



February 9, 2026

Via Email Only

Administrative Law Judge Emily I. DeVoe
Administrative Law Judge Ann Quimby
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
201 Fifth Avenue
Pittsburgh, PA 15222
edevoe@pa.gov
aquimby@pa.gov

Re: Joint Application of American Water Works Company, Inc., et al., 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

Your Honors:

Please find the attached **Answer of the of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) to the Preliminary Objections of the Joint Applicants to the Formal Protest of Upland Borough, Delaware County and the Preliminary Objections of the Joint Applicants to the Formal Protest of the Chester Water Authority** in the above noted proceeding.

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

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Ria Pereira".

Ria Pereira, Esq.
Counsel for CAUSE-PA

CC: Secretary Matthew L. Homsher (via E-file only)
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	:	Docket Nos. A-2025-3058927
Natural Gas Company LLC and Alpha	:	A-2025-3058928
Merger Sub, Inc. for a Certificate of	:	A-2025-3058929
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	:	

**ANSWER OF THE OF THE COALITION FOR AFFORDABLE UTILITY SERVICES
AND ENERGY EFFICIENCY IN PENNSYLVANIA (CAUSE-PA) TO THE
PRELIMINARY OBJECTIONS OF THE JOINT APPLICANTS TO THE FORMAL
PROTEST OF UPLAND BOROUGH, DELAWARE COUNTY AND THE
PRELIMINARY OBJECTIONS OF THE JOINT APPLICANTS TO THE FORMAL
PROTEST OF THE CHESTER WATER AUTHORITY**

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA
Ria M. Pereira, Esq., PA ID: 316771
Elizabeth R. Marx, Esq., PA ID: 309014
John W. Sweet, Esq., PA ID: 320182
Lauren N. Berman, Esq., PA ID: 310116
Levi A. Phillips, Esq. PA ID: 338477

118 Locust Street
Harrisburg, PA 17101
Fax: 717-233-4088

pulp@pautilitylawproject.org

February 9, 2026

Pursuant to the provisions of 52 Pa. Code §§ 5.61(a)(2) and 5.101(f), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), by and through its legal counsel at the Pennsylvania Utility Law Project, files this Answer in Opposition to the Preliminary Objections of American Water Works Company, Inc. (American Water), Essential Utilities, Inc. f/k/a Aqua America, Inc. (Essential), Aqua Pennsylvania, Inc. (Aqua PA) and Aqua Pennsylvania Wastewater, Inc. (Aqua PA WW), Peoples Natural Gas Company LLC (Peoples), and Alpha Merger Sub, Inc. (Merger Sub) (collectively, the Joint Applicants) to the Formal Protest of Upland Borough, Delaware County (Upland Borough), as well as the Joint Applicants' Preliminary Objections to the Formal Protest of Chester Water Authority (CWA) (collectively, Preliminary Objections). For the sake of brevity, CAUSE-PA is submitting a combined Answer to the separate Preliminary Objections filed against the Protests of CWA and Upland Borough, as these Preliminary Objections substantially mirror each other in terms of structure and arguments.

On December 29, 2025, Formal Protests were submitted in this matter by Upland Borough and CWA, respectively. In its Formal Protests, CWA argues that it has an interest in this proceeding because it has pending litigation against Aqua PA that “could be jeopardized if the merger is approved”,¹ and because CWA is a ratepayer of the Delaware County Regional Water Quality Control Authority (DELCORA), which is the subject of an acquisition attempt by Aqua PA WW – and may be impacted by the proposed change of control of Aqua PA and Peoples to be affected by the merger of Essential and Merger Sub, a wholly owned subsidiary of American Water (the Merger).² Similarly, Upland Borough alleges in its Formal Protest that its residents are served by CWA and DELCORA, and should “the acquisition of CWA and/or

¹ CWA Formal Protest at ¶ 4.

² CWA Formal Protest at ¶ 5.

