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February 9, 2026

**VIA ELECTRONIC FILING**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Joint Application of American Water Works Company, Inc., Essential Utilities, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC and Alpha Merger Sub, Inc. for a Certificate of Public Convenience under Sections 1102(a)(3) and 2210(c) of the Public Utility Code and All Other Necessary Approvals to Effect a Change of Control of Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., and Peoples Natural Gas Company LLC Docket Nos. A-2025-3058927; A-2025-3058928; A-2025-3058929 - *CWA Answer to Joint Applicants' Preliminary Objections*

Dear Secretary Homsher:

Please find the attached **Chester Water Authority's Answer to Joint Applicants' Preliminary Objections** in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,  
CLARK HILL

/s/ Joseph W. Jesiolowski  
Joseph W. Jesiolowski  
Counsel for CWA

JWJ  
Enclosures

CC: Certificate of Service

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of American Water Works Company, Inc., Essential Utilities, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC and Alpha Merger Sub, Inc. for a Certificate of Public Convenience under Sections 1102(a)(3) and 2210(c) of the Public Utility Code and All Other Necessary Approvals to Effect a Change of Control of Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., and Peoples Natural Gas Company LLC

Docket Nos. A-2025-3058927  
A-2025-3058928  
A-2025-3058929

**[PROPOSED] ORDER**

Upon consideration of the Preliminary Objections of the Joint Applicants to the Formal Protest of the Chester Water Authority, and Chester Water Authority's Answer thereto, **IT IS HEREBY ORDERED** that the Preliminary Objections of the Joint Applicants are **OVERRULED**. Chester Water Authority's Protest is allowed to stand.

Dated: \_\_\_\_\_, 2026

\_\_\_\_\_  
Administrative Law Judge

Kevin Dooley Kent (No. 85962)  
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**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of American Water Works Company, Inc., Essential Utilities, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC and Alpha Merger Sub, Inc. for a Certificate of Public Convenience under Sections 1102(a)(3) and 2210(c) of the Public Utility Code and All Other Necessary Approvals to Effect a Change of Control of Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., and Peoples Natural Gas Company LLC

Docket Nos. A-2025-3058927  
A-2025-3058928  
A-2025-3058929

**CHESTER WATER AUTHORITY'S ANSWER TO JOINT APPLICANTS' PRELIMINARY OBJECTIONS**

Pursuant to 52 Pa. Code § 5.101(f), Chester Water Authority ("CWA"), through its legal counsel, hereby files this Answer to the Joint Applicant's Preliminary Objections to the Formal Protest of CWA. The Joint Applicants filed their Preliminary Objections on January 20, 2026. Pursuant to Administrative Law Judge Long's Order dated January 26, 2026, CWA's opposition is due February 9, 2026.

**I. Background.**

1. CWA admits that American Water is incorporated in Delaware and maintains its corporate headquarters in Camden, NJ. CWA further admits that American Water and its

subsidiaries form an enormously large corporate enterprise, with thousands of employees, millions of customers, and operations across multiple states. Indeed, CWA admits that American Water is the largest investor-owned utility in the country. CWA lacks information regarding the specific averments in this paragraph concerning the precise number of American Water's employees, number of customer connections, miles of transmission main, etc. In any event, this precise information is not relevant to the pending preliminary objections, as there is no dispute that American Water is an enormous enterprise.

2. Admitted. Indeed, CWA admits that Essential is the second largest investor-owned utility in the country.

The enormous size of American Water and Essential make their merger against the public interest. Among other problems, their proposed merger will create a mega-monopoly that is "too big to regulate."

3. Admitted.

4. Admitted.

5. Admitted. Even though the Joint Applicants had publicly announced their merger plans more than a month earlier, the Joint Applicants waited to file their Joint Application on the day before Thanksgiving, and they asked for expedited consideration. This appears to be an intentional effort by the Joint Applicants to minimize the ability of the public to meaningfully respond to the Joint Application.

