Communication from Public

Name: Alexander Ferrer
Date Submitted: 06/01/2026 11:06 AM
Council File No: 22-0178
Comments for Public Posting: I am writing in support of stronger action to address RUBS billing in the City of Los Angeles. I am a researcher at UCLA's Institute on Inequality and Democracy, a PhD Candidate in Geography, and a scholar of tenancy. The council should take decisive action to curb the use of RUBS as widely as possible, by prohibiting its use in all new leases and clarifying to landlords and LAHD that RUBS has always been illegal under LARSO. The City of Los Angeles has set ambitious environmental goals which require continued action on conservation. Multifamily use represents 28% of all water use in Los Angeles as of 2020, and is projected by DWP to be the fastest growing segment of usage in coming decades. Multifamily also represents some 45.5 trillion BTUs of total energy consumption annually. Since 2016, it has been the policy of the State of California to promote submetering as a mechanism for incentivizing conservation in multifamily buildings, requiring all multifamily construction after 2018 to be so outfitted. In Los Angeles, 30,926 properties or more than 98% of buildings with more than 5 units, accounting for 639,193 total units were built prior to this requirement. In many of these buildings, landlords have turned to Ratio Utility Billing Systems allowing them to pass on the cost of utilities to tenants despite the lack of information on tenant use, splitting bills on the basis of square footage, occupancy, or other factors. Research by the EPA and National Multifamily Housing Council has shown that RUBS fails to deliver any conservation benefits relative to landlord paid utilities, and especially submetering. RUBS additionally disincentivizes landlords from the adoption of submeters in the future by removing the incentive and financing mechanism produced by avoided future costs, submetering is a modest and quickly recoupable cost which ultimately benefits the landlords themselves. RUBS provides a cost free and profitable alternative that benefits landlords but not conservation. In addition to delaying action on submetering, RUBS represents a serious barrier to effective climate and conservation action, because it creates a system of perverse incentives and barriers to information. RUBS fails to reward tenants proportionately to any reductions in usage and requires them to subsidize others' overuse, while depriving tenants and landlords of any actionable information on if and where overuse is occurring. Landlords, not

tenants, who control the critical building infrastructures which regulate usage and waste, a “split incentive problem” experts have long recognized. Leaky pipes and fixtures, inefficient appliances, broken sprinklers, poorly fitted windows, and faulty electronics– these are all critical issues that can dramatically increase water and energy use and waste. Under RUBS, all the costs this waste represents are pushed onto tenants, incentivizing even otherwise conscientious landlords to defer maintenance and upgrading and insulating them from the costs of neglect. Furthermore, the rising cost of utilities presents a significant challenge to low-income renters. Tenants with RUBS billed utilities may face especially high and uncertain utilities costs, contributing to overall renter costs burdens which are already at historic levels. Research suggests that even independent of rent burden, excessive utility costs are a significant predictor of eviction. Tenants with RUBS contracts are also excluded from low-income utility assistance programs that may alleviate this burden and prevent eviction. Billing reform can decrease cost, usage, and uncertainty for renters. Accurate unit based usage information is furthermore absolutely critical to conservation planning. RUBS has the effect of entirely disabling planners and regulators from obtaining this information. It is not being produced, and its production in the future is being disincentivized. I urge the members of the committee to support the proposed changes in the letters from Movement Legal and from the coalition of consumer, environmental, and tenant advocates supporting this letter, which would ban new RUBS contracts and clarify the prohibited status of RUBS under LARSO. Sincerely, Alexander Ferrer PhD Candidate at UCLA Geography Researcher at UCLA Luskin Institute on Inequality and Democracy

Communication from Public

Name: Alicia Yu
Date Submitted: 06/01/2026 07:13 PM
Council File No: 22-0178
Comments for Public Posting: As a tenant in Los Angeles, I call on the Los Angeles City Council to vote to ban Ratio Utility Billing Systems, or RUBS, in all housing across this city. Landlords who charge tenants for utilities through RUBS are systematically violating the Rent Stabilization Ordinance and the Tenant Protection Act. Ratio Utility Billing Systems subject tenants to bogus charges and allow landlords to get away with fraud. Imagine paying a costly bill for something you didn’t actually use. That, essentially, is the failure that is RUBS. RUBS also poses challenges to consumer protections, dissuades landlords from investing in environmentally-friendly infrastructure or making basic repairs to address waste, and allows landlords to put huge junk fees and other costly fees on our utility bills. This needs to end now. Tenants have the right to transparency, but existing law gives us no way to enforce that right. I urge you to support Debt Collective’s proposal for stronger action by the City Council on RUBS. The highest RUBS bill I have had to pay is $145. There was no transparency of the utility costs when I signed my lease and I have no control over the price of the bills. I am doing everything I can to save energy, water, etc but RUBS unfairly makes me pay for collective usage in the building.