



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 5, 2020

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 (2020) – 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, 2020.<sup>1</sup>

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](mailto:tpoole@upenn.edu)  
Phone: 215-746-6427

<sup>1</sup> *The Trustees of the University of Pennsylvania, Annual Compliance Filing – Renewal of Financial Security Reduction, Docket No. A-2010-2196823 (filed Mar. 11, 2019).*

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

Penn's current financial security expires on June 6, 2020.

- **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

March 5, 2020

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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

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 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).

Signature:

Thomas Poole

Dated: MARCH 4, 2020

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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  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
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

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

Counsel to the Trustees of the University of  
Pennsylvania

Dated this 5<sup>th</sup> day of March, 2020, in Harrisburg, Pennsylvania.

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MAR 5 2020

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