



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@mcneelaw.com

March 6, 2025

**VIA ELECTRONIC FILING AND SHAREPOINT**

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

**RE: The Trustees of the University of Pennsylvania;  
Annual Compliance Filing (2025) – 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, 2024.<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 (2024) – Renewal of Financial Security Reduction, Docket No. A-2010-2196823 (filed Mar. 7, 2024).

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

Penn's current financial security expires on June 6, 2025.

- **Penn's most recently reported four quarters of Pennsylvania gross receipts**

See CONFIDENTIAL Attachment A.

- **Penn's recent Tax Status Letter of Good Standing (if available) or recent Statement of Account from the Pennsylvania Department of Revenue**

See CONFIDENTIAL Attachment B for a copy of Penn's Statement of Account from the Pennsylvania Department of Revenue's ("Department") website. Penn's Statement of Account shows Penn's balance after its 2024 tax return.

- **Penn's recent REV-423 Specialty Tax Estimated Payment Form from the Pennsylvania Department of Revenue stating the total amount of Gross Receipts Taxes Penn pre-paid towards the current calendar year**

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. Penn also understands that this form represents a payment coupon. On the coupon's instructions, the Department states "Do not mail this coupon if payment is being made electronically." Because Penn's filings and payments are made electronically via the Department's MyPath site, Penn did not complete or return the form to the Department. Instead, on March 4, 2025, Penn electronically paid its 2025 estimated tax payment. As such, see CONFIDENTIAL Attachment C for a copy of Penn's RCT-112 Gross Receipts Electric/Hydro Tax Report from the Department's website showing proof of Penn's estimated 2025 gross receipts tax prepayment and 2025 gross receipts tax paid in full.

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

See CONFIDENTIAL Attachment A for the calculation used to determine Penn's 2025 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.

Rosemary Chiavetta, Secretary  
March 6, 2025  
Page 3

- **Documentation that Penn is in compliance with its Alternative Energy Portfolio Standards (“AEPS”) obligations**

See CONFIDENTIAL Attachment E.

- **Documentation that Penn is in compliance with the Commission’s required annual fees and supplemental annual fees**

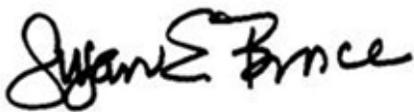
See Attachment F.

The CONFIDENTIAL documents (at Attachments A, B, C, and E) are being provided under seal to the Commission only via SharePoint. CONFIDENTIAL Attachment D (original Continuation Certificate) is being provided to the Commission under separate cover via overnight delivery.

**Penn respectfully requests that the Commission grant confidential treatment of the documents found at Attachments A, B, C, and E accompanying this compliance filing. As a privately held entity, this 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 w/ confidential attachments)  
Certificate of Service (via First-Class Mail w/o confidential attachments)

**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

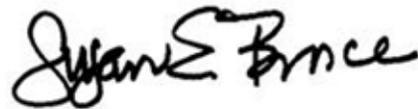
Office of Consumer Advocate  
5<sup>th</sup> Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17120-1921

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



---

Susan E. Bruce

Counsel to The Trustees of the University of  
Pennsylvania

Dated this 6<sup>th</sup> day of March, 2025, in Harrisburg, Pennsylvania.

**ATTACHMENT F**  
**PUC Compliance Documentation**

(Attached)

**From:** Helmus, Emily <ehelmus@pa.gov>  
**Sent:** Monday, February 24, 2025 2:47 PM  
**Subject:** RE: [External] Annual Compliance Filing (2025) - Renewal of Financial Security Reduction

[EXTERNAL]  
Hello Lauren,

The Trustees of the University of Pennsylvania (“Penn”) (Utility Code 1112645) does not have any outstanding annual fees or supplemental annual fees owed to the commission.

Emily



**Emily Helmus**  
Clerical Assistant 2  
Bureau of Administrative Services  
**Phone:** 717-787-8612  
**Email:** [ehelmus@pa.gov](mailto:ehelmus@pa.gov)  
**Consumer Hotline:**  
1-800-692-7380

**PRIVILEGE AND CONFIDENTIALITY NOTICE:** This email, including any attachments, may be privileged, confidential, proprietary and/or otherwise protected from disclosure, and is intended only for the use of the designated recipient(s). Any dissemination, disclosure, distribution, copying or other use of this communication without the approval of the sender is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender, delete the original electronic email and destroy any printed copies. Receipt by anyone other than the intended recipient is not a waiver of any attorney-client or work-product privilege. Email transmission cannot be guaranteed to be secure or error-free, therefore sender does not accept liability for any errors or omissions in the contents of this message, which arise as a result of email transmission.

## 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 "A. Zarynow", is written over a horizontal line.

Dated: 28. February 2025