

Tristan Davis

**From:** Office of Commissioner Clark  
**Sent:** Wednesday, July 15, 2026 10:47 AM  
**To:** Commissioner Correspondence  
**Subject:** FW: Filing for Docket 20260026-GU – Formal Objection Raising Rate-Design and Customer Impact Concerns  
**Attachments:** Exhibit E – Summary of Fixed Charge Concerns.pdf; Exhibit C- Florida City Gas June 2026 bill.pdf; Exhibit D – Customer Bill Comparison Table (2020–2026).pdf; Exhibit A- Florida City Gas December 2020 bill.pdf; Exhibit B-Florida City Gas December 2022 bill.pdf; formal objection to docket 20260026 july 14 2026.pdf; Exhibit F – SAFE Surcharge Accounting Questions.pdf

Good morning,

Please place the attached email in Docket No. 20260026. Thank you!

**Hannah E. Branum**

Executive Assistant to Commissioner Clark

Florida Public Service Commission

2540 Shumard Oak Blvd.

Tallahassee, FL 32399

(850) 413-6004



FLORIDA PUBLIC  
SERVICE COMMISSION

**From:** BONNIE LEYKO <njlake1@gmail.com>

**Sent:** Tuesday, July 14, 2026 1:36 PM

**To:** Records Clerk <CLERK@PSC.STATE.FL.US>

**Cc:** Office of Chairman Smith <Chairman.Smith@psc.state.fl.us>; Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>; Office of Commissioner La Rosa <Commissioner.LaRosa@psc.state.fl.us>; Office of Commissioner Payne <Commissioner.Payne@psc.state.fl.us>; Office of Commissioner Ortega <Commissioner.Ortega@psc.state.fl.us>

**Subject:** Filing for Docket 20260026-GU – Formal Objection Raising Rate-Design and Customer Impact Concerns

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**Subject: *Filing for Docket 20260026-GU – Formal Objection*** Raising Rate-Design and Customer Impact Concerns

**To the Office of Commission Clerk,**

Please file the attached objection in **Docket No. 20260026-GU**. This filing includes:

- A documented 80% bill increase with unchanged usage
- A comparison table showing identical CCF usage across multiple years
- Analysis of the proposed fixed charge and its impact on lower-use customers

- Concerns regarding the SAFE surcharge transition and cost accounting
- Potential long-term system impacts, including customer attrition

These issues directly relate to rate-design principles, cost allocation, and customer impact. Thank you for placing this filing into the docket for Commission review.

Attached please find my formal objection for Docket No. 20260026-GU, along with Exhibits A–F supporting the filing.

**Respectfully,** Bonnie Layko 2550 Jolena Drive Melbourne, Florida 32935 [321-986-7137](tel:321-986-7137) [njlake1@gmail.com](mailto:njlake1@gmail.com)

**Attachments:**

- Formal Objection Letter – Docket 20260026-GU
- Exhibit A – December 2020 Bill
- Exhibit B – 2022 Bill
- Exhibit C – 2026 Bill
- Exhibit D – Bill Comparison Table
- Exhibit E – Summary of Fixed Charge Concerns
- Exhibit F – SAFE Surcharge Accounting Questions

BONNIE LAYKO  
2550 JOLENA DR  
BLDG 28  
MELBOURNE, FL 32935



4045 NW 97th Ave  
Doral, FL 33178-2300

| Billing Date | Account Number | Next Reading Date | Invoice Number | Billing Type              |
|--------------|----------------|-------------------|----------------|---------------------------|
| Dec 11, 2020 | [REDACTED]     |                   | 1459158        | 805-801: RS-1 Residential |

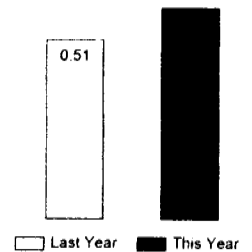
Previous Account Balance \$32.62  
Payment - Thank You! (\$32.62)  
Total Current Charges - Utility \$40.66  
**Total Account Balance \$40.66**

#### Detailed Current Charges - Utility

805-801: RS-1 Residential  
Svc Add: 2550 JOLENA DR, MELBOURNE  
Charges: 11/05/20 - 12/07/20

