

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

August 3, 2026

RE: Formal Customer Financial Hardship Statement and Post-Hearing Comments
Docket No. 20250052-WS (CSWR-Florida Utility Operating Company, LLC Rate Case)
Service Area: Sebring, Highlands County (The Crossings Neighborhood)

Dear Commission Clerk,

I am writing as an affected ratepayer under the CSWR-Florida utility system in Sebring to formally document an unmanageable financial hardship resulting from the 287% utility rate increase approved under interim rates. My household's wastewater costs have spiked immediately from \$16.00 per month (\$128.00 annually) to \$62.00 per month (\$744.00 annually). As an Engineering Assistant Professional residing in Highlands County—one of the economically challenged regions in the state—this sudden, \$616.00 annual operational cost increase directly threatens household stability. Wastewater service is a non-discretionary utility essential to public health; consumers have no functional option to opt out or downsize service to mitigate these expenses.

The current rate structure relies on an inequitable volumetric model. Because wastewater discharge is not independently metered, residential customers are billed for wastewater based entirely on their total freshwater consumption. Consequently, non-discretionary outdoor water usage—such as lawn irrigation, deck rinsing, and vehicle washing—is billed as wastewater despite returning directly to the ground rather than entering the utility's waste collection infrastructure.

Furthermore, current considerations to establish a standard flat rate for the Sebring Bluffs Apartments, while excluding single-family neighborhoods like The Crossings from similar consideration, constitutes undue rate discrimination. An investor-owned utility acquires underperforming municipal systems with full regulatory awareness of the capital and temporal requirements needed to recover positive revenue. Inherited infrastructure deficits should not be offset by imposing a sudden, disproportionate financial shock on captured residential consumers.

While the June 2026 evidentiary hearings have concluded, I request that the Commission explicitly consider the regressive impact of these steep interim structures on low- and fixed-income households as it deliberates the Final Order for 2027. I specifically urge the Commission to apply the following consumer protections in its final ruling:

1. **Implement Localized Rate Caps:** Consider regional county economics and restrict final Sebring rate adjustments to a cap aligned with historic inflation indexes rather than the current astronomical baseline.
2. **Reject the Interim Threshold:** Formally deny any standard rate adjustments that maintain or exceed the current \$62.00 interim rate threshold for the Sebring wastewater system.

3. **Mandate Relief Frameworks:** Require CSWR-Florida to establish local utility hardship waiver frameworks, tiered low-income rate structures, or deferred payment arrangements for verified hardship cases.
4. **Order Retroactive Refunds:** Order immediate, retroactive customer refunds with interest if final revenue audits prove that the interim rate collection exceeded actual minimum operating requirements.

Tracking the public data indicates that CSWR's Sebring collections are rapidly closing the approved Annual Revenue Requirement gap. Forcing residential consumers to bear this financial strain indefinitely without a designated hardship relief mechanism creates an unnecessary household crisis. I urge you to take action for the people.

Thank you for entering this formal statement into the official regulatory record for Docket No. 20250052-WS.

Respectfully submitted,

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cc: Highlands Co. Commissioners, Office of Governor Ron DeSantis