



June 16, 2016

The Honorable Samuel B. Ings
City of Orlando Commissioner, District 6
400 South Orange Avenue
Orlando, FL 32801

Dear Commissioner Ings:

The West Orange Chamber of Commerce (WOCC) Board of Directors extends its appreciation for allowing Mr. Chris Castro to present information to your fellow WOCC board members on Building Energy and Water Efficiency Strategy (BEWES) at May's board meeting. The presentation was very thorough and thought provoking. Mr. Castro's knowledge and passion for improved efficiencies was very evident. As you know, the Chamber board at its June 16th meeting voted with you abstaining from that vote, to send this letter to you.

While the program has merit and the Chamber supports the City's focus on water and energy efficiency for large buildings in our community, there are a few issues which we think need further consideration before moving forward with the adoption of an ordinance by the city council.

Create and expand voluntary and/or incentive-based programs encouraging building owners/agents to participate in reporting their water & energy usage for benchmarking purposes rather mandating this requirement in an ordinance. Mr. Castro mentioned that voluntary participation has not worked, yet none of our board members were aware of the voluntary program. How aggressive has the City been in raising awareness and encouraging participation for owners on a voluntary basis? The Chamber would be happy to partner with the City to promote voluntary participation in such a program.

Avoid unintended consequences of placing undue burden and expense on building owners/agents for reporting their aggregate water & energy use. Many of the buildings subject to the requirements of the proposed ordinance are multi-tenant properties in which each tenant is responsible for their own utility bill. Given the reality that some utilities are either unwilling or do not have the ability to provide whole building (aggregate) usage data and/or may charge for this service, mandates requiring the reporting of this data could place considerable burden on an owner/agent to manually aggregate this usage information. Additionally, mandates nearly always add expense for businesses.

Obtain building owner consent prior to publicly sharing benchmarking data. Any benchmarking information submitted by private building owners/agents should not be made public without owner/agent's consent. Some of our Chamber member businesses are engaged in competitive industries where their efficient use of water or energy resources is their competitive edge. Sharing this information publicly could undermine their advantage.

We appreciate you taking our concerns into consideration. We hope you agree that a volunteer, incentive-based and collaborative approach to BEWES would best serve our business community.

Respectfully,

Stina D'Uva
President/CEO

cc: Mr. Chris Castro, Director of Sustainability

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