6. Admitted. As noted in CWA's Protest, the PUC allowed less than 30 days, over the holidays, for the filing of protests. This was an unduly short amount of time for a matter of such great public importance. Further, the brevity of the timeline afforded for a matter of such public importance invites scrutiny of how, why, and by whom that timeline was set. Consumers

who might want to participate in the process could have been shut out by such a conspicuously short amount of time to respond.

7. Admitted that the Joint Applicants filed Preliminary Objections to CWA's Protest. Further admitted that in the Preliminary Objections, the Joint Applicants argue that CWA lacks standing to file a Protest to the proposed merger. As discussed in more detail below, the Preliminary Objections must be overruled because CWA has standing.

## **II. Standard of Review.**

8. Admitted.

9. Denied. The cases the Joint Applicants cite in this paragraph do not involve preliminary objections before the Pennsylvania Public Utility Commission ("PUC") pursuant to 52 Pa. Code § 5.101.

Section 5.101(a) of the PUC's Rules of Practice and Procedure states that preliminary objections are available to parties and may be filed in response to a pleading. 52 Pa. Code § 5.101(a). Preliminary objections must be accompanied by a notice to plead, and must state specifically the legal and factual grounds relied upon, and be limited to the following:

1. Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
2. Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.
3. Insufficient specificity of a pleading.
4. Legal insufficiency of a pleading.
5. Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.
6. Pendency of a prior proceeding or agreement for alternative dispute resolution.

7. Standing of a party to participate in the proceeding. 52 Pa. Code § 5.101(a).

PUC preliminary objection practice is analogous to Pennsylvania civil practice regarding preliminary objections. *Equitable Small Transportation Intervenors v. Equitable Gas Company*, 1994 Pa PUC LEXIS 69, Docket No. C-00935435 (July 18, 1994). Preliminary objections in civil practice requesting dismissal of a pleading will be granted only where the right to relief is clearly warranted and free from doubt. *Interstate Traveller Services, Inc. v. Pa. Dept. of Environment Resources*, 406 A.2d 1020 (Pa. 1979); *Rivera v. Philadelphia Theological Seminary of St. Charles Borromeo, Inc.*, 595 A.2d 172 (Pa. Super. 1991). The PUC follows this standard. *Montague v. Philadelphia Electric Company*, 66 Pa. PUC 24 (1988).

The PUC may not rely upon the factual assertions of the moving party but must accept as true for purposes of disposing of the motion all well pleaded, material facts of the nonmoving party, as well as every inference from those facts. *County of Allegheny v. Commonwealth of Pennsylvania*, 490 A. 2d 402 (Pa. 1985); *Commonwealth of Pennsylvania v. Bell Telephone Co. of Pa.*, 551 A.2d 602 (Pa. Cmwlt. 1988). Thus, the PUC must view a protest in the light most favorable to the protestor and should dismiss the protest only if it appears that the protestor would not be entitled to relief under any circumstances as a matter of law. *Equitable Small Transportation Intervenors v. Equitable Gas Company*, 1994 Pa. PUC LEXIS 69, Docket No. C-00935435 (July 18, 1994).

In deciding the preliminary objections, the PUC must determine whether, based on well-pleaded factual averments of the protestor, recovery or relief is possible. *Dept. of Auditor General, et al v. SERS, et al.*, 836 A.2d 1053, 1064 (Pa. Cmwlt. 2003), 2003 Pa. Commw. LEXIS 849; *P.J.S. v. Pa. State Ethics Comm'n*, 669 A.2d 1105 (Pa. Cmwlt. 1996) 1996 Pa. Commw. LEXIS 11. Any doubt must be resolved in favor of the non-moving party by refusing

to sustain the preliminary objections. *Boyd v. Ward*, 802 A.2d 705 (Pa.Cmwlth. 2002) 2002 Pa. Commw. LEXIS 580. All of the non-moving party's averments in the Protest must be viewed as true for purposes of deciding the preliminary objections, and only those facts specifically admitted may be considered against the non-moving party. *Ridge v. State Employees' Retirement Board*, 690 A.2d 1312 (Pa. Cmwlth. 1997) 1997 Pa. Commw. LEXIS 148.

