

Communication from Public

Name: Brian Abernathy

Date Submitted: 05/18/2026 12:14 PM

Council File No: 22-0178

Comments for Public Posting: I am a landlord and strongly oppose to the proposed ban on RUBS. Multifamily housing providers in Los Angeles face an unprecedented financial squeeze due to skyrocketing insurance premiums, inflation, high interest rates, and strict regulatory limits. For master-metered buildings—where installing individual meters is structurally or financially impossible—RUBS is not a profit center. It is a vital cost-recovery tool that allows us to keep our buildings operational. Banning RUBS will have severe, unintended consequences including:

- 1) Elimination of Conservation Incentives: When utilities are a flat fee, there is no incentive for residents to conserve. RUBS encourages shared environmental accountability, aligned with the City's climate goals.
- 2) Reduction of Property Maintenance: Forcing housing providers to absorb volatile utility spikes will deplete the capital needed for building repairs, upgrades, and deferred maintenance.
- 3) Threatens Small Landlords: This ban will disproportionately hurt "mom-and-pop" housing providers, forcing them to sell to large institutional corporations or face foreclosure, destabilizing LA's older housing stock.

Instead of a blanket ban, I urge the Committee to consider transparency regulations, such as requiring landlords to share master bills and formulas with residents. That's what we do! In what world should people be able to live without having to pay for the resources they use? Please do not eliminate the critical tool keeping local housing providers afloat.

Communication from Public

Name:

Date Submitted: 05/18/2026 10:43 AM

Council File No: 22-0178

Comments for Public Posting: RUBS remains an important conservation and cost-recovery tool for older, master-metered buildings where individual unit metering is not feasible. Any policy change should be based on data, stakeholder input, and a full analysis of impacts on conservation, affordability, and housing operations.

Communication from Public

Name: concerned property Owner

Date Submitted: 05/18/2026 10:45 AM

Council File No: 22-0178

Comments for Public Posting: RUBS (Ratio Utility Billing Systems) should not be banned because they provide a fair and practical way to allocate utility costs in multi-unit properties where individual meters are not installed. Without RUBS, landlords are often forced to absorb rising utility expenses, which can lead to higher rents for all tenants regardless of actual usage. RUBS also encourages conservation by making residents more aware of their water, gas, and electricity consumption, helping reduce waste and promote sustainability. When properly disclosed and regulated, RUBS can create a balanced system that benefits both property owners and residents.

Communication from Public

Name: Apartment Owners Association of California, Inc. (AOA)
Date Submitted: 05/18/2026 01:34 PM
Council File No: 22-0178
Comments for Public Posting: The Apartment Owners Association of California, Inc. (AOA) strongly opposed the proposed ban on RUBS. * RUBS promotes conservation and responsible utility usage * Utility costs continue to rise dramatically for housing providers * Eliminating RUBS removes a fair and widely used cost-allocation tool * Policies should encourage conservation, not discourage it * Additional operational restrictions make housing more difficult and expensive to provide Founded in 1977, the Apartment Owners Association of California (AOA) is California's largest membership organization for rental property owners, representing over 20,000 members and more than 100,000 housing providers statewide. AOA provides practical tools, education, and advocacy to support rental property owners across California.

Communication from Public

Name: Daniel Aronson
Date Submitted: 05/18/2026 01:50 PM
Council File No: 22-0178

Comments for Public Posting: I strongly support stronger transparency standards and oppose any prohibition on RUBS. RUBS remains an important conservation and cost-recovery tool for older, master-metered buildings where individual unit metering is not feasible. Any policy change should be based on data, stakeholder input, and a full analysis of impacts on conservation, affordability, and housing operations. MANY OF OR ESTEEMED ELECTED OFFICIALS HAVE BEEN HAMSTRING HOUSING PROVIDES BY CREATING NOT A FEW, NOT A MEASURED AMOUNT BUT HONDREDS OF LAWS THAT MAKE IT IMPOSSABLE TO BE A HOUSING PROVIDER OF SMALL APARTMENT BUILDINGS, MANY BETWEEN 5 AND 8 UNITS. OUR OFFICIALS SEEM TO BE IN BED WITH TENANT RIGHTS GROUPS WHO EVERY MONTH COME UP WITH LAWS THAT MAKE IT IMPOSSIBLE TO FOLLOW. WE NEED TO HIRE ADDITIONAL PEOPLE JUST TO KEEP UP. I FEEL CERTAIN THAT THESE ELECTED OFFICIALS ALONG W/ TENANT RIGHTS GROUPS - WHO ADVOCATE FOR FREE RENT- JUST DONT SAY FOR EX., SHOES NEED TO HAVE YOU SHOE TIED, BUT ALSO HOW TO TIE THEM , WHAT SHOELACE TO USE , ITS COLOR , WIDTH , LENGTH , GURTH AND WHERE IT WAS MADE AND THE LIST GOES ON AN ON AND ON. ENOUGH IS ENOUGH. I KNOW THAT THE TENANT RIGHTS GROUP GO TO THE MEETING AND ADVOCATE BUT, YOU NEED TO DO WHAT IS RIGHT AND NOT WHAT THE TENANT RIGHTS GROUPS WANT YOU TO DO.

Communication from Public

Name:

Date Submitted: 05/18/2026 01:58 PM

Council File No: 22-0178

Comments for Public Posting: Keep Ratio Utility Billing System (rubs) RUBS promotes conservation and responsible utility usage Utility costs continue to rise dramatically for housing providers Eliminating RUBS removes a fair and widely used cost-allocation tool Policies should encourage conservation, not discourage it Additional operational restrictions make housing more difficult and expensive to provide

Communication from Public

Name: stephen wallis

Date Submitted: 05/18/2026 01:59 PM

Council File No: 22-0178

Comments for Public Posting: Los Angeles should enthusiastically support RUBS (ratio Utility Billing System), not ban it! In fact, LA should allow RUBS for rent-controlled units, also. Tenants have ZERO incentive to save water otherwise. If tenants paid for their water usage, they would conserve to some degree. I pay for my water usage and it motivates me to save as much water as I can! Water conservation should be a high priority for all of us. It is idiotic for the council to even consider banning a sensible, proven conservation method.

Communication from Public

Name: NEAL COLLIER
Date Submitted: 05/18/2026 02:01 PM
Council File No: 22-0178
Comments for Public Posting: RUBS promotes conservation and responsible utility usage Utility costs continue to rise dramatically for housing providers Eliminating RUBS removes a fair and widely used cost-allocation tool Policies should encourage conservation, not discourage it Additional operational restrictions make housing more difficult and expensive to provide

Communication from Public

Name: Steven Moritz

Date Submitted: 05/18/2026 02:03 PM

Council File No: 22-0178

Comments for Public Posting: I strongly OPPOSE any proposal that would ban RUBS for new tenancies. This is based on the following: RUBS promotes conservation and responsible utility usage Utility costs continue to rise dramatically for housing providers and this would be a financial hardship for me and operating my buildings Eliminating RUBS removes a fair and widely used cost-allocation tool Policies should encourage conservation, not discourage it Additional operational restrictions make housing more difficult and expensive to provide

Communication from Public

Name:

Date Submitted: 05/18/2026 02:03 PM

Council File No: 22-0178

Comments for Public Posting: Public Comment – Council File 22-0178 | Opposition to RUBS Ban for New Tenancies To the Honorable Members of the Los Angeles City Council, I write as a housing provider in Los Angeles to strongly oppose any proposal that would ban the Ratio Utility Billing System (RUBS) for new tenancies. Operating a rental property in this city has become increasingly difficult. Insurance premiums have surged. Maintenance costs are up. Labor is more expensive. Property taxes continue to climb. And now, at the exact moment housing providers need every legitimate cost-management tool available, the Council is considering eliminating one of the most fair and widely accepted methods of utility cost allocation. RUBS does not gouge tenants — it allocates shared utility costs proportionally. It is transparent, established, and widely used across California and the country. Banning it does not make utilities cheaper. It simply shifts the full burden onto the housing provider, who is already absorbing costs from every other direction. More importantly, RUBS is a conservation tool. When residents pay for a share of what they use, they use less. That is not a theory — it is basic economic behavior. At a time when California faces ongoing water scarcity, rising energy demand, and a utility cost crisis, this Council would be eliminating one of the few market-based mechanisms that actually incentivizes conservation at the unit level. That is the wrong direction. Good policy should reduce barriers to housing provision, not add new ones. Every additional operational restriction makes it harder to maintain quality housing, harder to keep units on the market, and harder to justify the investment that this city desperately needs to address its housing shortage. I urge the Council to oppose this proposal and preserve RUBS as a legal and available option for housing providers in Los Angeles. Respectfully submitted, Mike Goldberg

Communication from Public

Name:

Date Submitted: 05/18/2026 02:04 PM

Council File No: 22-0178

Comments for Public Posting: Landlords are having such a hard time - smaller guys are getting crushed. Every year it just becomes less likely anyone can stay in business which leads to hard decisions good people don't like to make. You want to be kind and giving to your tenants, as they are your customers after all and people, but when you operate losing money constantly, it's impossible to do anything right. It impacts everyone negatively.

Communication from Public

Name:

Date Submitted: 05/18/2026 02:09 PM

Council File No: 22-0178

Comments for Public Posting: Honorable Members of the Los Angeles City Council, I am writing in opposition to the proposed restrictions and potential ban on Ratio Utility Billing Systems (RUBS) for new tenancies in the City of Los Angeles. At a time when Los Angeles is facing an unprecedented housing affordability crisis, the City continues to advance layer upon layer of regulation that increases operating costs, discourages investment, and ultimately reduces the supply of attainable housing. The cumulative effect of these policies is becoming unsustainable for rental housing providers — particularly small and midsized owners who make up a substantial portion of the city's housing stock. According to industry tracking and legislative summaries, California legislators introduce thousands of bills each legislative cycle, with housing providers facing an ever-growing wave of new regulations affecting rent control, disclosures, habitability standards, utility billing, eviction procedures, fees, compliance obligations, and operational liabilities. The proposed RUBS ban is yet another example of policymakers treating housing providers as political punching bags and low-hanging fruit for political gain, rather than as essential partners in solving the housing crisis. RUBS is not a hidden or predatory practice when properly disclosed. It is a widely used cost-allocation system that allows residents to share utility expenses in master-metered properties. Eliminating RUBS does not eliminate utility costs — it merely transfers rising water, sewer, trash, and energy expenses entirely onto property owners, many of whom are already operating under strict rent caps and increasing financial pressure. () The City must acknowledge the economic reality facing housing providers today:

- Insurance costs continue to rise dramatically
- Utility costs have surged
- Property taxes and labor expenses continue increasing
- Rent increases remain heavily restricted
- Compliance requirements expand every year
- Financing and construction costs remain elevated

At some point, excessive regulation stops protecting housing and starts destroying it. Los Angeles cannot regulate its way into affordability while simultaneously making housing ownership and operation financially unworkable. Every additional mandate further discourages reinvestment in aging buildings, reduces incentives to build new housing, and pushes responsible operators out of the market entirely. Ironically, policies intended

to create affordability often achieve the opposite result by constraining supply, increasing operating costs, and discouraging future housing development. If the City's true goal is long-term housing affordability, then it must begin treating housing providers as stakeholders to work with — not adversaries to punish. I respectfully urge the City Council to reject any outright ban on RUBS and instead focus on reasonable transparency standards that protect tenants without imposing yet another costly and unnecessary burden on housing providers. Los Angeles does not have a shortage of regulation. It has a shortage of housing.

