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Wallace & Nurick LLC

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PA.P.U.C.  
SECRETARY'S BUREAU

March 8, 2017

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") Order entered July 24, 2014 ("July 24 Order") at Docket No. M-2013-2393141 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 6, 2017.<sup>1</sup>

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 July 24 Order, 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. On June 6, 2016, the Commission granted Penn's most recent Renewal Petition. In accordance with the Commission's regulation and guidance, Penn submits this Renewal Petition for the following 12-month period beginning on June 6, 2017. *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;

<sup>1</sup> Penn's most recent Bond Reduction Renewal Petition ("Renewal Petition") became effective on June 6, 2016. *See* PUC Secretarial Letter at Docket No. A-2010-2196823 (dated June 6, 2016).

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- (2) A check in the amount of \$350 made payable to the Commonwealth of Pennsylvania to cover the requisite filing fee.

Please note that Penn is awaiting the Department of Revenue's issuance of a Certificate of Good Standing. Upon receipt, Penn will supplement this Renewal Petition by filing the Certificate of Good Standing with the Commission.

**Penn respectfully requests that the Commission grant confidential treatment of the document found at Attachment A 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 Attachment A as confidential, place it under seal, and prevent public disclosure in accordance with the Commission's procedures. Any party desiring access to the aforementioned document 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

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  
5<sup>th</sup> 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, 14<sup>th</sup> 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

  
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Vasiliki Karandrikas

Counsel to the Trustees of the University of  
Pennsylvania

Dated this 8<sup>th</sup> day of March, 2017, in Harrisburg, Pennsylvania.

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