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PA Parks, Usery Commission

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March 3, 2023

VIA OVERNIGHT DELIVERY

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

The Trustees of the University of Pennsylvania; RE:

> Annual Compliance Filing (2023) - 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, 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, 2022.1

In support of Penn's annual compliance filing, and in accordance with the September 20, 2018, 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, 2022).

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Expiration/anniversary date of Penn's current Financial Security

Penn's current financial security expires on June 6, 2023.

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

The Pennsylvania Department of Revenue is no longer providing Penn with the Tax Status Letter of Good Standing. As such, see **CONFIDENTIAL** Attachment A for a copy of Penn's Statement of Account from the Pennsylvania Department of Revenue's website.

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

The Pennsylvania Department of Revenue is no longer providing Penn with the REV-423 Specialty Tax Estimated Payment Form. As such, see <u>CONFIDENTIAL</u> Attachment B for a copy of Penn's RCT-112 Gross Receipts Electric/Hydro Tax Report from the Pennsylvania Department of Revenue's website.

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

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accordance with the Commission's procedures. Any party desiring access to the aforementioned documents can contact the undersigned counsel with such a request.

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

Very truly yours,

Susan E. Bruce (PA ID No. 80146)

MCNEES WALLACE & NURICK LLC

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Counsel to The Trustees of the University of Pennsylvania

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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:

Dated: 21. February 2023

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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 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

PAT Control Commission

Susan E. Bruce

Counsel to The Trustees of the University of Pennsylvania

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Dated this 3rd day of March, 2023, in Harrisburg, Pennsylvania.

ORIGIN ID:MDTA SUSAN BRUCE

(717) 713-1317

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