Communication from Public

Name: Corinne Drasin
Date Submitted: 05/18/2026 02:10 PM
Council File No: 22-0178
Comments for Public Posting: Please stop harming small landlords!!! RUBS is the only way we have of recouping these out of control utilities. We do not even raise our rent according to LAHD limits, just so we deal with these utility rates

Communication from Public

Name: Sue Gomez

Date Submitted: 05/18/2026 02:12 PM

Council File No: 22-0178

Comments for Public Posting: We urge you to keep RUBS for the following reasons: 1. RUBS promotes conservation and responsible utility usage. This is critical for a large city like LA to incentivize to save our precious environment!!! 2. Utility costs continue to rise dramatically for housing providers. I—and a number of my friends—are single retired women for whom our small residential unit properties provide the bulk of our retirement income. I also have two children and a 95 year mother I must help provide for. 3. Eliminating RUBS removes a fair and widely used cost-allocation tool. I CANNOT absorb any more of these costs! I limit my utility usage in my home wherever possible. My fellow citizens ought be incentivized to do the same. 4. Policies should encourage conservation, not discourage it. As an environmentalist, I cannot conceive of how LA policies can in good conscience do otherwise. Do we not have a responsibility to do this?? 5. Additional operational restrictions make housing more difficult and expensive to provide. Many of these proposed policies ignore the remaining small house providers like me and my friends. We are being driven out of our small, long term, family businesses by these sorts of policies. This is just another. Soon the only entities which will be able to offer housing are large corporations. Is this really what you want??? We offer good housing with responsive care. My tenants love me and my place. Please dont force me to sell...

Communication from Public

Name: Michael W Chin
Date Submitted: 05/18/2026 02:15 PM
Council File No: 22-0178
Comments for Public Posting: Oppose the Proposed Ban on RUBS in Los Angeles, Council File:
22-0178.

Communication from Public

Name: Michael W Chin
Date Submitted: 05/18/2026 02:17 PM
Council File No: 22-0178
Comments for Public Posting: Oppose the Proposed Ban on RUBS in Los Angeles, Council File:
22-0178

Communication from Public

Name: Brenda Rossberg

Date Submitted: 05/18/2026 02:18 PM

Council File No: 22-0178

Comments for Public Posting: Your actions to prevent RUBBS are crippling apartment owners, especially after rent control recently decoupled percentage increase when the landlord pays the utilities. Tenants run their air conditioners non stop & have no concern for the energy or expenses involved with their actions. RUBS promotes conservation and responsible utility usage. Utility costs continue to rise dramatically for housing providers. Eliminating RUBS removes a fair and widely used cost-allocation tool. Policies should encourage conservation, not discourage it. Additional operational restrictions make housing more difficult and expensive to provide. Your actions to make rental properties more affordable only hurt the tenants in the long run because, renters need to learn to be responsible for conservation too.

Communication from Public

Name: David Rosenfeld
Date Submitted: 05/18/2026 02:18 PM
Council File No: 22-0178
Comments for Public Posting: I oppose any proposal that would ban RUBS for new tenancies.
Council File Number: 22-0178 I encourage the City Council to oppose any proposal that would ban RUBS for new tenancies

Communication from Public

Name: Michael W Chin
Date Submitted: 05/18/2026 02:19 PM
Council File No: 22-0178
Comments for Public Posting: Oppose the Proposed Ban on RUBS in Los Angeles, Council File Number: 22-0178.

Communication from Public

Name:

Date Submitted: 05/18/2026 02:20 PM

Council File No: 22-0178

Comments for Public Posting: VOTE NO on any attempt to limit the bill back of utilities to residential tenants. Ratio Utility Billing (RUBS) helps motivate conservation of WATER usage by residents. Without the opportunity to hold residents accountable and financially responsible for their water use, landlords are forced to absorb the RISING costs of waste. 1. RUBS promotes conservation and responsible utility usage 2. Utility costs continue to rise dramatically for housing providers 3. Eliminating RUBS removes a fair and widely used cost-allocation tool 4. Policies should encourage conservation, not discourage it Additional operational restrictions make housing more difficult and expensive to provide driving small landlords to financial ruin. Operational costs are rising FASTER THAN INFLATION, yet archaic rent control rules put a hard ceiling on rent increases.

Communication from Public

Name: Verdel Flores

Date Submitted: 05/18/2026 02:22 PM

Council File No: 22-0178

Comments for Public Posting: Having tenants make RUBS payments insure that precious water and electricity are not wasted with hour long showers, hand-washing vehicles, running TVs, radios and house lights on 24/7. The small contribution from tenants is a large contribution to the landlords who are responsible for the entire bill, not just a percentage. Keep tenants responsible. Allow landlords to recoup a small savings on utilities.

Communication from Public

Name: Nadia Fahimian
Date Submitted: 05/18/2026 02:22 PM
Council File No: 22-0178
Comments for Public Posting: Housing providers already face rapidly increasing expenses, of insurance, maintenance, utilities, labor, and property taxes. Banning RUBS would make it even more difficult to manage operating costs while maintaining quality housing. here is already a mass exodus of proerty owners in califronia from the housing market because of all these UNFAIR addedd burden. ENOUGH !

Communication from Public

Name: Joshua Blacker

Date Submitted: 05/18/2026 02:26 PM

Council File No: 22-0178

Comments for Public Posting: Less than 10 years ago property owners were asked by the City of LA to promote water conservation and install RUBS systems and now the City wasn't to ban what it previously asked us to implement? Banning RUBS is truly insane. It is this kind of decision making that got Trump elected. Don't do this.

Communication from Public

Name: Jamie Pelleg

Date Submitted: 05/18/2026 02:26 PM

Council File No: 22-0178

Comments for Public Posting: The City is robbing property owners from being compensated for the utility fees which they pay. LADWP continues to raise their utility fees and we cannot even raise rents. You are going to hit property owners with severe decline in income if you ban collection of RUBS. Anything else you want us to pay for? Enough hitting us with taxes, restrictions and fees !!

Communication from Public

Name: Mona Asher
Date Submitted: 05/18/2026 02:26 PM
Council File No: 22-0178
Comments for Public Posting: I am strongly opposed 22-0178 RUBS PLEASE DISCONTINUE THIS MEASURE

Communication from Public

Name: Allan Wen

Date Submitted: 05/18/2026 02:29 PM

Council File No: 22-0178

Comments for Public Posting: To the Honorable Members of the Los Angeles City Council: I am writing to urge you to OPPOSE any proposal that would ban Ratio Utility Billing Systems (RUBS) for new tenancies, as currently being considered under Council File 22-0178. Let me be direct: RUBS works. It is a straightforward, widely accepted method that allocates shared utility costs among residents based on reasonable factors like unit size or occupancy. When tenants have a line-of-sight connection between their behavior and their utility costs, they use less water, less gas, less electricity. That is not a theory — that is how people respond to accountability. Banning RUBS does not make utilities more affordable for tenants; it just removes any incentive to conserve. For housing providers — particularly small, independent landlords — utility costs have not been standing still. Water rates, gas, and electricity have all climbed sharply over the past several years with no sign of reversing. RUBS is not a profit tool. It is a cost-recovery tool that allows providers to remain financially viable without abandoning the rental market altogether. When you strip away a landlord's ability to allocate legitimate operating costs fairly, you are not protecting tenants — you are pushing smaller operators out and making it harder to keep existing units available. Los Angeles is facing a severe housing shortage. At every level of government, there is agreement that we need more housing, not less, and that we need to keep what we have in service. Piling on additional operational restrictions moves us in the wrong direction. Policies that make rental housing more complicated and more expensive to operate do not protect renters in the long run — they shrink the pool of available housing. If this Council is serious about sustainability and conservation — and I believe it should be — then RUBS is actually aligned with those goals. Removing it sends exactly the wrong signal. It tells property owners to absorb unlimited utility exposure and tells tenants that consumption has no consequences. Neither outcome serves this city. I respectfully ask the Council to reject this proposal and instead pursue policies that fairly balance the concerns of tenants and housing providers alike — policies that keep housing viable, promote responsible resource use, and don't punish the people trying to provide homes in this city. Thank you for your time and your service to Los Angeles. Respectfully submitted, Allan Wen Council File:

22-0178

Communication from Public

Name: Nabil

Date Submitted: 05/18/2026 02:29 PM

Council File No: 22-0178

Comments for Public Posting: I strongly oppose the removal of RUBS for existing or new tenancy. RUBS promotes conservation and responsible utility usage Utility costs continue to rise dramatically for housing providers Eliminating RUBS removes a fair and widely used cost-allocation tool Policies should encourage conservation, not discourage it Additional operational restrictions make housing more difficult and expensive to provide

Communication from Public

Name: Joshua Luchs

Date Submitted: 05/18/2026 02:34 PM

Council File No: 22-0178

Comments for Public Posting: How can you consider banning RUBs in the city of LA. Prepare yourselves for another class action lawsuit. The utility and trash (thanks to RECYCLA) have now made operating a rent control property unprofitable. If a new tenant is willing to pay their fair share of the utilities, why are you interfering? They can simply chose to rent in a different a building that does not have utility reimbursements. It is one thing to restrict the rent we can charge current tenants, but to prohibit a new tenant allocation of third party services is going way too far. I have tenants that take 45 min showers because they don't currently pay for the water. I have tenants that fill the trash bin with un-broken down boxes because they don't pay the penalty for over stuffed trash bins. With the implementation of a RUBs program I have seen a decrease in water usage. With no increases for for 4 years and a new reduced increase formula, housing providers are losing faith in the long-term viability of providing housing in this city. Why would anyone build more housing in this city if when they ultimately go to sell it, the value is greatly depressed because of this councils ill informed tinkering. Example- The unintended consequence of the "tenants right to council" has been an explosion of frivolous lawsuits and insurance rates. In fact, most carriers wont even offer "habitability coverage" anymore property owners susceptible to predatory lawyers extorting us with exorbitant settlement demands. I understand that the DSA members are working toward 100% socialized housing in LA, but the rest of the non-socialist members of the council should not be going along with this misguided ideology.

Communication from Public

Name:

Date Submitted: 05/18/2026 02:34 PM

Council File No: 22-0178

Comments for Public Posting: Please reconsider banning RUBS for new tenants. Please look at the overall effect of that action. Contrary to an unrealistic but popular notion that all landlords are greedy and negligent; the opposite is true. Most property owners want to preserve the overall desirability of their respective neighborhoods by having responsible tenants, and by being responsible landlords; having friendly relations with tenants and neighbors in order to form a comfortable environment for all concerned. Costs have skyrocketed in the last 5 years in Los Angeles; yet we try to maintain those costs while also keeping rents realistic for responsible tenants....a two-way street. Thank you for hearing this side. With few exceptions, it is the true side!

Communication from Public

Name:

Date Submitted: 05/18/2026 02:34 PM

Council File No: 22-0178

Comments for Public Posting: RUBS promotes conservation and responsible utility usage. My costs as a housing provider are dramatically increasing. I am a small landlady who needs rental income for my retirement. Eliminating RUBS removes a fair and widely used cost-allocation tool. This would make it more costly for me to provide the housing I do. I am a responsible landlady who wants to be treated fairly. Please do not get rid of RUBS.

Communication from Public

Name: Ben Maughan

Date Submitted: 05/18/2026 02:36 PM

Council File No: 22-0178

Comments for Public Posting: Please stop making the city laws difficult for small investors.

Communication from Public

Name:

Date Submitted: 05/18/2026 02:38 PM

Council File No: 22-0178

Comments for Public Posting: I would like to respectfully ask the Board to reconsider and potentially prohibit the use of RUBS billing. In my opinion, RUBS is not always 100% accurate and can unfairly charge residents regardless of their actual utility usage. For example, a resident may be away on vacation for an extended period of time and still receive charges similar to someone actively occupying and using the unit. With the already high cost of rent and living expenses, RUBS often feels like another way to nickel-and-dime tenants instead of charging based on true individual consumption. If landlords do not wish to cover utility costs themselves, they should invest in installing individual submeters for each unit. While submetering may involve upfront costs, it is the only truly fair and transparent way to bill residents based on actual usage. Under RUBS, tenants are charged using formulas and estimates that may not reflect real consumption. A resident who conserves utilities or spends significant time away from home can still end up paying nearly the same as someone with much higher usage. Individual metering would create greater transparency, accountability, and fairness for both landlords and tenants. Thank you for your time and consideration.

