Proposed Stormwater Rate Increases



Lakeland Stormwater Background

- The City of Lakeland's Stormwater Utility (SWU) was created in 1999.
- In 2017, City of Lakeland consultant Raftelis Financial Consultants conducted a rate study that resulted in a phased-in rate increase that capped out at \$9.72 per ERU.
- 2026 budgeted revenue for Lakeland's Stormwater Utility is \$9.3 million. \$8.7 million will be used for operating dollars, leaving \$600,000 for capital improvements.
- The City of Lakeland recently identified \$43+ million in unfunded drainage projects and \$26+ million in unfunded lakes projects.
- The City retained Gesoyntec Consultants and their subconsultant Anser Advisory in 2023 to complete a comprehensive review of the city's current stormwater program.
- The consultant is recommending a 5-year phased-in increase that will result in a 133% increase in Lakeland's stormwater fees and higher for others due to loss of credits.

First Rate Comparison

- The city provided LEDC with a rate comparison to "similar utilities."
- The comparison lists cities in descending order from highest cost to lowest cost for the customer based on their monthly and annual bill.
- The consultant's study is based on population, area served and location.

Current Rate Comparison to Similar Utilities* ANSER

							Y
Jurisdiction	Population	Area Served (Acres)	Unit Size	Monthly Rate	Annual Rate	Annual Revenue	Monthly Revenue for 500 Customer
West Palm Beach, City of	150,000	35,434	2,171	\$14.83	\$177.96	\$15,376,467	\$7,415.00
Naples, City of	25,000	8,000	1,934	\$14.50	\$174.00	\$5,465,100	\$7,250.00
Port St. Lucie, City of	212,015	75,600	2,280	\$14.00	\$168.00	\$22,893,483	\$7,000.00
Clearwater, City of	109,907	16,000	1,830	\$13.40	\$160.80	\$16,500,000	\$6,700.00
Palm Bay, City of	119,000	43,520	4,693	\$12.34	\$148.08	\$10,157,317	\$6,170.00
Palm Coast, City of	86,768	34,528	3,682	\$11.65	\$139.80	\$12,995,325	\$5,825.00
Winter Park, City of	30,522	6,509	2,324	\$11.56	\$138.72	\$3,565,000	\$5,780.00
Daytona Beach, City of	72,647	42,240	1,661	\$11.46	\$137.52	\$13,950,498	\$5,730.00
Safety Harbour, City of	17,072	3,200	1,865	\$10.93	\$131.16	\$1,550,000	\$5,465.00
Cape Coral, City of	200,000	76,800	3,296	\$10.83	\$129.96	\$20,227,445	\$5,415.00
Gainesville, City of	141,085	41,310	2,300	\$10.40	\$124.80	\$9,161,009	\$5,200.00
St. Petersburg, City of	250,000	37,920	2,406	\$9.93	\$119.16	\$18,000,000	\$4,965.00
Lakeland, City of	110,000	47,995	5,000	\$9.72	\$116.64	\$8,932,000	\$4,860.00
Fort Myers, City of	86,400	31,360	2,500	\$9.60	\$115.20	\$6,500,000	\$4,800.00
Kissimmee, City of	60,375	13,580	2,404	\$9.10	\$109.20	\$834,527	\$4,550.00
Largo, City of	83,071	12,246	2,257	\$8.91	\$106.92	\$6,825,000	\$4,455.00
Tallahassee, City of	193,551	66,360	1,990	\$8.83	\$105.96	\$19,079,490	\$4,415.00
Winter Haven, City of	50,000	26,349	NR	\$7.46	\$89.52	\$2,014,950	\$3,730.00
Ocala, City of	57,586	29,028	1,948	\$5.54	\$66.48	\$6,835,282	\$2,770.00
Melbourne, City of	83,319	32,947	2,500	\$3.67	\$44.04	\$2,925,000	\$1,835.00
						_	

^{*}Based on population, area served and location. Table sorted based on monthly rates. Average ERU = 2,581 sq. ft.

Second Rate Comparison

- LEDC reviewed our initial concerns regarding the rate study with staff.
- We then received consultant comparison 2.0 (below) which measures and ranks "similar utilities" by unit cost.

Current Rate Comparison to Similar Utilities* ANSER



Jurisdiction	Population	Area Served (Acres)	Unit Size	Monthly Rate	Monthly cost per Unit	Monthly cost per 1,000 Units	Annual Rate	Annual Revenue	Monthly Revenue
Naples, City of	25,000	8,000	1,934	\$14.50	\$0.0075	\$7.50	\$174.00	\$5,465,100	\$7,250.00
Clearwater, City of	109,907	16,000	1,830	\$13.40	\$0.0073	\$7.32	\$160.80	\$16,500,000	\$6,700.00
Daytona Beach, City of	72,647	42,240	1,661	\$11.46	\$0.0069	\$6.90	\$137.52	\$13,950,498	\$5,730.00
West Palm Beach, City of	150,000	35,434	2,171	\$14.83	\$0.0068	\$6.83	\$177.96	\$15,376,467	\$7,415.00
Port St. Lucie, City of	212,015	75,600	2,280	\$14.00	\$0.0061	\$6.14	\$168.00	\$22,893,483	\$7,000.00
Safety Harbour, City of	17,072	3,200	1,865	\$10.93	\$0.0059	\$5.86	\$131.16	\$1,550,000	\$5,465.00
Winter Park, City of	30,522	6,509	2,324	\$11.56	\$0.0050	\$4.97	\$138.72	\$3,565,000	\$5,780.00
Gainesville, City of	141,085	41,310	2,300	\$10.40	\$0.0045	\$4.52	\$124.80	\$9,161,009	\$5,200.00
Tallahassee, City of	193,551	66,360	1,990	\$8.83	\$0.0044	\$4.44	\$105.96	\$19,079,490	\$4,415.00
St. Petersburg, City of	250,000	37,920	2,406	\$9.93	\$0.0041	\$4.13	\$119.16	\$18,000,000	\$4,965.00
Largo, City of	83,071	12,246	2,257	\$8.91	\$0.0039	\$3.95	\$106.92	\$6,825,000	\$4,455.00
Fort Myers, City of	86,400	31,360	2,500	\$9.60	\$0.0038	\$3.84	\$115.20	\$6,500,000	\$4,800.00
Kissimmee, City of	60,375	13,580	2,404	\$9.10	\$0.0038	\$3.79	\$109.20	\$834,527	\$4,550.00
Cape Coral, City of	200,000	76,800	3,296	\$10.83	\$0.0033	\$3.29	\$129.96	\$20,227,445	\$5,415.00
Palm Coast, City of	86,768	34,528	3,682	\$11.65	\$0.0032	\$3.16	\$139.80	\$12,995,325	\$5,825.00
Ocala, City of	57,586	29,028	1,948	\$5.54	\$0.0028	\$2.84	\$66.48	\$6,835,282	\$2,770.00
Palm Bay, City of	119,000	43,520	4,693	\$12.34	\$0.0026	\$2.63	\$148.08	\$10,157,317	\$6,170.00
Lakeland, City of	110,000	47,995	5,000	\$9.72	\$0.0019	\$1.94	\$116.64	\$8,932,000	\$4,860.00
Melbourne, City of	83,319	32,947	2,500	\$3.67	\$0.0015	\$1.47	\$44.04	\$2,925,000	\$1,835.00
Winter Haven, City of	50,000	26,349	NR	\$7.46	N/A	N/A	\$89.52	\$2,014,950	\$3,730.00

^{*}Based on population, area served and location. Table sorted based on monthly rates. Average monthly rate = \$10.43