DELCORA occur, the merger has the significant likelihood of affecting the terms, conditions, and quality of service, including a future impact on rates that will be charged to Upland Borough residents.”³

On January 20, 2026, the Joint Applicants filed Preliminary Objections to the Formal Protest of Upland Borough and Preliminary Objections to the Formal Protest of CWA. In their Preliminary Objections, the Joint Applicants incorrectly argue that the Protests filed by CWA and Upland Borough should be dismissed because Protestants lack standing and set forth attenuated and insufficient allegations which are premised on potential future acquisition of CWA and/or DELCORA by Aqua PA and/or Aqua PA WW.⁴

Pursuant to the Prehearing Order in this matter dated January 26, 2026, Answers to the Joint Applicants’ Preliminary Objections are due on or before February 9, 2026. CAUSE-PA submits the following Answer in response to Joint Applicants’ Preliminary Objections. While the Preliminary Objections were not directed at CAUSE-PA’s protest, CAUSE-PA is concerned about the Joint Applicants’ efforts to limit participation in this proceeding which must broadly determine whether the merger is in the public interest. Therefore, CAUSE-PA requests that the Commission deny the Joint Applicants’ Preliminary Objections and grant standing to CWA and Upland Borough as parties to this matter.

As discussed in detail below, the present proceeding requires that the Commission examine whether the Merger, if approved, would result in affirmative public benefits and is “necessary or proper for the service, accommodation, convenience, or safety of the public.”⁵ The public interest standard is broad and encapsulates both known and anticipated harms – including

³ Upland Borough Formal Protest at ¶ 4.

⁴ Joint Applicant’s Preliminary Objections to Upland Borough Protest at ¶¶ 3-4. Joint Applicant’s Preliminary Objections to CWA Protest at pp. 3-4, ¶ 21.

⁵ 66 Pa. C.S. § 1103(a).

the potential impacts to the Protestants if the Merger is approved and Aqua's pursuit to acquire CWA and/or DELCORA comes to fruition. CAUSE-PA submits that the Joint Applicants' Preliminary Objections to the Formal Protests of CWA and Upland Borough should be denied in their entirety, and avers in support as follows:

1. Admitted in part, denied in part. CAUSE-PA admits that American Water is a public utility holding company that is incorporated in Delaware and maintains its corporate headquarters in Camden, New Jersey. CAUSE-PA is without knowledge or information sufficient to form a belief as to the remaining allegations set forth in Paragraph 1 of the Preliminary Objections, and therefore denies those allegations and demands proof thereof, if deemed relevant.
2. Admitted in part, denied in part. CAUSE-PA admits that Essential is a publicly-traded public utility holding company organized under the laws of the Commonwealth of Pennsylvania and headquartered in Bryn Mawr, Pennsylvania. CAUSE-PA is without knowledge or information sufficient to form a belief as to the remaining allegations set forth in Paragraph 2 of the Preliminary Objections, and therefore denies those allegations and demands proof thereof, if deemed relevant.
3. Admitted in part, denied in part. CAUSE-PA admits that Aqua PA and Aqua PA WW are Pennsylvania corporations headquartered in Bryn Mawr, Pennsylvania; that Aqua PA and Aqua PA Wastewater are each a "public utility" as that term is defined in Section 102 of the Code and, therefore, are subject to regulation by the Commission; and that Aqua PA is a direct subsidiary of Essential. CAUSE-PA further admits that Peoples is a Pennsylvania limited liability company headquartered in Pittsburgh, Pennsylvania. CAUSE-PA is without knowledge or information sufficient to form a belief as to the

remaining allegations set forth in Paragraph 3 of the Preliminary Objections, and therefore denies those allegations and demands proof thereof, if deemed relevant.

4. Admitted in part, denied in part. CAUSE-PA admits that Peoples provides natural gas across 18 counties in Western Pennsylvania; that Peoples is a “public utility” and “natural gas distribution company” as those terms are defined respectively in Sections 102 and 2201 of the Code, and is subject to regulation by the Commission, and that Peoples is an indirect subsidiary of Essential. CAUSE-PA is without knowledge or information sufficient to form a belief as to the remaining allegations set forth in Paragraph 4 of the Preliminary Objections, and therefore denies those allegations and demands proof thereof, if deemed relevant.
5. Admitted.
6. Admitted.
7. The averments contained in Paragraph 7 of the Preliminary Objections represent legal conclusions to which no response is required.
8. The averments contained in Paragraph 8 of the Preliminary Objections represent legal conclusions to which no response is required.
9. The averments contained in Paragraph 9 of the Preliminary Objections represent legal conclusions to which no response is required.
10. The averments contained in Paragraph 10 of the Preliminary Objections represent legal conclusions to which no response is required.
11. The averments contained in Paragraph 11 of the Preliminary Objections incorporate by reference the previous paragraphs of the Preliminary Objections, and therefore no response is required.