Communication from Public

Name: Mike Anderson
Date Submitted: 05/18/2026 02:57 PM
Council File No: 22-0178
Comments for Public Posting: Please do not BAN Rubs. It will create more problems for Housing providers

Communication from Public

Name:

Date Submitted: 05/18/2026 02:59 PM

Council File No: 22-0178

Comments for Public Posting: DO NOT APPROVE RUBS. Landlords already have extremely high expenses, this will create another burden to be carried by them

Communication from Public

Name: Edgar Akopyan
Date Submitted: 05/18/2026 03:07 PM
Council File No: 22-0178
Comments for Public Posting: From what I've seen as a landlord, tenants often use more utilities when they are not responsible for the bills. For example, they might let leaks go unfixed or take longer showers or wash cars, since they are not paying for the water. As a homeowner, I am responsible for all utility costs. In my view, there should not be a difference between owning and renting when it comes to paying for utilities. If everyone pays their share, people are more likely to use water, electricity, and gas responsibly. I believe RBUS can help save water, electricity, and gas, which is better for the environment. We all need to be aware of our impact, and when people do not pay for utilities, they may use them less carefully.

Communication from Public

Name: Edgar Akopyan
Date Submitted: 05/18/2026 03:07 PM
Council File No: 22-0178
Comments for Public Posting: From what I've seen as a landlord, tenants often use more utilities when they are not responsible for the bills. For example, they might let leaks go unfixed or take longer showers or wash cars, since they are not paying for the water. As a homeowner, I am responsible for all utility costs. In my view, there should not be a difference between owning and renting when it comes to paying for utilities. If everyone pays their share, people are more likely to use water, electricity, and gas responsibly. I believe RBUS can help save water, electricity, and gas, which is better for the environment. We all need to be aware of our impact, and when people do not pay for utilities, they may use them less carefully.

Communication from Public

Name:

Date Submitted: 05/18/2026 03:09 PM

Council File No: 22-0178

Comments for Public Posting: As a mom and pop housing provider, it has become and is increasingly disadvantageous to remain as a housing provider and we will into selling our one property. Other like minded mom and pops are echoing these same words. The city can become the new owner/managers of housing for residents to request repairs from and to deal with all manner and aspect of providing housing to the many residents that are abusive, or ignorant, entitled PITA . As far as I remember the city was never even a decent property manager of city owned housing for low income, projects = slumlord. And here now you want to take away a right to charge for water utilities when we have tenants that abusively fill water bottles for sale at swap meets, fill their portable swimming pools, take long hot showers and do not even think to air out a bathroom to dry out, then later complain about mold growing in the humidity. Should we provide toilet paper and other toiletry items and laundry detergent next??

Communication from Public

Name: Crystal Carter

Date Submitted: 05/18/2026 03:10 PM

Council File No: 22-0178

Comments for Public Posting: I urge LA Cit Council to OPPOSE any proposal that would ban RUBS for new tenancies RUBS promotes conservation and responsible utility usage, utility costs continue to rise dramatically for housing providers, eliminating RUBS removes a fair and widely used cost-allocation tool, policies should encourage conservation, not discourage it and additional operational restrictions make housing more difficult and expensive to provide.

Communication from Public

Name: Bahman Mehdizadeh

Date Submitted: 05/18/2026 03:10 PM

Council File No: 22-0178

Comments for Public Posting: the constant meddling in our work must stop. costs are getting out of hand. you tie our hand in rent increases while insurance and utility costs are out of control. now you're blocking our ability to recoup costs? truth of the matter is most tenants will let the water run when they don't pay for it. it's common sense. please stop. we are not the caretakers of society.

Communication from Public

Name:

Date Submitted: 05/18/2026 03:15 PM

Council File No: 22-0178

Comments for Public Posting: Paul Rajewski 2450 Mission St San Marino, CA 91108
Paul@pininv.com May 18, 2026 Los Angeles City Council Los Angeles Housing Department (LAHD) City Hall 200 N. Spring Street Los Angeles, CA 90012 **Re: Opposition to LAHD Staff Report Recommendations Prohibiting Ratio Utility Billing Systems (RUBS) in RSO Properties** Dear Members of the Los Angeles City Council and LAHD Staff, I am writing as a property owner and manager in Los Angeles to strongly oppose the Los Angeles Housing Department's recommendations to prohibit Ratio Utility Billing Systems (RUBS) and other unmetered utility allocation methods in properties subject to the Rent Stabilization Ordinance (RSO). Treating master-metered utilities as part of "rent" with only a limited one-time adjustment would impose severe and unsustainable financial burdens on property owners while undermining long-standing efforts to promote conservation and fairness. Los Angeles has already imposed extensive restrictions on rental property owners through rent control under the RSO. Allowable rent increases are strictly capped, often falling well below rising operating costs, including skyrocketing utility rates from LADWP and other providers. Property owners face additional burdens such as annual registration fees and other regulatory costs. Eviction protections further complicate operations: tenants cannot be evicted for nonpayment until they are significantly delinquent—often two months behind market-rate equivalents, which in rent-controlled units effectively means absorbing three months or more of losses before action is possible. These layered restrictions already strain the viability of providing quality housing. Eliminating RUBS would exacerbate these challenges dramatically. In older buildings without individual submeters (which are prohibitively expensive to retrofit in many properties), RUBS provides a fair, proportionate way to allocate shared utility costs based on factors like unit size, occupancy, or a combination thereof. It allows owners to recover legitimate expenses without absorbing 100% of volatile utility increases—costs that rent caps do not fully accommodate. Key reasons for opposition include: - **Financial Unsustainability**: Utilities are rising faster than permitted rent increases. Forcing owners to include these in base rent without adequate ongoing recovery mechanisms would result in net losses, reduced

maintenance, deferred upgrades, or properties becoming economically unviable. The proposed one-time rent adjustment (capped at Housing Authority utility allowance rates) is insufficient to cover actual costs over time. - ****Disincentive for Conservation****: RUBS encourages tenants to conserve water, electricity, and other resources by tying costs to usage patterns. Removing it shifts all responsibility to landlords, removing price signals for tenants and potentially increasing overall consumption—counter to the City's water conservation and environmental goals. - ****Impact on Housing Supply and Quality****: In a city with a severe housing shortage, additional cost burdens on owners discourage investment in rental properties, new construction, and upkeep of existing stock. This ultimately harms tenants through poorer conditions or fewer available units. - ****Lack of Alternatives for Many Properties****: Submetering is not feasible or cost-effective for numerous older multifamily buildings. Banning RUBS without realistic transition support ignores this reality and places undue pressure on owners. - ****Existing Tenant Protections****: RUBS is already regulated in California (e.g., no over-recovery allowed, and payments count toward rent limits in RSO units). Enhanced transparency requirements—such as clear formulas and dispute processes—would address concerns without a full ban. I urge the City Council to reject the staff recommendations for an outright prohibition in RSO properties. Instead, focus on the original intent of greater transparency and disclosure while preserving RUBS as a vital tool for fair cost allocation and conservation. Over-regulating an already heavily burdened sector risks further exacerbating Los Angeles' housing crisis. Thank you for considering my input. I am available to discuss this matter or provide additional data on how RUBS operates effectively in practice. Sincerely, Paul Rajewski Owner 1341 West Carson St, Torrance, CA

Communication from Public

Name: ed santiago
Date Submitted: 05/18/2026 03:18 PM
Council File No: 22-0178
Comments for Public Posting: What is the intent behind this, to make property owners HOMELESS too , bad politics keep at it see where it takes us

Communication from Public

Name: Susan Quam

Date Submitted: 05/18/2026 03:21 PM

Council File No: 22-0178

Comments for Public Posting: Hello, Please do not ban RUBS for new tenancies. The City of Los Angeles has already made it so difficult to operate rental properties. This will only choke out an already flailing business enterprise. Landlords need to be able to keep up with the costs of providing housing. RUBS also keeps tenants accountable for the amount of resources consumed, encouraging conservation. No other industry has these types of restrictions place on them. People need food, gas for their cars, etc. but these industries are allowed to charge whatever the market will bear. They City is forcing property owners into being a safety net for renters. That is not our role, any more than it is the role of a grocery store to provide food without compensation.

Communication from Public

Name: Manuel

Date Submitted: 05/18/2026 03:25 PM

Council File No: 22-0178

Comments for Public Posting: Tenants don't care about wasting water. One of my tenants would just run the water and flush the toilet all night just to annoy the tenant downstairs. When I received the bill from DWP it was for over \$7000. That is more than I collect in rents on the property. she did it again for over \$5000. last year. What else can I do? She pays less than \$1800. per month for a two-bedroom apartment.

Communication from Public

Name:

Date Submitted: 05/18/2026 03:26 PM

Council File No: 22-0178

Comments for Public Posting: RUBS remains an important conservation and cost-recovery tool for older, master-metered buildings where individual unit metering is not feasible. Any policy change should be based on data, stakeholder input, and a full analysis of impacts on conservation, affordability, and housing operations.

Communication from Public

Name:

Date Submitted: 05/18/2026 03:40 PM

Council File No: 22-0178

Comments for Public Posting: As a small business-family and minority owned-apartment complex owner, we urge you to OPPOSE any proposal that would ban RUBS for new tenancies. Council File Number: 22-0178: RUBS promotes conservation and responsible utility usage. Utility costs continue to rise dramatically for housing providers, like us. Eliminating RUBS removes a fair and widely used cost-allocation tool. Policies should encourage conservation, not discourage it. Additional operational restrictions make housing more difficult and expensive for us to provide.

Communication from Public

Name: G Ceballos

Date Submitted: 05/18/2026 03:41 PM

Council File No: 22-0178

Comments for Public Posting: Stop LA landlords from collecting rent and RUBS, the city can hire a landlord to manage a building that the city owns, I already manage property that I own!

Communication from Public

Name: Fred Sutton

Date Submitted: 05/18/2026 03:41 PM

Council File No: 22-0178

Comments for Public Posting: Attached, letter from the California Apartment Association.



California Apartment Association
Los Angeles County

May 19th, 2026

Chair Nithya Raman
Los Angeles Housing and Homelessness Committee
City of Los Angeles
VIA Email

Re: Item 5- Ratio Utility Billing Systems (C.F. [22-0178](#))

On behalf of the California Apartment Association, we write to express our support for stronger transparency standards that ensure residents clearly understand how utility charges are calculated.

Transparency is not the same as prohibition. The originating motion focused on transparency, not a ban on Ratio Utility Billing Systems (RUBS). For that reason, CAA opposes the Los Angeles Housing Department's recommendation to eliminate RUBS in Los Angeles.

It is unclear how such a significant policy recommendation moved forward without specific direction from the Council, stakeholder input, or supporting analysis.

No Direction for Prohibition

Neither the [originating motion](#) nor [subsequent direction](#) from the Housing and Homelessness Committee directed LAHD to evaluate or recommend a prohibition on RUBS. The policy discussion was focused on greater transparency standards. It is unclear what authority LAHD relied upon to advance a recommendation that goes well beyond the scope of council direction.

No Stakeholder Process

LAHD held one stakeholder meeting in November 2023. That discussion focused on transparency practices, billing clarity, and enforcement. Eliminating RUBS, and the potential impacts on residents, housing providers, conservation, and operating costs, was not presented for review or feedback. Following this letter is CAA's 2023 correspondence with LAHD regarding that stakeholder meeting.

