

Communication from Public

Name: Alan Milla

Date Submitted: 08/13/2026 06:05 PM

Council File No: 22-0178

Comments for Public Posting: What many people don't know is that LADWP has an administrative law which regulates the resale of its utilities. It's called Rule 18 and it can be found here <https://www.ladwp.com/rules-governing-water-and-electric-services> on page 72. Rule 18 has existed since at least 2008, and mirrors the State's Public Utilities Code 739.5, which only applies to private utilities and their customers. The problem that I've encountered when trying to file a Rule 18 complaint against my landlord was that LADWP has not department specifically tasked with taking complaints against its customers and has policies that prevent it from intervening in landlord/tenant disputes over the resale of DWP utilities. This is in direct conflict with the language of Rule 18 and its apparent intent. Affected tenants and their advocates reading this should call DWP customer service and try making a Rule 18 complaint themselves. You will inevitably be directed to LAHD, which will be unable to assist you because there are no city codes which address RUB fraud. DWP's Rule 18 is the only one, and only LADWP has the authority to enforce it. Rule 18 reads: "The resale of water and electrical energy by Department Customers is prohibited by the City Charter, the general provisions of the water and electric rate ordinances, and these Rules. Any resale of water or electric energy will be cause for termination of service." It offers approvable methods of reselling DWP utilities that include use of privately owned submeters or non-metered billing methods which limit tenant responsibility to their own units, do not exceed what the tenant would be charged directly by DWP, and do not include any additional fees or costs whatsoever. It requires that billing methodologies be pre-approved by LADWP, that their rates be posted in a conspicuous place, and it gives DWP the authority to force a customer to discontinue cost allocation methods known to be in violation of this rule. Rule 18 has been an administrative law for at least 10 years, and the rampant abuse of tenants through fraud and harassment are the result of DWP ignoring its responsibilities to Los Angeles residents simply because they are not direct DWP customers. DWP policies have been implemented which favor landlords and turn a blind to the damage being done to vulnerable residents. Landlords have taken advantage of this and have collectively created a system of fraudulent price gouging that no other city department is empowered to prevent. Policies, however, are a choice, and DWP's choice has left the City of Los Angeles vulnerable. Because DWP has a codified responsibility to regulate utility resale and the codified authority to enforce its regulations, the City can be held liable for aiding and abetting utility resale fraud on a very large scale. If protesting isn't enough, maybe lawsuits will bring about change. Either force LADWP to change its policies, including advertising a complaint line, investigating utility resale fraud, and enforcing legal billing practices—or—just ban

RUBS!

Communication from Public

Name: Maribel Hernandez

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Council File No: 22-0178

Comments for Public Posting: Rubs is billing me for 1 month 700.00 in utility bills. I am emailing texting and calling property management and they confirm its correct, mind you this is for a studio apt with 2 children that are home with me 2 weeks out of the month!