12. Denied. It is improper and unreasonable to dismiss the Protests at issues, even assuming *arguendo* that the Protestants are not customers of the Joint Applicants, do not receive utility service from the Joint Applicants, and the only interests alleged in the Protests are based upon actions that may occur in the future. CAUSE-PA similarly denies that the Protestants lack standing to file Protests in this proceeding.

In this proceeding, the Joint Applicants must show that the proposed Merger provides affirmative public benefits and is “necessary or proper for the service, accommodation, convenience, or safety of the public.”⁶ Pennsylvania Courts have clearly articulated that the public interest standard involved in this proceeding should be interpreted broadly and encompasses a wide range of considerations. Satisfying this standard requires the Commission to find that a proposed merger would "affirmatively promote the 'service, accommodation, convenience, or safety of the public' in some substantial way."⁷

Similarly, in making a determination whether a proposed Merger is in the public interest, the Pennsylvania Commonwealth Court has recognized that “the balancing test under Section 1102 . . . [is] to weigh all the factors for and against the transaction, including the impact on rates, to determine if there is a substantial public benefit[.]”⁸ CWA and Upland Borough’s Formal Protests in this matter clearly articulate standing based on the public interest standard involved in this proceeding. CWA alleges in its Protest, what includes that: (1) CWA is in a unique position to be affected by the proposed Merger because pending litigation against Aqua PA would be jeopardized by approval of the

⁶ 66 Pa. C.S. § 1103(a).

⁷ City of York v. Pennsylvania Public Utility Commission, 449 Pa. 136, 141, 295 A.2d 825, 828 (Pa. 1973); see also Section 1103(a) (allows the Commission to impose upon its issuance of a certificate of public convenience "such conditions as it may deem to be just and reasonable.").

⁸ McCloskey v. Pa. PUC, 195 A.3d 1055, 1067 (Pa. Cmmw. Ct. 2018).

Merger;⁹ (2) CWA is a ratepayer of DELCORA, which is subject of an acquisition attempt by Aqua PA wastewater;¹⁰ and (3) if DELCORA is acquired and the Merger is approved, CWA's ratepayers would be subject to American Water's higher rates.¹¹ Similarly, Upland Borough alleges standing in their Formal Protest based on, what includes: (1) If the acquisition of CWA and/or DELCORA occur, the proposed Merger has a significant likelihood of affecting the "terms, conditions, and quality of service, including a future impact on rates that will be charged to Upland Borough residents"¹²; and (2) "Upland Borough has a financial stake in this proceeding as Aqua PA Wastewater has committed to pay Upland \$700,000.00 in the event of it closing its proposed acquisition of DELCORA per the stipulation filed before the Commission at docket no. A-2019-3015173."¹³ Thus, both Protests clearly articulate how they are likely to suffer a direct, immediate, and substantial injury to an interest because of the present proceeding. These interests undeniably warrant standing.¹⁴

13. Admitted in part, denied in part. The averments contained in Paragraph 13 of the respective Preliminary Objections attempt to characterize Pennsylvania case law, and the quotations from such precedent speak for itself. However, CAUSE-PA denies that the Protestants have failed to establish standing based on the public interest standard in this proceeding, which we have explained in detail above.

14. Admitted in part, denied in part. The averments contained in Paragraph 14 of the respective Preliminary Objections represent legal conclusions to which no response is

⁹ CWA Formal Protest at ¶¶ 4, 8.

¹⁰ CWA Formal Protest at ¶ 5.

¹¹ CWA Formal Protest at ¶¶ 5-7.