No Environmental or Economic Analysis

The recommendation also lacks environmental and economic analysis. RUBS helps connect utility use with cost responsibility, encouraging residents to conserve water and energy, report leaks, and avoid waste. A recent analysis of San José's RUBS ban found that water usage increased among affected apartment buildings after the policy took effect. San José is now considering whether to reverse course and lift the ban. We have included these documents.

No comparable analysis was conducted before LAHD recommended eliminating RUBS. Nor was an analysis on how this would impact rent and operating costs. There was also no review of how this recommendation may conflict with other local policies, including indoor temperature requirements, the City's existing [Energy and Water Benchmarking program](#), or a possible Building



California Apartment Association
Los Angeles County

Performance Standard. The city will potentially require reductions in energy and water usage while also eliminating the very tools that encourage conservation.

Compounding Regulations on Housing Providers

Los Angeles should not move forward with another costly regulation on rental housing providers without first completing a full analysis of impacts on conservation, affordability, utility costs, and housing operations. The city recently severely curtailed allowable rent increases despite recommendations, data, and studies showing the need for a different approach.

The City cannot continue to impose unworkable policies on the rental housing stock without appropriate fact gathering and analysis. It is LA local government action that is making housing more expensive and harder to find.

CAA respectfully urges the Committee to reject the RUBS prohibition recommendation and focus on the council direction to pursue reasonable transparency standards that protect residents while preserving conservation and cost-recovery tools.

Sincerely,

A handwritten signature in black ink that reads "Fred Sutton".

Fred Sutton
California Apartment Association



San Jose Ordinance Prohibiting RUBS: Impact on Water Consumption

In late 2017, the City of San Jose (City) adopted Ordinance #29775, which banned the use of Ratio Billing Systems (RUBS) for allocating utility billing among apartments not having individual meters starting in February 2018. In response to this change, the California Apartment Association commissioned our firm to examine how water usage in the City was affected by the ban. Based on the data and methods discussed below, we find that (1) median water usage in our sample of approximately 4,000 apartments using RUBS increased 11 to 12 percent following the law change, and (2) the law change likely played a major role in this consumption increase.

Background

A Ratio Utility Billing System (RUBS) is a method used by property owners to allocate utility costs – such as water, sewer, and gas or electricity – among tenants. Instead of measuring each unit’s actual consumption with a submeter, landlords apply formulas based on variables like square footage, number of occupants, or number of bathrooms. RUBS is typically implemented in older buildings where installing individual utility meters is impractical or cost prohibitive.

The financial incentives to conserve are perhaps less strong in a building using RUBS than in a building where renters are charged based on actual usage (as measured by direct metering). However, the financial and conservation incentives are much stronger than the almost non-existent feedback that renters receive when projected utility expenses are folded into monthly rents and fixed for the full term of the lease. In fact, a fixed payment creates a “use-it-or-lose-it” incentive, since tenants receive no rent reduction from water conservation and no rent increase from profligate water usage. Any savings from conservation would either go to the landlord or a future renter (in the form of lower rent).

RUBS also aligns with California’s sustainability initiatives – such as the State Water Resources Control Board’s conservation mandates – by encouraging responsible water use in multi-family dwellings.

Past Research on RUBS and Water Conservation

Several studies have examined the impact of RUBS on water consumption in multi-family buildings. For example, a 1999 study prepared for the National Apartment Association and the National Multi Housing Council found that sub-metered properties used 18 to 39 percent less water, and RUBS properties used 6 to 27 percent less water, than did in-rent properties.¹ The authors also found that

¹ “Submetering, RUBS, and Water Conservation.” Doug Koplrow and Alexi Lownie. Industrial Economics, Incorporated. June 1999. [https://utilitymca.org/pdf/NAA & NMHC-Water-study-on-RUBS-and-SubMetering.pdf](https://utilitymca.org/pdf/NAA%20&%20NMHC-Water-study-on-RUBS-and-SubMetering.pdf)

billing type had a greater influence on consumption patterns than either the cost of water/sewer or the age of the building. Other studies, including ones from the U.S. Environmental Protection Agency, have suggested that RUBS are nearly as effective as submetering in promoting conservation, especially when supported by educational outreach and transparent billing practices.²

The San Jose Ordinance Prohibiting RUBS

In late 2017, the City of San Jose adopted Ordinance #29775, which prohibited the use of RUBS in residential rental properties. The ordinance took effect in February 2018. At the time of implementation, the ordinance included a grace period for existing fixed-term leases, whereby landlords were permitted to continue RUBS billing until the expiration of any fixed lease that was in effect as of the ordinance's effective date.

Under this ordinance, apartment landlords are required to include the projected cost of water and other utilities in the rent, rather than billing tenants separately using RUBS formulas. The measure was intended to protect tenants from unpredictable utility charges. The actual impact was to eliminate all financial incentives to conserve, and to shift the burden of unexpected increases in utility costs from tenants to landlords and to future renters.

Our Data and Analysis

To assess whether the City of San Jose's ordinance prohibiting the use of RUBS has had a measurable effect on water consumption in multi-family apartments, we undertook a multi-step data analysis. Specifically, we obtained anonymized water billing and usage data from a major billing service for billings from 2016 through 2024. We eliminated buildings that exhibited intermittent reporting during the revised 2016-2024 period. After these exclusions, we analyzed usage data for approximately 4,000 apartment units in San Jose that reported consistently throughout the sample period.

Our Results

Our analysis indicates that the phase-out of RUBS coincided with a 11-12 percent increase in median water usage for the buildings in our sample.³ Based on a comparison to broader residential per-capita water consumption trends for the Bay Area, we conclude that the ordinance likely played a major role in this increase.

Discussion

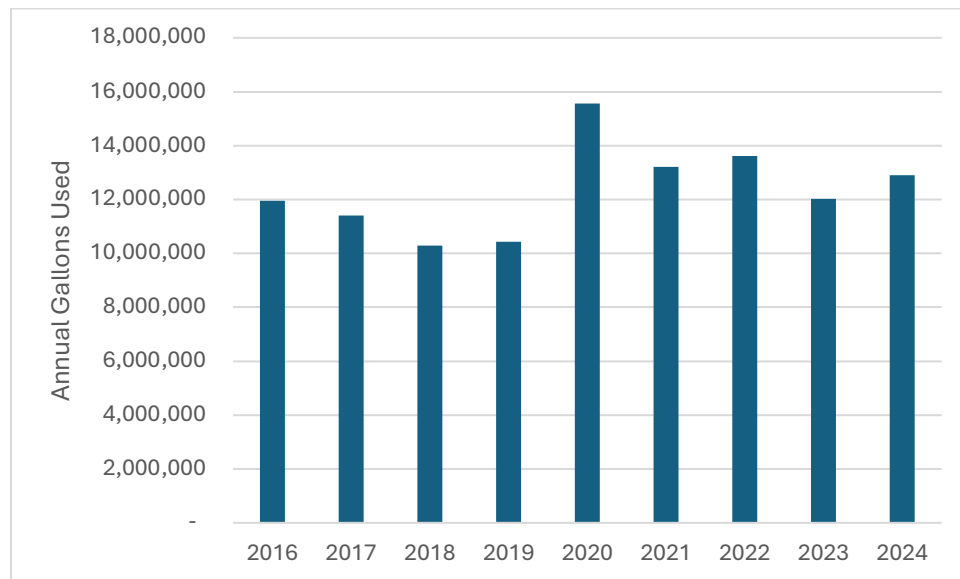
Figure 1 shows median annual water usage in our sample from 2016 through 2024. It shows that median usage declined modestly between from 2016 through 2019 but then jumped in 2020. The

² U.S. Environmental Protection Agency, "Water Conservation Measures for Multi-Family Residential Properties," 2012. [https://utilitymca.org/pdf/NAA & NMHC-Water-study-on-RUBS-and-SubMetering.pdf](https://utilitymca.org/pdf/NAA%20&%20NMHC-Water-study-on-RUBS-and-SubMetering.pdf)

³ The median is the level at which 50 percent of observations are above and 50 percent are below. Our use of median rather than average values for most of this analysis is consistent with other studies that have evaluated water usage. Medians are less affected by "outliers" such as a surge in water consumption created by a leak or other factors not related to our analysis. They are also more representative of typical usage trends, as they are less dominated by results of a relatively few large buildings in a sample. The one area where we used averages was when we compared the results for our sample apartments to per-capita water usage in the broader Bay Area. This is because per-capita usage is based on average rather than median consumption rates.

Covid-19 pandemic likely contributed to the large increase in 2020, and indeed, usage partially declined in 2021. However, water consumption has remained consistently above the pre-ordinance years, and, in fact, increased in 2024.

Figure 1
Median Water Usage by Year
2016 to 2024



There are two main challenges in measuring the impacts of the ordinance on water usage: (1) the Covid-19 pandemic, which led to people spending more time at home and likely increased water usage in 2020 and possibly in subsequent years; and (2) uncertainty regarding the precise timing of the shift from RUBS billing to rent-inclusive billing for the buildings in the sample. (This is mainly due to the grace period in the ordinance that allowed RUBS to be used until the expiration of leases that were in effect prior to the ordinance’s effective date.) To account for these factors, we measured changes in median water consumption in two ways, as shown in Figure 2 (next page):

- First, we compared median consumption between the pre-ordinance period (2016-2017) and the post-ordinance period (2019-2024), excluding only 2018. This resulted in an increase of 11.0 percent.
- Second, we excluded the 2018 and 2019 transition years, as well as the 2020 pandemic year, and compared median consumption between the pre-ordinance period (2016-2017) and the post pandemic period (2021-2024).⁴ This resulted in an 11.8 percent increase.

⁴ In this alternative, we exclude 2019 as well as 2018 because fixed leases likely delayed the phase-out of RUBS for many renters into 2019, and, more generally, it would likely take a while for renters to adjust their behavior in response to a change in billing practices.

Figure 2
Increases in Median Water Consumption
In Sample RUBS Apartment Complexes