Third Rate Comparison

We then received consultant comparison 3.0 (below) which measures and

,	o implement		, naa i	rio sarri	3 0,000 1		anorari	, G 15
	A	Area Served			Monthly cost	Monthly cost per		Annual Bill @
Jurisdiction	Population	(Acres)	Unit Size	Monthly Rate	per Unit	1,000 Units		_
Winter Park, City of	30,522	6,509	2,324	\$23.50	\$0.0101	\$10.11	\$282.00	\$467.17
Palm Coast, City of	86,768	34,528	3,682	\$28.27	\$0.0077	\$7.68	\$339.24	\$354.72
Clearwater, City of	109,907	16,000	1,830	\$13.87	\$0.0076	\$7.58	\$166.44	\$350.16
Nanles City of	25 000	8 000	1 93/	\$14.50	\$0.0075	\$7.50	\$174.00	\$316.38

proposing to	implement.	etc.,						
		Area Served			Monthly cost	Monthly cost per		Annual Bill @
Jurisdiction	Population	(Acres)	Unit Size	Monthly Rate	per Unit	1,000 Units	Annual Rate	3,850 ERU
Winter Park, City of	30,522	6,509	2,324	\$23.50	\$0.0101	\$10.11	\$282.00	\$467.1
Palm Coast, City of	86,768	34,528	3,682	\$28.27	\$0.0077	\$7.68	\$339.24	\$354.7
Clearwater, City of	109,907	16,000	1,830	\$13.87	\$0.0076	\$7.58	\$166.44	\$350.1
Naples, City of	25,000	8,000	1,934	\$14.50	\$0.0075	\$7.50	\$174.00	\$346.3
West Palm Beach, City of	150,000	35,434	2,171	\$15.73	\$0.0072	\$7.25	\$188.76	\$334.7

1,661

2,280

1,865

2,257

1,990

2,300

3,850

3,850

2,406

2,500

1,948

2,404

3,296

4,693

5,000

2,500

NR

72,647

212,015

17,072

83,071

193,551

141,085

110,000

110,000

250,000

86,400

57,586

60,375

200,000

119,000

110,000

83,319

50,000

42,240

75,600

3,200

12,246

66,360

41,310

47,995

47,995

37,920

31,360

29,028

13,580

76,800

43,520

47,995

32,947

26,349

Daytona Beach, City of

Port St. Lucie, City of

Safety Harbour, City of

Tallahassee, City of

Gainesville, City of

St. Petersburg, City of

Fort Myers, City of

Kissimmee, City of Cape Coral, City of

Palm Bay, City of

Melbourne, City of

Winter Haven, City of

Lakeland, City of (Current)

Ocala, City of

Lakeland, City of (New Scenario 2)

Lakeland, City of (New Scenario 1)

Largo, City of

\$11.96

\$14.00

\$10.93

\$12.84

\$10.06

\$11.00

\$17.47

\$16.60

\$9.93

\$9.80

\$7.52

\$9.10

\$11.83

\$10.92

\$9.72

\$3.67

\$7.83

\$0.0072

\$0.0061

\$0.0059

\$0.0057

\$0.0051

\$0.0048

\$0.0045

\$0.0043

\$0.0041

\$0.0039

\$0.0039

\$0.0038

\$0.0036

\$0.0023

\$0.0019

\$0.0015

N/A

\$7.20

\$6.14

\$5.86

\$5.69

\$5.06

\$4.78

\$4.54

\$4.31

\$4.13

\$3.92

\$3.86

\$3.79

\$3.59

\$2.33

\$1.94

\$1.47

N/A

\$143.52

\$168.00

\$131.16

\$154.08

\$120.72

\$132.00

\$209.64

\$199.20

\$119.16

\$117.60

\$90.24

\$109.20

\$141.96

\$131.04

\$116.64

\$44.04

\$93.96

\$334.74 \$332.66 \$283.68 \$270.76 \$262.83 \$233.55 \$220.96

209.64
199.20
190.68
181.10
178.35

\$174.88 \$165.82

\$107.50

\$89.81

\$67.82

N/A

Constituent Concerns

- Constituents don't care about comparisons consultants make in unit sizes, ERUs, annual revenue, or monthly revenue per 500 customers.
- Constituents care about the increase in their bill, especially during a time of economic uncertainty.

Complicated or Simple?

Area Served

(Acres) 6,509

34,528

16,000

8,000

35,434

42,240

75,600

12,246

66,360

41,310

47,995

47,995

37,920

31,360

29,028

13,580

76,800

43,520

47,995

32,947

26,349

3,200

Population

30,522

86,768

109,907

25,000

150,000

212,015

17,072

83,071

193,551

141,085

110,000

110,000

250,000

86,400

57,586

60,375

200,000

119,000

110,000

83,319

50,000

72,647

Jurisdiction

Winter Park, City of

Palm Coast, City of

Clearwater, City of

West Palm Beach, City of

Daytona Beach, City of

Port St. Lucie, City of Safety Harbour, City of

Tallahassee, City of

Gainesville, City of

St. Petersburg, City of

Fort Myers, City of

Kissimmee, City of

Cape Coral, City of

Melbourne, City of

Winter Haven, City of

Lakeland, City of (Current)

Palm Bay, City of

Ocala, City of

Lakeland, City of (New Scenario 2)

Lakeland, City of (New Scenario 1)

Naples, City of

Largo, City of

Unit Size

2,324

3,682

1,830

1,934

2,171

1,661

2,280

1,865

2,257

1,990

2,300

3,850

3,850

2,406

2,500

1,948

2,404

3,296

4,693

5,000

2,500

NR

Monthly cost

per Unit

\$0.0101

\$0.0077

\$0.0076

\$0.0075

\$0.0072

\$0.0072

\$0.0061

\$0.0059

\$0.0057

\$0.0051

\$0.0048

\$0.0045

\$0.0043

\$0.0041

\$0.0039

\$0.0039

\$0.0038

\$0.0036

\$0.0023

\$0.0019

\$0.0015

N/A

Monthly Rate

\$23.50

\$28.27

\$13.87

\$14.50

\$15.73

\$11.96

\$14.00

\$10.93

\$12.84

\$10.06

\$11.00

\$17.47

\$16.60

\$9.93

\$9.80

\$7.52

\$9.10

\$11.83

\$10.92

\$9.72

\$3.67

\$7.83

Monthly cost per

1,000 Units Annual Rate

\$282.00

\$339.24

\$166.44

\$174.00

\$188.76

\$143.52

\$168.00

\$131.16

\$154.08

\$120.72

\$132.00

\$209.64

\$199.20

\$119.16

\$117.60

\$90.24

\$109.20

\$141.96

\$131.04

\$116.64

\$44.04

\$93.96

\$10.11

\$7.68

\$7.58

\$7.50

\$7.25

\$7.20

\$6.14

\$5.86

\$5.69

\$5.06

\$4.78

\$4.54

\$4.31

\$4.13

\$3.92

\$3.86

\$3.79

\$3.59

\$2.33

\$1.94

\$1.47

N/A

Annual Bill @

3,850 ERU

\$467.17

\$354.72

\$350.16

\$346.38

\$334.74

\$332.66

\$283.68

\$270.76

\$262.83

\$233.55

\$220.96

\$209.64

\$199.20

\$190.68

\$181.10

\$178.35

\$174.88

\$165.82

\$107.50

\$89.81 \$67.82

N/A

Industry Standard Consultant Comparisons

 Let's take a look at how Lakeland's former consultant, Raftelis, and current consultant Anser, typically compare cities by monthly rate (ERU).



Town of Davie, Florida Stormwater Services Assessment Report

January 2024

Presented by:

Craven Thompson & Associates, Inc.

GovRates, Inc.

