



C-2025-3058173

Rebuttal to the Answer and or New Matter. More Specifically, This is in Response to Any "PO", Attempt to Dismiss, or Premature Motions to Dismiss for Any Reason, Including the Flatley Wrong Argument of Jurisdiction and or Oversight by the PUC.

1 message

Alex Miklos <shondor1122@gmail.com>

Fri, Nov 28, 2025 at 17:26

To: Shondor1122@gmail.com

To: The PUC

From: Alexander Miklos

Re: See Subject

Date: 11/28/2025

To all concerned parties;
Before I begin to explain and show why the preliminary answers and or Motions to Dismiss are, on its face, Wrong. Please check and note that I sent a message yesterday (Thanksgiving) to the PUC. I was inquiring about the different time for responses ive read about and needed clarification, among other things, with the holiday etc,etc,. Staff, personell, including the attorney for the water company, (Andrew Henry) and much of the nation had short weeks which in turn limited the thoroughness of this, my response. So, in short I'm sending this in the event that a "usually 10 days" response as I read somewhere is implied. This should only serve as notice that I am refuting the contention of any preliminary motion to dismiss. I have volumes of exhibits and evidence, deep and thorough arguments which once presented easily prove without question why my legal arguments are sound and correct. This communication today is not up to my standard. I would need a few more business days.

That all said, here's the abbreviated response.

1) Aqua IL, Aqua America, Essential Utilities, are in essence all the same. The corporate location for ALL of these "entities" is in Bryn Mawr, PA.

FULL stop. In non-lawyer speak, it's a shell game, it's a shell game and a ruse to make the company unaccountable.

I have more than enough evidence to do what I've read is a high bar, and... "Pierce the Corporate Veil" if and when I choose to.

However, I need not.

PA and IL and other federal laws offer other easier avenues for holding such entities accountable. Both are applicable in this matter

1- The alter ego law

2- The active Participant law.

(I have and will furnish vast supporting documentation for all of the above) I

am pressed for time and literally must leave for a prior commitment.

Just really quickly, the Attorney for "Aqua" presented a total of one Exhibit. "It's a water bill meant to show, I presume, where I live. I do not dispute where I live.

I would direct all parties to view the document and see the top left hand corner. It reads, from memory,... Aqua IL

Then goes on beneath and literally reflects NOT an Illinois address, but the REAL address....On Lancaster Ave, in Bryn Mawr PA.

Further more, and again quickly, I have spoken with and or corresponded with, at last count, about 33 representatives from CS reps, (most of which were actually Aqua collection agents)which is part of my complaint, Risk managers, other Essential staff and employees, the top lawyer, to a CEO of Aqua, and then unfortunately I was made to deal with a 3rd party...ESIS Risk Management (part of my complaint, they violated several bad faith statutes) on behalf of "Aqua" on all things directly related to the matters at hand. Only 1 of those thirty-three employees was from Illinois. Her name was Angie and she was great. Angie was and to this day is still the only employee who simply did what she said she was going to do and she met a most basic standard . Angie, sent a very simple email, and called me back. That's it. I was thrilled. Contacting a rep in Illinois was actually not easy. Its not easy because all phone numbers on "Aqua's OWN website, emails, bills, on Google, Aqua ALERTS (including the Nitrates warning) etc, etc, etc.....reflect the phone number of their headquarters. Not in Illinois.... but on Lancaster Ave....in Bryn Mawr, PA.

ALL other persons, THIRTY TWO and counting, I have been contacted by and or corresponded with, were in the State of PA and not in Illinois.

My original hard copy demand letter which I sent certified mail on Sept 9, and after much malfeasance, and after what the USPS called federal mail tampering, and only after that federal investigation was announced, my initial complaint letter was finally "discovered" and acknowledged by an unspecified person... at Aqua's corporate location, on....OCT 7. (part of my bad faith complaint) When my letter was apparently sabotaged, I then began to email the letter. Eventually my emailed letter was accepted by Aqua/Essential personell, on Lancaster ave, at the corporate location, around Sept15-18ish, then "handled, then responded to, and allegedly investigated by Essential Risk Managers...in PA and not Illinois, natives. The Essential Managers, Mitchell Plott and BD Potter, who work for Essential Utilities, and are also.....not Illinois residents and also not Aqua Illinois employees, responded to my claim with a denial letter. There was zero investigation in my view, no interviews, no documentation, no supporting evidence and.... when they made the pre-determined ruling I pointed out that I hadn't even sent them the evidence yet as I repeatedly told them I would. Anyway, the denial was sent around 1530 on or around Thursday Sept 18, and when I responded that I needed to send the evidence now that I finally had a

contact person. I was met with an out of office til next week, aout-rssponse..... I then forwarded about 30 exhibits supporting my claim. Doctors notes, lost wage documents, texts, emails, docs, etc,etc, The following week after receiving the evidence, the Essential Risk team and not Aqua Illinois, or Illinois employees delegated my complaint to ESIS.

Lastly, I reached out to the PUC for help with accountability regarding bad faith actions, policies, and behavior stemming from the PA location. I also asked for oversight regarding the handling or mishandling of my complaint by the persons in PA. And also with the handling or mishandling of even the denial letter and process of and by PA...employees.

So, I can, I reckon and will, pursue damages and restitution for the illness is suffered and after drinking contaminated water provided to me by Aqua in another format if it simplifies things further for the PUC.

3 areas which can and must be addressed in this format.

1- Aqua can and is accountable by the PUC for the reasons and laws that I cited: Alter ego and Active Participant I. As well as others.

Again, I can and will pierce the corporate Veil in another venue me thinks, as it relates directly to Aqua/Essential and the illness and damages I suffered. So as an act of good faith and to make things simpler in terms of jurisdiction for the PUC, I'm ok with focusing on...

2- Bad faith actions, policies, etc by the actors in PA are under the PUC's oversight.

3- The handling or mishandling of the complaint....., the denial, lack of investigation, process all by PA employees and entities involved, including ESIS (hired by Essential) are all directly under the PUC's perview. As part of this I would ask for some relevant supporting documentation, (as I have already done twice) discovery I reckon, for things that informed the companies decisions on the handling or mishandling, of the claim, the investigation, denial, etc. Basically just supporting what they have told me already in writing.

Ty, I have to go for now,
Alexander Miklos