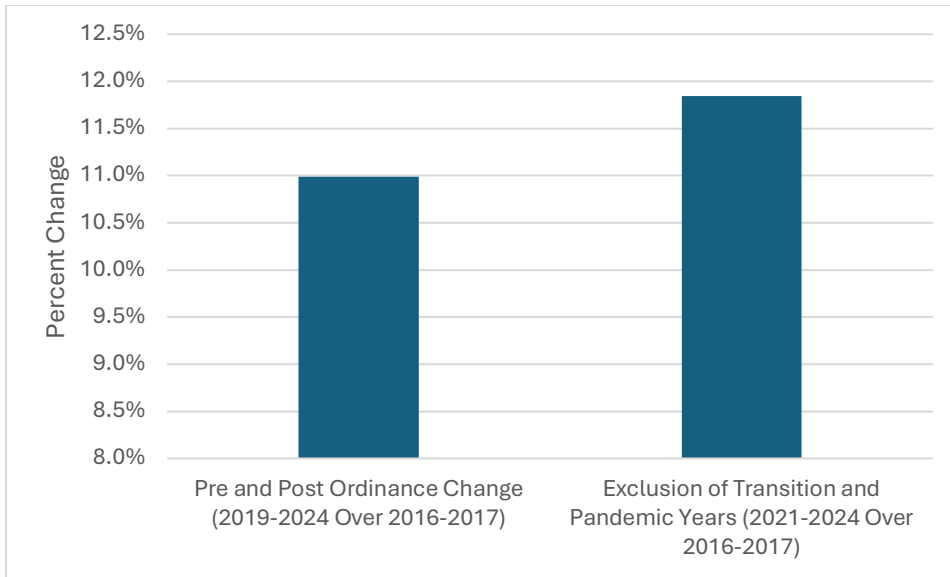
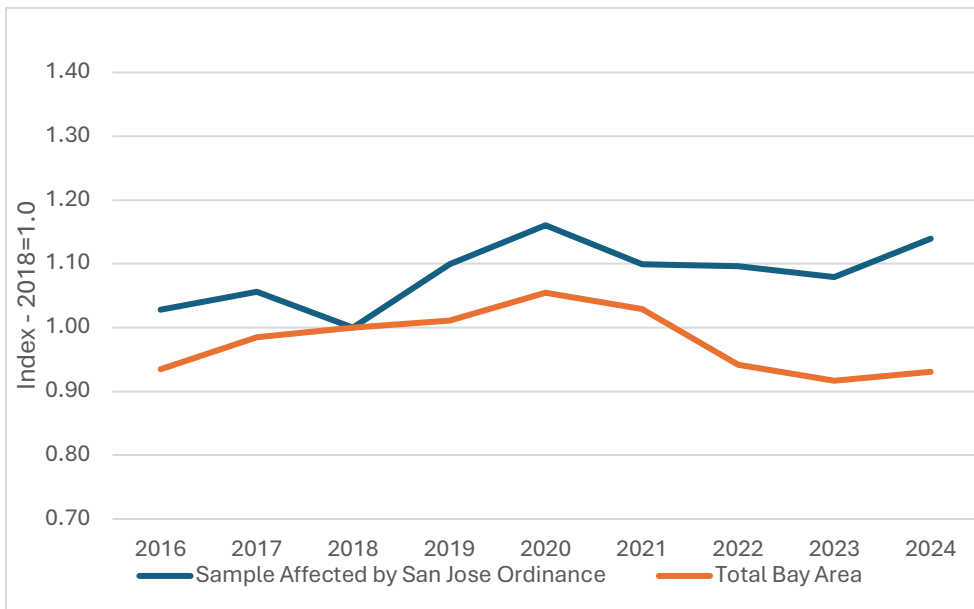


Figure 3
Comparison of Water Usage
Buildings in the RUBS Sample Broader Bay Area
(Each Indexed to 2018=1.0)



Comparison to broader Bay Area consumption trends. Figure 3 illustrates how average water consumption in the buildings impacted by the San Jose ordinance compares to residential per-

capita water use across the Bay Area.⁵ Although these comparisons aren't perfectly aligned – the Bay Area per-capita numbers include both single-family homes and apartments and the per building figures in our sample can be affected by, for example, changes in household size – they still offer a general indication of how the sample compares to broader regional water usage patterns.

Compared to the broader Bay Area region, water use by buildings in the sample rose more sharply in 2020 and stayed elevated in the post-pandemic period. The persistence of elevated water consumption – and the widening gap in consumption rates relative to the overall Bay Area – are indicators that the 2018 ordinance changes are a major contributing factor to increased median water consumption within our sample.

Conclusion

Our analysis of apartment building data indicates that the San Jose ordinance banning RUBS has had a significant impact on water consumption, with the data suggesting an 11-12 percent increase in water use among affected buildings. While the sharp increase in 2020 may be partly attributed to the Covid-19 pandemic, the persistence of higher water usage through 2024 indicates that the ordinance is likely to continue interfering with state and regional efforts to reduce water consumption. This increase in usage continues to undermine the State's reduction targets established during the most recent drought.

⁵ Bay Area Water Supply and Conservation Agency. 2023-24 Annual Report.
[https://bawasca.org/uploads/userfiles/files/BAWSCA Annual%20Survey 2023-24 FINAL.pdf](https://bawasca.org/uploads/userfiles/files/BAWSCA%20Annual%20Survey%202023-24%20FINAL.pdf)



Memorandum

TO: CITY COUNCIL
FROM: Mayor Matt Mahan
SUBJECT: MARCH BUDGET
MESSAGE FOR FISCAL
YEAR 2025-2026
DATE: March 12, 2025

APPROVED:

RECOMMENDATION

Direct the City Manager to submit a balanced budget for Fiscal Year 2025-2026, guided by the policy direction and framework of priorities outlined in this March Budget Message.

* * *

In accordance with Section 1204 of the San José City Charter, I present my Fiscal Year 2025-2026 March Budget Message for consideration by the City Council and the residents of San José. With Council approval, this initial framework provides the City Manager with direction to prepare proposals for the Council's budget deliberations in May and to formulate the Fiscal Year 2025-2026 Proposed Budget.

OVERVIEW

I. Following Through on Focus

Since taking office in 2023, I have advocated for increased focus to help us better prioritize our goals and align resources, effectively track progress, and ultimately deliver better outcomes for our community on the most dire challenges we face as a city. The previous City Council adopted four key Focus Areas – Reducing Unsheltered Homelessness, Increasing Community Safety, Cleaning Up Our Neighborhoods, and Attracting Investment in Jobs and Housing. These Focus Areas put us on a path toward greater accountability and results. We will increase residents' trust in local government by working together to produce tangible improvements that our residents can see and feel in their daily lives.

We can achieve this mission if we remain focused, embrace pragmatic solutions, and make operations more efficient. Since the beginning of the current fiscal year, we've opened 417 placements for homeless neighbors by adding emergency interim housing (EIH) beds, converted motel rooms, and safe parking spaces with 1,044 net new placements expected to open by the end of 2025. In parallel, we've opened 298 new affordable housing units and we're issuing a Notice of Funding Availability (NOFA) allocating at least \$50 million for new construction of affordable homes. To speed up police hiring, we've invested in streamlining background checks. We've completed deployment of a network of 474 automatic license plate readers (ALPRs) and secured funding for an automated speed enforcement pilot to supplement our officers. To achieve

agreed upon set of policies should be finalized next year. This review shall be undertaken with approaches to community outreach and engagement that streamline the process.

If we're serious about speeding up housing construction, we also need to be more flexible with existing rules and processes that contribute to longer development timelines. For example, housing developers currently are not permitted to continue construction through the weekend, dragging out construction timelines. The City Manager is directed to bring back an update to the Municipal Code to allow limited weekend construction hours by default in areas zoned for commercial, industrial, and high-density housing, with a mechanism for Council to reduce or modify the allowed hours to address site-specific concerns.

San José's entitlement timelines can also cause unnecessary development delays as projects are entitled for only two years with the option for two one-year extensions. Requests for extension have to come back for a public hearing, consuming staff time and creating uncertainty for investors. Allowing entitlements to span four years will create greater certainty within an investment cycle and reduce staff time preparing paperwork for extensions that are virtually always approved. Therefore, the City Manager is directed to return to the City Council with recommendations to reform entitlements to allow for a longer entitlement period.

New technology can play a role in improving planning processes and customer service. Just as we've successfully utilized AI-powered translation services to make public meetings more accessible, we can embrace technology to deliver better customer service in PBCE. For example, AI can help create checklists for development applicants, calculate fees, help an applicant navigate our online permitting processes, and point out specific rules in the Municipal Code. The Mayor's Office of Technology and Innovation has applied for funding through the Bloomberg Mayors Challenge to implement innovative ideas such as these. Should funding be awarded, the City Manager is directed to work with the Mayor's Office on an AI pilot within PBCE to improve the customer experience.

Many older buildings in San José have one shared meter for water. Due to city regulations, residents of these master-metered buildings do not pay for the water they use, disincentivizing conservation and exponentially increasing utility bills for property owners. To promote conservation and reduce costs associated with master-metered buildings, the City Manager is directed to return to the City Council with recommendations to align city policy with HUD guidelines that allow property owners to charge proportionally for tenants' use of utilities on master-metered properties.

Incentivizing Housing Development

With limited funding sources for affordable housing construction and tax-fatigue amongst voters, we must be agile in pursuing new sources of capital for affordable housing construction. Housing Revenue Bonds allow government agencies to issue tax exempt bonds at lower interest rates to finance construction of affordable housing that will be paid back through rental income. Enhanced Infrastructure Financing Districts apply a tax increment that may be paired with broader redevelopment opportunities in areas planned for significant development. In pursuit of funding mechanisms that don't add new taxes, the City Manager is directed to explore the feasibility of utilizing Housing Revenue Bonds and Enhanced Infrastructure Financing Districts.



California Apartment Association
4401 Atlantic Ave. Suite 200
Long Beach, CA 90807

December 19, 2023

Anna Ortega
Assistant General Manager
City of Los Angeles Housing Department
1200 West 7th Street
Los Angeles, CA 90017
VIA Email

(C.F. 22-0178) Transparency Implementation of Ratio Utility Billing System (RUBS)

The California Apartment Association (CAA) represents local housing providers who are involved with a range of rental properties from those that offer a single unit to large apartment communities as well as businesses that provide goods, services, and support to the housing industry. Our members touch on the everyday lives of many city residents. We have a keen interest in the pursuit of fair and equitable housing policies.

Thank you for including CAA members in feedback sessions with the Housing Department on Ratio Utility Billing Systems (RUBS) and a potential transparency ordinance. We value the ability to relay our thoughts on these issues.

CAA recognizes and appreciates concerns regarding a resident's ability to identify and understand shared utility calculations. RUBS are used to encourage conservation by residents and allow the owners of multi-family properties to share the cost of utilities with their residents using a formula that approximates usage.

RUBS is a critical element of the city's conservation and greening goals. A survey by the National Apartment Association and National Multifamily Housing Council found that when an apartment community implemented RUBS, water usage decreased by 6-27%¹. Consumption behavior changes when people are responsible for outcomes.

By furnishing details about their usage estimates, residents can exert a measurable influence on their consumption. RUBS is particularly useful for buildings that are not equipped or cannot be equipped with utility sub-meters. Acknowledging the age of many properties in the city, retrofitting plumbing, and building systems to accommodate sub-meters may prove cost prohibitive.

Transparency

It is important that residents understand their rent obligations and how the utility costs are determined. Housing providers should utilize a clear utility addendum which **at the inception of the tenancy** describes the methodology and how the amount is calculated.

¹ Koplou, D. and A. Lownie. 1999. "Submetering, RUBS, and Water Conservation". Industrial Economics, Inc. Cambridge, MA.

Property owners who implement RUBS likely use a third-party utility billing service to calculate the RUBS allocation and conduct billing directly with tenants. If desired, a third-party billing service can produce a statement that will allow a resident to understand their usage and track the usage over time. This can give a tenant additional information on the calculation.

Common Areas

As these properties are master metered, it is extremely difficult to ascertain specific water usages attributable to common areas. A high rise with little greenery is different from a garden style community with lush vegetation. Operators determine common area allowances according to the requirements of the property. Common areas are to the benefit of the entire community and utilized by the residents. We want to encourage as much green space as possible. The city should not add complexity to these formulas by capping common area allowances as it can deter green space, can't be accurately quantified, and varies by property.

Enforcement

Housing providers and third-party billing agents should both be responsible and accountable to the rules of this proposed ordinance. We urge the department to include a notification and response timeline for potential concerns. If there are questions on a bill, a tenant should expect a prompt response and communication within 10 days. The city should also include a cure period for any violation to ensure mistakes, miscalculations or errors made in good faith are given a period to rectify and the owner an ability to remedy. The ordinance's objective should prioritize compliance and transparency, rather than fostering a cottage industry of litigation.

Thank you for conducting stakeholder feedback sessions with our members and considering our perspective. We look forward to working with the department further on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Sutton". The signature is fluid and cursive, with a long horizontal stroke at the end.