Anser Advisory Consulting, LLC

CITY OF DUNEDIN

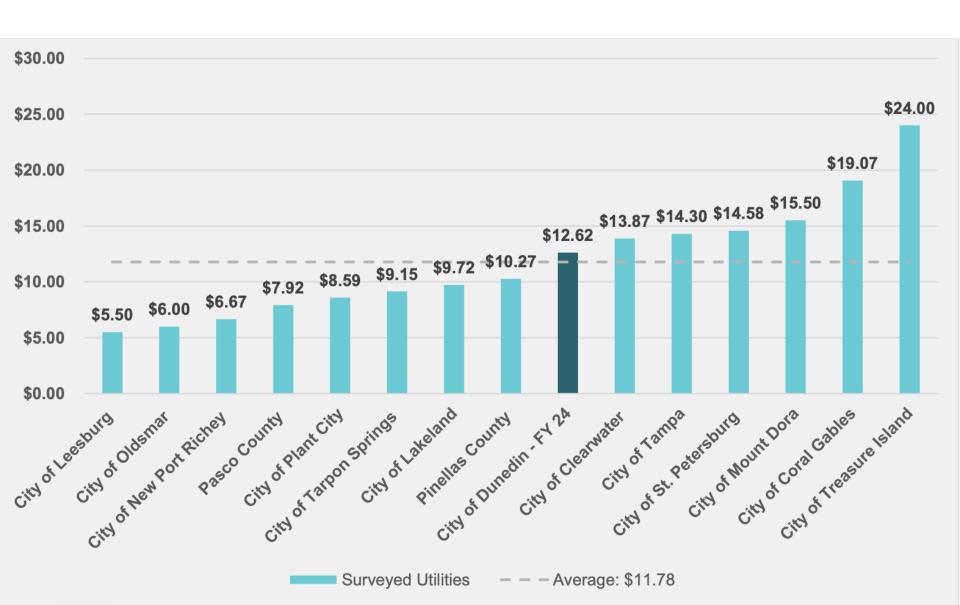
Stormwater Rate Study

FINAL REPORT / April 4, 2024



Fees Effective January 2024 Figure 1 Town of Davie, Florida **Comparison of Monthly Stormwater Fees Per ERU** \$60 \$50 \$40 \$30 \$20 Other Southeast Florida Utilities Average: \$12.43 per ERU \$10 City of Torkin March Beach City of State Parket City of Coconst Crock City of Million Physicals City of and Landerday Charles the Barbara Ba Ciri of Ontrod Park Allage of the control Young Selings Soit Charles at the state of the sta Circla Lander Hill Young Code React City of Hornespeed With the state of City of Capaba Charlet and take the Charlet and the Charlet a City of Africagnat City of Statistic Ciri of Materiale City of tallywood City of Tartagray City of Capaca Capaca

Figure 2: Comparison of Stormwater Rates



2024 – Oldsmar, Florida – Raftelis (Lakeland's former consultant)

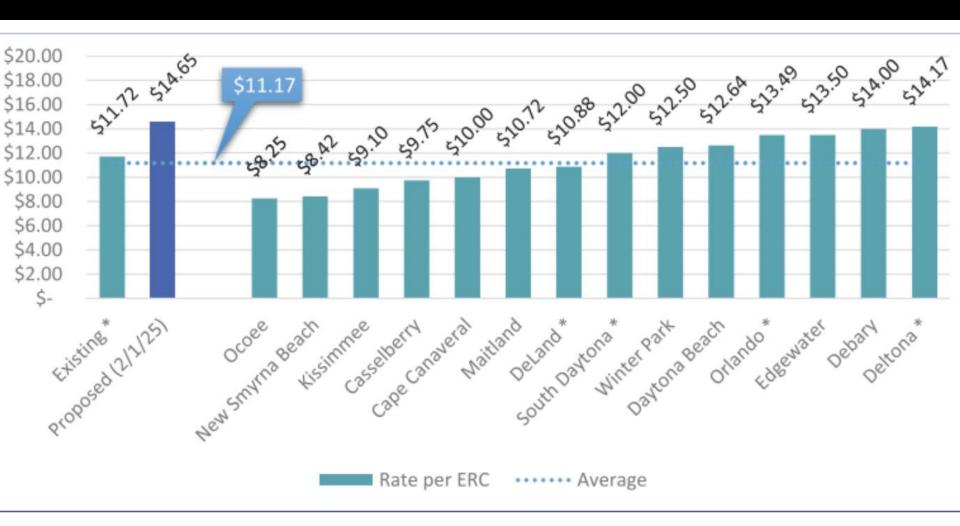
Jurisdiction	Mon	thly ERU	Ann	ual ERU
Treasure Island	\$	25.92	\$	311.04
Dunedin*	\$	20.12	\$	241.44
St. Petersburg (Tier 2)	\$	19.78	\$	237.36
Largo*	\$	17.72	\$	212.64
Clearwater	\$	16.18	\$	194.16
St. Pete Beach	\$	15.31	\$	183.75
Belleair Beach	\$	15.00	\$	180.00
Redington Beach	\$	15.00	\$	180.00
Oldsmar (Proposed)	\$	15.00	\$	180.00
Gulfport	\$	12.45	\$	149.40
Oldsmar (Current)	\$	12.00	\$	144.00
Belleair	\$	11.92	\$	143.04
Safety Harbor	\$	10.93	\$	131.16
Tarpon Springs*	\$	10.65	\$	127.80
Pinellas County (Unincorporated)	\$	10.41	\$	124.91
Madeira Beach	\$	10.00	\$	120.00
Pinellas Park	\$	7.67	\$	92.00
North Redington Beach	\$	4.30	\$	51.60

2024 – Ft. Lauderdale, Florida – Stantec





2024 – Oviedo, Florida – Willdan



Similar Comparisons?

Now, let's take another higher rates than the c

& Palm Coast. Two cities Lakeland has nothing in common with.	

Area Served	Monthly cost	Monthly cost per	Annual Bill @

Monthly Rate

\$23.50

\$28.27

\$13.87

\$14.50

\$15.73

\$11.96

\$14.00

\$10.93

\$12.84

\$10.06

\$11.00

\$17.47

\$16.60

\$9.93

\$9.80 \$7.52

\$9.10

\$11.83

\$10.92

\$9.72

\$3.67

\$7.83

|--|

2,324

3,682

1,830

1,934

2,171

1,661

2,280

1,865

2,257

1,990

2,300

3,850

3,850

2,406

2,500

1,948

2,404

3,296

4,693

5,000

2,500

NR

Unit Size

Population

30,522

86,768

109,907

25,000

150,000

72,647

17,072

83,071

193,551

141,085

110,000

110,000

250,000

86,400

57,586

60,375

200,000

119,000

110,000

83,319

50,000

212,015

(Acres)

6,509

34,528

16,000

35,434

42,240

75,600

12,246

66,360

41,310

47,995

47,995

37,920

31,360

29,028

13,580

76,800

43,520

47,995

32,947

26,349

3,200

8,000

Jurisdiction

Winter Park, City of

Palm Coast, City of

Clearwater, City of

West Palm Beach, City of

Daytona Beach, City of

Port St. Lucie, City of

Tallahassee, City of

Gainesville, City of

St. Petersburg, City of

Fort Myers, City of

Kissimmee, City of

Cape Coral, City of

Melbourne, City of

Winter Haven, City of

Lakeland, City of (Current)

Palm Bay, City of

Ocala, City of

Lakeland, City of (New Scenario 2)

Lakeland, City of (New Scenario 1)

Safety Harbour, City of

Naples, City of

Largo, City of

er look at this comparison.	Only two of the cities have
consultants proposed incre	ease for Lakeland, Winter Po
ties Lakeland has nothing i	n common with

per Unit

\$0.0101

\$0.0077

\$0.0076

\$0.0075

\$0.0072

\$0.0072

\$0.0061

\$0.0059

\$0.0057

\$0.0051

\$0.0048

\$0.0045

\$0.0043

\$0.0041

\$0.0039

\$0.0039

\$0.0038

\$0.0036

\$0.0023

\$0.0019

\$0.0015

N/A

er look at this comparison.	Only two of the cities have
consultants proposed incre	ease for Lakeland, Winter Po

ark

1,000 Units Annual Rate

\$10.11

\$7.68

\$7.58

\$7.50

\$7.25

\$7.20

\$6.14

\$5.86

\$5.69

\$5.06

\$4.78

\$4.54

\$4.31

\$4.13

\$3.92

\$3.86

\$3.79

\$3.59

\$2.33

\$1.94

\$1.47

N/A

\$282.00

\$339.24

\$166.44

\$174.00

\$188.76

\$143.52

\$168.00

\$131.16

\$154.08

\$120.72

\$132.00

\$209.64

\$199.20

\$119.16

\$117.60

\$109.20

\$141.96

\$131.04

\$116.64

\$44.04

\$93.96

\$90.24

3,850 ERU

\$467.17

\$354.72

\$350.16

\$346.38

\$334.74

\$332.66

\$283.68

\$270.76

\$262.83 \$233.55 \$220.96

\$209.64

\$199.20

\$190.68 \$181.10 \$178.35 \$174.88

\$165.82

\$107.50

\$89.81

\$67.82

N/A

Winter Park Example

- Winter Park no longer charges its constituents through a utility bill, but as a property tax.
- Residential and commercial properties are treated as equals when it comes to assessing impervious surface. Impervious surface area is determined through building permit data and ariel photographs from the Orange County Property Appraiser's GIS system.
- Lakeland's consultant and the city chose to only collect accurate impervious surface data on commercial properties.
- Unlike Winter Park, Lakeland's consultant has recommended charging all residential properties the same fee.
- Is the City willing to treat all constituents as equals, commercial and residential, as
 it relates to assessing impervious surface like Winter Park?