**Basic Service Charge \$12.00**  
Energy Charges: CRA: .00521 x 19.2 = \$0.10, Distribution: .4612 x 19.2 = \$8.86, ECCR: .25062 x 19.2 = \$4.81 **\$13.77**  
PGA: Gas Cost: .002 x 19.2 = \$0.04, WACOG: .398 x 19.2 = \$7.64 \$7.68  
SAFE Charge \$1.05  
Utility Tax \$3.12  
Franchise Tax @ 6.00 % \$2.07  
Gross Receipts Tax \$0.97  
**Total Current Charges - Utility \$40.66**

#### Average Daily Usage



Billing Inquiries? Call 1-800-993-7546

Welcome to a new, simple and secure customer experience. Please take note of your new account number and visit [floridacitygas.com/new-experience](http://floridacitygas.com/new-experience) to sign up for online account access and payments.

Please Pay This Amount By  
Dec 31, 2020  
\$40.66

#### Billing Period and Meter Readings

| Meter Number | Type of Reading | Billing Period | Days | Reading |     | Gas Usage (CCF) | Meter Multiplier | BTU Factor | Therms Billed |
|--------------|-----------------|----------------|------|---------|-----|-----------------|------------------|------------|---------------|
|              |                 |                |      | Old     | New |                 |                  |            |               |
| 3671790      | Actual          | 11/05/12/07    | 32   | 242     | 260 | 18              | X 1              | X 1.064    | = 19.2        |

Late Charge Reminder: Any balance not paid by the due date will be subject to a Late Payment Charge of \$5.00 or 1.5%, whichever is greater

To Report a Gas Leak (24hr.) call 1-888-352-5325

[floridacitygas.com](http://floridacitygas.com)

If paying by mail, return the portion below with your check or money order payable to Florida City Gas

BONNIE LAYKO  
2550 JOLENA DR  
BLDG 28  
MELBOURNE, FL 32935



4045 NW 97th Ave  
Doral, FL 33178-2300

| Billing Date | Account Number | Next Reading Date |
|--------------|----------------|-------------------|
| Dec 9, 2022  | [REDACTED]     |                   |

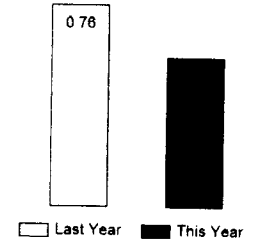
| Billing Type                |
|-----------------------------|
| 801-801: RS-100 Residential |

Previous Account Balance (\$2.66)  
Total Current Charges - Utility \$51.39  
Total Account Balance \$48.73

Detailed Current Charges - Utility  
801-801: RS-100 Residential  
Svc Add: 2550 JOLENA DR, MELBOURNE  
Charges: 11/02/22 - 12/06/22

Basic Service Charge \$15.00  
Energy Charges: CRA:  $.0029 \times 19.1 = \$0.06$ , Distribution:  $.40383 \times 19.1 = \$7.71$ , ECCR:  $.17325 \times 19.1 = \$3.31$  \$11.08  
PGA: Gas Cost:  $.00396 \times 19.1 = \$0.08$ , WACOG:  $.78659 \times 19.1 = \$15.02$  \$15.10  
SAFE Charge \$3.17  
Utility Tax \$3.42  
Franchise Fee @ 6.00 % \$2.66  
Gross Receipts Tax \$0.96  
Total Current Charges - Utility \$51.39

#### Average Daily Usage



The Florida Public Service Commission has approved new SAFE rates and PGA cap rate effective Jan. 1, 2023 and is reviewing proposed rates for ECCR that would take effect at the same time. As of Nov. 1, charges from Florida City Gas will now appear on your bank statements as "FLCityGas."

Please Pay This Amount By  
Dec 29, 2022  
\$48.73

#### Billing Period and Meter Readings

| Meter Number | Type of Reading | Billing Period | Days | Reading |     | Gas Usage (CCF) | Meter Multiplier | BTU Factor | Therms Billed |
|--------------|-----------------|----------------|------|---------|-----|-----------------|------------------|------------|---------------|
|              |                 |                |      | Old     | New |                 |                  |            |               |
| 3671790      | Actual          | 11/02 12/06    | 34   | 614     | 632 | 18              | X 1 X            | 1.06       | = 19.1        |

Late Charge Reminder: Any balance not paid by the due date will be subject to a Late Payment Charge of \$5.00 or 1.5%, whichever is greater.

