



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

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

March 11, 2019

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;
Annual Compliance Filing – Renewal of Financial Security Reduction;
Docket No. A-2010-2196823**

Dear Secretary Chiavetta:

Pursuant to the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Tentative Opinion and Order entered on September 20, 2018 in Docket No. P-2017-2608078 ("September 20 Order"), which became final on November 1, 2018, by operation of law, The Trustees of the University of Pennsylvania ("Penn") hereby submit this annual compliance filing to renew the previously-approved financial security reduction level, effective as of June 6, 2019.¹

In support of Penn's annual compliance filing, and in accordance with the September 20 Order, please find enclosed the following information and documentation:

- **Penn's licensed name, docket number and utility code**

The Trustees of the University of Pennsylvania
Docket No. A-2010-2196823
Utility Code: 1112645

- **Penn's contact information (name, address, email, and phone number)**

Thomas Poole, Utility Engineer
University of Pennsylvania
3101 Walnut Street
Philadelphia, PA 19104
Email: tpoole@upenn.edu
Phone: 215-746-6427

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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¹ Secretarial Letter, *Financial Security Reduction Petition Renewal*, Docket No. A-2010-2196823 (Apr. 25, 2018).

- **Expiration/anniversary date of Penn's current Financial Security**

Penn's current financial security expires on June 6, 2019.

- **Penn's recent Department of Revenue Tax Status Letter of Good Standing**

See CONFIDENTIAL Attachment A.

- **Penn's most recent Department of Revenue REV-423 PA Corporation Specialty Tax Estimated Payment form**

See CONFIDENTIAL Attachment B.

- **Penn's most recent 12 months of gross receipts**

See CONFIDENTIAL Attachment C.

- **Penn's 5% gross receipts calculation using its most recent 12 months of gross receipts**

See CONFIDENTIAL Attachment C.

- **Penn's original bond, letter of credit, rider, amendment, or other financial instrument in an amount equal to 5% of its most recent 12 months of gross receipts (effective on the expiration/anniversary date of Penn's current financial security).**

See CONFIDENTIAL Attachment D.

- **Penn's available Alternative Energy Portfolio Standards ("AEPS") compliance data from the most recent twelve months.**

See CONFIDENTIAL Attachment E.

Penn respectfully requests that the Commission grant confidential treatment of the documents found at Attachments A through E accompanying this compliance filing. 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.

Rosemary Chiavetta, Secretary
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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/leh

Enclosures

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

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VERIFICATION

I, Thomas Poole, 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).

Signature:

Thomas Poole

Dated: MARCH 5, 2019

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
Vasiliki Karandrikas

Counsel to the Trustees of the University of
Pennsylvania

Dated this 11th day of March, 2019, in Harrisburg, Pennsylvania.

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