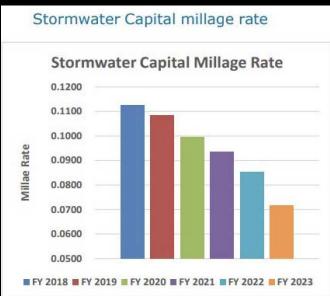




Palm Coast Example

- In 2023, Palm Coast's stormwater department and its consultant recommended a 102% increase in stormwater fees.
- City Council approved a 76% multi-year phased-in increase ending in 2028.
- City Council also included a condition that stormwater fees between 2028 and 2033 will be limited to each year's inflation rate.
- The stormwater rate is increasing in part because the city has annually cut a
 portion of property tax that has been allocated to stormwater revenue.
- In other words, the higher stormwater fee is subsidizing a lower property tax.





St. Petersburg Example

- St. Petersburg changed their rate structure in October 2019.
- Their prior rate structure treated single-family residential properties differently from all other properties.
- Previously, all single-family residential properties were billed the same amount no matter how much (or how little) demand they placed on the stormwater drainage system. All other properties were billed based on their stormwater contribution.
- The overall goal of updating the stormwater billing structure was to charge all properties the same, objective way.
- The new structure allows a property's fee to more accurately reflect its impact to their stormwater system.

Single-Family Properties	
Tier	Property Impervious Surface Area
Tier 1	1,600 or less
Tier 2	1,601 - 3,200
Tier 3	3,201 - 4,800
Tier 4	4,801 or greater st.petersburg

Employers

Now let's take a closer look at how the proposed 133% increase in stormwater rates will affect our local employers.

- WAREHOUSE Publix 1936 George Jenkins Blvd
 - \$34,486 Current
 - \$80,497 Full Rate
- MANUFACTURING Refresco (Juice Bowl) 2090 S. Road 98
 - \$14,064 Current
 - \$32,844 Full Rate
- RETAIL Publix 5375 N. Socrum Loop
 - \$15,192 Current
 - \$35,460 Full Rate
- RESTAURANT Cheddars 3411 S. Florida Avenue
 - \$2,052 Current
 - \$4,800 Full Rate

Florida Stormwater Utility Report

- After we had a chance to review the comparison to "similar utilities" we had some concerns.
- We acquired a copy of the Florida Stormwater Associations 2024 Stormwater Utility Report.
- The FSA surveys over 160
 jurisdictions (cities and counties)
 and publishes their detailed
 findings every other year.
- In reviewing the FSA report we realized the consultant compared Lakeland to the highest cost jurisdictions in the State of Florida.
- Many of the jurisdictions they selected were not similar to Lakeland in population, area served or location.



"Similar Utilities" Comparison?

- If you study this version of the "similar utilities" comparison. The first thing that jumps out to you is that we are "dissimilar" to half of the cities the consultant chose to compare us to.
- Second, you will notice they don't follow their own methodology in comparing us to cities with similar populations, areas served or location.
- Let's take a closer look at the consultants "similar utilities" by monthly rate and then let's play Sesame Street..."One of these doesn't belong" (Is not like the others).

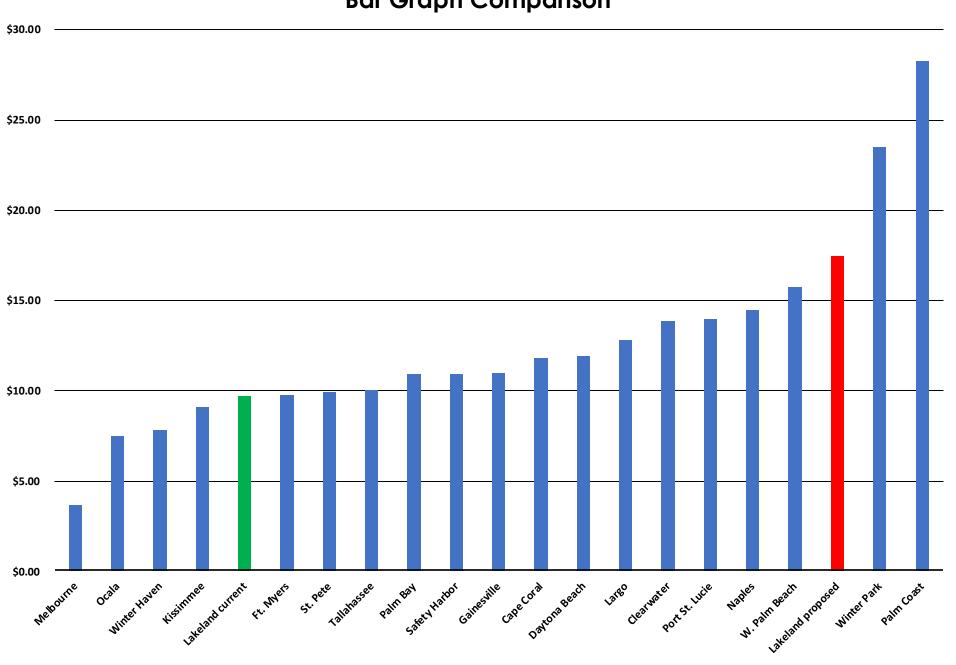
				imilar			NSEF
lurisdiction	Population	Area Served (Acres)	Unit Size	Monthly Rate	Annual Rate	Annual Revenue	Monthly Revenue
West Palm Beach, City of	150,000	35,434	2,171	\$14.83	\$177.96	\$15,376,467	\$7,415.00
Naples, City of	25,000	8,000	1,934	\$14.50	\$174.00	\$5,465,100	\$7,250.00
Port St. Lucie, City of	212,015	75,600	2,280	\$14.00	\$168.00	\$22,893,483	\$7,000.00
Clearwater, City of	109,907	16,000	1,830	\$13.40	\$160.80	\$16,500,000	\$6,700.00
Palm Bay, City of	119,000	43,520	4,693	\$12.34	\$148.08	\$10,157,317	\$6,170.00
Palm Coast, City of	86,768	34,528	3,682	\$11.65	\$139.80	\$12,995,325	\$5,825.00
Winter Park, City of	30,522	6,509	2,324	\$11.56	\$138.72	\$3,565,000	\$5,780.00
Daytona Beach, City of	72,647	42,240	1,661	\$11.46	\$137.52	\$13,950,498	\$5,730.00
Safety Harbour, City of	17,072	3,200	1,865	\$10.93	\$131.16	\$1,550,000	\$5,465.00
Cape Coral, City of	200,000	76,800	3,296	\$10.83	\$129.96	\$20,227,445	\$5,415.00
Gainesville, City of	141,085	41,310	2,300	\$10.40	\$124.80	\$9,161,009	\$5,200.00
St. Petersburg, City of	250,000	37,920	2,406	\$9.93	\$119.16	\$18,000,000	\$4,965.00
akeland, City of	110,000	47,995	5,000	\$9.72	\$116.64	\$8,932,000	\$4,860.00
ort Myers, City of	86,400	31,360	2,500	\$9.60	\$115.20	\$6,500,000	\$4,800.00
Cissimmee, City of	60,375	13,580	2,404	\$9.10	\$109.20	\$834,527	\$4,550.00
argo, City of	83,071	12,246	2,257	\$8.91	\$106.92	\$6,825,000	\$4,455.00
Tallahassee, City of	193,551	66,360	1,990	\$8.83	\$105.96	\$19,079,490	\$4,415.00
Winter Haven, City of	50,000	26,349	NR	\$7.46	\$89.52	\$2,014,950	\$3,730.00
Ocala, City of	57,586	29,028	1,948	\$5.54	\$66.48	\$6,835,282	\$2,770.00
Melbourne, City of	83,319	32,947	2,500	\$3.67	\$44.04	\$2,925,000	\$1,835.00

