

Communication from Public

Name:

Date Submitted: 07/13/2026 09:41 AM

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. I am also a tenant eviction defense attorney, and see the ways landlords can take advantage of tenants' limited resources and information. This is the perfect example of that - the lack of transparency with RUBS charges allows landlords to charge tenants more than would be legally permissible under the RSO. 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. It renders the rent control protections enacted by this very Council irrelevant. 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.

Communication from Public

Name: Mark Toney - Executive Director - TURN

Date Submitted: 07/13/2026 04:15 PM

Council File No: 22-0178

Comments for Public Posting: June 13, 2026 The Honorable Marqueece Harris-Dawson
President Los Angeles City Council 200 N. Spring Street Los Angeles, CA 90012 Re: Strengthening Consumer Protections and Advancing Equity Through Reform of Ratio Utility Billing Systems (RUBS) Dear President Harris-Dawson and members of the City Council The Utility Reform Network (TURN) writes in strong support of the Los Angeles Housing Department's recommendations to reform Ratio Utility Billing Systems (RUBS) and urges the City Council to strengthen and adopt these recommendations to better protect California tenants. For nearly fifty years, TURN has advocated on behalf of California consumers to ensure affordable, transparent, and equitable utility service. Through our statewide consumer hotline, which assists hundreds of utility customers each year, we have heard from dozens of consumers in Los Angeles County struggling with the consequences of RUBS billing. Their experiences reveal a system that is confusing, opaque, and fundamentally unfair-particularly for low-income households, seniors, people with disabilities, and communities of color already burdened by rapidly increasing utility costs. As California faces an affordability crisis and works toward ambitious climate goals, consumers deserve utility billing systems that are transparent, equitable, and encourage conservation-not systems that deepen financial insecurity while shielding landlords from accountability. TURN urges the Council to strengthen its reforms by prioritizing the following consumer protection principles. 1. Require Meaningful Transparency and Consumer Accountability Consumers have the right to understand what they are being charged and how those charges are calculated. Under RUBS, consumers frequently receive only a dollar amount with little, or no explanation of the methodology used to determine their share of utility costs. Consumers regularly report being unable to obtain master utility bills, allocation formulas, occupancy assumptions, square footage calculations, or documentation supporting their charges. Even when consumers request this information, many report receiving delayed, incomplete, or no response from landlords or third-party billing companies. Without standardized disclosure requirements, consumers have no meaningful way to verify whether charges are accurate or lawful. This lack of transparency creates significant

opportunities for billing errors, excessive charges, and abuse while leaving consumers responsible for costs they cannot independently verify. The Council should require comprehensive annual reporting of all RUBS calculation methodologies, supporting utility bills, and allocation assumptions, with meaningful penalties for noncompliance. 2. Strengthen Consumer Protections and Create Clear Avenues for Redress California consumers deserve an accessible process for resolving billing disputes. TURN's consumer hotline regularly assists tenants who have spent weeks or months attempting to identify the appropriate agency responsible for addressing RUBS complaints. Many report being referred between landlords, third-party billing companies, utility providers, and government agencies without ever receiving a clear answer or resolution. This fragmented system places an unreasonable burden on consumers-particularly those with limited English proficiency, disabilities, or limited financial resources-to navigate a complex dispute process while facing mounting utility charges. RUBS also creates opportunities for unscrupulous landlords to use utility charges to circumvent consumer protections and unfairly increase housing costs. Strong oversight, enforceable reporting requirements, accessible complaint processes, and meaningful enforcement mechanisms are essential to protecting tenants from unlawful billing practices. As utility costs continue to rise across California, consumers need greater-not fewer-protections and meaningful agency over the bills they are expected to pay. 3. Promote Environmental Equity Through Direct Metering and Submetering RUBS undermines California's conservation and climate objectives. Unlike direct metering or submetering, RUBS disconnects individual utility charges from individual consumption. Regardless of how carefully a household conserves water or energy, consumers remain responsible for paying a share of their neighbors' usage through a predetermined allocation formula. This structure removes one of the most effective incentives for conservation: allowing consumers to see their own usage and directly benefit from reducing it. Submetering provides consumers with accurate information about their individual consumption, empowers households to manage their utility costs, and supports California's greenhouse gas reduction and water conservation goals. RUBS, by contrast, allows landlords to avoid investing in submetering infrastructure while shifting utility costs to tenants without providing the tools necessary to reduce consumption. Cons



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June 13, 2026

The Honorable Marqueece Harris-Dawson
President
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

Re: Strengthening Consumer Protections and Advancing Equity Through Reform of Ratio Utility Billing Systems (RUBS)

Dear President Harris-Dawson and members of the City Council

The Utility Reform Network (TURN) writes in strong support of the Los Angeles Housing Department's recommendations to reform Ratio Utility Billing Systems (RUBS) and urges the City Council to strengthen and adopt these recommendations to better protect California tenants.