¹² Upland Borough Formal Protest at ¶ 4.

¹³ Upland Borough Formal Protest at ¶ 6.

¹⁴ See Tripps Park v. Pa. PUC, 415 A.2d 967 (Pa. Commw. 1980).

required. However, CAUSE-PA asserts that the Protestants have standing as they have asserted an interest that is substantial, direct, and immediate based on the public interests in this proceeding, as discussed in further detail above.

15. The averments contained in Paragraph 15 of the respective Preliminary Objections represent legal conclusions to which no response is required.
16. The averments contained in Paragraph 16 of the respective Preliminary Objections represent legal conclusions to which no response is required. However, as discussed above, CAUSE-PA avers that Protestants CWA and Upland Borough have standing in the present proceeding based on the public interest standard in this proceeding.
17. Admitted in part, denied in part. The legal conclusions set forth in Paragraph 17 do not require a response. CAUSE-PA denies that the Commission's decision in Applications of Pennsylvania-American Water Company¹⁵ preclude Protestants' standing in the present proceeding. In that matter, the Commission affirmed an Initial Decision which found that certain protestants lacked standing because "mere ownership of land within a certificated service territory of a utility is not the same as being a customer of that utility."¹⁶ By contrast, the Protestants in the present proceeding do not allege standing based on a property interest or ownership. Instead, as outlined in detail above, both Protestants have articulated their respective interests if the Merger is approved, including significant potential impacts from the projected CWA/ DELCORA acquisition, and potential impacts on pending litigation if the Merger is approved. These impacts could have a significant and substantial impact on the rights of the Protestants.

¹⁵ Applications of Pennsylvania-American Water Co., 1995 Pa. PUC LEXIS 197, *20-22, Docket Nos. A-212285F019, et al. (Order entered Oct. 26, 1995) ("Pennsylvania-American Water Co.").

¹⁶ Id. at 20-21.

18. Admitted in part, denied in part. CAUSE-PA admits that Protestants do not appear to have alleged that they are customers of the Joint Applicants, or that the Joint Applicants provide them with utility services. However, as discussed in detail above, Protestants nevertheless have a standing in this proceeding based on the public interest standard entailed in this matter.
19. Denied. Protestants' failure to allege standing based on property ownership in the Joint Applicants' service territories is not dispositive of Protestants' standing in this proceeding. For the reasons set forth in detail above, Protestants have properly alleged standing based on the examination of the public benefits which must occur in this proceeding.
20. Denied. CAUSE-PA denies that Protestants lack standing because they allege potential impacts from the proposed Merger which are premised on future events – namely the acquisition of CWA and/or DELCORA if the merger is approved.¹⁷ The subsequent acquisition of CWA and/or DELCORA is not based on pure speculation. Instead, Protestants allege that these entities have been subject to acquisition attempts by Aqua PA Wastewater.¹⁸ As Upland Borough points out in its Formal Protest “Should the acquisition of CWA and/or DELCORA occur, the merger has the significant likelihood of affecting the terms, conditions, and quality of service, including a future impact on rates that will be charged to Upland Borough residents.”¹⁹

¹⁷ CWA Formal Protests at ¶ 5; Upland Borough Formal Protest at ¶ 3-4.

¹⁸ CWA Formal Protest at ¶ 5; Upland Borough Formal Protest at p. 3. See also, CWA Formal Protest at Exhibit A (which indicates that, “in 2019 DELCORA entered into a contract, called an Asset Purchase Agreement, whereby DELCORA agreed to sell itself to Aqua. It has been six years since then, and the sale still has not closed.”)

¹⁹ Upland Borough Formal Protest at ¶ 4.