This recitation of the standard of review is copied substantially verbatim from the standard of review articulated in (1) the PUC Opinion and Order in *Stillwater Lakes v. Stillwater Sewer Corporation*, C-2022-3031532 (December 22, 2022) and (2) the PUC Opinion and Order in *Masi v. Pennsylvania American Water Company*, C-2018-2645920 (July 1, 2018).

10. Denied. The cases the Joint Applicants cite in this paragraph do not involve preliminary objections before the PUC. See response to Paragraph 9 above for the correct standard of review for preliminary objections before the PUC.

### **III. Preliminary Objections.**

#### **A. Preliminary Objection No. 1**

11. CWA incorporates by reference Paragraphs 1 through 10 as if fully set forth herein.

12. Denied. CWA admits it is not a present customer of the Joint Applicants, but this is not relevant to CWA's Protest. Regardless of CWA's status as not a present customer of the Joint Applicants, CWA has standing for at least three separate reasons.

*First*, CWA has pending litigation against Aqua that could be jeopardized if the merger is approved. CWA's Protest, ¶ 4.

*Second*, CWA is a present wastewater ratepayer of DELCORA. Aqua PA is attempting to acquire DELCORA. If Aqua succeeds, and then Aqua itself is acquired by American Water, CWA's wastewater rates will go up considerably. *Id.* at ¶ 5.

*Third*, CWA has representative standing for the many CWA ratepayers who are presently Aqua PA wastewater customers who will see their rates go up considerably if the merger is approved. *Id.* at ¶¶ 5-12.

For all of these reasons, the Preliminary Objections should be overruled and CWA’s Protest should be allowed to stand.

13. Admitted.

14. Admitted.

15. Admitted.

16. Denied. CWA need not be a present customer of the Joint Applicants to have standing. *First*, CWA has standing because it has pending litigation against Aqua PA that could be jeopardized if the merger is approved. CWA’s Protest, ¶ 4. This is precisely the type of “substantial, direct, and immediate” interest that conveys standing to CWA, regardless of the fact that CWA is not a present customer of the Joint Applicants. *Second*, CWA has standing as a DELCORA wastewater customer, given Aqua PA’s attempts to acquire DELCORA. *Third*, CWA has representative standing on behalf of its many customers who are present wastewater customers of Aqua PA. The PUC and Pennsylvania Courts have long recognized the doctrine of representative standing in circumstances similar to here. *See Energy Cross Council of Pa. v. Pa. PUC*, 995 A.2d 465, 476 (Pa. Commw. 2010) (alteration in original) (citing *Tripps Park v. Pa. PUC*, 415 A.2d 967 (Pa. Commw. 1980) (finding that “an association may have standing as a representative of its members ... as long as an organization has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action, [i.e., is aggrieved, the organization] has standing.”); *Parents United for Better Schools v. School District of Philadelphia*, 646 A.2d 689 (Pa. Commw. 1994)). For example, in *Tripps*

*Park*, the Commonwealth Court held that an organization of Pennsylvania Gas and Water Company customers and ratepayers had standing “even in the absence of injury to itself ... solely as the representative of its members.” *Tripps Park*, 415 A.2d at 970.

17. Denied. CWA does not assert that it has standing because it owns property within the Joint Applicants’ service territory. This is an intentional misreading of CWA’s Protest. As described elsewhere in this response, CWA’s basis for standing is threefold. *First*, CWA has standing because it has pending litigation against Aqua PA that could be jeopardized if the merger is approved. CWA’s Protest, ¶ 4. This is precisely the type of “substantial, direct, and immediate” interest that conveys standing to CWA, regardless of the fact that CWA is not a present customer of the Joint Applicants. *Second*, CWA has standing as a DELCORA wastewater customer, given Aqua PA’s attempts to acquire DELCORA. *Third*, CWA has representative standing on behalf of its many customers who are present wastewater customers of Aqua PA.