Customer Service call 1-800-993-7546. To report a gas leak (24hr.) call 1-888-352-5325.

floridacitygas.com

BONNIE LAYKO  
2550 JOLENA DR BLDG 28  
MELBOURNE, FL 32935



P.O. Box 658  
Dover, DE 19903-0658

| Billing Date | Account Number | Next Reading Date | Billing Type       |
|--------------|----------------|-------------------|--------------------|
| Jun 04, 2026 | [REDACTED]     | Jul 06, 2026      | RS-100 Residential |

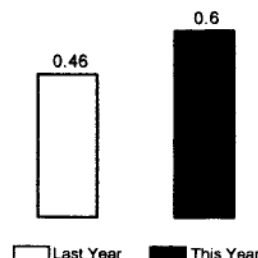
Previous Account Balance \$0.04  
Payment - Thank You! (\$100.00)  
Total Current Charges - Utility \$73.45  
Total Account Balance (\$26.51)

**Detailed Current Charges - Utility**

RS-100 Residential  
Svc Add: 2550 JOLENA DR, MELBOURNE, 32935  
Charges: 05/05/26 - 06/03/26

Basic Service Charge \$19.00  
Energy Charges: CRA: .00363 x 17.97 = \$0.07, Distribution: .57421 x 17.97 = \$10.32, \$13.27  
ECCR: .13265 x 17.97 = \$2.38, RELOC: .02808 x 17.97 = \$0.50  
PGA: Gas Cost: .00635 x 17.97 = \$0.11, WACOG: 1.26365 x 17.97 = \$22.71  
SAFE Charge \$22.82  
Utility Tax \$8.70  
Franchise Fee @ 6.00% \$4.72  
Gross Receipts Tax \$3.83  
Total Current Charges - Utility \$1.11  
Total Current Charges - Utility \$73.45

**Average Daily Usage**



Earn rebates when upgrading or replacing natural gas appliances! Learn more at: [FloridaCityGasRebates.com](http://FloridaCityGasRebates.com)

Please Pay This Amount By  
Jun 25, 2026  
\$0.00

**Billing Period and Meter Readings**

| Meter Number | Type of Reading | Billing Period | Days | Reading Old | Reading New | Gas Usage (CCF) | Meter Multiplier | BTU Factor | Therms Billed |
|--------------|-----------------|----------------|------|-------------|-------------|-----------------|------------------|------------|---------------|
| 3671790      | Actual          | 05/05 06/03    | 30   | 1,317       | 1,334       | 17              | X 1 X            | 1.057      | = 17.97       |

Invoice Number: 850700077565

Late Charge Reminder: Any balance not paid by the due date will be subject to a Late Payment Charge of \$5.00 or 1.5%, whichever is greater.

Customer Service call 1-800-993-7546. To report a gas leak (24hr.) call 1-888-352-5325.

[floridacitygas.com](http://floridacitygas.com)

If paying by mail, return the portion below with your check or money order payable to Florida City

**Exhibit D – Customer Bill Comparison Table (2020–2026)**

| <b>Date</b> | <b>Usage</b> | <b>Total Bill</b>           |
|-------------|--------------|-----------------------------|
| Dec. 2020   | 18 CCF       | \$40.66                     |
| Dec. 2022   | 18 CCF       | \$51.39                     |
| June 2026   | ~17 CCF      | \$72–\$78 (recent averages) |

## **Exhibit E – Summary of Fixed Charge Concerns**

### **Exhibit E – Summary of Concerns Regarding Proposed Fixed Customer Charge**

**1. Magnitude of Increase** Florida City Gas proposes increasing the residential fixed customer charge from approximately **\$19/month to \$36.50/month**, nearly doubling the unavoidable monthly cost.

**2. Annual Impact** The proposed charge equals **\$438 per year before any gas is used**, creating a substantial financial burden for lower-use customers.

**3. Loss of Customer Control** Fixed charges cannot be reduced through conservation. This rate design removes customers' ability to manage bills through usage, contrary to standard rate-design principles.

**4. Rate Design Concerns** The proposal raises concerns related to:

- **Gradualism** (the increase is not incremental)
- **Rate shock** (especially for low-income or low-use customers)
- **Cost allocation** (shifts recovery toward fixed charges rather than volumetric rates)

**5. Disproportionate Impact on Lower-Use Customers** Customers with minimal usage bear a significantly higher percentage increase than higher-use customers, creating inequitable cost distribution.