21. Denied. CAUSE-PA denies that the Protestants' interests are attenuated because they are premised on potential future acquisitions by Aqua PA and/or Aqua PA WW. Protestants allege that CWA and/or DELCORA are already targeted to be acquired by Aqua PA/ Aqua PA Wastewater. Consideration of the public interest in this present matter is broad and certainly encompasses consideration of the anticipated harm to the Protestants if the Merger is approved and these subsequent acquisitions come to fruition.
22. Denied. In Paragraph 22 of the Preliminary Objections to CWA's Formal Protest, the Joint Applicants argue that Protestants' allegations that certain ratepayers receive wastewater service from Aqua PA WW are too general of an interest to constitute standing. CAUSE-PA denies that these allegations are too general to confer standing based on the public interest standard entailed in this proceeding, and discussed in detail above. In Paragraph 22 of the Preliminary Objections to Upland Borough's Formal Protest, the Joint Applicants argue that Protestants attempt to allege a financial interest in this present proceeding ignores that Aqua PA WW will allegedly remain an individual operating utility if the Merger is approved. CAUSE-PA avers that the extent to which and the timing by which the proposed Merger may result in consolidation of the Joint Applicants' operating Companies is an open question which must be examined through the course of this proceeding.
23. Denied. In Paragraph 23 of the Preliminary Objections to CWA's Formal Protest, the Joint Applicants argue that CWA's interest is premised on pending litigation of Aqua PA that "could be jeopardized" following the Merger. The Joint Applicants further argue that CWA does not consider that Aqua PA WW will allegedly remain a separate operating Company if the Merger is approved. The extent to which and the timing by which the

proposed Merger may result in consolidation of the Joint Applicants' operating Companies is an open question which must be examined through the course of this proceeding. Protestants also do not lack standing if their allegations are premised on future impacts from the Merger. Such impacts may constitute anticipated harms, and require further investigation in the context of this proceeding. In Paragraph 23 of the Preliminary Objections to Upland Borough's Protest, the Joint Applicants allege that Protestant Upland Borough lacks representational standing because it has not identified its residents, or that it has authority to represent its residents in this proceeding. Upland Borough has alleged a substantial, direct, and immediate interest which may be adversely affected if the Merger is approved, and as discussed in detail above.

24. Denied. In Paragraph 24 of the Preliminary Objections to CWA's Formal Protest, the Joint Applicants allege that CWA lacks representational standing because it has not identified its residents, or that it has authority to represent its residents in this proceeding. Instead, CWA has alleged a substantial, direct, and immediate interest which may be adversely affected if the Merger is approved, and as discussed in detail above. In Paragraph 24 of the Preliminary Objections to Upland Borough's Protest (which is misnumbered as Paragraph 11), the Joint Applicants allege that Upland Borough lacks any interest in the present proceeding. For the reasons set forth above, CAUSE-PA denies that Protestants lack standing in the present proceeding.

25. Denied. In Paragraph 25 of the Preliminary Objections to CWA's Protest, the Joint Applicants allege that CWA lacks any interest in the present proceeding. For the reasons set forth above, CAUSE-PA denies that Protestants lack standing in the present proceeding.

WHEREFORE, CAUSE-PA respectfully requests and the Preliminary Objections to the Formal Protest of Upland Borough and the Formal Protest of CWA are dismissed in their entirety.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



Ria M. Pereira, Esq., PA ID: 316771
Elizabeth R. Marx, Esq., PA ID: 309014
John W. Sweet, Esq., PA ID: 320182
Lauren N. Berman, Esq., PA ID: 310116
Levi A. Phillips, Esq. PA ID: 338477
118 Locust Street
Harrisburg, PA 17101
717-236-9486
pulp@pautilitylawproject.org

February 9, 2026

Verification

I, Elizabeth R. Marx, legal counsel for the Coalition for Affordable Utility Services and Energy Efficiency (“CAUSE-PA”), on behalf of CAUSE-PA, hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, 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).



