

ORIGINAL



DISTRIBUTION CENTER  
03 AUG 22 AM 9:06

J. DAVID THOMAS  
VICE PRESIDENT  
CORP FACILITIES, HEALTH, SAFETY & ENVIRONMENT

RECEIVED FPSC  
03 AUG 22 AM 9:37  
COMMISSIONER  
CLERK

August 21, 2003

030000-P4

Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

**SUBJECT: WORKSHOP ON INDIVIDUAL WATER METERING OF MID- AND HIGH-RISE BUILDINGS**

Ladies and Gentlemen:

Vivendi UNIVERSAL Entertainment LLLP for itself and through various affiliated entities (collectively hereafter "Universal") owns and operates various commercial facilities in the State of Florida, including structures which may be considered to fall within the definition of "mid- and high-rise buildings."<sup>1</sup> Universal wishes to express its opposition to the proposal to require that all new mid- and high-rise buildings constructed in the State include individual water metering.

In support of its opposition to such a requirement, Universal notes that:

- Unlike electricity, many tenants (or occupants) in commercial multi-tenant buildings do not have a need for a separate water supply to their space. For example, it is common for multiple occupants on a single floor of a commercial building to share restroom facilities. Requiring separate metering facilities in such cases is both unnecessary and unwarranted.

<sup>1</sup> Universal notes that the announcement notice does not contain a definition of mid- and high-rise buildings. Therefore, Universal is unable to determine with specificity the specific buildings to which this requirement may apply.

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC   L    
OTH \_\_\_\_\_

Vivendi UNIVERSAL Entertainment  
100 Universal City Plaza Universal City CA 91608 TEL 818 777 5150 FAX 818 866 3499  
E-MAIL david.thomas@unistudios.com  
www.universalstudios.com

DOCUMENT NUMBER-DATE  
07806 AUG 22 8

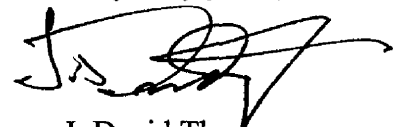
FPSC-COMMISSION CLERK

*DIVISION OF THE COMMISSION CLERK  
AND ADMINISTRATIVE SERVICES  
AUGUST 21, 2003  
PAGE 2 OF 2*

- Traditionally, many owners of commercial buildings with multiple occupants have found it both efficient and efficacious to either simply consider water utility expenses as part of the base administrative expense of the building or have allocated water utility expense to various tenants according to a set formula (e.g., square footage of occupied space). These approaches have worked well and continue to be viable and reasonable alternatives that should not be precluded.
- Mid- and high-rise commercial buildings are often a part of a larger campus or development, such as our operations at Universal Orlando, which are occupied by a single entity for whom it is much more convenient and cost-effective to receive metered utility services, including water service, for the entire campus from a single point. In such cases, is simply a waste of resources to require individual metering of each such commercial building, only to then require the single entity to add the various individual meters together to produce a bill; and,
- Even in cases where multiple entities occupy one or more mid- and high-rise commercial buildings, it should continue to be a matter of negotiation between the landlord and the various entities (whether related or unrelated) as to whether or not individual metering is efficacious. There is no need for the Public Service Commission to intervene in such relationships with what is essentially a “one size fits all” mandate.

Universal appreciates the opportunity to share its views on this issue with the Public Service Commission and is hopeful that the Commission will determine that it is not in the public interest to move forward with a requirement for separate metering.

Very truly yours,



J. David Thomas

CC: Frank Matthews, Esquire (Hopping Green & Sams)  
Mr. John McReynolds