Jurisdiction	Population	Acres	Unit Size	Monthly Rate	Annual Rate
Palm Coast	86,768	34,528	3,682	\$28.27	\$339.24
Winter Park	30,522	6,509	2,324	\$23.50	\$282.00
W. Palm Beach	150,000	35,434	2,171	\$15.73	\$188.76
Naples	25,000	8,000	1,934	\$14.50	\$174.00
Port St. Lucie	212,015	765,600	2,280	\$14.00	\$168.00
Clearwater	109,907	16,000	1,830	\$13.87	\$166.44
Largo	83,071	12,246	2,257	\$12.84	\$154.08
Daytona Beach	72,647	42,240	1,661	\$11.96	\$143.52
Cape Coral	200,000	76,800	3,296	\$11.83	\$141.96
Gainesville	141,085	41,310	2,300	\$11.00	\$132.00
Safety Harbor	17,072	3,200	1,865	\$10.93	\$131.16
Palm Bay	119,000	43,520	4,693	\$10.92	\$131.04
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Anser Advisory Stormwater Rate Bar Graph Comparison



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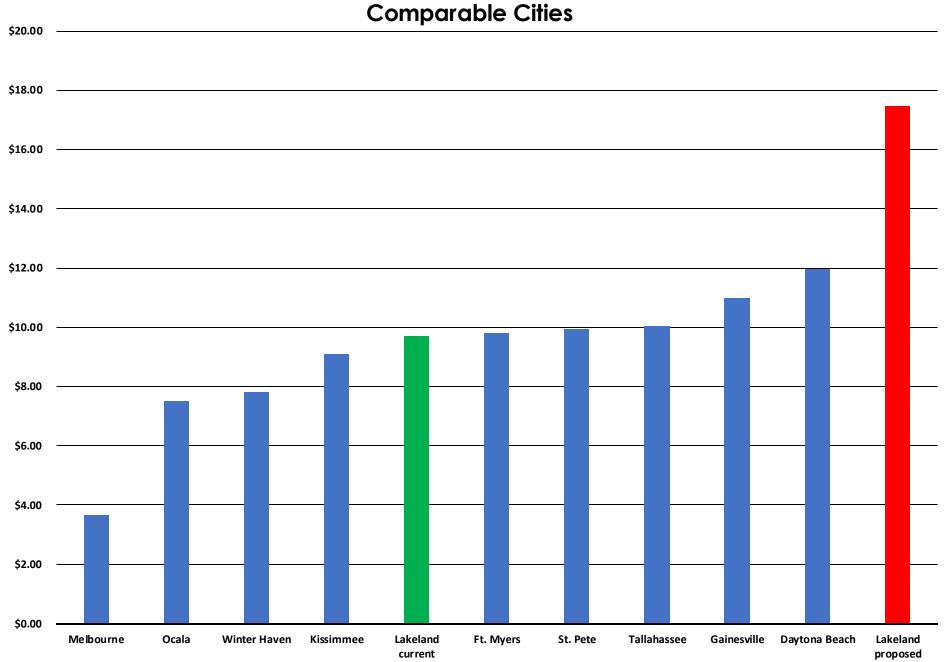
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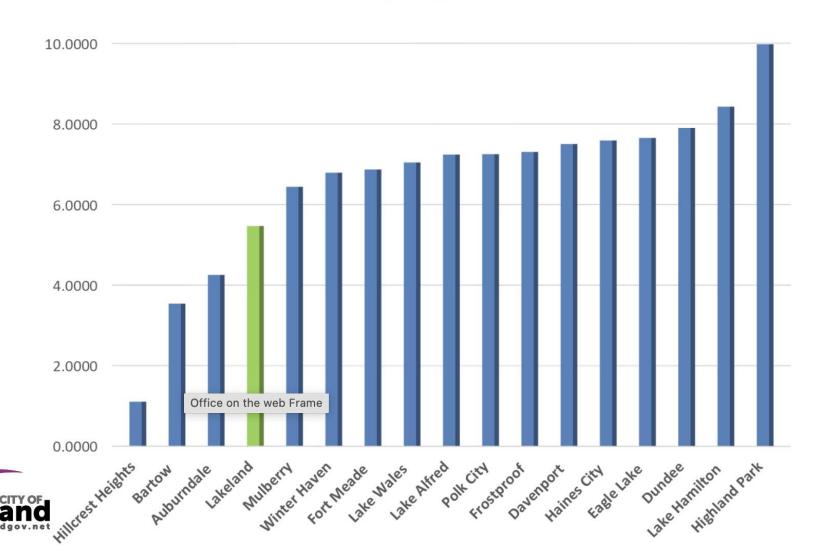


Anser Advisory Stormwater Rates Comparable Cities

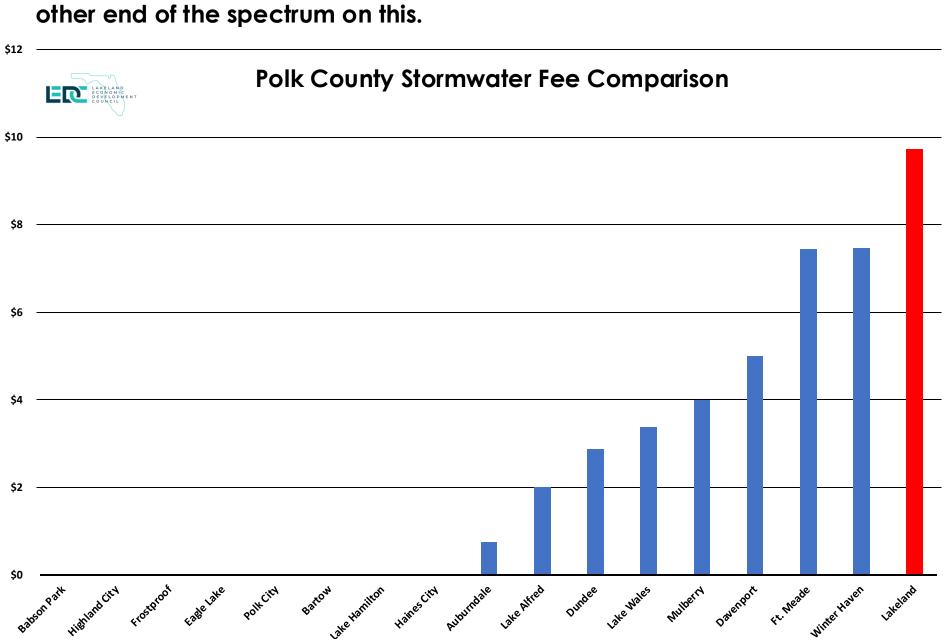


When considering tax increases, City staff regularly shares a graph with the Commission like the one below comparing Lakeland's millage rate to cities in Polk County. LEDC believes these types of comparisons are misleading.

Polk County Municipal Millage Comparison

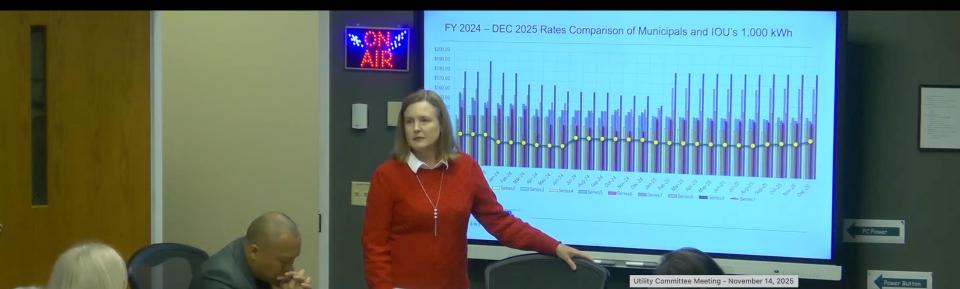


• While I don't think it is relevant, if you are going to look at Polk County for millage, you should see the comparison for stormwater and Lakeland is at the other end of the spectrum on this.