Fred Sutton
Senior Vice President
California Apartment Association

Communication from Public

Name: Michael Hananel

Date Submitted: 05/18/2026 03:43 PM

Council File No: 22-0178

Comments for Public Posting: Please OPPOSE any proposal that would ban RUBS for new tenancies. If you want to help solve the "so called housing crisis" in Los Angeles, adding more and more restrictive polices such as this makes it virtually impossible for any landlord to survive which incentivizes less landlords and less development of new housing in the city. • RUBS promotes conservation and responsible utility usage • Utility costs continue to rise dramatically for housing providers • Eliminating RUBS removes a fair and widely used cost-allocation tool • Policies should encourage conservation, not discourage it • Additional operational restrictions make housing more difficult and expensive to provide Please be sure to OPPOSE this measure or the result will be more and more housing providers leaving the city and the state as we have seen in recent years compounding the housing problem and making it worse. Markets with less restrictive housing laws have lower rents and much much lower homelessness. Thank you, Michael Hananel

Communication from Public

Name: Alex McAllister
Date Submitted: 05/18/2026 03:54 PM
Council File No: 22-0178

Comments for Public Posting: I strongly oppose the proposed ban on Ratio Utility Billing System (RUBS) for new tenancies. RUBS promotes conservation by incentivizing tenants to use water, gas, and electricity responsibly. Studies show tenant utility usage drops 20-30% when they pay their own costs. Eliminating RUBS removes this conservation incentive at a time when California faces serious water and energy challenges. Housing providers already face rapidly rising expenses - insurance has doubled, utilities are up 30-40%, and property taxes continue to climb. Banning RUBS would force owners to absorb these costs, making it even more difficult to maintain quality affordable housing. RUBS is a fair, widely-used cost-allocation tool. Policies should encourage conservation and responsible housing operations, not make them more difficult. I urge the Council to OPPOSE this proposal.

Communication from Public

Name: Sean Bowles

Date Submitted: 05/18/2026 03:57 PM

Council File No: 22-0178

Comments for Public Posting: SUBJECT: Opposition to Proposed RUBS Ban – Council File 22-0178 Dear Los Angeles City Council, I respectfully oppose any proposal to eliminate RUBS (Ratio Utility Billing Systems) for new tenancies. It is neither practical nor responsible to prohibit utility cost-allocation systems in buildings that are not separately metered. Water, gas, sewer, trash, and electricity are real operational costs directly tied to actual resident usage. If those costs cannot be fairly allocated among occupants, they do not disappear: they are simply shifted entirely onto the housing provider, ultimately increasing rents and reducing operational sustainability. Many multifamily buildings throughout California were historically constructed without separate utility meters for each unit. In these situations, RUBS provides a reasonable and widely accepted method to distribute shared utility expenses among the people actually consuming the resources. Eliminating RUBS also removes incentives for conservation. When usage is disconnected from accountability, overall consumption tends to increase. At a time when California continues to face serious concerns surrounding water supply, energy demand, infrastructure strain, and rising utility costs, public policy should encourage responsible usage, not discourage it. Housing providers already face rapidly increasing insurance premiums, maintenance costs, labor expenses, property taxes, utility inflation, and regulatory burdens. Removing RUBS without providing realistic alternatives will place additional financial pressure on housing operations and may unintentionally reduce both housing quality and availability. A more balanced approach would focus on transparency, disclosure standards, and fair implementation practices rather than an outright prohibition. Thank you for your time and consideration. Sincerely, Sean Bowles

Communication from Public

Name: Mike Rounds

Date Submitted: 05/18/2026 03:58 PM

Council File No: 22-0178

Comments for Public Posting: I oppose the passage of Council File Number: 22-0178. Please vote against it.

Communication from Public

Name: Michael Green
Date Submitted: 05/18/2026 04:06 PM
Council File No: 22-0178
Comments for Public Posting: To ban RUBS is to invite hostile irresponsible tenants to arbitrarily punish landlords by running up bills the (tenants) don't have to pay. Don't do this.

Communication from Public

Name: Elissa Diaz
Date Submitted: 05/18/2026 04:16 PM
Council File No: 22-0178
Comments for Public Posting: Please find a letter on behalf of the Los Angeles Area Chamber of Commerce attached.

May 19, 2026

Chair Nithya Raman
Los Angeles Housing and Homelessness Committee
City of Los Angeles City Hall
200 North Spring Street
Los Angeles, California 90012

Re: Council File No. 22-0178 – Ratio Utility Billing Systems (Item 5)

Dear Chair Nithya Raman,

On behalf of the Los Angeles Area Chamber of Commerce, we write to oppose the recommendation to eliminate the Ratio Utility Billing Systems (RUBS) by the Los Angeles Housing Department (the Department).

The Chamber supports stronger transparency standards for the calculation of utility charges. The recommendation by the Department to eliminate RUBS altogether is deeply concerning given the lack of public and stakeholder input, analyses, and City Council direction. We understand that the original 2022 motion instructing a report back by the Department “with recommendations for the implementation of an ordinance that will require greater transparency for tenant utility bills” did not include any reference to elimination. The recommendation by the Department to eliminate RUBS goes far beyond the direction and scope of the Council motion and policy discussion.

RUBS is a tool used in older, master-metered buildings to fairly allocate utility costs and encourage conservation. The Department’s recommendation does not include environmental nor economic analysis. We do not have an understanding of the potential impacts of eliminating RUBS, including the impact on rent and operating costs, conservation efforts, and affordability. As we continue to face affordability concerns and a housing crisis in the City, it is vital we have analyses to inform decision making that will impact rental housing providers and tenants.

The Chamber respectfully urges the Committee to reject the Department’s recommendation to eliminate RUBS and instead encourages the Committee to pursue reasonable transparency standards as outlined in the original motion.

Thank you for your consideration.

Sincerely,



Carlos A. Singer
Chief Policy Officer

Communication from Public

Name:

Date Submitted: 05/18/2026 04:19 PM

Council File No: 22-0178

Comments for Public Posting: Subject: Opposition to Proposed Ban on RUBS for New Tenants
Dear Council Members, I respectfully write to urge the Los Angeles City Council to oppose any proposal that would prohibit the use of RUBS (Ratio Utility Billing System) for new tenants. RUBS is a fair and widely used method that allows housing providers to allocate shared utility costs among residents in a reasonable and transparent manner. At a time when utility costs continue to rise dramatically, eliminating RUBS would place an additional financial burden on property owners and operators who are already facing increasing operational expenses, maintenance costs, insurance premiums, and regulatory requirements. In addition, RUBS encourages conservation and responsible utility usage by making residents more aware of their individual consumption habits. Policies that discourage conservation efforts may unintentionally contribute to higher overall water and utility usage, which is contrary to the city's broader environmental and sustainability goals. Many multifamily properties, particularly older buildings, were not originally designed with individual utility metering systems. Requiring housing providers to absorb all utility costs without practical cost-allocation tools would create significant financial strain and make housing more difficult and expensive to provide. I respectfully ask the City Council to carefully consider the unintended consequences of banning RUBS and to support balanced policies that promote conservation, fairness, and housing stability for both residents and housing providers. Thank you for your time and consideration of this important issue. Sincerely, Mrs Petra

Communication from Public

Name: Steve Jones

Date Submitted: 05/18/2026 04:21 PM

Council File No: 22-0178

Comments for Public Posting: Dear Councilmembers Raman, Jurado, Blumenfield, Hutt, and McOsker, I am writing as a housing provider and property owner in the City of Los Angeles to express my strong opposition to the proposed ban on Ratio Utility Billing Systems (RUBS), scheduled for consideration by the Housing & Homelessness Committee on Wednesday, May 20, 2026 (Agenda Item 5, Council File No. 22-0178). RUBS is one of the few practical tools available to owners of older, master-metered multifamily buildings to fairly recover rising utility costs. Eliminating this mechanism would cause serious financial harm to housing providers who are already operating under the City's reduced rent increase allowances — now capped at 90% of CPI with a maximum of 4%, down from the prior 8% — and who have also lost the 1% supplemental increase for gas and electric in master-metered buildings. I would also note that the evidence strongly supports the conservation value of RUBS. Studies show that properties utilizing RUBS experience, on average, a 31% reduction in water consumption. Conversely, San Jose's prohibition on RUBS was followed by an increase in water usage at affected apartment buildings — the opposite of what this city should be encouraging during a period of ongoing water scarcity. Furthermore, this proposal was developed by LAHD without direction from the City Council and without meaningful input from the housing provider community. I urge the Committee to reject this recommendation and to engage in a balanced, transparent process that includes the perspectives of those who own and operate rental housing in this city. I respectfully ask that you vote against this proposal and protect the viability of rental housing in Los Angeles. Thank you for your consideration. Sincerely, Steve Jones

Communication from Public

Name: Elin Ray Guthrie

Date Submitted: 05/18/2026 04:25 PM

Council File No: 22-0178

Comments for Public Posting: WTF. You are burdening small landlords with multiple fees, when you will not allow us to raise the rent to cover them. I believe that even the RSO/ SCEP fees are even exceeding the percent we're allowed to raise rent. Not to mention that, I think it's six years since. We haven't been able to raise any rent at all because of the pandemic M Not only that but the RSO/ SCEP paperwork this year was totally eff'd up. The very first item was a pull down menu for the year & the only year listed was 2025. Excuse me? We're already in 2026. And despite my T1 exemption, documented on both forms, your system tried to bill me for 2 units. Who are you hiring to code these things? Third graders?

Communication from Public

Name: Delvind Hullan

Date Submitted: 05/18/2026 04:37 PM

Council File No: 22-0178

Comments for Public Posting: Los Angeles experiences frequent droughts and even fires. It would be terrible to encourage people to waste water by not making people accountable for their usage. Similarly why should someone who conserves water be punished with a static high utility fee if the usage for their home or the price of the utility falls should they not also enjoy this benefit? Removing the ability to charge for usage is a terrible idea which will only encourage water waste!

Communication from Public

Name: Lorena Sahagun
Date Submitted: 05/18/2026 05:10 PM
Council File No: 22-0178

Comments for Public Posting: To Whom It May Concern, I strongly oppose any proposal that would prohibit the use of Ratio Utility Billing Systems (RUBS) for new residential tenancies. Banning RUBS would create unintended financial consequences for housing providers while ultimately discouraging water and energy conservation among tenants. RUBS exists because in many multifamily properties—particularly older buildings—installing individual utility meters is physically impractical or prohibitively expensive. Eliminating RUBS without providing realistic alternatives would shift the entire burden of rising utility costs onto property owners, many of whom are already struggling under increasing insurance premiums, property taxes, maintenance costs, labor expenses, and regulatory mandates. Importantly, RUBS creates accountability for utility usage. When tenants bear no direct responsibility for water, gas, sewer, or trash consumption, usage predictably increases. This results in higher overall consumption, greater strain on infrastructure, and less conservation. In a state like California, where water shortages and environmental sustainability are ongoing concerns, discouraging conservation incentives is counterproductive public policy. Additionally, prohibiting RUBS for new tenancies would disproportionately harm small and mid-sized housing providers rather than large institutional operators. Many independent owners rely on RUBS to maintain operational stability in older properties that were never designed for individual metering. Removing this option could force owners to increase rents across the board simply to absorb uncontrollable utility expenses, which ultimately harms tenants as well. There is also a fairness issue. Under an all-inclusive utility structure, low-usage tenants effectively subsidize high-usage tenants. RUBS is not perfect, but it is a reasonable and widely used mechanism to distribute shared utility costs more equitably among occupants. If policymakers believe reforms are needed, the focus should instead be on transparency, disclosure requirements, billing consistency, and consumer protections—not outright prohibition. A blanket ban ignores the operational realities of multifamily housing and risks worsening California's already severe housing affordability and supply challenges. For these reasons, I respectfully urge you to reject any proposal that would ban RUBS for new tenancies. Sincerely,

