



100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166  
Tel: 717.232.8000 • Fax: 717.237.5300

Vasiliki Karandrikas  
Direct Dial: 717.237.5274  
Direct Fax: 717.260.1707  
vkarandrikas@mwn.com

October 2, 2014

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

**VIA ELECTRONIC FILING**

**RE: The Trustees of the University of Pennsylvania; Docket No. A-2010-2196823  
Petition To Amend Electric Generation Supplier License To Reduce Bond Level**

Dear Secretary Chiavetta:

Pursuant to a request made by the Pennsylvania Public Utility Commission's ("Commission") Bureau of Technical Services, we are serving the enclosed Petition to Amend Electric Generation Supplier License to Reduce Bond Level of the Trustees of the University of Pennsylvania, which was filed with the Commission on September 12, 2014, as indicated on the Certificate of Service.

Please contact the undersigned with any questions regarding this filing.

Very truly yours,

McNEES WALLACE & NURICK LLC

By   
Vasiliki Karandrikas

Counsel to The Trustees of the University of Pennsylvania

VK/emp  
Enclosures

c: James Shurskis, Bureau of Technical Utility Services (via E-mail)  
Certificate of Service (w/o confidential attachments via First Class Mail)

**www.mwn.com**

HARRISBURG, PA • LANCASTER, PA • SCRANTON, PA • STATE COLLEGE, PA • COLUMBUS, OH • WASHINGTON, DC

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Sections 1.57, 1.58 and 5.14.

**VIA FIRST-CLASS MAIL**

Office of Consumer Advocate  
5<sup>th</sup> Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17120-1921

Office of Attorney General  
Bureau of Consumer Protection  
Strawberry Square, 14<sup>th</sup> Street  
Harrisburg, PA 17120

Office of Small Business Advocate  
Commerce Building, Suite 202  
300 North Second Street  
Harrisburg, PA 17101

Commonwealth of Pennsylvania  
Department of Revenue  
Bureau of Compliance  
Harrisburg, PA 17128-0946

Carlo L. Ciabattoni  
Manage Energy Acquisition  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101-8699

  
\_\_\_\_\_  
Vasiliki Karandrikas

Counsel to the Trustees of the University of  
Pennsylvania

Dated this 2nd day of October, 2014, in Harrisburg, Pennsylvania.



100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166  
Tel: 717.232.8000 • Fax: 717.237.5300

Vasiliki Karandrikas  
Direct Dial: 717.237.5274  
Direct Fax: 717.260.1707  
vkarandrikas@mwn.com

September 12, 2014

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

**VIA HAND DELIVERY**

**RE: The Trustees of the University of Pennsylvania; Docket No. A-2010-2196823  
Petition To Amend Electric Generation Supplier License To Reduce Bond Level**

RECEIVED  
2014 SEP 12 PM 3:50  
SECRETARY'S OFFICE

Dear Secretary Chiavetta:

Pursuant to the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Final Order entered on July 24, 2014 ("July 24 Order"), in Docket No. M-2013-2393141, *Public Utility Commission Bonding/Security Requirements for Electric Generation Suppliers*, The Trustees of the University of Pennsylvania ("Penn") hereby respectfully request to amend Penn's EGS license to reduce its bond level, effective on or before October 15, 2014,<sup>1</sup> as set forth in Attachment A.

According to the July 24 Order, an EGS may file a petition seeking a reduction in its security level from 10% to 5% of its most recent twelve months of revenue or \$250,000, whichever is higher, consistent with the July 24 Order, the Public Utility Code, and Commission regulations. July 24 Order at 11. As set forth in the July 24 Order, Penn has enclosed the following documents for filing with the Commission in support of Penn's Petition:

- (1) Attachment A, which sets forth Penn's gross revenues for the sale of electricity to retail customers in Pennsylvania for the most recent twelve months;
- (2) Attachment B, which provides the amount of gross receipts taxes that Penn has prepaid towards its estimated revenues for the current calendar year;
- (3) Attachment C, which includes available Alternative Energy Portfolio Standards ("AEPS") compliance data from the most recent twelve months; and

<sup>1</sup> To be clear, this Petition only seeks a reduction in Penn's required bonding level, not its form of security.

**WWW.MWN.COM**

HARRISBURG, PA • LANCASTER, PA • SCRANTON, PA • STATE COLLEGE, PA • COLUMBUS, OH • WASHINGTON, DC

Rosemary Chiavetta, Secretary  
September 12, 2014  
Page 2

- (4) Attachment D, which includes Department of Revenue documents that support Penn's request for a bond level reduction.<sup>2</sup>

Also enclosed is a check in the amount of \$350 made payable to the Commonwealth of Pennsylvania to cover the requisite filing fee for Penn's Petition.

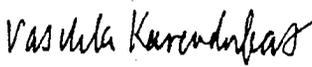
**Penn respectfully requests that the Commission grant confidential treatment of the documents found at Attachments A-D accompanying this Petition. As a privately held entity, the enclosed information is not available to the public and is believed by Penn to be of a proprietary or confidential nature and is so designated by being stamped "Confidential." Penn respectfully requests that the Commission treat these documents as confidential, place them under seal, and prevent public disclosure in accordance with the Commission's procedures. Any party desiring access to the aforementioned documents can contact the undersigned counsel with such a request.**

Finally, Penn seeks an effective date of October 15, 2014, in preparation for Penn's upcoming bond renewal deadline of October 22, 2014. Commission action by Penn's requested effective date would enable Penn to arrange for a new bond to become effective by October 22, 2014.

Please date stamp the extra copy of this transmittal letter, and kindly return it to our messenger for our filing purposes. Please contact the undersigned with any questions regarding this filing. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By   
Vasiliki Karandrikas

Counsel to The Trustees of the University of Pennsylvania

VK/emp  
Enclosures

c: James Shurskis, Bureau of Technical Utility Services (w/o Attachments – via e-mail)

RECEIVED  
2014 SEP 12 PM 3:50  
PA 100 BUREAU  
SECRETARY'S BUREAU

<sup>2</sup> See July 24 Order at 16. Because Penn does not propose to utilize a parental or corporate guarantee, the Petition does not include long-term bond rating information.