



**National
Consumer Law
Center**

*Fighting Together
for Economic Justice*

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February 24, 2026

Honorable Members of the City Council
City of Los Angeles
200 North Spring Street
Los Angeles, CA 90012
Sent via Public Comment Form¹

Tiena Johnson Hall, General Manager
Anna Ortega, Assistant General Manager Regulatory Code & Compliance Bureau
Los Angeles Housing Department
1910 Sunset Blvd, Ste. 300
Los Angeles, CA 90026
Sent via email to tiena.hall@lacity.org and anna.ortega@lacity.org

RE: Council File 22-0178 and Ratio Utility Billing System (RUBS)

Dear Honorable Members of the City Council, Ms. Johnson Hall, and Ms. Ortega:

My name is Olivia Wein, and I am a Senior Attorney at the National Consumer Law Center (NCLC),² where my work focuses on policies and programs that protect low-income consumers' access to essential utility services, including water, energy, and telecommunications. My colleague, April Kuehnhoff, is a Senior Attorney at NCLC whose work focuses on advocacy related to fair debt collection and how consumer laws protect tenants.

We read the Los Angeles Housing Department's recent report and recommendations about implementation of an ordinance requiring greater transparency from landlords using Ratio

¹ <https://cityclerk.lacity.org/publiccomment>

² The National Consumer Law Center ("NCLC") is a national research and advocacy organization focusing on the legal needs of consumers, especially low income and elderly consumers. For over 50 years NCLC has been the consumer law resource center to which legal services and private lawyers, state and federal consumer protection officials, public policy makers, consumer and business reporters, and consumer and low-income community organizations across the nation have turned for legal answers, policy analysis, and technical and legal support.

Utility Billing System (RUBS) to calculate utility bills in master-metered rental housing.³ Respectfully, we do not believe that simply adding greater transparency will be sufficient to protect Los Angeles tenants. Instead, **we urge the City Council to prohibit RUBS billing for all Los Angeles tenants - not just tenants living in rent stabilized units.**

Prohibiting RUBS billing will promote City conservation efforts, such as ongoing water conservation efforts in Los Angeles. Since RUBS bills are based on a portion of the entire bill, it is much harder to motivate individuals and families to decrease their use of water or other utilities. Promoting individual metering by utilities or submetering by landlords in master-metered buildings would more effectively promote conservation by tenants - creating a direct connection between usage and utility bills.⁴

We are attaching to this letter an article that we recently published, An Introduction to Ratio Utility Billing Systems for Tenant Advocates.⁵ As discussed in this article, it is difficult for tenants to assess the accuracy of RUBS utility bills because they do not know:

1. the formula for calculating these bills,
2. the total amount of the master bill,
3. whether the landlord pays a master-metered utility bill at the commercial rate but then passes on a higher residential rate to the tenants, or
4. the fees assessed by any third-party billing agent.

To obtain adequate transparency to assess the accuracy of their bill, the tenant would need information about all four items. While the third and fourth factors might be stable from bill to bill, the second factor would be different every time - requiring access to the master bill every payment period to calculate the accuracy of an individual bill. It is likely that tenants, in practice, would face obstacles accessing the master bill even if regulations required landlords to provide "reasonable access" to such statements. Tenant unions or advocates would need to obtain the bills from each unit every billing period to assess whether the totals are being inflated for the building as a whole. This is typically not feasible, hindering group efforts to address inflated utility bills.

Moreover, while the factors considered in the RUBS formula might not change from one payment period to the next, any formula that accounts for the number of occupants would necessarily change any time unit occupancy changes. Tenants would likely not have access to changing building occupancy numbers. Even formulas based on static numbers comparing the square footage of their unit to the building as a whole or the number of bedrooms or

³ https://cityclerk.lacity.org/onlinedocs/2022/22-0178_rpt_lahd_1-05-25.pdf

⁴ For example, Massachusetts law encourages conservation by prohibiting RUBS for water and allows for submetering only if the landlord installs water conservation measures and complies with additional requirements. M.G.L. c. 186, sec. 22.

⁵ <https://library.nclc.org/article/introduction-ratio-utility-billing-systems-tenant-advocates>

bathrooms in their unit compared to the number in the building as a whole would typically be inaccessible to tenants.

In addition to difficulty accessing the needed information to determine the accuracy of their bill, a large knowledge gap would remain. In order to know that they needed to find these pieces of information to check the accuracy of their utility bill every payment period, the tenants would first need to understand what RUBS is and how it works. Tenants generally are not familiar with RUBS billing or how it is calculated. Los Angeles would need to spend significant time, money, and resources to create campaigns to increase public knowledge of RUBS and their rights as tenants with respect to RUBS billing - a process that will be even more difficult where tenants have limited English proficiency.

For the reasons outlined above, we urge the LA City Council to prohibit RUBS billing for all Los Angeles tenants. Thank you for your time. Please feel free to contact us at the email addresses below if you have any questions.

Sincerely,

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