeloncorp.com
Counsel for PECO Energy Company

Kenneth M. Kulak, Esquire
Anthony C. DeCusatis, Esquire
Catherine G. Vasudevan, Esquire
Brooke E. McGlinn, Esquire
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103
E-mail: ken.kulak@morganlewis.com
E-mail: anthony.decusatis@morganlewis.com
E-mail: catherine.vasudevan@morganlewis.com
E-mail: brooke.mcglinn@morganlewis.com
Counsel for PECO Energy Company

Carrie B. Wright, Esquire
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
400 North Street, 2 West
Harrisburg, PA 17120
E-mail: carwright@pa.gov
Counsel for Bureau of Investigation & Enforcement

Elizabeth Rose Triscari, Esquire
John R. Evans
Office of Small Business Advocate
300 North Second Street - Suite 202
Harrisburg, PA 17101
E-mail: etriscari@pa.gov
Email: jorevan@pa.gov
Counsel for Office of Small Business Advocate

Christy M. Appleby, Esquire
Hayley Dunn, Esquire
Aron J. Beatty, Esquire
Tanya J. McCloskey, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
E-mail: CAppleby@paoca.org
E-mail: HDunn@paoca.org
E-mail: ABeatty@paoca.org
E-mail: tmccloskey@paoca.org
Counsel for Office of Consumer Advocate

Patrick M. Cicero, Esquire
Elizabeth R. Marx, Esquire
Kadeem G. Morris, Esquire
John Sweet, Esquire
Public Utility Law Project
118 Locust Street
Harrisburg, PA 17101
E-mail: pulp@palegalaid.net
Counsel for Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)

Scott J. Rubin, Esquire
333 Oak Lane
Bloomsburg, PA 17815
E-mail: Scott.j.rubin@gmail.com
Counsel for International Brotherhood of Electrical Workers, Local 614 (IBEW Local 614)

Charles T. Joyce, Esquire
Spear Wilderman, P.C.
230 South Broad Street, Suite 1400
Philadelphia, PA 19102
E-mail: ctjoyce@spearwilderman.com
Counsel for International Brotherhood of Electrical Workers, Local 614 (IBEW Local 614)

Joseph L. Vullo, Esquire
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
E-mail: jlvullo@bvrrlaw.com
Counsel for Community Association of Pennsylvania (CAAP)

Charis Mincavage, Esquire
Adeolu Bakare, Esquire
Alessandra L. Hylander, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
E-mail: cmincavage@mcneeslaw.com
E-mail: abakare@mcneeslaw.com
E-mail: ahylander@mcneeslaw.com
Counsel for Philadelphia Area Industrial Users Group (PAIEUG)

Roger E. Clark, Esquire
Delaware Valley Regional Planning Commission
905 Denston Drive
Ambler, PA 19002
E-mail: roger@rogerclarkconsulting.com
Counsel for the Delaware Valley Regional Planning Commission

Roman Petyk, Esquire
2929 Walnut Street
FMC Tower, Suite 400
Philadelphia, PA 19104-5099
E-mail: roman.petyk@ogc.upenn.edu
Counsel for The Trustees of the University of Pennsylvania

Joline R. Price, Esquire
Robert W. Ballenger, Esquire
Community Legal Services of Philadelphia
1424 Chestnut Street
Philadelphia, PA 19102
E-mail: jprice@clsphila.org
E-mail: rballenger@clspila.org
Counsel for TURN et al.

Mark C. Hammond, Esquire
Land Air Water Legal Solutions, LLC
1000 Westlakes, Drive, Suite 150
Berwyn, PA 19312
E-mail: mhammond@landairwater.com
Counsel for Tesla, Inc.

Donald R. Wagner, Esquire
Linda R. Evers, Esquire
Michael A. Gruin, Esquire
Stevens & Lee
111 N. Sixth Street
Reading, PA 19601
E-mail: drw@stevenslee.com
E-mail: lre@stevenslee.com
E-mail: mag@stevenslee.com
Counsel for Walmart

Karen O. Moury, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
E-mail: kmoury@eckertseamans.com
Counsel for NRG Energy, Inc.

Deanne M. O'Dell, Esquire
Sarah C. Stoner, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
E-mail: dodell@eckertseamans.com
E-mail: stoner@eckertseamans.com
**Counsel for Retail Energy Supply
Association (RESA)**

Mark Belland, Esquire
O'Brien, Belland & Bushinsky, LLC
500-506 North 6th Street
Philadelphia, PA 19123
E-mail: mbelland@obbblaw.com
**Counsel for Laborers International Union
of North America, Local 57**


Charles E. Thomas, III, Esquire
Thomas, Niesen & Thomas, LLC
212 Locust Street, Suite 302
Harrisburg, PA 17101
E-mail: cet3@tntlawfirm.com
Counsel for *Calpine Energy Solutions*

Barry A. Naum, Esquire
Derrick Price Williamson, Esquire
Spilman Thomas & Battle PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
E-mail: bnaum@spilmanlaw.com
E-mail: dwilliamson@spilmanlaw.com
Counsel for ArcelorMittal USA, LLC

MAIL ONLY:

Honorable Christine M. Tartaglione (Senator)
Pennsylvania Senate
458 Main Capitol
Senate Box 203002
Harrisburg, PA 17120-3002
Interested Party

DATED: June 20, 2018



David P. Zambito, Esquire
Counsel for *The Trustees of the University of
Pennsylvania*