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April 25, 2016

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 for Bond Reduction Renewal**

Dear Secretary Chiavetta:

Pursuant to the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Secretarial Letter dated June 10, 2015 ("June Letter"), in Docket No. A-2010-2196823, and 52 Pa. Code § 54.40(d), The Trustees of the University of Pennsylvania ("Penn") hereby respectfully request to renew Penn's reduced bond level, effective on or before June 15, 2016.¹

In order to hold an electric generation supplier ("EGS") license in the Commonwealth, the applicant must furnish a bond or other security that demonstrates financial responsibility. 66 Pa.C.S. § 2809(c). After its first year in operation, a licensed EGS must submit its security level to the Commission for review and may seek approval for an alternative level of bonding commensurate with its nature and scope of operation. 52 Pa. Code. § 54.40(d). According to the Commission's Order entered July 24, 2014 ("July 24 Order") at Docket No. M-2013-2393141, an EGS may file a petition seeking a reduction in its level of security from 10% to 5% of its most recent 12 months' of revenue or \$250,000, whichever is higher. See July 24 Order, pp.10-11.

Penn has operated as a licensed EGS in the Commonwealth for several years. In the June Letter, the Commission granted Penn's initial Bond Reduction Petition. Pursuant to the June Letter, and in accordance with the Commission's regulation and guidance, Penn submits this Petition for Bond Reduction Renewal ("Renewal Petition"). See July 24 Order; 52 Pa. Code. § 54.40(d). In support of its Renewal Petition, Penn has enclosed the following documents for filing with the Commission:

- (1) Attachment A, which sets forth Penn's gross revenues for the sale of electricity to retail customers in Pennsylvania for the most recent 12 months;

¹ The June Letter reduced Penn's bonding level from 10% to 5% of its most recent 12-months of revenues. To be clear, this Renewal Petition only seeks to renew Penn's reduced bonding level, not its form of security.

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Rosemary Chiavetta, Secretary
April 25, 2016
Page 2

- (2) Attachment B, which includes a Certificate of Good Standing from the Department of Revenue in support of Penn's request for a bond level reduction.

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 Renewal Petition.

Penn respectfully requests that the Commission grant confidential treatment of the documents found at Attachments A-B accompanying this Renewal 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.

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*
Vasiliki Karandrikas

Counsel to The Trustees of the University of Pennsylvania

VK

Enclosures

c: Certificate of Service (w/o confidential attachments via First Class Mail)

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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

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

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

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

Office of Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

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

Manager 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 25th day of April, 2016, in Harrisburg, Pennsylvania.

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