



McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Susan E. Bruce
Direct Dial: 717.237.5254
Direct Fax: 717.260.1666
sbruce@mcneeslaw.com

March 4, 2022

VIA OVERNIGHT DELIVERY

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

DATE OF DEPOSIT

MAR 4 2022

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**RE: The Trustees of the University of Pennsylvania;
Annual Compliance Filing (2022) – Renewal of Financial Security Reduction;
Docket No. A-2010-2196823 – CONFIDENTIAL INFORMATION ENCLOSED**

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, 2021.¹

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)**

Andrew Zarynow, Energy Planning Engineer
University of Pennsylvania
3101 Walnut Street
Philadelphia, PA 19104
Email: azarynow@upenn.edu
Phone: 215-898-5000

¹ *The Trustees of the University of Pennsylvania, Annual Compliance Filing – Renewal of Financial Security Reduction, Docket No. A-2010-2196823 (filed Mar. 4, 2021).*

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

Penn's current financial security expires on June 6, 2022.

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

See CONFIDENTIAL Attachment A.

- **Penn's recent REV-423 Specialty Tax Estimated Payment Form from the Pennsylvania Department of Revenue**

See CONFIDENTIAL Attachment B.

- **Penn's most recent 12 months (or four quarters) of Pennsylvania gross receipts**

See CONFIDENTIAL Attachment C.

- **Penn's 5% gross receipts calculation using its most recent 12 months (or four quarters) of gross receipts**

See CONFIDENTIAL Attachment C.

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

See CONFIDENTIAL Attachment D.

- **Penn's available Alternative Energy Portfolio Standards ("AEPS") compliance data from the most recent 12 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 4, 2022
Page 3

Please contact the undersigned with any questions regarding this filing. Thank you.

Very truly yours,

A handwritten signature in black ink that reads "Susan E. Bruce". The signature is written in a cursive style with a large, stylized initial "S".

Susan E. Bruce (PA ID No. 80146)
MCNEES WALLACE & NURICK LLC

Counsel to The Trustees of the University of Pennsylvania

SEB/leh

Enclosures

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

VERIFICATION

I, Andrew Zarynow, 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:

A handwritten signature in black ink, appearing to read "Andrew Zarynow", is written over a horizontal line.

Dated: 03/02/2022

DATE OF DEPOSIT

MAR 4 2022

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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
Forum Place
555 Walnut Street, 1st Floor
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

DATE OF DEPOSIT

MAR 4 2022

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



Susan E. Bruce

Counsel to The Trustees of the University of
Pennsylvania

Dated this 4th day of March, 2022, in Harrisburg, Pennsylvania.

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. Fold the printed label at the solid line below. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. GETTING YOUR SHIPMENT TO UPS
Customers with a Daily Pickup
 Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS

Locations:

Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.
 Hand the package to any UPS driver in your area.

UPS Access Point™
 ADVANCE AUTO PARTS STORE 764
 5/ S 3RD ST
 LEMOYNE, PA 17043

UPS Access Point™
 THE UPS STORE
 717 MARKET ST
 LEMOYNE, PA 17043

UPS Access Point™
 UPTOWN DISCOUNT DRUGS
 2336 N 3RD ST
 HARRISBURG, PA 17110

RECEIVED

MAR 7 2022

PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU

FOLD HERE

SUSAN E. BRUCE 717-237-5251 MCNEES WALLACE & NURICK LLC 100 PINE ST HARRISBURG PA 17101		1.0 LBS LTR	1 OF 1
SHIP TO: ROSEMARY CHIAVETTA, SECRETARY (717) 783-1740 PA. PUBLIC UTILITY COMMISSION 400 NORTH STREET, 2ND FLOOR COMMONWEALTH KEYSTONE BLDG. HARRISBURG PA 17120-0202		PA 171 9-20	
			
UPS NEXT DAY AIR SAVER		1P	
TRACKING #: 1Z 12X 990 13 9315 8119			
			
BILLING: P/P			
Client - Matter Number: 24791-0006			
CS 22.0.18. WNTNV50 10.0A 02/2022*			