



April 22, 2024

**VIA E-FILING**

**David P. Zambito**

Direct Phone 717-703-5892

Direct Fax 215-989-4216

dzambito@cozen.com

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

Re: ***Pennsylvania Public Utility Commission v. PECO Energy Company - Electric Division***

**Petition to Intervene of The Trustees of the University of Pennsylvania and The Hospital at the University of Pennsylvania; Docket Nos. R-2024-3046931, et al.**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of The Trustees of the University of Pennsylvania and The Hospital at the University of Pennsylvania in the above-referenced proceeding. Copies of this pleading have been served on the parties per the attached Certificate of Service.

If you have any questions regarding this filing, please direct them to me. Thank you for your attention to this matter.

Sincerely,

Cozen O'Connor

Counsel for *The Trustees of the University of Pennsylvania and The Hospital at the University of Pennsylvania*

DPZ/kmg  
Enclosures

cc: Per Certificate of Service



Carrie B. Wright, Esq.  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
carwright@pa.gov  
*(Counsel for Bureau of Investigation and  
Enforcement)*

Charles T. Joyce  
Samuel E. Shopp  
SPEAR WILDERMAN, P.C.  
230 South Broad Street, Ste. 1650  
Philadelphia, PA 19102  
ctjoyce@spearwilderman.com  
sshopp@spearwilderman.com  
*Counsel for IBEW Local 614*

Nicholas J. Enoch  
LUBIN & ENOCH, P.C.  
349 North 4th Avenue  
Phoenix, Arizona 85003-1505  
nick@lubinandenoch.com  
*Counsel for IBEW Local 614*



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David P. Zambito, Esquire  
Counsel for *The Trustees of the University of  
Pennsylvania and The Hospital at the University of  
Pennsylvania*

VERIFICATION

I, Anne Papageorge 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).

Date: 4/19/24

Anne Papageorge  
Anne Papageorge  
PRINTED NAME  
TITLE Sr VP  
COMPANY UPenn

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2024-3046931, <i>et al.</i>
	:	
PECO Energy Company – Electric Division	:	

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**NOTICE TO PLEAD**

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You are hereby advised that, pursuant to 52 Pa. Code § 5.66, you may respond to the enclosed Petition to Intervene of The Trustees of the University of Pennsylvania and The Hospital at the University of Pennsylvania within twenty (20) days after the date of service. Your answer should be filed with the Secretary of the Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120. A copy should also be served on the undersigned counsel.



Dated: April 22, 2024

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David P. Zambito, Esq. (I.D. #80017)  
Jonathan P. Nase, Esq. (I.D. #44003)  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101  
Telephone: (717) 703-5892  
Facsimile: (215) 989-4216  
E-mail: dzambito@cozen.com  
E-mail: jnase@cozen.com  
Counsel for *The Trustees of the University of  
Pennsylvania and The Hospital at the University of  
Pennsylvania*



educational institution with approximately 20,000 students and also operates The Hospital at the University of Pennsylvania, a world class academic medical center.

3. UPENN is a customer of PECO, purchasing electricity pursuant to rate schedule GS – General Service. As such, its rates would increase under the Proposed Tariff.

4. UPENN’s attorneys in this matter are:

David P. Zambito, Esq. (ID #80017)  
Jonathan P. Nase, Esq. (ID #44003)  
Cozen O’Connor  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101-1236  
Telephone: (717) 703-5892  
Facsimile: (215) 989-4216  
E-mail: dzambito@cozen.com  
jnase@cozen.com

UPENN agrees to accept electronic service to all attorneys listed above.

5. The Commission’s disposition of PECO’s requested rate increase may impact the rates and services provided to UPENN by PECO.

6. Consistent with 52 Pa. Code § 5.72(a)(2), UPENN has an interest that may be directly affected by this proceeding and that is not represented by any other party of record. Consequently, UPENN should be granted intervenor status in this proceeding.

WHEREFORE, The Trustees of the University of Pennsylvania and The Hospital at the University of Pennsylvania, respectfully request that the Pennsylvania Public Utility Commission grant this Petition to Intervene and provide them with full party status in this proceeding.

Respectfully submitted,



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David P. Zambito, Esq. (ID # 80017)  
Jonathan P. Nase, Esq. (ID #44003)  
Cozen O'Connor  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101-1236  
Telephone: (717) 703-5892  
Facsimile: (215) 989-4216  
E-mail: dzambito@cozen.com  
jnase@cozen.com

Dated: April 22, 2024

Counsel for *The Trustees of the University of Pennsylvania and The Hospital at the University of Pennsylvania*