18. Admitted.

19. Admitted.

20. Admitted.

21. Denied. CWA has alleged that it is a wastewater customer of DELCORA and that Aqua PA is trying to acquire DELCORA. Protest, ¶ 5. CWA has also alleged that if the merger is approved, customers paying Aqua PA Wastewater rates will eventually be moved to American Water’s rates, which are 30% higher. *Id.* Thus, CWA has alleged that “[i]f the DELCORA sale goes through, and then the Essential-American merger is approved, CWA will eventually be moved onto American Water’s much higher rates.” *Id.* Under the governing standard of review, these factual averments must be accepted as true.

In response, the Joint Applicants argue that this interest is “premised upon future events” and thus too “attenuated” to confer standing to CWA. Preliminary Objections, ¶¶ 20-22. In a footnote, the Joint Applicants cite several legal cases to supposedly support this argument. However, none of these cases stand for the proposition for which the Joint Applicants cite them.

The first case the Joint Applicants cite is *Application of Artesian Water Pennsylvania, Inc., for Approval to Begin to Offer, Render, Furnish or Supply Water Serv. to the Pub. in Additional Territory in Portions of New Garden Twp., Chester Cnty., Pennsylvania*, No. A-2014-2451241, 2015 WL 1976284, at \*9 (Apr. 22, 2015). This case merely held that “[t]he residency of the Protestant and his location ‘near’ the proposed service area is not sufficiently specific to [confer standing].” This is an unremarkable proposition and irrelevant to CWA’s claimed basis for standing. CWA does not allege standing from being “near” the proposed service area. Rather, CWA alleges standing for three separate and independent reasons other than geographic proximity to the service area.

The next case the Joint Applicants cite is *In re El Rancho Grande, Inc.* 437 A.2d 1150 (Pa. 1981). The Joint Applicants provide neither a pin cite nor a parenthetical for this case. From a reading of this case, it is unclear why the Joint Applicants have bothered to cite it. This case says absolutely nothing about a supposed lack of standing “premised upon future events” that are supposedly “attenuated.”

The third case the Joint Applicants cite is *Wm. Penn Parking Garage, Inc. v. City of Pittsburgh*, 346 A.2d 269, 282-84 (1975). Again, it is unclear why the Joint Applicants have bothered to cite it. This case merely stands for the unremarkable proposition that “[t]he requirement that an interest be ‘direct’ simply means that the person claiming to be aggrieved must show causation of the harm to his interest by the matter of which he complains.” *Id.* at 282.

Indeed, contrary to the Joint Applicants' argument, the Court in *Wm. Penn* stated that "there are no simple rules for determining precisely how close a causal connection between the conduct complained of and the injury to the challenger is necessary to confer standing." *Id.* at 284.

Here, CWA has alleged that (1) it is a wastewater customer of DELCORA, (2) Aqua PA is trying to acquire DELCORA, (3) if that happens, CWA will become an Aqua PA customer, and (4) if this merger is approved, CWA will eventually be moved to American Water's substantially higher wastewater rates. All of these averments must be accepted as true at this procedural stage. (Indeed, all of these averments are indisputably true, as a matter of fact and public record.) This is not an "attenuated" chain of events "premised upon future events," as the Joint Applicants argue. Rather, this is premised on the indisputable fact that *Aqua is actively trying to acquire DELCORA in a pending PUC docket.*<sup>1</sup> This is not a remote or hypothetical possibility; rather, it is something Aqua PA has spent considerable resources to argue in favor of, and something the PUC may well grant.

To be clear, CWA strongly opposes Aqua PA's attempt to acquire DELCORA. But that does not make the acquisition of DELCORA some remote hypothetical possibility. Unless and until Aqua PA completely renounces its attempts to close on the DELCORA acquisition, the chances of Aqua PA closing on that acquisition are all too real.