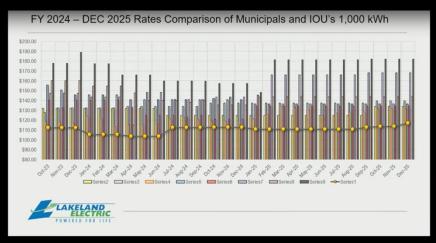
Where we stand with respect to peer utilities

- Two weeks ago, the Lakeland City Commission voted to increase electric rates.
- During Friday's Utility Committee meeting on November 14th Lakeland Electric's Fuel Manager, Sandra Ruede reminded the Commission that Lakeland Electric compares its rates to peer utilities, that is utilities that are similar to Lakeland, that generate their own power, etc.
- When questioned if Lakeland Electric had the lowest rates in Florida, Ruede said no, but Lakeland only compares itself to similar utilities.
- Ruede said "The reason we look at these utilities is because they are comparable to us"



November 17th City Commission Meeting

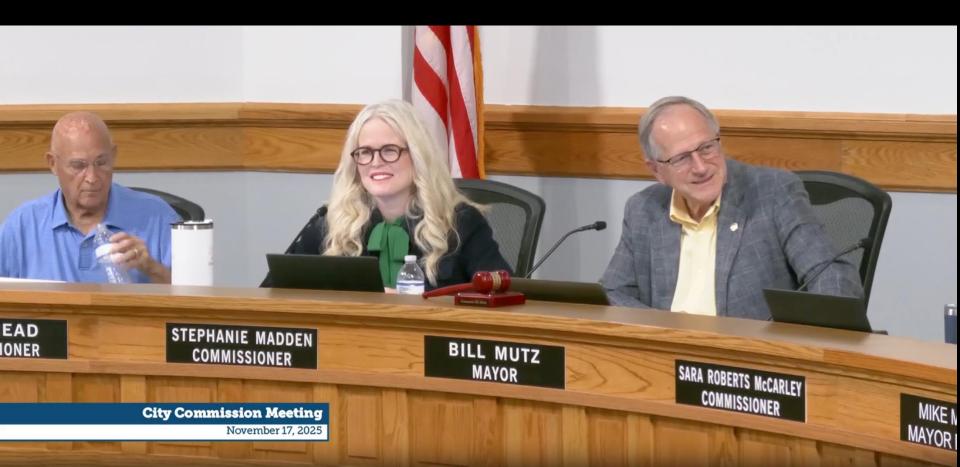
- On Monday, November 17th Ruede addressed the City Commission and once again emphasized that when increasing rates, it is important to make sure LE is comparable with its peers.
- "We always compare ourselves to other utilities and their rates as well as what's going on in the market to make sure we are comparable. With this fuel increase we looked at everyone else, where are they at, and where do we stand in relation to that." Sandra Ruede, Fuel Manager, Lakeland Electric
- "We are in line not only with what we are seeing in the market, but we are still well below our competitors. We are still the lowest in the state of Florida among comparable utilities." Sandra Ruede, Fuel Manager





City Commission Agrees

- When discussing the Lakeland Electric Rate increase Mayor Mutz said "If we
 make this move, I think it is imperative that our media coverage includes the
 fact of where we stand with respect to other peer utilities."
- We agree with you Mayor Mutz. You want our citizens to know that we have the lowest rates among comparable utilities in the state of Florida. And we understand that.



Media Coverage

- This is what the media coverage would say for stormwater if these rates are approved.
- "Lakeland will have one of the highest stormwater utility rates in the State of Florida in 5 years, and most likely the highest rate compared to our peers."



Lakeland's Competition

 When making comparisons the City of Lakeland and its consultants should consider Lakeland's competitors vs. picking the highest cost jurisdictions to justify a 133% rate increase.

2-6c	6c What is your current SWU rate per month? [see year to year comparison below]																		
Comparative Monthly Stormwater Rates																			
Averages																			
1995	1997	1999	200	1 2	003	2005	2007 2009 201		2011	2014 20:		2016	6 2018 20		202	0 20	22	2024	
\$3.07	\$3.37	\$3.18	\$3.3	36 \$	3.52	\$3.85	\$4.29	\$4.88	\$	5.22	\$5	.67	\$6.53	\$ \$6	.97	\$7.5	50 \$8.	.05	\$8.84
						-	-		<u> </u>							_			
Jurisdi	Jurisdiction			2005	2007	2009	2011	201	L4	201	6	201	3 2	2020	202	22	2024	Cha	ange
Alachua County														\$3.33	\$3.	.33	\$4.17	,	\$0.84
Bay County					\$3.33	\$3.33				\$3.	33	\$3.3	3	\$3.33	\$3.	.33	\$3.33	,	\$0.00
Brevard County				\$3.00		\$3.00	\$3.33	\$ \$3	.00	\$4.	33	\$5.3	3	\$5.33	\$5.	.33	\$5.33	,	\$0.00
Charlot	Charlotte County				\$3.00		\$10.7	\$10	.71	\$10.	71	\$10.7	1						
City of	City of Altamonte Springs		s		\$5.75	\$6.75	\$6.75	\$6	.75	\$6.	75	\$6.7	5	\$6.75	\$6.	.75	\$6.75	9	\$0.00
City of	City of Atlantic Beach			\$4.00	\$4.00	\$5.00	\$5.00	\$8	.39	\$8.	39								
City of	City of Auburndale			\$0.75	\$0.75	\$0.75	\$0.75	\$0	.75	\$0.	75	\$0.7	5	\$0.75	\$0.	.75	\$0.75		\$0.00
City of	Aventur	a		\$2.50	\$2.50		\$2.50)						\$3.50	\$3.	.50	\$3.50		\$0.00
City of	City of Boca Raton									\$3.	22								
City of	Boynton	Beach		\$5.00	\$5.00					\$5.	00						\$8.25		
	Bradent									\$4.	50								
		on Beach	_		\$8.33	\$8.33	\$8.33	\$ \$8	.33		_				_	.58	9.58	_	\$0.00
	City of Callaway		_							\$1.0	\rightarrow	\$1.0	_	\$1.00	-	.00	\$1.00	_	\$0.00
	City of Cape Canaveral		_		\$3.00	\$3.00			.00	\$5.	00	\$7.0	_	\$9.00	\$10	\rightarrow	\$10.00	_	\$0.00
	City of Cape Coral		_	\$3.50	\$6.25	\$6.25		_	.25		_	\$9.2	_	\$9.92	\$10	\rightarrow	\$11.83		\$1.00
	City of Casselberry		_		\$2.90		\$7.00	_	.00	\$7.0	\rightarrow	\$7.0	_	\$8.65	· ·	.20	\$9.75	_	\$0.55
	City of Clearwater		_	\$8.65	\$9.91	\$11.13				\$14.	\rightarrow	\$14.5	_	13.40	\$13	\rightarrow	\$13.87	_	\$0.47
	City of Clermont		\rightarrow		\$3.00		\$3.00		.00	\$3.	\rightarrow	\$3.0	_	\$4.99	\$4.	\rightarrow	\$7.85	_	\$2.86
	City of Cocoa		_	\$3.00			\$5.00	_	.75	\$6.	\rightarrow	\$6.7	-		\$10.51 8.96 \$8.96		\$10.98	_	\$0.47
	City of Cocoa Beach		-	\$5.00	\$6.00	\$6.00	\$6.00		.00	\$8.	\rightarrow	\$8.5	_	\$8.96	<u> </u>	\rightarrow	\$8.96	_	\$0.00
	City of Coconut Creek		+				_	\$3	.46	\$3.	_	\$3.7	_	\$3.92	\$4.	_	\$4.59	_	\$0.44
	Cooper		\rightarrow					- co	20	\$2.5	\rightarrow	\$2.9	_	\$3.22	<u> </u>	.58	\$5.58	_	\$0.00
	Coral Ga		+	44.00	45.00		47.4		.20	\$8.	_	\$13.3	-	16.16	\$19	_	\$19.07	_	\$0.00
	Daytona	Beach	-	\$4.00	\$6.00	67.00	\$7.48		.67	\$9.	\rightarrow	\$10.0		10.07	\$11	\rightarrow	\$11.96	_	\$0.50
	DeBary Deerfiel	d Danah	-		\$7.00	\$7.00	-	\$7	.00	\$7.0	00	\$7.0	_	\$7.00 \$3.75	\$14	\rightarrow	\$14.00 \$4.77	_	\$0.00 \$1.02
	DeLand	и веасп	-				_				\dashv	\$8.6	_	\$8.69	\$9.	\rightarrow	\$9.67	_	\$0.00
	Delray B	ooch	+	\$4.50	\$5.33	\$5.33	\$5.33	, će	.33	\$5.	22	\$6.0	_	\$5.33	\$5.	\rightarrow	\$1.12	_	\$0.00 \$4.21)
	Deltona	eacii	-	\$5.00	\$5.55	\$5.55	33.3.	, ,,,	.55	33	33		_	<i>\$3.33</i>	33.	.55	31.12	(5	4.21)
City of			+	\$5.00		\$4.00	\$4.00	\$4	.00	\$4.0	nn	\$4.0	10	\$4.00	\$4.	nn	\$4.00	-	\$0.00
_	Dunedin		+	\$4.50	\$6.00	\$6.00	-		.00	\$10.	\rightarrow	\$11.1	_	11.89	\$12	\rightarrow	\$12.25	<u> </u>	\$0.00
	Eagle La			уч. 30	70.00	\$0.00	\$7.40	_	.00	710.	10	711		11.05	712	.23	V12.23	Η,	,0.00
			$\overline{}$	\$6.00	\$6.00	\$7.00	\$8.00	_	.00	\$9.	00	\$10.0	00 5	11.00	\$13	.00	\$13.50		\$0.50
	City of Edgewater City of Eustis		\top	¥ 0.00	40.00	77.00	70.0	7		75.	-	7201		\$6.00	<u> </u>	.00	\$6.00	<u> </u>	\$0.00
	City of Fernandina Beach		,							\$4.0	00	\$12.0	_	12.00	\$12	\rightarrow	\$12.73	_	\$0.73
	City of Flagler Beach						1			\$5.0	00	\$6.2	.5	\$6.25					
_	City of Fort Lauderdale			\$2.62	\$2.90	\$3.20	\$3.53	\$ \$3	.50	\$4.	\rightarrow	\$10.0	00 \$	14.00	\$21	.52	\$23.68		\$2.16
	City of Fort Meade		\neg	\$4.25	\$4.25	\$4.25			.25	\$6.	\rightarrow	\$6.7	_	\$7.44	\$7.	\rightarrow	\$7.44	_	\$0.00
_	City of Fort Myers					\$4.80		_	.80	\$4.	\rightarrow	\$7.6	_	\$9.60		.60	\$9.80		\$0.20
	City of Fort Pierce			\$2.50	\$4.50	\$4.50	\$4.50	\$4	.50	\$4.	50	\$4.5	0	\$5.75	\$5.	.75	\$5.75	,	\$0.00
City of	City of Fort Walton Beach		h				\$3.00	\$3	.00	\$4.	25	\$4.7	5	\$5.00	\$5.	.00	\$5.00		\$0.00
City of	City of Fruitland Park					\$1.00	\$2.00)		\$2.	00	\$2.0	00	\$2.00	\$2.	.00	\$2.00	,	\$0.00
City of	City of Gainesville			\$6.50	\$6.95	\$7.65	\$8.1	\$8	.56	\$9.	00	\$9.4	5	\$9.90	\$10	.40	\$11.00	9	\$0.60
City of	Green C	ove Sprin	gs							\$3.	50	\$3.5	0	\$3.50	\$3.	.50	\$25.00	\$2	21.50