For nearly fifty years, TURN has advocated on behalf of California consumers to ensure affordable, transparent, and equitable utility service. Through our statewide consumer hotline, which assists hundreds of utility customers each year, we have heard from dozens of consumers in Los Angeles County struggling with the consequences of RUBS billing. Their experiences reveal a system that is confusing, opaque, and fundamentally unfair-particularly for low-income households, seniors, people with disabilities, and communities of color already burdened by rapidly increasing utility costs.

As California faces an affordability crisis and works toward ambitious climate goals, consumers deserve utility billing systems that are transparent, equitable, and encourage conservation-not systems that deepen financial insecurity while shielding landlords from accountability.

TURN urges the Council to strengthen its reforms by prioritizing the following consumer protection principles.

1. Require Meaningful Transparency and Consumer Accountability

Consumers have the right to understand what they are being charged and how those charges are calculated.

TURN believes in a society where clean power, phone, and broadband are treated as basic rights for all families.

Under RUBS, consumers frequently receive only a dollar amount with little, or no explanation of the methodology used to determine their share of utility costs. Consumers regularly report being unable to obtain master utility bills, allocation formulas, occupancy assumptions, square footage calculations, or documentation supporting their charges. Even when consumers request this information, many report receiving delayed, incomplete, or no response from landlords or third-party billing companies.

Without standardized disclosure requirements, consumers have no meaningful way to verify whether charges are accurate or lawful. This lack of transparency creates significant opportunities for billing errors, excessive charges, and abuse while leaving consumers responsible for costs they cannot independently verify.

The Council should require comprehensive annual reporting of all RUBS calculation methodologies, supporting utility bills, and allocation assumptions, with meaningful penalties for noncompliance.

2. Strengthen Consumer Protections and Create Clear Avenues for Redress

California consumers deserve an accessible process for resolving billing disputes.

TURN's consumer hotline regularly assists tenants who have spent weeks or months attempting to identify the appropriate agency responsible for addressing RUBS complaints. Many report being referred between landlords, third-party billing companies, utility providers, and government agencies without ever receiving a clear answer or resolution.

This fragmented system places an unreasonable burden on consumers-particularly those with limited English proficiency, disabilities, or limited financial resources-to navigate a complex dispute process while facing mounting utility charges.

RUBS also creates opportunities for unscrupulous landlords to use utility charges to circumvent consumer protections and unfairly increase housing costs. Strong oversight, enforceable reporting requirements, accessible complaint processes, and meaningful enforcement mechanisms are essential to protecting tenants from unlawful billing practices.

As utility costs continue to rise across California, consumers need greater-not fewer-protections and meaningful agency over the bills they are expected to pay.

3. Promote Environmental Equity Through Direct Metering and Submetering

RUBS undermines California's conservation and climate objectives.

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Unlike direct metering or submetering, RUBS disconnects individual utility charges from individual consumption. Regardless of how carefully a household conserves water or energy, consumers remain responsible for paying a share of their neighbors' usage through a predetermined allocation formula.

This structure removes one of the most effective incentives for conservation: allowing consumers to see their own usage and directly benefit from reducing it.

Submetering provides consumers with accurate information about their individual consumption, empowers households to manage their utility costs, and supports California's greenhouse gas reduction and water conservation goals. RUBS, by contrast, allows landlords to avoid investing in submetering infrastructure while shifting utility costs to tenants without providing the tools necessary to reduce consumption.

Consumers who make efforts to conserve should not subsidize excessive usage by others simply because they lack access to individualized metering.

Furthermore, tenants billed through RUBS are often ineligible for critical utility affordability programs such as CARE and FERA because the landlord-not the tenant-is recognized as the utility customer. This means many low-income households contribute to the funding of these public assistance programs through utility rates but are denied access to the very benefits designed to help them.

This inequity further entrenches vulnerable households in a cycle of utility debt and energy insecurity.

Conclusion

TURN believes utility affordability, consumer transparency, environmental sustainability, and housing stability are fundamentally connected.

As California's leading consumer advocacy organization focused on energy, telecommunications, and broadband affordability, TURN urges the Los Angeles City Council to adopt and strengthen the LAHD recommendations by:

- Eliminating RUBS wherever possible and encouraging direct metering and submetering.
- Requiring complete transparency regarding billing methodologies, calculations, and supporting utility documentation.
- Establishing straightforward, accessible complaint and enforcement processes that provide meaningful consumer protections and accountability.

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- Protecting tenants from unfair billing practices while expanding access to affordability programs for the households that need them most.

California consumers deserve utility billing systems that promote conservation, protect against abuse, and empower households with the information necessary to manage rising utility costs. Strengthening protections around RUBS represents an important step toward advancing environmental justice, consumer equity, and affordability for all Angelenos.

Thank you for your leadership and consideration.

Sincerely,

Mark Toney
Executive Director

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