22. Denied. It is not clear what the Joint Applicants even mean when they argue that CWA merely alleges "a general interest in full compliance with the law." This is not what CWA alleged in its Protest. Rather, CWA alleged three grounds for standing. *First*, CWA has standing because it has pending litigation against Aqua PA that could be jeopardized if the merger is approved. CWA's Protest, ¶ 4. This is precisely the type of "substantial, direct, and

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<sup>1</sup> <https://www.puc.pa.gov/docket/A-2019-3015173>

immediate” interest that conveys standing to CWA, regardless of the fact that CWA is not a present customer of the Joint Applicants. *Second*, CWA has standing as a DELCORA wastewater customer, given Aqua PA’s attempts to acquire DELCORA. *Third*, CWA has representative standing on behalf of its many customers who are present wastewater customers of Aqua PA. The PUC and Pennsylvania Courts have long recognized the doctrine of representative standing in circumstances similar to here. *See Energy Cross Council of Pa. v. Pa. PUC*, 995 A.2d 465, 476 (Pa. Commw. 2010) (alteration in original) (citing *Tripps Park v. Pa. PUC*, 415 A.2d 967 (Pa. Commw. 1980) (finding that “an association may have standing as a representative of its members ... as long as an organization has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action, [i.e., is aggrieved, the organization] has standing.”); *Parents United for Better Schools v. School District of Philadelphia*, 646 A.2d 689 (Pa. Commw. 1994)). For example, in *Tripps Park*, the Commonwealth Court held that an organization of Pennsylvania Gas and Water Company customers and ratepayers had standing “even in the absence of injury to itself ... solely as the representative of its members.” *Tripps Park*, 415 A.2d at 970.

23. Denied. The Joint Applicants tried this same argument to block multiple petitions to intervene in this proceeding. Administrative Law Judge Long soundly rejected their argument.

By way of background, CWA stated in its Protest that it had standing here because, among other things, “CWA has pending litigation against Aqua PA that could be jeopardized if the merger is approved.” CWA Protest, ¶ 4. Under the governing standard of review, this factual averment must be accepted as true. This type of harm CWA has articulated is precisely the type of “substantial, direct, and immediate” interest that confers standing to CWA here,

pursuant to the very cases the Joint Applicants cite. *See, e.g., George v. Pa. PUC*, 735 A.2d 1282, 1286 (Pa. Cmwlth. Ct. 1999). This alone confers standing on CWA, even if CWA's other arguments for standing are not accepted.

To avoid this, the Joint Applicants argue that the proposed merger will not actually merge or consolidate their operating subsidiaries, like Aqua PA. Thus, the Joint Applicants argue, there can be no harm to CWA if the merger is approved, since Aqua PA will operate the same post-merger as it operated previously.

The Joint Applicants raised this same argument earlier in this proceeding, and it failed. Specifically, the Township of Lower Makefield, the City of Butler, Manchester Township, North York Borough, Spring Garden Township, West Manchester Township, and York Township filed petitions to intervene in this proceeding. They argued, among other things, that they had standing to intervene because their residents are in the service territory of Pennsylvania American Water Company, one of the operating subsidiaries of the Joint Applicants. The Joint Applicants opposed the interventions, arguing that the proposed merger would not merge any of the operating subsidiaries of the Joint Applicants, and thus the proposed merger would have no effect on the residents in these municipalities.<sup>2</sup> Administrative Law Judge Long heard oral argument on these points at the Pre-Hearing Conference on January 22, 2026. She then soundly rejected the Joint Applicants' argument. Here is the relevant order from Administrative Law Judge Long, dated January 26, 2026:<sup>3</sup>

The Joint Applicants objected to the petitions to intervene of Township of Lower Makefield, the City of Butler, Manchester Township, North York Borough, Spring Garden Township, West Manchester Township, and York Township (in this order, collectively, Municipalities), because, among other things, the

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<sup>2</sup> <https://www.puc.pa.gov/pcdocs/1911022.pdf>

<sup>3</sup> <https://www.puc.pa.gov/pcdocs/1911656.pdf>

municipalities are in the service territory of Pennsylvania American Water Company (PAWC). Although PAWC is a subsidiary of Applicant American Water Works, the Joint Applicants argue that PAWC is not a party to the Joint Application, and that there is no present intent to consolidate the operations of the Aqua utilities with PAWC.

