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March 7, 2024

**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 -7 2024

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**RE: The Trustees of the University of Pennsylvania;  
Annual Compliance Filing (2024) – 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, 2023.<sup>1</sup>

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](mailto:azarynow@upenn.edu)  
Phone: 215-898-5000

<sup>1</sup> *The Trustees of the University of Pennsylvania, Annual Compliance Filing (2023) – Renewal of Financial Security Reduction, Docket No. A-2010-2196823 (filed Mar. 3, 2023).*

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

Penn's current financial security expires on June 6, 2024.

- **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 Statement of Account shows Penn's balance after its 2023 tax return.

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

It is Penn's understanding that payments for REV-423 specialty taxes must now be made online, and therefore, Penn does not have in its possession the REV-423 Specialty Tax Estimated Payment Form to file with the Commission. As such, see CONFIDENTIAL Attachment B for a copy of Penn's RCT-112 Gross Receipts Electric/Hydro Tax Report from the Pennsylvania Department of Revenue's website showing proof of Penn's estimated 2024 gross receipts tax prepayment and 2024 gross receipts tax paid in full.

- **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 for the calculation used to determine Penn's 2024 gross receipts tax.

- **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.

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**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.**

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

Counsel to The Trustees of the University of Pennsylvania

SEB/leh

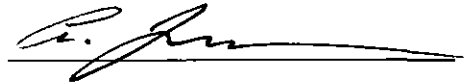
Enclosures

c: Stephen Jakab, Bureau of Technical Utility Services (via First-Class Mail with confidential attachments)  
Certificate of Service (via First-Class Mail without 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: 20. February. 2024

DATE OF DEPOSIT

MAR - 7 2024

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  
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

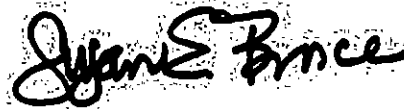
Commonwealth of Pennsylvania  
Department of Revenue  
Bureau of Compliance  
Harrisburg, PA 17128-0946

Manager Energy Acquisition  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101-8699

**DATE OF DEPOSIT**

MAR -7 2024

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



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Susan E. Bruce

Counsel to The Trustees of the University of  
Pennsylvania

Dated this 7<sup>th</sup> day of March, 2024, in Harrisburg, Pennsylvania.

ORIGIN ID:MDTA (717) 232-8000  
LISA CHARLETON  
MCNEES WALLACE & NURICK LLC  
100 PINE ST

SHIP DATE: 07MAR24  
ACTWGT: 0.50 LB  
CAD: 255022721/INET4535

HARRISBURG, PA 17101  
UNITED STATES US

BILL SENDER

TO **ROSEMARY CHIAVETTA, SECRETARY**  
**PA PUBLIC UTILITY COMMISSION**  
**400 NORTH STREET, 2ND FLOOR**

583J205389AE3

**HARRISBURG PA 17120**

(800) 692-7380

REF: 24791.0006

INV:

PO:

DEPT:



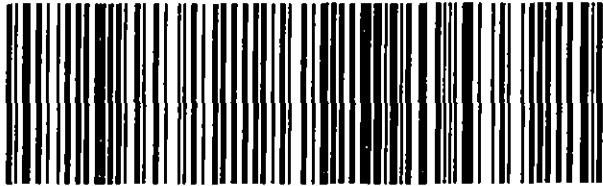
**FRI - 08 MAR 5:00P**  
**STANDARD OVERNIGHT**

TRK# **7754 5980 6868**  
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**16 MDTA**

**17120**

**PA-US MDT**



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**MAR 8 2024**

**PA PUBLIC UTILITY COMMISSION**  
**SECRETARY'S BUREAU**

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