**6. System-Wide Implications** A fixed charge of this magnitude may encourage customer attrition, concentrating system costs among fewer remaining customers and increasing long-term rate pressure.

## **Exhibit F – SAFE Surcharge Accounting Questions**

### **Exhibit F – SAFE Surcharge Accounting and Transparency Questions**

Before transferring SAFE-related costs into permanent base rates, the following information is requested to ensure transparency and proper cost recovery:

#### **1. Total SAFE Surcharge Collections**

- Total amount collected from customers since the surcharge's inception.

#### **2. Completed SAFE Project Costs**

- Total expenditures for completed SAFE projects.
- Comparison of projected vs. actual costs.

#### **3. Remaining SAFE Work**

- Identification of any remaining projects.
- Estimated costs and timelines for completion.

#### **4. Cost Breakdown for Base Rate Transfer**

- Detailed explanation of which SAFE costs are being moved into base rates.
- Clarification of whether any previously collected surcharge funds remain unspent.

#### **5. Customer Benefit Analysis**

- Demonstration that the elimination of the surcharge provides a measurable benefit to customers rather than functioning as a permanent rate increase.

#### **6. Assurance of Proper Accounting**

- Confirmation that SAFE surcharge collections have been fully and accurately applied to SAFE-related work.

## **FORMAL OBJECTION – Florida City Gas Proposed Rate Increase**

### **Docket No. 20260026-GU**

To the Florida Public Service Commission:

I am submitting this ***formal objection to Florida City Gas's proposed rate increase in Docket No. 20260026-GU***. The proposal would nearly double the residential fixed customer charge, shift cost recovery onto lower-use customers, and create a financial incentive for customers to leave the natural gas system entirely. My usage has remained unchanged since 2020, yet my monthly bill has increased by approximately 80% due solely to rate and fee changes.

#### **Customer Bill Comparison (Same Usage, Different Years)**

My home was newly constructed in 2019, so usage comparisons are not affected by aging equipment or outdated appliances.

- **December 2020:** 18 CCF — \$40.66
- **2022:** 18 CCF — \$51.39
- **2026:** ~17 CCF — \$72–\$78

This data shows that my natural gas consumption has remained essentially flat, while my bill has risen dramatically. The increase is driven by rate design—not usage.

#### **Proposed Fixed Customer Charge Increase**

Florida City Gas proposes raising the residential fixed customer charge from approximately **\$19/month to \$36.50/month**.

This represents:

- Nearly a **100% increase** in the unavoidable monthly charge
- Approximately **\$438 per year** before a single CCF is used
- A cost customers cannot reduce through conservation

This rate design violates basic principles of gradualism and creates rate shock for lower-use residential customers. Shifting more cost recovery into fixed charges disproportionately harms customers who use less natural gas and removes their ability to manage bills through usage.

#### **SAFE Surcharge Transition**

Florida City Gas proposes eliminating the SAFE surcharge and transferring SAFE-related costs into permanent base rates.

Before approving this change, I request that the Commission require:

- Total SAFE surcharge collections to date

- Total cost of completed SAFE projects
- Remaining SAFE work, if any
- A clear breakdown of the costs being moved into base rates

Customers deserve assurance that previously collected surcharge funds have been properly accounted for and that this transition reflects actual cost recovery rather than a permanent rate increase.

### **Long-Term System Impact**

A fixed charge of this magnitude will accelerate customer attrition. Lower-use customers with electric alternatives will have a strong financial incentive to leave the natural gas system.

In my case:

- My home already has electric service available for major appliances
- Conversion would require only appliance replacement, not infrastructure changes
- Avoiding a **\$438 annual fixed charge** makes switching economically rational

Customer departures will concentrate system costs among fewer remaining customers, increasing long-term rate pressure and undermining system stability.

### **Requested Commission Action**

I respectfully request that the Commission:

- Deny the proposed rate increase as filed
- Require full justification for doubling the fixed customer charge
- Require complete SAFE surcharge accounting before any transfer into base rates
- Adopt a rate structure that allows customers to control expenses through usage

For customers like me whose usage has not changed since 2020, this proposal results in an 80% bill increase driven entirely by rate design—not consumption.

Thank you for your consideration.

**Respectfully, [**

Bonnie Layko

2550 Jolena Drive

Melbourne, Florida

321-986-7137

Njlake1@gmail.com