The Municipalities countered that there is no record support for the averment that there will be no impact from the merger on PAWC and its customers. Among other things, the Municipalities contend that they should be permitted an opportunity to explore the issue of whether there will be impacts – positive or negative – as a result of the transaction. OSBA and OCA supported the intervention of the Municipalities.

Following argument from interested Parties, I granted the petitions to intervene of the Municipalities.

As Administrative Law Judge Long recognized during the Pre-Hearing Conference, the Joint Applicants' argument was absurd; it is obvious that the proposed merger could have a significant effect on the operating subsidiaries. Indeed, if the operating subsidiaries are going to be run in the exact same fashion post-merger, then there is no reason to merge the parent organizations in the first place. Administrative Law Judge Long's ruling against the Joint Applicants' fallacious argument is now the law of the case, and the Joint Applicants cannot re-raise the same argument to challenge CWA's standing to file a protest.

In sum, CWA alleged in its Protest that the proposed merger could jeopardize pending litigation CWA has against Aqua PA. This factual averment must be accepted as true at this procedural stage. And, accepting this averment as true, CWA has sufficiently articulated the type of "substantial, direct, and immediate" interest that confers standing to CWA here. On this basis alone, the Joint Applicants' Preliminary Objection must be overruled.

24. Denied. CWA has alleged that "[m]any of CWA's ratepayers receive wastewater service from . . . Aqua PA Wastewater." Protest, ¶ 6. CWA has also alleged that if the merger is approved, customers paying Aqua PA Wastewater rates will eventually be moved to American

Water's rates, which are 30% higher. *Id.* at ¶ 5. Thus, CWA has alleged that "CWA's ratepayers have or will suffer a direct, immediate, and substantial injury to an interest because of this proceeding." *Id.* at ¶ 13. Under the governing standard of review, these factual averments must be accepted as true. This type of harm is precisely the type needed to convey representational standing upon CWA here. *See Energy Cross Council of Pa. v. Pa. PUC*, 995 A.2d 465, 476 (Pa. Commw. 2010) (alteration in original) (citing *Tripps Park v. Pa. PUC*, 415 A.2d 967 (Pa. Commw. 1980) (finding that "an association may have standing as a representative of its members ... as long as an organization has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action, [i.e., is aggrieved, the organization] has standing."); *Parents United for Better Schools v. School District of Philadelphia*, 646 A.2d 689 (Pa. Commw. 1994)). For example, in *Tripps Park*, the Commonwealth Court held that an organization of Pennsylvania Gas and Water Company customers and ratepayers had standing "even in the absence of injury to itself ... solely as the representative of its members." *Tripps Park*, 415 A.2d at 970.

25. Denied. As discussed above, CWA has a direct, substantial, and immediate interest that confers standing here. Among other things, CWA has direct standing because the proposed merger could jeopardize litigation CWA has pending against Aqua PA. CWA also has representational standing because many of CWA's ratepayers use Aqua PA Wastewater for sewer service, and these customers will see their rates go up substantially if the merger is approved.

WHEREFORE, CWA respectfully requests that the ALJ overrule the Joint Applicants' Preliminary Objections and allow CWA's Protest to stand.

Dated: February 9, 2026

**By:** /s/ Joseph W. Jesiolowski  
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**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of American Water Works Company, Inc., Essential Utilities, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC and Alpha Merger Sub, Inc. for a Certificate of Public Convenience under Sections 1102(a)(3) and 2210(c) of the Public Utility Code and All Other Necessary Approvals to Effect a Change of Control of Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., and Peoples Natural Gas Company LLC

Docket Nos. A-2025-3058927  
A-2025-3058928  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have, on this day, served copies of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

**VIA EMAIL ONLY**

The Honorable Mary D. Long  
The Honorable Emily I. DeVoe  
The Honorable Ann Quimby  
Administrative Law Judge  
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Dated this 9<sup>th</sup> day of February, 2026.

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