Lorena Sahagun

Communication from Public

Name: Craig Davis

Date Submitted: 05/18/2026 05:22 PM

Council File No: 22-0178

Comments for Public Posting: RUBS is an important conservation tool that encourages responsible water, gas, and electricity usage. Eliminating RUBS would remove incentives for conservation at a time when California continues to face serious concerns over water supply, energy demand, and rising utility costs. -RUBS promotes conservation and responsible utility usage -Utility costs continue to rise dramatically for housing providers -Eliminating RUBS removes a fair and widely used cost-allocation tool -Policies should encourage conservation, not discourage it -Additional operational restrictions make housing more difficult and expensive to provide

Communication from Public

Name: ar01 portobello
Date Submitted: 05/18/2026 05:28 PM
Council File No: 22-0178
Comments for Public Posting: 22-0178

Communication from Public

Name: Blake Blivas

Date Submitted: 05/18/2026 05:33 PM

Council File No: 22-0178

Comments for Public Posting: This is completely outrageous, for the City of Los Angeles with its perennial drought and fire issues to consider something like this ludicrous. All you would be doing encouraging tenants to use waste or utilize any amount of water or power with no consequence or cost. Blake we must go to LA City council meeting at 2:30pm on Wednesday to give our discussion points-

1. RUBS promotes conservation. When utilities are simply folded into rent, tenants have less financial reason to reduce water, gas, electricity, or trash-related usage. LAHD's report notes that landlord advocates told the city RUBS supports conservation and greening goals by making tenants financially responsible for usage.
2. A ban shifts unpredictable utility costs onto housing providers. Utility costs fluctuate. If Los Angeles prohibits RUBS in RSO buildings, landlords would no longer be able to separately recover rising utility costs through an allocation system. LAHD recommends replacing existing RUBS charges with a one-time rent adjustment, but that locks a variable operating cost into rent control limits.
3. The original motion asked for transparency, not abolition. The 2022 motion requested detailed written disclosure of the billing methodology, rules for common-area charges, dispute procedures, landlord liability for third-party billing errors, and protections for low-income tenants. It did not ask LAHD to eliminate RUBS.
4. The better solution is disclosure and enforcement. The legitimate tenant complaint is that they may not know how bills are calculated or how to dispute them. The city can fix that with mandatory formulas, itemized bills, master-bill access, response deadlines, audit rights, and penalties for overcharges. LAHD already recommends these kinds of transparency requirements for non-RSO units.
5. A ban punishes compliant landlords instead of bad billing practices. If a landlord or billing company overcharges, hides the formula, adds junk fees, or refuses to explain charges, the city should penalize that conduct. But banning RUBS entirely removes a practical tool from older buildings where individual metering may be difficult or prohibitively expensive

Communication from Public

Name: Veronica m
Date Submitted: 05/18/2026 05:35 PM
Council File No: 22-0178
Comments for Public Posting: RUBS promotes conservation and responsible utility usage Utility costs continue to rise dramatically for housing providers Eliminating RUBS removes a fair and widely used cost-allocation tool Policies should encourage conservation, not discourage it Additional operational restrictions make housing more difficult and expensive to provide

Communication from Public

Name: Kelly Lynch

Date Submitted: 05/18/2026 05:44 PM

Council File No: 22-0178

Comments for Public Posting: DO NOT ELIMINATE RUBS. Housing Provider Landlords should be allowed to pass on tenant utility expense to tenants through RUBS which has been in place for years for this very reason. It holds tenants accountable, if faucets or toilet are running they'll report because they know they're paying for utilities. Conservation is important, if there is no repercussions for wasting water it will continue. Utility fees have risen significantly and continue to do so. It's an unequitable burden on housing providers if RUBS is eliminated forcing housing providers to cover utility costs. The City needs to be partners with housing providers instead of demonizing us over and over again with penalties like the one you're reviewing now. There's nothing fair about eliminating RUBS it's just another unequitable penalty imposed on housing providers. Please lets work together to strengthen housing in LA not tear down the ones providing! Thank you.

Communication from Public

Name: Randy Kirshner
Date Submitted: 05/18/2026 05:46 PM
Council File No: 22-0178
Comments for Public Posting: Housing providers already face rapidly increasing expenses, including insurance, maintenance, utilities, labor, and property taxes. Banning RUBS would make it even more difficult to manage operating costs while maintaining quality housing. RUBS is an important conservation tool that encourages responsible water, gas, and electricity usage. Eliminating RUBS would remove incentives for conservation at a time when California continues to face serious concerns over water supply, energy demand, and rising utility costs.

Communication from Public

Name: Robert Gonzales
Date Submitted: 05/18/2026 05:54 PM
Council File No: 22-0178
Comments for Public Posting: RUBS promotes conservation and responsible utility usage Utility costs continue to rise dramatically for housing providers Eliminating RUBS removes a fair and widely used cost-allocation tool Policies should encourage conservation, not discourage it Additional operational restrictions make housing more difficult and expensive to provide Please take a few moments to make

Communication from Public

Name: Noemi D
Date Submitted: 05/18/2026 05:57 PM
Council File No: 22-0178
Comments for Public Posting: RUBS promotes conservation and responsibility utility usage. Policies should encourage CONSERVATION and not discourage it. People should pay for what they use in utilities because they will have to pay more if they expend more. Taking out RUBS will make people less interested in saving water or electricity. Sometimes tenants left the lights and air conditioners on after leaving their apartments to go to work if that will not cost them more. If tenants know that to leave lights on, or let leaks go without asking for repair will cost them a lot of money they will take care of the situations right away to save in utilities like water or electricity. Please OPOSE any proposal that would ban RUBS for new tenancies. Council File number: 22-0178. Thank you.
Noemi D

Communication from Public

Name: Noemi D

Date Submitted: 05/18/2026 05:57 PM

Council File No: 22-0178

Comments for Public Posting: RUBS promotes conservation and responsibility utility usage. Policies should encourage CONSERVATION and not discourage it. People should pay for what they use in utilities because they will have to pay more if they expend more. Taking out RUBS will make people less interested in saving water or electricity. Sometimes tenants left the lights and air conditioners on after leaving their apartments to go to work if that will not cost them more. If tenants know that to leave lights on, or let leaks go without asking for repair will cost them a lot of money they will take care of the situations right away to save in utilities like water or electricity. Please OPOSE any proposal that would ban RUBS for new tenancies. Council File number: 22-0178. Thank you.
Noemi D

Communication from Public

Name: Dilip Bhavnani

Date Submitted: 05/18/2026 06:11 PM

Council File No: 22-0178

Comments for Public Posting: Dear Esteemed members of the LA City Council Housing Committee, My name is Dilip Bhavnani and I am a huge proponent of housing in our great City. I am a huge believer in our City and was a founding member of the Arts District BID and current Chairperson of Central City East Association. I have developed hundreds of units across Los Angeles and have several hundred more being considered. As a very concerned citizen, I urge you to stop the Rubs Ban for the following reasons: • Based on a study encompassing hundreds of thousands of units utilizing a RUBS service provider in California, over the past several years, on average, there has been a 31% reduction in water consumption across rental properties utilizing RUBS for water cost allocation. In fact, a recent study following the ban on the use of RUBS in San Jose found that water usage increased at impacted apartment buildings following the prohibition. • RUBS is one of the few tools available that encourages conservation of water and other utilities in older, master-metered buildings where individual-unit usage cannot be specifically measured. RUBS utilizes fair and reasonable allocation methodologies that allocate water and other utility costs on a variety of factors that ensure accuracy. • RUBS allows housing providers to fairly recover rising utility costs tied to resident consumption. In the face of the city's recent reduction of allowable rent increases to 90% of CPI up to a maximum of 4% (from previous 8%) and elimination of the 1% additional allowed increases for gas and electric in master metered buildings, maintaining the use of RUBS is critical to the survival of many of today's housing providers who may be operating at the margins. • The LAHD proposal was developed without direction from the City Council and without input from housing providers. If you have any questions, please do not hesitate to contact me. Best regards, Dilip

Communication from Public

Name: C J Martinez
Date Submitted: 05/18/2026 06:20 PM
Council File No: 22-0178
Comments for Public Posting: DO NOT REMOVE THE RUBS BILLING SYSTEM!!!

Communication from Public

Name: AroutiounTerzian
Date Submitted: 05/18/2026 06:28 PM
Council File No: 22-0178
Comments for Public Posting: I OPPOSE any proposal that would ban RUBS for new tenancies.

Communication from Public

Name: Madeline Ryan
Date Submitted: 05/18/2026 06:36 PM
Council File No: 22-0178
Comments for Public Posting: Please allow us landlords to fairly distribute use of utilities among the tenants via RUBS. Tenants haven't any incentive to conserve when utilities are included.

Communication from Public

Name: Donald Karasevicz

Date Submitted: 05/18/2026 06:37 PM

Council File No: 22-0178

Comments for Public Posting: Please oppose banning RUBS as it prevents landlords from ensuring responsible water, gas, and electric usage by tenants.
Thank you.

Communication from Public

Name: George

Date Submitted: 05/18/2026 06:42 PM

Council File No: 22-0178

Comments for Public Posting: Every one wants to decrease the rent amount for renters. So we have to oppose this kind of restrictions . Thank, George

Communication from Public

Name:

Date Submitted: 05/18/2026 08:05 PM

Council File No: 22-0178

Comments for Public Posting: Do NOT Ban RUBS! RUBS promotes conservation and responsible utility usage Utility costs continue to rise dramatically for housing providers Eliminating RUBS removes a fair and widely used cost-allocation tool Policies should encourage conservation, not discourage it Additional operational restrictions make housing more difficult and expensive to provide

Communication from Public

Name: Akiva Fialkoff
Date Submitted: 05/18/2026 08:07 PM
Council File No: 22-0178
Comments for Public Posting: RUBS promotes conservation and responsible utility usage and tenants are more mindful of irrelevant consumption. Policies should encourage conservation, and discourage waste. Additional operational restrictions make housing more difficult and expensive to mom and pop provide

Communication from Public

Name:

Date Submitted: 05/18/2026 08:47 PM

Council File No: 22-0178

Comments for Public Posting: Please consider conservation of utilities before voting to discontinue RUBS for Los Angeles Landlords. Individuals usually need to see consequences in order to turn off the water tap or light switch. Thank you for your consideration.

Communication from Public

Name: Monica Zhang

Date Submitted: 05/18/2026 04:40 PM

Council File No: 22-0178

Comments for Public Posting: STOP RUBS BAN We operate several multifamily buildings in City of Los Angeles, some subject to RSO and some not. For our buildings that do not have submeters, we allocate utilities fairly to residents using RUBS. Utility billing is not a profit center for us. Most new construction buildings are charging tenants for utilities, so tenants are used to seeing rental rates quoted assuming that they will be paying for utilities. By not allowing older buildings (without submeters) to use RUBS, the older buildings will need to increase their posted rental rates, and it will be more difficult for prospective renters to compare rental rates against buildings where they will be paying for utilities. Water submeters also frequently break. We spent a significant amount to replace water submeters recently at our building. The cost to add submeters to older buildings will be cost prohibitive for many landlords. When residents pay for their share of utilities, they are more cognizant to conserve. In the last year, we saw a significant increase in our water/sewer expenses at one of our buildings in Historic Filipinotown, partly due to increased usage and partly due to increased rates. When residents were billed using RUBS, the residents asked questions why the water/sewer increased, and we explained the higher usage and higher rate, and we reminded all residents to try to conserve water. Subsequently, we saw residents' usage decrease, bringing down the monthly water/sewer bill. If residents had not been billed for water/sewer, there would not have been the incentive to conserve water. RUBS allows housing providers to fairly recover rising utility costs tied to resident consumption. In the face of the city's recent reduction of allowable rent increases to 90% of CPI up to a maximum of 4% (from previous 8%) and elimination of the 1% additional allowed increases for gas and electric in master metered buildings, maintaining the use of RUBS is critical to the survival of many of today's housing providers who may be operating at the margins. The LAHD proposal was developed without direction from the City Council and without input from housing providers. As such, we urge the Housing & Homeless Committee to STOP THE RUBS BAN. Thank you.