On behalf of the Coalition for Affordable
Utility Services and Energy Efficiency in
Pennsylvania

Date: February 9, 2026

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	:	Docket Nos. A-2025-3058927
Natural Gas Company LLC and Alpha	:	A-2025-3058928
Merger Sub, Inc. for a Certificate of Public	:	A-2025-3058929
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	:	

Certificate of Service

I hereby certify that I have this day served copies of the **Answer of the of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) to the Preliminary Objections of the Joint Applicants to the Formal Protest of Upland Borough, Delaware County and the Preliminary Objections of the Joint Applicants to the Formal Protest of the Chester Water Authority** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email

Kenneth M. Kulak, Esq. Mark A. Lazaroff, Esq. Catherine G. Vasudevan, Esq. Brooke E. Mcglinn, Esq. Morgan Lewis and Bockius LLP 2222 Market Street Philadelphia, PA 19103-2921 ken.kulak@morganlewis.com mark.lazaroff@morganlewis.com catherine.vasudevan@morganlewis.com brooke.mcglinn@morganlewis.com	Anthony D. Kanagy, Esq. Garrett P. Lent, Esq. Hayley E. Wilburn, Esq. Emily Grecu, Esq. 17 North 2nd Street, 12th Floor Harrisburg, PA 17101-1601 akanagy@postschell.com glent@postschell.com hwilburn@postschell.com egrecu@postschell.com
Alexander R. Stahl, Esq. Kimberly Joyce, Esq. 762 West Lancaster Avenue	Meagan Moore, Esq. Peoples Natural Gas Company LLC 375 North Shore Drive

<p>Bryn Mawr, PA 19010 astahl@aquaaamerica.com kajoyce@essential.co</p>	<p>Pittsburgh, PA meagan.moore@peoples-gas.com</p>
<p>Scott B. Granger, Esq. Bureau of Investigation and Enforcement Pennsylvania Public Utility Commission 400 North Street Harrisburg, PA 17120 sgranger@pa.gov</p>	<p>Harrison W. Breitman, Esq. Joel H. Cheskis, Esq. Johnathan Longhurst, Esq. Crystal M. Zook, Esq. Office Of Consumer Advocate Forum Place 555 Walnut Street, 5th Floor Harrisburg, PA hbreitman@paoca.org jcheskis@paoca.org jlonghurst@paoca.org czook@paoca.org pawcaquaexternal@paoca.org</p>
<p>Steven C. Gray, Esq. Office of Small Business Advocate Forum Place 555 Walnut Street, 1st Floor Harrisburg, PA 17101 sgray@pa.gov</p>	<p>Samuel J. Pasquarelli, Esq. Sherrard, German & Kelly, P.C. 535 Smithfield Street, Suite 300 Pittsburgh, PA 15222 Samuel.pasquarelli@sgkpc.com</p>
<p>Thomas Wyatt, Esq. Matthew Olesh, Esq. Matthew Selmasska, Esq. James G. Pringle, Esq. Obermayer Rebmann Maxwell & Hippel LLP 1500 Market Street, Suite 3400 Philadelphia, PA 19102 thomas.wyatt@obermayer.com matthew.olesh@obermayer.com matthew.selmasska@obermayer.com James.Pringle@obermayer.com</p>	<p>Alex J. Baumler, Esq. Sean Kilkenny, Esq. Lamb McErlane PC 24 East Market Street, Box 565 West Chester, PA 19381 alex@skilkennylaw.com sean@skilkennylaw.com</p>
<p>Joseph W. Jesiolowski, Esq. Kevin D. Kent, Esq. Clark Hill PLC Clark Hill Two Commerce Square 2001 Market Street, Suite 2620</p>	<p>Michael Maddren, Esq. Murphy Maddren Ltd 6 Dickinson Drive, Suite 115 Chadds Ford, PA 19317 mike@murphymaddren.com</p>

Philadelphia, PA 19103 jjesiolowski@clarkhill.com kkent@clarkhill.com	
Maureen B. Carlton Esq. Andrew Griffin, Esq. Aaron Nelson, Esq. Curtin & Heefner LLP 1040 Stony Hill Road Yardley, PA 19067 mbc@curtinheefner.com apg@curtinheefner.com adn@curtinheefner.com	Joel P. Trigiani, Esq. P.O. Box 126 Villanova, PA 19085 joel@trigianilaw.com
Domenic A. Bellisario, Esq. 310 Grant Street, Suite 1302 Pittsburgh, PA 15219 domenic@bellisario.com	

Respectfully Submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



Ria Pereira, Esq., PA ID: 316771
118 Locust Street
Harrisburg, PA 17101
717-710-3839
pulp@pautilitylawproject.org

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