

Communication from Public

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Comments for Public Posting: Our building was inspected by the Los Angeles County Weights and Measures Department, which found that the water meters installed were improperly and illegally installed. The remote readouts for those meters were also found to be inaccessible to tenants. Following these findings, the property management abandoned the meters altogether and notified residents that it would transition to Ratio Utility Billing System (RUBS) billing for water charges. This change directly violates Senate Bill 7 (SB 7, enacted January 1, 2018), which requires that all new multi-unit residential buildings constructed after January 1, 2018, must be either individually metered or submetered for water service. Specifically, California Water Code Section 535 prohibits the use of RUBS or any method of allocating water costs that does not measure actual water usage for buildings subject to the submetering requirement. Despite these violations: The California Public Utilities Commission (CPUC) has disclaimed jurisdiction. The Los Angeles Department of Water and Power (LADWP) has disclaimed jurisdiction. The Los Angeles Department of Building and Safety (LADBS) has also disclaimed jurisdiction. Currently, the property uses Conservice, a licensed third-party utility billing company, to administer water billing. However, Conservice defers all tenant complaints and inquiries to the property management team, which has provided no resolution or legal justification for continuing RUBS billing in a building that is required to be submetered under state law. I urge the responsible city and state enforcement agencies to investigate this issue and ensure compliance with SB 7 and related provisions of the California Water Code, as the current billing practice is unlawful and places an unjust financial burden on tenants. Respectfully submitted, Jacob