



## PH HAIYAN ADVOCACY INC.

*“An Advocacy Group on Climate Change Adaptation and Mitigation”*  
No. 1 Beta Bayview Homes Subd. Barangay 88, San Jose Tacloban City  
Email: [p hhaiyanadvocacy6500@gmail.com](mailto:p hhaiyanadvocacy6500@gmail.com) Website: [p hhaiyan.org](http://p hhaiyan.org)  
Tel. No. 053-832-5179 / Mobile no: +639 17-846-1299 / +639 54-179-3532

19 March 2026

### THE HONORABLE CHAIRPERSON

Philippine Competition Commission  
25th Floor, Vertis North Corporate Center 1  
North Avenue, Quezon City

**Subject: Consumer Interest and Concerns on the Timing and Accountability of the Reported Acquisition of PrimeWater Infrastructure Corporation by Crystal Bridges Holding Corporation Affecting Consumers of the Leyte Metropolitan Water District**

**Dear Honorable Chairperson:**

Greetings.

This refers to the reported acquisition of PrimeWater Infrastructure Corporation by Crystal Bridges Holding Corporation, which was relayed to the Leyte Metropolitan Water District on 26 January 2026. We understand that the transaction may be under review by the Philippine Competition Commission.

We respectfully submit the following core consumer concerns:

The Joint Venture Agreement has been in effect since 2019. However, consumers continue to experience **intermittent and unreliable water supply**, notwithstanding LMWD’s formal findings of breach under the Joint Venture Agreement and the initiation of pre-termination proceedings.

LMWD itself, in its reply dated 3 March 2026, confirms the following:

- a. issuance of a **Notice of Material Breach** (5 May 2025);
- b. failure to cure within the prescribed period; and
- c. issuance of a **Notice of Intention to Pre-Terminate** (17 July 2025).

From a consumer standpoint, the issuance of the Notice of Intention to Pre-Terminate establishes that there were material violations of the Joint Venture Agreement by the

concessionaire, warranting the initiation of pre-termination proceedings. The reported acquisition occurred after the initiation of the pre-termination process.

Again, from a consumer standpoint, this raises serious concerns that the transaction may affect, delay, or dilute the enforcement of accountability and contractual liabilities arising from the concessionaire's performance deficiencies.

Stakeholders view the pre-termination process as a necessary mechanism to address these deficiencies, and any transaction at this stage should not undermine that process.

At present, there is no clear articulation of how the reported transaction will benefit consumers within the Leyte Metropolitan Water District service area.

Further, stakeholders are **not aware of any public consultation or stakeholder engagement conducted** in relation to the change in ownership, despite its direct impact on an essential public service.

This lack of transparency leaves consumers without sufficient information on whether the transaction will improve service reliability or address existing issues.

In light of the foregoing, we request to know the following:

1. Whether the reported acquisition has been formally notified to the Commission;
2. Whether consumer welfare considerations form part of the review;
3. Whether the unresolved pre-termination process is being taken into account; and
4. Whether the Commission has sought or will seek the position of LMWD.

Given the foregoing, we respectfully submit that the matter directly implicates consumer welfare considerations within the mandate of the Philippine Competition Commission.

For the Commission's reference, we respectfully attach the following documents as part of the annexes to this submission:

Annex "A" – Letter dated 18 February 2026 addressed to the Leyte Metropolitan Water District;

Annex "B" – Reply of the Leyte Metropolitan Water District dated 3 March 2026;

Annex "C" – Follow-up communication raising additional matters relating to consumer welfare; and

Annex "D" – Copy of the letter furnished to concerned public institutions.

We trust that the Commission will ensure that any transaction affecting essential services does not prejudice the public.

Thank you for your consideration.

Very truly yours,



**PETRONILO "PETE" L. ILAGAN**  
Chairman and CEO

**Copy furnished:**

His Excellency, President Ferdinand R. Marcos Jr.  
Hon. Ralph Recto, Executive Secretary  
Hon. Joy Salonga, Administrator LWUA  
The Honorable Board Members, LMWD  
Hon. Carlos Jericho Petilla, Governor, Province of Leyte  
All Municipal/City Mayors Covered by the LMWD Franchise Area  
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