Tristan Davis

From: Tristan Davis on behalf of Records Clerk
Sent: Tuesday, July 7, 2026 8:21 AM
To: 'Tara Filippelli'
Cc: Consumer Contact
Subject: RE: Docket No. 20260026-GU

Good Morning,

We will be placing your comments below in consumer correspondence in Docket No. 20260026, and forwarding them to the Office of Consumer Assistance.

Thank you!

Tristan Davis
Commission Deputy Clerk I
Florida Public Service Commission
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From: Tara Filippelli <mrandmrsscoots@gmail.com>
Sent: Thursday, July 2, 2026 5:25 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Docket No. 20260026-GU

To the Honorable Commissioners:

I respectfully urge the Florida Public Service Commission to reject, or substantially reduce, Florida City Gas's requested base rate increase in Docket No. 20260026-GU.

The Commission's duty is not to ensure that a utility achieves its desired level of profitability. Your duty is to protect the public by ensuring that rates are fair, just, reasonable, and no higher than necessary to provide safe and reliable service.

Florida City Gas serves approximately **123,000 customers** across South and Central Florida, including thousands of families in Brevard County, where I reside. Those customers have no competitive alternative. They cannot negotiate a better price or choose another natural gas provider. That places an even greater responsibility on this Commission to act as the public's advocate.

This request comes only three years after the Commission approved new base rates in the company's 2022 rate case, which became effective in May 2023. Now Florida City Gas is seeking **approximately $35 million in additional annual revenue**, citing inflation, labor, operating expenses, and capital investments.

This proceeding cannot be evaluated in isolation. Florida City Gas received a significant base rate increase in its 2022 rate case, which became effective in 2023. Now, only three years later, the company has returned seeking approximately **$35 million** in additional annual base rate revenue.

Viewed individually, each rate request may appear justifiable. Viewed collectively, however, they reveal an increasingly frequent reliance on customers to fund higher revenues through successive rate cases. At some point, the Commission must ask not only whether this individual request is reasonable, but whether the cumulative financial burden imposed on captive customers remains consistent with Florida law requiring utility rates to be fair, just, and reasonable.

Florida families do not experience these increases one at a time. They experience them alongside escalating homeowners insurance premiums, rising property taxes, higher housing costs, inflation in groceries and healthcare, and increases from other regulated utilities. While Florida City Gas can petition the Commission whenever it believes additional revenue is warranted, its customers have no comparable ability to recover their own rising costs.

Repeated requests for substantial rate increases over relatively short periods risk creating the perception that periodic rate cases have become a routine business strategy rather than a remedy of last resort. That is why the Commission's independent oversight is so critical. Before asking customers to pay more yet again, the utility should be required to demonstrate not only that its costs have increased, but that it has exercised exceptional fiscal discipline, aggressively pursued operational efficiencies, controlled administrative expenses, and exhausted every reasonable opportunity to reduce the burden on ratepayers.

I respectfully urge the Commission to evaluate this filing within the broader context of Florida City Gas' recent ratemaking history and give meaningful weight to the cumulative impact that repeated increases have on Florida households. A rate increase that may appear reasonable when viewed alone can become unreasonable when considered alongside the financial burden imposed by successive increases over a relatively short period of time.

No one disputes that inflation has affected utilities. But inflation has also affected every Florida household. Families cannot simply increase their income by petitioning a regulatory agency. Small businesses cannot guarantee themselves higher profits simply because expenses increased. Florida City Gas should likewise be expected to demonstrate that it has aggressively reduced costs, improved operational efficiency, and prioritized spending before asking captive customers to finance another significant rate increase.

The filing states that the company invested approximately **$116 million** in infrastructure during 2024 and 2025 and plans to invest another **$62 million** through 2027, excluding additional SAFE investments. Infrastructure investment is important, but prudent investment alone does not automatically justify shifting every associated cost to customers. The Commission must determine whether each investment is necessary, timely, cost-effective, and managed efficiently. Ratepayers should not become the default financing mechanism for every corporate capital plan.

This filing also follows the acquisition of Florida City Gas by Chesapeake Utilities Corporation for approximately **$923 million**. Chesapeake publicly described the acquisition as a transformational investment expected to accelerate earnings growth and expand shareholder value. While shareholders are entitled to a reasonable opportunity to earn a return, Florida consumers should not be expected to guarantee that investment through repeated rate increases. Investment risk belongs with investors—not captive utility customers.

I urge the Commission to thoroughly examine:

- Whether executive compensation and corporate overhead are appropriate.
- Whether every proposed capital project is essential rather than merely desirable.
- Whether lower-cost alternatives were evaluated.
- Whether operating efficiencies have been fully exhausted.
- Whether shareholders are bearing an appropriate share of rising costs.
- Whether the requested return on equity remains justified in today's economic environment.

The Commission should also consider the broader economic reality facing Floridians. Homeowners insurance premiums have skyrocketed. Property taxes continue to rise. Housing costs remain elevated. Grocery prices, healthcare expenses, and virtually every household necessity cost significantly more than they did only a few years ago. Utility bills do not exist in a vacuum. Every additional dollar approved by this Commission comes directly out of a family's monthly budget.

It is also worth noting that Florida City Gas's previous rate case generated significant legal controversy. In the subsequent litigation, members of the Florida Supreme Court expressed concern that aspects of the Commission's prior decision could permit customers to bear costs that may unfairly benefit shareholders. While the Court ultimately upheld the Commission's order, those concerns should encourage heightened scrutiny—not deference—in evaluating this new request.

The burden of proof rests entirely with Florida City Gas. It should not be enough for the company to demonstrate that costs have increased. The company should also be required to demonstrate, with clear and convincing evidence, that every reasonable effort has been made to reduce expenses, improve efficiency, and minimize the impact on customers before any increase is approved.

If Florida City Gas cannot meet that burden, the requested increase should be denied.

If the Commission determines that some additional revenue is necessary to preserve safe and reliable service, any increase should be limited to the smallest amount supported by competent evidence after removing every unnecessary, imprudent, or shareholder-benefiting expense.

Florida consumers deserve a regulator that is willing to ask difficult questions, demand rigorous proof, and place the interests of the public on equal footing with the financial interests of the utility. I respectfully ask the Commission to do exactly that in Docket No. 20260026-GU.

Thank you for your consideration and for your service to the people of Florida.

Respectfully,

Anthony Scuteri