Communication from Public

Name: Stuart Waldman
Date Submitted: 05/18/2026 04:44 PM
Council File No: 22-0178

Comments for Public Posting: Dear Chair Raman and Members of the Housing and Homelessness Committee, On behalf of the Valley Industry & Commerce Association (VICA), we support stronger transparency standards so residents clearly understand how utility charges are calculated, but we oppose the Los Angeles Housing Department's recommendation to prohibit Ratio Utility Billing Systems (RUBS) in Los Angeles. The original policy discussion was about transparency, not a ban, and the recommendation to eliminate RUBS appears to go beyond the direction previously given by the Council and Committee. The record also suggests there was no meaningful stakeholder process on a prohibition. The November 2023 discussion focused on transparency, billing clarity, and enforcement, not on eliminating RUBS or evaluating the broader impacts such a policy would have on residents, housing providers, conservation, or operating costs. Just as important, there does not appear to be a supporting environmental or economic analysis for this recommendation. The materials included with this item state that a review of San José's RUBS ban found water usage increased by 11 to 12 percent in affected apartment buildings after the policy took effect, and San José leadership later directed staff to consider aligning policy with HUD guidelines that allow proportional utility charges on master-metered properties. Before Los Angeles adopts a similar prohibition, the City should fully evaluate the likely impacts on conservation, affordability, utility costs, and housing operations. Los Angeles should focus on reasonable transparency standards that protect residents while preserving practical conservation and cost-recovery tools. VICA respectfully urges the Committee to reject the recommendation to prohibit RUBS and instead stay within the original council direction to improve transparency and accountability.



May 18, 2026

Housing and Homelessness Committee
Los Angeles City Hall
200 N. Spring Street, Suite 525
Los Angeles, CA 90012

RE: Council File: 23-1134-S2 — OPPOSE

Dear Chair Raman and Members of the Housing and Homelessness Committee,

On behalf of the Valley Industry & Commerce Association (VICA), we support stronger transparency standards so residents clearly understand how utility charges are calculated, but we oppose the Los Angeles Housing Department's recommendation to prohibit Ratio Utility Billing Systems (RUBS) in Los Angeles. The original policy discussion was about transparency, not a ban, and the recommendation to eliminate RUBS appears to go beyond the direction previously given by the Council and Committee.

The record also suggests there was no meaningful stakeholder process on a prohibition. The November 2023 discussion focused on transparency, billing clarity, and enforcement, not on eliminating RUBS or evaluating the broader impacts such a policy would have on residents, housing providers, conservation, or operating costs.

Just as important, there does not appear to be a supporting environmental or economic analysis for this recommendation. The materials included with this item state that a review of San José's RUBS ban found water usage increased by 11 to 12 percent in affected apartment buildings after the policy took effect, and San José leadership later directed staff to consider aligning policy with HUD guidelines that allow proportional utility charges on master-metered properties. Before Los Angeles adopts a similar prohibition, the City should fully evaluate the likely impacts on conservation, affordability, utility costs, and housing operations.

Los Angeles should focus on reasonable transparency standards that protect residents while preserving practical conservation and cost-recovery tools. VICA respectfully urges the Committee to reject the recommendation to prohibit RUBS and instead stay within the original council direction to improve transparency and accountability.

Sincerely,

Stuart Waldman
VICA President

Communication from Public

Name: Marc Chopp

Date Submitted: 05/18/2026 04:45 PM

Council File No: 22-0178

Comments for Public Posting: The proposed RUBS ban will create serious unintended consequences for the Los Angeles rental housing market. Housing providers are facing unprecedented operating pressures including:
* Rising water and sewer rates * Increasing insurance costs * Higher maintenance and labor expenses * Expanding regulatory compliance requirements * Rent increase limitations under RSO
Removing RUBS eliminates one of the few remaining tools available to partially offset utility costs tied directly to resident consumption. This policy may also discourage owners from maintaining or preserving older multifamily housing properties, especially rent-stabilized buildings operating on thin margins. Some owners may defer improvements, reduce staffing, or leave the rental housing market entirely. A complete ban is an extreme approach. A more balanced solution would be improving disclosure standards and oversight rather than eliminating RUBS altogether. I respectfully ask the Committee to reject this proposal.

Communication from Public

Name:

Date Submitted: 05/18/2026 04:46 PM

Council File No: 22-0178

Comments for Public Posting: I strongly oppose the proposed ban on RUBS (Ratio Utility Billing Systems) in Los Angeles rental housing. RUBS is one of the only practical methods available for recovering utility costs in older master-metered apartment buildings that cannot feasibly be individually submetered. Eliminating RUBS would unfairly force housing providers to absorb rapidly increasing water, sewer, trash, and utility costs with no reasonable recovery mechanism. This proposal will especially harm small and mid-sized housing providers who are already struggling under strict rent stabilization limitations, rising insurance premiums, increasing labor costs, and escalating municipal fees. RUBS also promotes conservation. When residents share responsibility for utility usage, water consumption decreases significantly. Removing RUBS removes an important incentive for conservation during a time when California continues to face long-term water challenges. If RUBS is banned, housing providers will have fewer resources available for building maintenance, capital improvements, safety upgrades, and habitability investments. This ultimately harms tenants as well. The City should focus on encouraging conservation and preserving existing housing stock, not imposing additional financial burdens that make operating rent-stabilized housing increasingly unsustainable. I respectfully urge the Committee to reject the proposed RUBS ban.

Communication from Public

Name: Raquel Cataldo

Date Submitted: 05/18/2026 04:51 PM

Council File No: 22-0178

Comments for Public Posting: As a housing provider, I strongly oppose any proposal to ban Ratio Utility Billing Systems (RUBS). Property owners are already facing unprecedented increases in operating expenses, including insurance premiums, maintenance costs, utilities, labor, compliance requirements, and property taxes. Removing RUBS would place yet another financial burden on housing providers at a time when affordability and housing supply are already under extreme pressure. RUBS is not simply a billing method — it is also an important conservation tool. When residents share responsibility for utility consumption, it encourages more responsible use of water, gas, and electricity. Eliminating RUBS removes a key incentive for conservation during a period when California continues to struggle with water shortages, rising energy demand, and increasing infrastructure costs. Without the ability to reasonably allocate utility expenses, many landlords will be forced to absorb rapidly escalating utility costs entirely on their own. This will inevitably lead to higher rents, reduced funds available for property maintenance and improvements, and additional financial strain on smaller housing providers who are already struggling to remain viable. Policies that increase operational costs without providing realistic alternatives ultimately harm both housing providers and tenants. Instead of restricting RUBS, the City Council should focus on balanced solutions that support housing sustainability, encourage conservation, and preserve the long-term financial health of rental housing. I urge the Council to reconsider this proposal and work collaboratively with housing providers to create policies that are fair, practical, and sustainable for everyone involved.

Communication from Public

Name: Joel Levin

Date Submitted: 05/18/2026 08:52 PM

Council File No: 22-0178

Comments for Public Posting: Please do not support the ban on RUBS for utility billing. Aside from the modest revenue it generates for property owners, this is an important measure to ensure that tenants use water responsibly. We have found that tenants are much more aware of their water use when they are paying for it. It shouldn't surprise you to know that when something is free, people tend to overuse it or waste it. If you care about water conservation in Los Angeles, PLEASE do not ban RUBS. Thank you, Joel Levin Small Residential Property Owner

Communication from Public

Name:

Date Submitted: 05/18/2026 09:30 PM

Council File No: 22-0178

Comments for Public Posting: RUBS is an important conservation tool that encourages responsible water, gas, and electricity usage. Eliminating RUBS would remove incentives for conservation at a time when California continues to face serious concerns over water supply, energy demand, and rising utility costs. Housing providers already face rapidly increasing expenses, including insurance, maintenance, utilities, labor, and property taxes. Banning RUBS would make it even more difficult to manage operating costs while maintaining quality housing.

Communication from Public

Name: jeff davis

Date Submitted: 05/18/2026 09:31 PM

Council File No: 22-0178

Comments for Public Posting: I'm copying and pasting m, but seriously, at some point our council representatives should purely base Deion's off of common sense....and RUBS is ultimately good for all. RUBS promotes conservation and responsible utility usage Utility costs continue to rise dramatically for housing providers Eliminating RUBS removes a fair and widely used cost-allocation tool Policies should encourage conservation, not discourage it Additional operational restrictions make housing more difficult and expensive to provide

Communication from Public

Name: Alison Rose Jefferson

Date Submitted: 05/18/2026 09:48 PM

Council File No: 22-0178

Comments for Public Posting: I oppose any proposal that would ban Rate Utilities Billing System (RUBS) for new tenancies. RUBS promotes conservation and responsible utility usage. Utility costs continue to rise dramatically for housing providers and tenants need to be included in the calculations for these cost. Eliminating RUBS removes a fair and widely used cost-allocation tool. Policies should encourage conservation, not discourage it. Additional operational restrictions make housing more difficult and expensive to provide. Thank you.

Communication from Public

Name: Terry Stephen Carpenter
Date Submitted: 05/18/2026 09:58 PM
Council File No: 22-0178
Comments for Public Posting: Please do not eliminate RUBS.

Communication from Public

Name:

Date Submitted: 05/18/2026 02:40 PM

Council File No: 22-0178

Comments for Public Posting: To the Honorable Members of the Los Angeles City Council: I respectfully oppose any proposal that would prohibit the use of RUBS (Ratio Utility Billing Systems) for new tenancies in Los Angeles. RUBS is a widely used and practical method for allocating utility costs among residents in multi-family housing. It encourages conservation and responsible utility usage by ensuring that tenants are more aware of the actual costs associated with water, gas, sewer, and trash services. Policies that promote accountability and conservation should be encouraged — not eliminated. At the same time, utility costs for housing providers continue to rise dramatically. Water, sewer, electricity, gas, insurance, labor, and maintenance expenses have all increased substantially in recent years. Eliminating RUBS would remove one of the few fair and reasonable tools available to help allocate these escalating costs. Without RUBS, housing providers are forced to absorb higher operational expenses or increase rents more broadly across all tenants, regardless of actual usage. Additional operational restrictions on property owners make housing increasingly difficult and expensive to provide in Los Angeles. The City should be focused on policies that support housing stability, encourage conservation, and allow responsible property management — not policies that further increase financial burdens on housing providers. I urge the Council to reject any proposal that would ban RUBS for new tenancies and instead pursue balanced policies that support both conservation efforts and the long-term sustainability of rental housing in Los Angeles. Thank you for your consideration.

Communication from Public

Name: Karla Williams

Date Submitted: 05/18/2026 02:45 PM

Council File No: 22-0178

Comments for Public Posting: Eliminating RUBS would be harmful for both tenants and housing providers. Without RUBS, utility costs would simply be built into higher rents, meaning residents who conserve water and energy would end up subsidizing heavier users. RUBS encourages accountability and conservation while helping keep base rents lower and more transparent. For housing providers, especially older multifamily properties without individual meters, banning RUBS would create significant financial strain as utility costs continue to rise, making it harder to maintain properties, complete repairs, and invest in building improvements. Removing one of the few practical cost-sharing tools available in Los Angeles housing is a step in the wrong direction. The City should focus more on policies that encourage job growth, support local businesses, and increase housing production rather than continuing to restrict housing providers' ability to operate and maintain their properties responsibly. Los Angeles already faces rising costs, housing shortages, and businesses leaving the city. Adding more operational restrictions on landlords will only place additional pressure on the housing market and ultimately impact tenants through reduced housing quality, deferred maintenance, and higher overall costs.