Comparative Monthly Stormwater Rates											
Jurisdiction	2005	2007	2009	2011	2014	2016	2018	2020	2022	2024	Change
City of Gulf Breeze							\$5.07	\$9.38	\$9.38	\$11.24	\$1.86
City of Gulfport		\$2.87	\$2.87	\$2.87	\$3.21	\$3.60	\$3.95	\$3.95	\$3.95	\$11.45	\$7.50
City of Haines City	\$2.00		\$2.00		\$4.52	\$4.52	\$4.93	\$4.94			
City of Hallandale Beach	\$2.17	\$2.68	\$2.68	\$2.50	\$3.35	\$3.35	\$7.37				
City of Hialeah	\$2.50	\$2.50	\$2.50	\$2.50		\$2.50	\$2.50	\$2.50	\$2.50	\$2.50	\$0.00
City of Holly Hill	\$3.00	\$3.00	\$6.00		\$6.00						
City of Hollywood	\$2.35	\$2.69		\$3.22							
City of Holmes Beach										\$2.95	
City of Homestead	\$3.18			\$3.18		\$3.37	\$3.37	\$3.37	\$3.37	\$3.37	\$0.00
City of Indian Harbour Beach						\$4.00	\$4.00	\$4.00	\$4.00	\$4.00	\$0.00
City of Jacksonville				\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$0.00
City of Jacksonville Beach	\$5.00	\$5.00	\$5.00		\$4.78	\$5.00	\$5.00	\$5.00			
City of Key Colony Beach						\$60.00	\$60.00	\$60.00	\$60.00	\$60.00	\$0.00
City of Key West					\$7.90	\$8.22	\$8.72	\$8.98	\$9.25	\$9.82	\$0.57
City of Kissimmee				\$7.38	\$8.08	\$8.08	\$8.45	\$8.78	\$9.10	\$9.10	\$0.00
City of Lake Alfred					\$2.00	\$2.00	\$2.00	\$2.00	\$2.00	\$2.00	\$0.00
City of Lake Mary	\$3.00	\$3.00	\$3.00	\$3.00		\$4.00	\$4.00	\$4.00	\$4.00	\$4.00	\$0.00
City of Lake Wales										\$3.38	
City of Lake Worth Beach	\$2.90	\$5.80		\$5.80	\$6.30		\$6.30	\$6.52	\$6.52	\$6.52	\$0.00
City of Lakeland	\$2.00	\$2.00	\$6.00	\$6.00	\$6.00	\$6.00	\$8.00	\$8.82	\$9.26	\$9.72	\$0.46
City of Largo	\$3.57	\$3.57	\$3.57	\$4.45		\$6.65	\$6.65	\$6.65	\$8.91	\$12.84	\$3.93
City of Lauderhill				\$12.19							
City of Leesburg				\$6.00	\$6.00	\$5.50	\$5.50	\$5.50			
City of Longwood		\$6.00	\$6.00	\$6.00	· ·	\$6.00	\$6.00	\$6.00	\$6.00	\$6.00	\$0.00
City of Madeira Beach		\$5.00	\$5.00				\$10.00	\$10.00	\$10.00	\$10.00	\$0.00
City of Maitland					\$8.60	\$9.80	\$9.60			\$10.72	
City of Marathon									\$20.00	\$10.00	(\$10.00)
City of Margate	\$2.69	\$2.69	\$3.57			\$5.15	\$5.15	\$8.25	\$8.25	\$8.25	\$0.00
City of Mascotte	,	,	,			,	,	\$7.00	\$7.00	\$7.00	\$0.00
City of Melbourne					\$3.00	\$3.67	\$3.67	\$3.67	\$3.67	\$3.67	\$0.00
City of Miami		\$3.50	\$3.50		*****	\$3.50	\$3.50	\$3.50	\$3.50	\$3.50	\$0.00
City of Miami Gardens		7-1-1	\$4.00	\$4.00	\$4.00	\$4.00	\$6.00	\$6.00	\$6.00	\$6.00	\$0.00
City of Miami Springs		\$3.67	*****	*	\$3.67	\$3.67	\$6.00	\$6.00	\$6.00	\$6.00	\$0.00
City of Minneola		\$2.00	\$4.00		70.07	\$4.00	\$4.00	\$4.00	\$4.00	\$4.00	\$0.00
City of Miramar	\$2.00	\$2.50	*			7	*	7	7	*	*****
City of Mount Dora	72.00	72.00	\$5.00		\$6.50						
City of Mulberry			\$4.00	\$4.00	\$4.00		\$4.00	\$4.00	\$4.00	\$4.00	\$0.00
City of Naples	\$4.00	\$4.00	\$11.82	\$12.01	\$12.80	\$13.05	\$13.35	\$13.93	\$14.50	\$14.50	\$0.00
City of Neptune Beach	\$3.00	\$3.00	\$3.00	\$12.01	\$3.00	\$5.00	\$5.00	\$18.41	P24.50	724.50	\$0.00
City of New Port Richey	\$3.36	\$3.36	\$3.36	\$3.36	\$5.50	\$3.36	\$6.50	\$6.67	\$6.67	\$6.67	\$0.00
City of New Smyrna Beach	\$3.33	\$5.50	\$5.50	\$3.50		\$7.17	\$7.33	\$7.67	\$7.92	\$7.92	\$0.00
City of Niceville	\$2.65	\$2.65	\$3.85	\$4.25	\$4.51	\$4.51	\$4.51	\$4.51	\$4.51	\$4.74	\$0.23
City of North Bay Village	72.03	72.03	\$3.03	Ş-1.23	Q-7.51	\$1.26	\$7.72	y-1.51	Ç-7.31	Ç-1.7-4	Q0.23
City of North Lauderdale	\$3.00	\$3.00	\$3.00		\$3.00	\$3.00	\$6.00	\$6.00	\$6.00	\$6.00	\$0.00
City of North Miami	\$4.65	\$4.65	\$5.64		\$3.00	\$6.19	\$6.19	\$6.19	\$7.12	\$7.12	\$0.00
	-	-	\$5.04	Ć4 EO	¢4 E0	30.19	30.19	30.19	\$1.12		30.00
City of North Miami Beach	\$3.70	\$4.50		\$4.50	\$4.50					\$5.06	
City of Oakland Park	\$3.99	\$6.00	\$6.00	\$6.00	\$6.00	\$7.00	\$7.00	\$7.00	\$7.00	\$9.50	\$2.50

