

[EXT]:

Luis Francisco

MAY 11 2026

From Luis Francisco <providence1133@gmail.com>

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PA PUBLIC UTILITY COMMISSION
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**DRAFT SUPPLEMENTAL REBUTTAL
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION
In Re: Joint Application of American Water Works Company, Inc. and Essential Utilities, Inc.**

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

SUPPLEMENTAL REBUTTAL TO JOINT APPLICANTS' EVIDENCE (APPENDIX C)

NOW COMES, Luis Francisco, Pro Se Intervenor, to provide this Supplemental Rebuttal. The Intervenor notes that the **Appendix C** filed by the Joint Applicants as evidence to dismiss my petition actually **confirms the legal basis** of my claim for the following reasons:

1. SUCCESSORSHIP CONFIRMED

Appendix C traces the corporate lineage of SUEZ/Aqua Pennsylvania back to **Dauphin Consolidated Water Supply Company (inc. 1903)**. This entity was a consolidation of various water companies in the same territory where **Rutherford Heights Water Supply Co. (1911)** operated.

2. THE 1941 INDENTURE CONNECTION

The Applicants' evidence (Appendix C, Page 1) highlights corporate activities in **1939**, confirming the entity's active status immediately prior to the execution of the **1941 Master Indenture**. Under the doctrine of successor liability, the obligations of the consolidated companies (including the 1911 First Mortgage Gold Bonds) were carried forward into the 1941 Indenture structure.

3. ADMISSION OF LEGACY LIABILITIES

By filing Appendix C, the Joint Applicants admit they are the legal successors to the assets of Dauphin Consolidated. They cannot accept the benefits of the infrastructure and franchises described in Appendix C while simultaneously disclaiming the **Senior Liens**(Bond No. 232) that encumber those same assets.

CONCLUSION

The Joint Applicants' own evidence establishes the "Chain of Title" that links my bonds to their current corporate structure. I request that the Commission deny their request for dismissal and order the validation of this senior debt based on the Applicants' documented history.

Respectfully submitted,

/s/ Luis Francisco

Date: May 9, 2026

Luis Francisco

[EXT]: *Luis Francisco*

DATE OF DEPOSIT

MAY 11 2026

From Luis Francisco <providence1133@gmail.com>

Date Mon 5/11/2026 12:56 PM

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The "Certificate for Contest" (Certificate of Service) A2025-3058927

This document is your legal proof that you followed the rules of **52 Pa. Code § 1.54** by sending copies to all parties. If you just submitted your "contest action" (rebuttal) without this specific form, the Commission's system will consider the filing incomplete.

Why they are demanding it:

- **Procedural Rule:** The PA PUC requires a certificate of service to accompany and be attached to all pleadings filed with the Commission.
- **Due Process:** It informs the Secretary and the Judge exactly **when** and **how** (e.g., electronic mail) you served the attorneys.
- **Verification:** It prevents the companies from claiming they were never notified, which is their primary tactic to try and dismiss your claim on technical grounds.

Draft: Certificate of Service for your Rebuttal

Since you mentioned they are demanding this specifically for your "contest action," you should file this immediately.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Contest Action / Rebuttal to Joint Applicants' Answer** upon the parties listed below, in accordance with the requirements of **52 Pa. Code § 1.54**(relating to service by a party).

Manner of Service: Electronic Mail

Parties Served:

- **Kenneth M. Kulak, Esq.** (Morgan Lewis) – ken.kulak@morganlewis.com
- **Anthony D. Kanagy, Esq.** (Post & Schell) – akanagy@postschell.com
- **Michael W. Gang, Esq.** (Post & Schell) – mgang@postschell.com
- **Megan E. Rulli, Esq.** (Post & Schell) – mrulli@postschell.com
- **Kimberly A. Joyce, Esq.** (Essential Utilities) – kajoyce@essential.co
- **Alexander R. Stahl, Esq.** (Aqua Pennsylvania) – astahl@aquaamerica.com
- **Joel Cheskis, Esq.** (Office of Consumer Advocate) – jcheskis@paoca.org

Dated this **8th day of May, 2026.**

/s/ Luis Francisco

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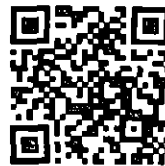
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