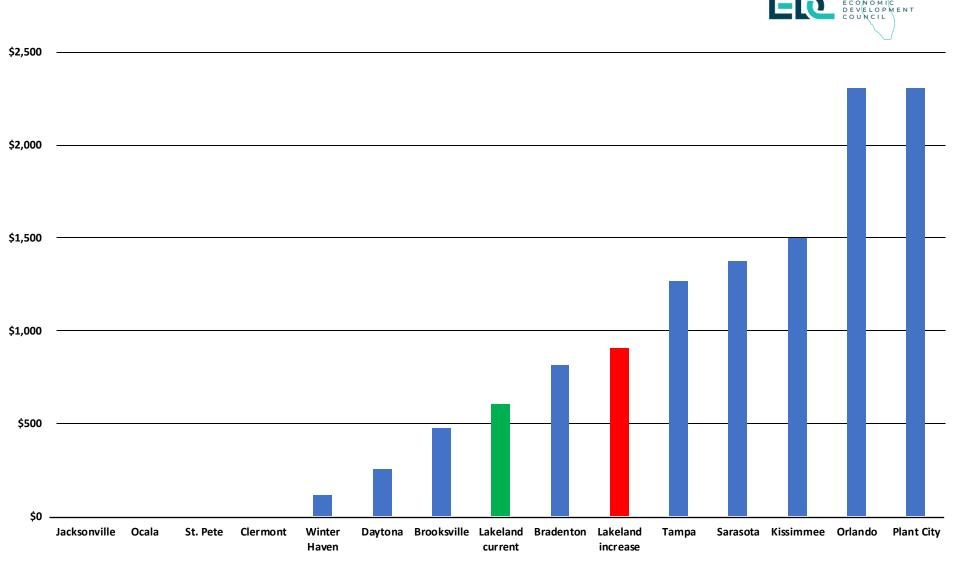
LEDC Agrees & Supports Peer Comparisons

- Just this year, on May 5th LEDC expressed its support for a 50% increase in impact fees. The LEDC supported the maximum increase adoptable.
- "We are for it, we think its needed, and we support it." Scruggs said at the City's agenda study meeting.



2025 Impact Fee Comparisons

The impact fee increase doesn't change our competitive position with Tampa, Orlando and our other competitors.



LEDC Support for Increases

- Just for the record, the LEDC has publicly supported city recommended increases in many key areas during your terms in office including:
 - Multiple Lakeland Electric Rate Case Increases
 - All Water & Wastewater Increases
 - Economic Development Impact Fee Mitigation Incentive Decreases
 - Impact Fee Increases



Won't other jurisdictions increase their rates in the next 5 years?

- 46% of jurisdictions in the State of Florida have not increased their stormwater rates in the past 10 years.
- 42% of jurisdictions have increased their stormwater rates in the range of \$.0 to \$3.72 per ERU in the past 10 years.
- Lakeland is proposing to increase its stormwater rates up to \$7.75 per ERU in the next 5 years.
- Data and experience tell us that 9 out of 10 jurisdictions in Florida have either not increased their stormwater rates at all in the past 10 years or increased their fees less than 50% of the increase Lakeland is proposing to implement.
- The data shows that the level of Lakeland's proposed increase is rare and extreme.

Comparative Monthly Stormwater Rates												
Jurisdiction	2005	2007	2009	2011	2014	2016	2018	2020	2022	2024	Change	
City of Gulf Breeze							\$5.07	\$9.38	\$9.38	\$11.24	\$1.86	
City of Gulfport		\$2.87	\$2.87	\$2.87	\$3.21	\$3.60	\$3.95	\$3.95	\$3.95	\$11.45	\$7.50	
City of Haines City	\$2.00		\$2.00		\$4.52	\$4.52	\$4.93	\$4.94				
City of Hallandale Beach	\$2.17	\$2.68	\$2.68	\$2.50	\$3.35	\$3.35	\$7.37					
City of Hialeah	\$2.50	\$2.50	\$2.50	\$2.50		\$2.50	\$2.50	\$2.50	\$2.50	\$2.50	\$0.00	
City of Holly Hill	\$3.00	\$3.00	\$6.00		\$6.00							
City of Hollywood	\$2.35	\$2.69		\$3.22								
City of Holmes Beach										\$2.95		
City of Homestead	\$3.18			\$3.18		\$3.37	\$3.37	\$3.37	\$3.37	\$3.37	\$0.00	
City of Indian Harbour Beach						\$4.00	\$4.00	\$4.00	\$4.00	\$4.00	\$0.00	
City of Jacksonville				\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$0.00	
City of Jacksonville Beach	\$5.00	\$5.00	\$5.00		\$4.78	\$5.00	\$5.00	\$5.00				

Lake Bonny

- Some might say, what about Lake Bonny?
- Lake Bonny projects are only 10% of the total dollars of proposed unfunded drainage and lakes projects in the \$69 million budget they include:
- \$5,000,000 Flood prevention and stormwater control
- \$1,250,000 Sediment inactivation
- \$300,000 Stormwater retention and treatment
- \$1,000,000 Wetland restoration and nutrient recycling



Summary

- We recognize that the City of of Lakeland has significant unfunded stormwater capital expenditure needs.
- The LEDC agrees that the identified unfunded projects and state mandates are real and need to be addressed.
- There are serious issues with regards to the consultant's study:
 - We need a study that more accurately reflects who Lakeland competes with and is comparable to, similar to, Lakeland Electric.
 - If we are going to change the fundamental basis of what we charge our constituents, lowering our equivalent residential unit square footage from 5,000 to 3,850, then we need to measure residential impervious surface, the same way we measure commercial impervious surface, and charge based on an accurate assessment of the size of their true impact to the system, similar to, St. Petersburg.
 - The consultant's recommendation of 133% increase in Lakeland's stormwater fees over the next 5 years is unreasonable and won't work.

Summary

- The proposed increase would result in Lakeland's stormwater fees being among the highest in the State of Florida's 166 jurisdictions and the highest among comparable cities (peers).
- Lakeland's stormwater rate is already above the median as it relates to our competitors.
- We are not asking for the lowest stormwater rates, we are asking for competitive rates with comparable cities.
- The LEDC understands that the city will not be able to fund all of our identified unfunded projects in 5 years if they don't get approval for a 133% increase.
- We are not being unreasonable and saying no, as a matter of fact we have a long track record of publicly supporting increases in many city fees including electric, water, wastewater, and most recently, impact fees.
- We believe it is going to take some more time to study potential solutions.

Final Thoughts